ONLINE DISINFORMATION IN EUROPE

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

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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).

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.

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1. INTRODUCTION

1.1 Disinformation 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 nearly new[3]. Politicians, corporations as well as the media have been been benefitting from information disorder and even engaged in disinformation strategiesto 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 more influence on political decision-making and ultimately increasing their 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 chose 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 delegitimize 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.

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[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
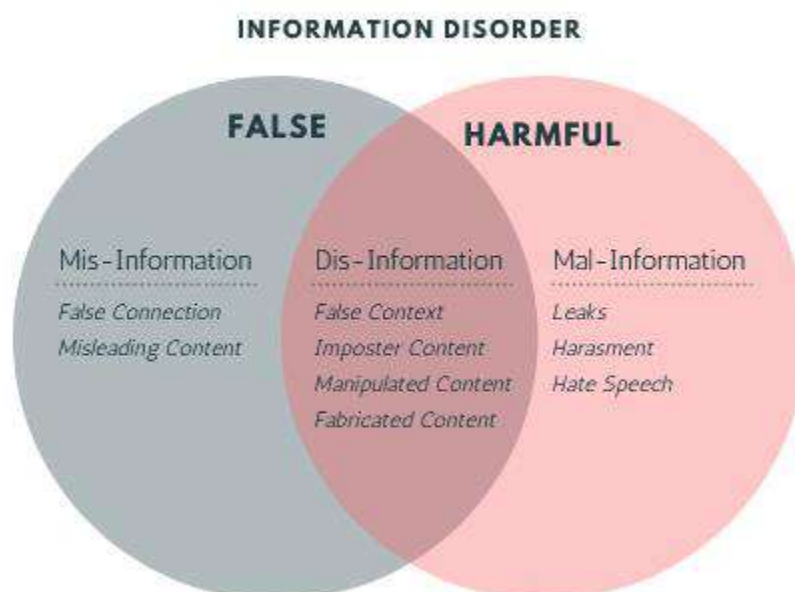
INFORMATION DISORDER

Figure 1: Information disorder, misinformation, disinformation and malinformation. Source: Information Disorder: Toward an interdisciplinary framework for research and policy making by Claire Wrdle 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, considering that they are manipulating 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 as well as to serve personal interests. And, 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. Warlde, in '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.

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[5] https://firstdraftnews.org/articles/fake-news-complicated/

With the emergence of the Internet (the EU internet penetration was 89% in 2020[6]) 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]

What contributes to the explosion of disinformation especially via social media is the rapid advancements of technologies such as bots and other methods that use artificial intelligence such as social media accounts that are automatically controlled. For example, a study conducted in 2017[11] 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 bymainstream 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 Group (HLEG),[12] 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 2021[9] found that 54% of European citizens are concerned about it, a percentage that has increased after the Covid-19 pandemic.

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[6] https://www.internetworldstats.com/stats9.htm
[7] https://www.science.org/doi/full/10.1126/science.aap9559
[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] https://cacm.acm.org/magazines/2017/9/220438-is-that-social-bot-behaving-unethically/fulltext
[12] https://digital-strategy.ec.europa.eu/en/library/final-report-high-level-expert-group-fake-news-and-online-disinformation

1.2 Objectives of the study

The present study revolves around three objectives that aim to support European policy makers towards understanding 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 aims 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. 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 aims to identify patterns of false information spreading as a means to serve the agendas and interests of political groups, exploring who spreads such false information and who benefits from it. To this end, we focus on three different disinformation topics (Covid-19, immigration and climate change), and five different EU countries (France, Germany, Greece, Italy and Spain).

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.

1.3. 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, greek 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 the search, the articles and the reports included in this study were mainly in English, but part of the research was also made in the national languages of the target 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; and our intention was to include in our search, at least, the most recent General election for each country of the study. 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 the 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,

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[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.

summarizing and interpreting conclusions and evidence from primary sources.
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- *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.

While conducting this study, we encountered a number of challenges and limitations that we need to explicitly acknowledge:

- *Language limitations.* Considering that a large portion of the research was specifically 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.
- *Content limitations.* We found particularly challenging to find reliable sources reporting on climate change disinformation in Europe specifically. Although, several sources and studies where available for this topic in other parts of the world like the US, the available sources on this subject for Europe were limited.

1.4. 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. 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 involved the analysis of 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 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

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

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 very 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, we found that 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 in detail the main policy recommendations from the most important of 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 the enhancement of 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 that aim 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 cluster of policy recommendations aims to empower different groups of stakeholders, including platform users, citizens, and journalists, to allow them to use platforms and digital media to their benefit for better communication, information and engagement. 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 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 also concern the promotion of ethical conduct in media, journalism 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 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 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 & technologies, exchange of information and knowhow, etc., in order to combat disinformation in a holistic and efficient way.

1.5. Outline of the study

The rest of this document is divided in three chapters, one chapter per study objective. More specifically, chapter 2 focuses on the examination of ethical standards and codes of conduct in journalism. The topics covered include journalistic authorities responsible for the ethical application of journalism (section 2.1), the ethical codes and principles that journalists have to comply with in the countries of interest (section 2.2), and the implications of non-compliance as well as the challenges that arise when trying to ensure compliance (section 2.3). In chapter 3, we present the results of our study about disinformation in Europe and its connection with political interests, with regard to the specific topics of Covid-19, immigration and climate change, focusing on the five countries of interest. Iin chapter 4 we collect and analyse a number of policy measures and recommendations towards addressing the challenge. Finally, in the Annexes we present the Codes of Conduct that are studied in chapter 2, both regarding European organisations as well as National organisations for the countries of interest.

2. 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.

2.1. Organisations

2.1.1. Regulator bodies of audiovisual media services

The European Regulators Group for Audiovisual Media Services (ERGA)[15] is the main regulatory body at a European level that brings together the heads of 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 Directive (AVMSD)[16] 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; for the countries of interest[17] they can be found in Figure 2.

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[15] https://erga-online.eu/

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

[17] The national council for radio and television: https://www.esr.gr/information/; Die medienanstalten: https://www.die-medienanstalten.de/en/; Conseil Superieur de l'audiovisuel:https://www.csa.fr/; Commission nacional de los mercados y la competencia: https://www.cnmc.es/en; Autorita per le garanzie nelle comunicazioni: https://www.agcom.it/

Figure 2: Regulatory bodies of Audiovisual services

In addition, there is also the European Platform of Regulatory Authorities (ERPA)[18], which is connecting 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 members of EPRA are the same as the ones for ERGA, which can be also found in Figure 2.

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

France

The Conseil Superieur de l'Audiovisuel[19] (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 the broadcasting organisations have 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

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[18] https://www.epra.org/articles/general-information-on-epra
[19] https://www.csa.fr/

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 and fines. These decisions have to be checked by legal authorities in order to be finalised. For less important violations, CSA can also formulate recommendations or deliberations that gives guidance to the expectations regarding the respect of the principles[20] 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.[21] Additionally, in 2018 a set of laws were published in France that aim to fight information manipulation.[22] For example, one paragraph of these lawsproposes a number of ways to mitigate the influence of false information on the election process.[23]**Germany**

The Medienanstalten is the umbrella organisation of 14 media authorities in Germany and their responsibilities[24] 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.[25]

Regarding programme supervision, they have some principles[26] that the broadcasters have to respect such as the 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

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[20] https://www.csa.fr/Reguler/Comment-le-CSA-peut-il-sanctionner/Differentes-sanctions-possibles

[21] https://www.csa.fr/Informer/Espace-presse/Communiques-de-presse/Procedure-de-sanction-a-l-encontre-de-C8-amende-de-3-millions-d-euros

[22] Law 2018-1201 and 2018-1202

[23] https://thelawreviews.co.uk/title/the-technology-media-and-telecommunications-review/france#footnote-009-backlink

[24] https://www.die-medienanstalten.de/en/about-the-media-authorities/responsibilities

[25] https://www.die-medienanstalten.de/en/about-the-media-authorities

[26] https://www.die-medienanstalten.de/en/areas-of-interest/programme-supervision

of advertising, duration of advertising, content requirements for advertisements and prohibited advertising[27].

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.[28] The regulations the media should follow come from the Interstate Broadcasting Agreement (Rundfunkstaatsvertrag[29]), which is influenced by the AudioVisual Media Services Directive (AVMSD[30]). Adding to the sanctions that can be imposed by the Medienanstalten, there are also some paragraphs in the German penal law[31] that condemn the spread of false information and news. Another law that was voted in 2017 is the Network Enforcement Act[32] that is focused on the false information spread in social media. This act requires social networks to implement specified 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 fall under the jurisdiction of the German court.[33]

Greece

The responsibilities of the National Council for Radio and Television (NCRTV) cover only the broadcasting sector whereas the press is not subject to any regulatory authority. The NCRTV has the following roles[34]:

● supervise the radio and television programs in terms of content

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[27] https://www.die-medienanstalten.de/en/areas-of-interest/monitoring-of-advertising

[28] https://www.die-medienanstalten.de/service/pressemitteilungen/meldung/zak-entscheidet-ueber-verstoesse-aus-programm-und-werbung

[29] https://www.die-medienanstalten.de/fileadmin/user_upload/Rechtsgrundlagen/Gesetze_Staatsvertraege/RStV_22_english_version_clean.pdf

[30] https://www.die-medienanstalten.de/fileadmin/user_upload/Rechtsgrundlagen/Gesetze_Staatsvertraege/Audiovisual_Media_Service_Directive_en.pdf

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

[32] https://www.bmjv.de/DE/Themen/FokusThemen/NetzDG/NetzDG_node.html

[33] https://thelawreviews.co.uk/title/the-media-and-entertainment-law-review/germany

[34] https://www.esr.gr/%cf%84%ce%bf-%ce%b5%cf%83%cf%81/%ce%bd%ce%bf%ce%bc%ce%b9%ce%ba%cf%8c-%cf%80%ce%bb%ce%b1%ce%af%cf%83%ce%b9%ce%bf-%ce%b1%cf%81%ce%bc%ce%bf%ce%b4%ce%b9%cf%8c%cf%84%ce%b7%cf%84%ce%b5%cf%82-%ce%bf%ce%bb%ce%bf%ce%bc/

- 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[35]. Adding to the regulations set and monitored by the NCRTV, there are also laws[36] [37] 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.[38]

Italy

The Autorita per le garanzie nelle comunicazioni (AGCOM)[39] has as its main objective to guarantee media pluralism, the competitiveness of the telecommunication market and the protection of consumers. It performs regulatory and supervisory functions in the sectors of telecommunications, audiovisual media, publishing and postal.

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[40][41] Adding to the sanctions that AGCOM is able to

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[35] http://repository-esr.ekt.gr/esr/handle/20.500.12039/18413

[36] Article 191 penal code: https://www.lawspot.gr/nomikes-plirofories/nomothesia/n-4619-2019/arthro-191-poinikos-kodikas-nomos-4619-2019-diaspora

[37] Article 7 of law 3340/2005: https://www.lawspot.gr/nomikes-plirofories/nomothesia/n3340-2005/arthro-7-nomos-3340-2005

[38] https://media.gov.gr/organogramma/diefthynsi-epopteias-meson-enimerosis/

[39] https://www.agcom.it/home

[40] https://rm.coe.int/the-independence-of-media-regulatory-authorities-in-europe/168097e504

[41] https://www.agcom.it/documentazione/documento?p_p_auth=fLw7zRht&p_p_id=101_INSTANCE_FnOw5lVOIXoE&p_p_lifecycle=0&p_p_col_id=column-1&p_p_col_count=1&_101_INSTANCE_FnOw5lVOIXoE_struts_action=%2Fasset_publisher

impose, there is also a law[42] about sharing false, enlarged or prejudiced information which might jeopardize public order.[43]

Spain

The National Commission of Markets and Competition (CNMC[44]) 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.[45]

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[46]. 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.[47]

%2Fview_content&_101_INSTANCE_FnOw5lVOIXoE_assetEntryId=23464412&_101_INSTANCE_FnOw5lVOIXoE_type=document

[42] 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

[43] https://www.rcmediafreedom.eu/Tools/Legal-Resources/Tackling-fake-news-the-Italian-way

[44] https://www.cnmc.es/en

[45] https://www.cnmc.es/en/ambitos-de-actuacion/audiovisual

[46] https://rm.coe.int/the-independence-of-media-regulatory-authorities-in-europe/168097e504

[47] https://www.cnmc.es/expedientes/sncdtsa00616

2.1.2. Unions of Journalists

The largest organisation of journalists in Europe is the European Federation of Journalists[48] (EFJ), representing over 320,000 journalists in 72 journalists' organisations across 45 countries. In order for a journalists' organization to be able to become a member of the EFJ, it has to be a member of the International Federation of Journalists[49] (IFJ), the world's largest organisation of journalists.

Members of EFJ have to follow the "IFJ Global charter of ethics for Journalists[50]", 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
- protecting and respecting of the source
- serving the interest of the society
- respecting diversity, dignity and privacy
- solidarity to colleagues

More details of the aforementioned categories will be given in section 2.2. The members of IFJ have to follow the aforementioned charter as well as some other conditions defined in the IFJ Constitution[51]. 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[52].

Members of EFJ are national journalists' organizations; for the countries of interest these are illustrated in Figure 3.

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[48] https://europeanjournalists.org/
[49] https://www.ifj.org/
[50] https://www.ifj.org/fileadmin/user_upload/GLOBAL_CHARTER_OF_ETHICS_FOR_JOURNA LISTS_-_EN.pdf
[51] https://www.ifj.org/who/rules-and-policy/constitution.html
[52] https://www.ifj.org/media-centre/news/detail/article/ifj-and-national-federation-of-israeli-journalists.html

Figure 3: Unions of Journalists

2.1.3. 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[53], trying to reduce disinformation in Europe, both private and public as well as non- and for-profit. As stated by the Duke Reporters' Lab[54], 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 September 2015, brings together the fact-checking organisations across the globe. The IFCN is committed to promoting excellence in fact-checking. Any legally registered organization that is 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. These members have to follow the IFCN fact-checkers' code of principles[55], which can be found in Annex I. In short, the signatories are committed to:

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[53] https://edmo.eu/fact-checking-activities/

[54] https://reporterslab.org/fact-checking-census-shows-slower-growth/

[55] https://www.ifcncodeofprinciples.poynter.org/

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 IFCN[56] 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[57]. So far, there are 25 organisations[58], 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 they are removed from the list. For the countries of interest, the organizations that are part of IFCN can be found in Figure 4. Further fact-checking organizations that are not necessarily members of IFCN but are based in the EU can be found in the EDMO listing[59].

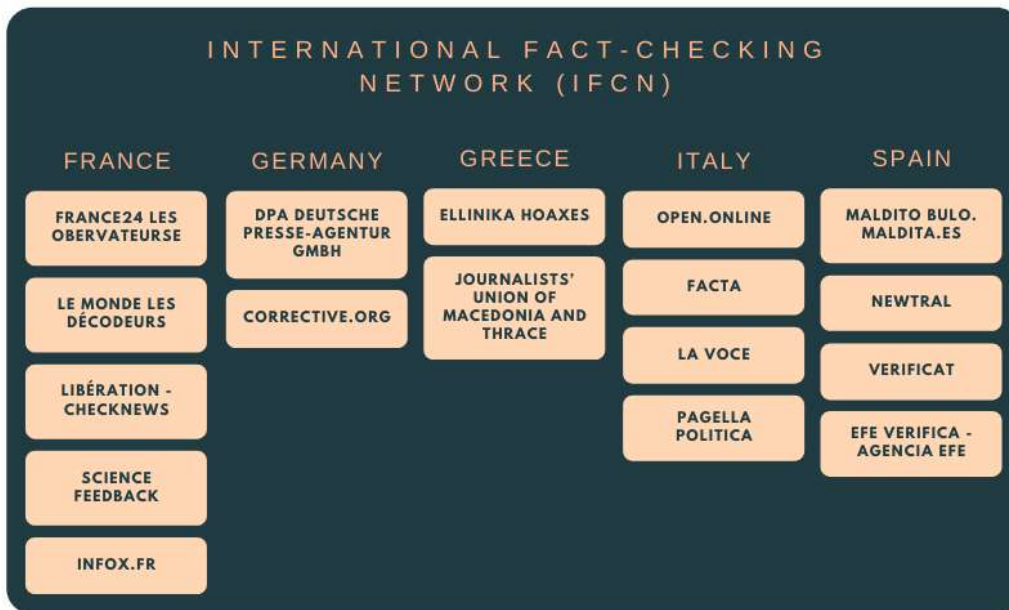*Figure 4: Fact- checking organisations*

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[56] https://ifcncodeofprinciples.poynter.org/signatories
[57] https://www.ifcncodeofprinciples.poynter.org/process
[58] https://ifcncodeofprinciples.poynter.org/signatories
[59] https://edmo.eu/fact-checking-activities/

Another relevant organisation is the European External Action Service's (EEAS) East Stratcom Task Force through its "EU vs Disinfo" project. The main purpose of EU vs Disinfo is to "better forecast, address, and respond to the Russian Federation's ongoing disinformation campaigns"[60]. 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 identify and expose disinformation cases that originate from pro-Kremlin media, mostly from Russian and eastern European (e.g., Ukraine) media, and they compile a database with those cases and their debunks.

Paul Butcher in his article "Disinformation and democracy: The home front in the information war"[61] 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.

2.1.4. European Commission code of practice on disinformation

An additional reference document on disinformation in Europe, that is not directly related to journalism, is the code of practice on disinformation[62] created by the European Commission. The code of practice on disinformation includes some commitments that several bodies and trade associations[63] (mainly social media

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[60] https://euvsdisinfo.eu/about/

[61] https://www.epc.eu/en/publications/Disinformation-and-democracy-The-home-front-in-the-information-war~21c294

[62] https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation

[63] They 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.

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 opinion of the public and the necessity of its transparency; and 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 (see section 2.1.1) has agreed to assist the European Commission with it.[64] To this end ERGA publishes several documents[65] that aim to evaluate or improve the implementation of the code of ethics on disinformation such as the "ERGA Report on disinformation: Assessment of the implementation of the Code of Practice"[66] or the "ERGA Recommendations for the new Code of Practice on Disinformation"[67].

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[64] https://erga-online.eu/?p=732

[65] https://erga-online.eu/?page_id=14

[66] https://erga-online.eu/wp-content/uploads/2020/05/ERGA-2019-report-published-2020-LQ.pdf

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

2.2. Journalistic codes of ethical conduct - a summary of 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 the avoidance of 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 of a journalist 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 as well as 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 assure the information they share does not contribute to discrimination of any kind, preserve the human dignity and respect the privacy of all individuals
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 confuse their role with theirs.
10. **Protect press credibility**: They should not publish any non-factual information that can compromise the credibility of the press, as well as 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 what categories are covered by the codes of conduct followed by the organizations that are members of EFJ (see section 2.1), for each of the countries of interest, based mostly on information provided by Accountable Journalism[68], a collaborative project created by Tampere University that offers the world's largest collection of ethical codes of conduct and press organisations, and on the codes of ethics by country[69]. The codes of conduct for the specific countries can be found in Annex II.

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[68] https://accountablejournalism.org/
[69] https://research.tuni.fi/ethicnet/country/

Codes of Ethics

CATEGORIES

	IFJ/EFJ	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

According to Figure 5, there are some categories that are covered by all or almost all ethical codes. All countries and organisations 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 the categories are less represented to 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.

2.3. Implications and challenges of compliance with ethical conduct

Compliance with ethical standards

Compliance with ethical standards even among leading news organisations that voluntarily adopt such codes of ethics varies significantly, depending on media form but also on country.

Accuracy of information, including truthfulness and integrity, has always been a cornerstone of ethical conduct and a determinant characteristic of trusted news media[70]. However, with the explosion of new technologies and online media, the abundance of information and the consequent transformation of the traditional news cycle with fixed deadlines to a 24/7 news production process has put tremendous emphasis on the news production speed. The pressure on journalists and newsrooms for continuous delivery of fresh news content combined with the audience's gravitation towards outlets and platforms that report news first can erode journalistic standards of carefulness and accuracy[71], since the need for speed may reduce the ability to properly verify information or even consider and report all aspects relevant to a reported journalistic topic[72]. 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

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[70] Basic Concept of Journalism, Branden Salas, ED-Tech Press, 2018. https://books.google.gr/books?id=UejEDwAAQBAJ&pg=PA110&source=gbs_toc_r&cad=3#v=onepage&q&f=false

[71] Rosenberg, Howard, and Charles S. Feldman. 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&printsec=frontcover

[72] Nico Drok & Liesbeth Hermans (2016) Is there a future for slow journalism?, Journalism Practice, 10:4, 539-554, DOI: 10.1080/17512786.2015.1102604

'slow journalism', taking 'time to find things out, notice stories that others miss, and communicate it all to the highest standards'[73].

Objectivity is another important journalistic standard, the compliance to which may vary among different media or different countries[74]. 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[75].

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 2017[76] 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%).

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[73] Greenberg, Susan, "Slow Journalism." Prospect, February 26, 2007
https://www.prospectmagazine.co.uk/magazine/slowjournalism
[74] Basic Concept of Journalism, Branden Salas, ED-Tech Press, 2018.
https://books.google.gr/books?id=UejEDwAAQBAJ&pg=PA110&source=gbs_toc_r&cad=3#v=onepage&q&f=false
[75] Basic Concept of Journalism, Branden Salas, ED-Tech Press, 2018.
https://books.google.gr/books?id=UejEDwAAQBAJ&pg=PA110&source=gbs_toc_r&cad=3#v=onepage&q&f=false
[76] 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 article[77] presented a survey among US journalists to examine 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 further examined two types of professional practices related to the two core values in journalism, accountability and transparency. Results indicate that journalists have been increasingly adopting practices that enhance transparency, which may also be seen as a way for better connection and understanding 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[78], 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%), with low journalistic standards following.

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')[79]. 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

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[77] 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
[78] https://reutersinstitute.politics.ox.ac.uk/our-research/bias-bullshit-and-lies-audience-perspectives-low-trust-media
[79] https://europa.eu/eurobarometer/surveys/detail/2183 - Summary

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 2020[80] 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%[81]. 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 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 Yellow Vests protests[82]. 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 most trusted, while popular commercial broadcaster RTL and the Bild tabloid are the most distrusted.

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[80] https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf
[81] Percentage of respondents that agree 'they can trust most news most of the time'.
[82] https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf

- 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 ones 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. At the same study, it has been shown that people with extreme political views are considerably 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 favorable picture for media objectivity as perceived by the public, there is more nuance to this. The authors of the study point out that political opinions make 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 also 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[83], the Reuters Institute compared the level of trust people have in 226 individual news outlets across 23 European countries with assessments of the accuracy 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.

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

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 particularly 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 agenda (especially political and commercial) are the main reasons for low trust in media[84]. A big part of the audience feels that the media are being used by politicians and businessmen to push their own political or economic interests. Given that on average traditional media struggle to survive economically in an increasingly digital environment, it is not unrealistic to assume that owners, in many cases extremely wealthy businessmen, are there for 'power, influence and access to the establishment'. And thus, it is not surprising to see them trying to interfere with how the outlet is run or influence the ethos of the organisation[85]. For example, in the aforementioned survey[86], a lot of 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 a lot of 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 ample opportunities to exert indirect

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[84] https://reutersinstitute.politics.ox.ac.uk/our-research/bias-bullshit-and-lies-audience-perspectives-low-trust-media
[85] https://www.democraticaudit.com/2013/12/18/the-political-affiliations-of-the-uks-national-newspapers-are-becoming-more-fluid/
[86] https://reutersinstitute.politics.ox.ac.uk/our-research/bias-bullshit-and-lies-audience-perspectives-low-trust-media

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[87]. Success should be redefined by each organization, considering not only viewership and profits, which are of course essential, but also integrity and quality so as to create the right blend.

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. And finally, transparency with regard to the sources used for supporting journalistic reporting.

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[87] https://www.ey.com/en_gr/forensic-integrity-services/how-media-organizations-can-get-real-and-confront-fake-news

3. POLITICAL INTERESTS SERVED

During the last decade, many anti-establishment politicians but also some mainstream politicians have used extensively false claims to promote their political agenda on key policy issues. The policy issues surrounded by higher levels of misinformation strongly reflect national political agendas[88]. In this report, we focus on disinformation and fake news related to three 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 propaganda[89]. In 2019 Social Media manipulation campaigns have taken place in 7π0 countries, and at least a political party or national government attempted to shape public attitudes in each country[90]. An important motivation towards such increased creation and spread of disinformation is the effect that it can have on national politics, shaping the beliefs and behaviours of the electorate and in some cases impacting elections[91] or casting doubt on their results[92].

The role of disinformation and fake news in politics has been studied significantly especially in US Politics during the last decade[93]. Since Donald Trump's election, "Fake news" has become a global term[94,95]. 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

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[88] 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

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

[90] Samantha Bradshaw, Philip N. Howard, The Global Disinformation Disorder: 2019 Global Inventory of Organised Social Media Manipulation, Working Paper 2019.2. Oxford, UK, Project on Computational Propaganda, 2019.

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

[92] https://www.science.org/content/article/us-election-nears-researchers-are-following-trail-fake-news

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

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

[95] 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.

reported on by a variety of mainstream news outlets, going from fringe speculation to mainstream media headlines[96] [97] [98] [99] [100].

There is evidence that social media can be used to systematically manipulate and alter public opinion, also in Europe. For instance, in the 2017 French presidential election evidence shows that social bots drove the #MacronLeaks disinformation campaign[101]. Remarkable exposure to online disinformation was observed in 2018 Italian General Election[102] [103]. Disinformation campaigns were also noticed in 2017 German federal elections; even in a regional level,[104].

It has been shown that, particularly during political crises or elections, social media users tend to share more extremist, sensationalist, conspiratorial, fraudulent, and other forms of unsubstantiated content, along with content from reliable sources[105]. Extremist groups use social media for radical propaganda and recruitment efforts[106]. Foreign electoral intervention plays a key role to disinformation campaigns worldwide and in Europe (i.e., by US, Russia, China). 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

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

[97] 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.*

[98] 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

[99] 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.*

[100] 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

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

[102] GigliettoF, Iannelli L, RossiL, ValerianiA,RighettiN,Carabini F, et al. MappingItalianNewsMediaPoliticalCoveragein theLead-Upto2018GeneralElection. Available at SSRN:https://ssrncom/abstract=3179930.2018

[103]AGCOM. News vs Fake nel sistema dell'informazione. Report available at: https://wwwagcomit/documents/10179/12791486/Pubblicazione+23-11-2018/93869b4f-0a8d-4380-aad2-c10a0e426d83?version=10.2018;.

[104] 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).

[105] Vidya Narayanan, Vlad Barash, John Kelly, Bence Kollanyi, Polarization, partisanship and junk news consumption over social media in the US, Comprop, February 2018.

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

elections[107]. 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 a radical and divisive ideology during the 2019 EU elections[108].

Malicious actors often use fear, through hostile narratives (i.e. fear for losing health, wealth or identity)[109]. This kind of discriminatory behaviour can be endorsed by different political actors (both liberals and conservatives) of the political spectrum[110].

Studies show that disinformation, regardless of the topic, creates distorted beliefs about a political issue that can influence people's political views and as a result their voting behaviour concerning that issue even when controlling for pre-existing views and political sophistication (Reedy et al., 2014; Wells, Reedy, Gastil, & Lee, 2009) and voting outcomes[111,112,113,114].

Focusing on three selected topics, Covid-19, immigration and climate change, we study disinformation in five EU countries: Greece, Germany, France, Spain and Italy. This report explores disinformation in line with politics and poses three main research questions: i) who spreads disinformation (i.e. political actors, parties, interests); how disinformation campaigns affect the political landscape, and which political actors may be benefitted or harmed the most by it.

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

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

[109] 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

[110] Geoffrey A. Wetherell, Mark J. Brandt, Christine Reyna, Discrimination across the Ideological Divide: The Role of Value Violations andAbstract Values in Discrimination byLiberals and Conservatives, Social Psychological and Personality Science, Sage, 2013.

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

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

[113] Tucker, Joshua A., Andrew Guess, Pablo Barbera, Cristian Vaccari, Alexandra Siegel, Sergey Sanovich, Denis Stukal, and Brendan Nyhan, "Social Media, Political Polarization, and Political Disinformation: A Review of the Scientific Literature," Technical Report, Hewlett Foundation 2018.

[114] Zhuravskaya, Ekaterina, Maria Petrova, and Ruben Enikolopov, "Political Effects of the Internet and Social Media," Annual Review of Economics, 2020, 12, 415–438.

3.1. General disinformation topics

3.1.1. Covid-19

During the Covid-19 pandemic another type of pandemic came to be, that is now known as "infodemic[115] [116]

According to a report[117] that combined information published by five European independent fact-checkers, the most common topics of Covid19-related misinformation are:

- 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 hydroxyloroquine 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 caught the virus such as breathing tests[118].
- Vaccine misinformation: this includes disinformation about deaths of volunteers that ended up being from different reasons, 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[119,120]. In 2019 (prior to Covid) a Eurobarometer poll found that almost half of Europeans believed that vaccines are dangerous.[121]
- 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.

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[115] https://www.who.int/docs/default-source/coronaviruse/situation-reports/20200202-sitrep-13-ncov-v3.pdf

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

[117] https://Covidinfodemiceurope.com/report/Covid_report.pdf

[118] Such as holding your breath for 10 seconds.

[119] https://www.newyorker.com/news/q-and-a/the-influence-of-the-anti-vaccine-movement

[120] https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(21)00443-8/fulltext,

[121] https://www.politico.eu/wp-content/uploads/2019/04/ebs_488_report_en.pdf

- <u>Comparisons between coronavirus and seasonal flu:</u> this includes mostly misleading comparisons between the flu and the corona virus, implying that the virus is not more or even significantly less dangerous or transmissive than the flu.

This disinformation is helping grow a distrust of the people towards media (40%) as well as the government (20%), as discovered by a survey conducted by Ipsos Public Affairs and the Centre for International Governance Innovation (CIGI).[122] In addition, the same study 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.

The false information 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[123]. This content is sometimes shared by public figures but mostly it is shared by ordinary people. A group of people that sometimes spreads disinformation about Covid-19 and ultimately portrays the larger danger for the population is doctors. For example, CNN has published an interview of a doctor that constantly shares disinformation about Covid-19 vaccines, during the interview they confront his lies with the facts[124].

A research conducted by Avaaz 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.[125]

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[126,127]. On this topic, YouTube recently announced that they would ban several anti-vaccine accounts in order to reduce

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[122] 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
[123] https://reutersinstitute.politics.ox.ac.uk/types-sources-and-claims-Covid-19-misinformation
[124] https://www.youtube.com/watch?v=yw6D98v0BBg
[125] https://secure.avaaz.org/campaign/en/facebook_neglect_europe_infodemic/?slideshow
[126] Bessi, A., Coletto, M., Davidescu, G. A., Scala, A., Caldarelli, G., & Quattrociocchi, W. (2015). Science vs conspiracy: Collective narratives in the age of misinformation. PloS one, 10(2), e0118093
[127] Del Vicario, M., Bessi, A., Zollo, F., Petroni, F., Scala, A., Caldarelli, G., Stanley, H.E. & Quattrociocchi, W. (2016). The spreading of misinformation online. Proceedings of the National Academy of Sciences, 113(3), 554-559

misinformation about vaccines not only for Covid-19 but also for other diseases such as hepatitis B[128].

The aforementioned facts have given the opportunity to foreigners to be able to interfere in the internal affairs of several EU countries. For example, Russia and China took the opportunity and used disinformation campaigns for their own interests. They both promoted the claim that they were successful in handling the crisis when EU was not, with an ultimate goal to discredit the EU and reduce the trust that EU citizens have to 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 and conspiracy theories that regard 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.[129]

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.[130]

A large part of the disinformation circulating in Europe regards the vaccines. This false information is creating a culture of fear towards vaccination but the anti-vax attitude is not really new. As discovered by the Vaccine Confidence Project of the European Parliament, western European countries that have a large share of populist parties in the parliament have a greater percentage of anti-vaxxers.[131] This can be explained on some level due to the fact that both anti-vaxxers and populism base their opinions on the distrust towards elites and experts.[132] The gigantic rise of social media has added

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[128] https://www.nytimes.com/2021/09/29/technology/youtube-anti-vaxx-ban.html?smid=fb-nytimes&smtyp=cur&fbclid=IwAR0AtILMGRF05m-70olkoWYDEM7v6jMTEx_gXy-uYr5BhmaH6iftzy6T0wY

[129] https://fortune.com/2021/07/23/russian-disinformation-campaigns-are-trying-to-sow-distrust-of-Covid-vaccines-study-finds/

[130] https://www.ifj.org/fileadmin/user_upload/210512_IFJ_The_Covid_Story_Report_-_FINAL.pdf

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

[132] https://www.politico.eu/article/how-populists-spread-vaccine-fear/

another tool to the arsenal of the anti-vax movement, allowing wide and uncontrolled spread of their messages more than ever before. A large study published in Nature[133] with regard to the online anti-vax movement and disinformation in Facebook, reveals "a multi-sided landscape of unprecedented intricacy that involves nearly 100 million individuals partitioned 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 online space, overwhelming pro-vaccination voices. Atlantic[134] and NYT[135] in two relevant articles, point out that Covid-19 is the moment that this movement has been waiting for to spread their misleading claims These false claims may be similar to the propaganda made about smallpox immunizations more than a century ago ("ingredients are toxic and unnatural; vaccines are not sufficiently tested; the scientists who produce them are quacks and profiteers; the cell cultures involved in some 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 unprecedent "speed, scale, and reach" that is only now possible thanks to online media.

3.1.2. 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[136], matched by a dramatic fall in levels of trust in European Institutions and an increase in voter support for right-wing, anti-immigrant parties[137,138,139]. Relative empirical research suggests that individuals are often poorly informed about immigration and its

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[133] https://www.nature.com/articles/s41586-020-2281-1
[134] https://www.theatlantic.com/ideas/archive/2020/12/campaign-against-vaccines-already-under-way/617443/
[135] https://www.nytimes.com/2021/08/31/opinion/anti-vaccine-movement.html
[136] Eurobarometer, S. (2018). 86, 87, 88, 89, internet.
[137] Dustmann, C., Vasiljeva, K., and Piil Damm, A. (2019). Refugee migration and electoral outcomes. The Review of Economic Studies, 86(5):2035–2091.
[138] 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.
[139] 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

consequences[140,141,142,143,144]. The aforementioned characteristics facilitate the spread of disinformation, false claims and fake-news. Disinformation campaigns targeting at issues related to immigration and minorities have contributed significantly to the increase in anti-immigrant sentiments and movements[145].
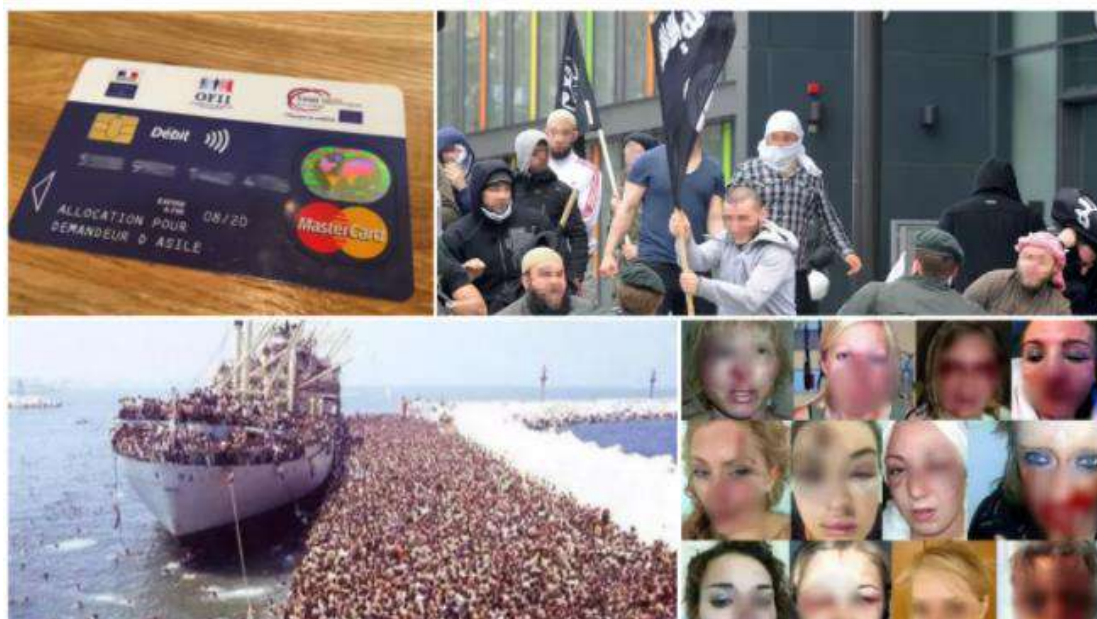
Several images that were misappropriated and used to manipulate public opinion on the migration crisis.

Figure: Several images that were misappropriated and used to manipulate the public opinion on the migration crisis[146]

An overlap between disinformation activities targeting immigrants, Muslims or other minority groups has been observed. However, immigrants and minority groups are not

[140] https://www.ipsos.com/ipsos-mori/en-uk/perceptions-are-not-reality-things-world-gets-wrong

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

[142] 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.

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

[144] 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.

[145] M. Ekman, Anti-Immigrant Sentiments and Mobilization on the Internet, SAGE Handbook of Media and Migration. London: SAGE, 2019, pp. 551–562

[146] https://observers.france24.com/en/20180105-fake-images-racist-stereotypes-migrants

all equally likely to become targeted by hate speech and disinformation[147]. 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, SubSaharan Africa, Asia, as well as the Roma, Russian minorities and recent immigrants, and in general, Muslim immigrants and Jewish minorities [148].

Disinformation on immigration and minorities often is weaponized during electoral campaigns, used be political actors and parties. Sometimes anti-immigrant disinformation is also linked to foreign sources (i.e. Chinese, alt-right American, and Russian)[149]. Other studies link disinformation to extremism or terrorism (e.g. ISIS)[150] [151] ; in this case Muslim minorities are not treated as a threat; but mainly as 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[152].

Cultural threat: This is in line with "Islamisation" narrative, according to 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. For instance, there are stories about schools in Italy, Spain or Germany which allegedly abandoned Christmas traditions or religious symbols to appease local Muslims/immigrants[153]. Moreover, in France, misleading information is spread according to which, each Muslim family has more than 8 children, at the same time non-Muslim families have an average of approximately 2 children[154].

Economic threat: Political actors and the media regularly connect the immigration with economic effects, in terms of welfare state and benefits, often using negative

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[147]

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

[148] 9 European Union Agency for Fundamental Rights (FRA), Second European Union Minorities and Discrimination Survey Technical Report, 2017

[149]

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

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

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

[152] https://observers.france24.com/en/20180105-fake-images-racist-stereotypes-migrants

[153] https://euvsdisinfo.eu/report/italian-town-forbids-christmas-carols-not-to-insult-migrants

[154] https://euvsdisinfo.eu/report/muslim-fertility-rate-in-france-is-much-higher-than-non-muslim

framing and portraying 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[155]. Relevant 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[156].

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[157]. 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[158]. According to the Austrian fact-checking website Mimikama, the women in the photos were victims of domestic violence, police violence or random attacks[159]. Although the association between crime and immigration has been shown to be misleading and a myth by a large body of research[160], it still remains one of the most popular topics of the anti-immigrant sentiment. At this point, it is worth mentioning the #stopislam disinformation campaign on social media platforms[161] [162], the hashtag is used with content in different languages which is 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[163]. 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 staff[164];

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[155] 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

[156] 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

[157] https://euvsdisinfo.eu/report/migrants-responsible-for-increase-in-robberies-murders-and-rapes-in-germany

[158] https://observers.france24.com/en/20180105-fake-images-racist-stereotypes-migrants

[159] https://www.mimikama.at/facebook/ueberfallene-frauen/

[160] https://onlinelibrary.wiley.com/doi/epdf/10.1111/j.1745-9125.2012.00278.x

[161] S. Civila, L.M. Romero-Rodríguez, and A. Civila, The Demonization of Islam through Social Media: A Case Study of #Stopislam in Instagram, Publications, Vol. 8, No. 4, 2020, p. 52.

[162] E. Poole, E. Haifa Giraud, and E. de Quincey, Tactical Interventions in Online Hate Speech: The Case of #stopIslam, New Media & Society, March 2020

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

[164] https://teyit.link/jswzpjH

the same video in Spain, presented the man as if he was a Muslim doing it in a Spanish health centre[165]. This is of course a global phenomenon, also recognised by the UN that warns that such disinformation may "worsen the precarious situations in which immigrants often live[166]", often leading as far as deportation.

At this point, it is worth mentioning that 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, among them Spain and Italy[167]. Finally, the EU 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 the discrimination[168].

3.1.3. Climate change

Climate change is an issue preoccupying the society and global community for many years and now it increasingly becomes more and more urgent to identify its sources and effects and properly tackle it. While scientists and states try to take measures to minimize the rate that climate change 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 fuel industry[169], accomplish sowing doubt and increasing the number of climate change deniers with several disinformation campaigns.[170] Based on research conducted by InfluenceMap in the three years following the Paris agreement, major oil and gas companies have invested over 1B on misleading lobbying and branding[171]. In the past it was easier to clearly deny the negative effects of human activities on the climate but lately the extreme weather conditions as well as the increasing number of unexpected natural disasters such as wildfires and floods[172] are hard to deny, ignore or downplay. Of course,

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165

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

[166] https://rosanjose.iom.int/SITE/en/blog/disinformation-escalation-during-pandemic-and-how-contain-it

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

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

[169] https://wires.onlinelibrary.wiley.com/doi/full/10.1002/wcc.665

[170] https://www.sciencenews.org/article/climate-change-disinformation-denial-misinformation

[171] https://influencemap.org/report/How-Big-Oil-Continues-to-Oppose-the-Paris-Agreement-38212275958aa21196dae3b76220bddc

[172] https://www.sciencenews.org/article/climate-change-wildfires-heat-waves-hurricanes-records-2020

disinformation about climate change is as popular as ever especially due to the increase of online media, and especially social media, used to transmit such false information. With the evolution of social media, that allows anyone to share anything and reach thousands of people in a short period of time, disinformation is harder to tackle. The main way to fight disinformation currently is through fact-checking and debunking, but these techniques are not always effective since they cannot happen in real time and often a post can take great engagement very quickly. For this issue, Facebook, which is vastly used for spreading information true or false is taking steps to identify and minimise the "fake news" shared in the platform with the new climate change misinformation project[173].

At the same time, a study conducted by AVAAZ shows that YouTube actively presents videos with climate change disinformation to millions of users. This can be done through the search results presented to someone when looking for climate related information. Interesting fact is that well-known brands[174] and groups, such as Greenpeace, have advertisements run on these specific climate change misinformation videos[175]. They gathered in total 5.537 videos when searching for climate change, and they concluded that 16% of the 100 most viewed videos contained false information. This issue is getting larger both because the number of misinformation videos is getting larger but also due to 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.[176]

According to literature, the entities creating the misinforming content are not necessarily the same as those that could potentially benefit from it, e.g. oil industry companies or philanthropic actors with specific interest in the environment[177]. Bjorn et al. (2017)[178] find in general six categories of actors that deny environmental science: scientists, governments, political and religious organisations including think tanks, foundations and institutes, industry (such as oil or coal), 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

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[173] https://www.dw.com/en/facebook-starts-bid-to-fight-climate-misinformation/a-56713217
[174] Brands like Samsung, L'Oréal, Warner Bros, Carrefour, and Danone
[175] Such as Samsung, L'Oreal, Warner Bros, Carrefour and Danone
[176] https://secure.avaaz.org/campaign/en/youtube_climate_misinformation/
[177] https://wires.onlinelibrary.wiley.com/doi/full/10.1002/wcc.665
[178] 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

undermine their credibility; but also denying the existence of climate change all together, something that is vastly adopted by several political parties.[179]

The disinformation about climate change usually creates doubt about the issue. Three types of doubt have been identified: first is the doubt about the reality of it, then the doubt about its urgency, and finally the doubt about the credentials of climate scientists. This doubt is later on used for personal gain by the anti-climate change actors.[180]

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 responsive to the warnings from the scientific world[181]. 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 [182].

Nevertheless, more often far-right parties in Europe tend to support climate change denial or sceptical opinions. As shown in a study conducted by adelphi,[183] there are three attitudes towards climate change from populist right-wing parties. The denialists or sceptics, the disengaged or cautions, and the affirmative. The majority of the European right-wing parties are considered disengaged or cautious (11/21) but many are also considered denialists (7/21).[184] 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

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[179] https://www.annualreviews.org/doi/pdf/10.1146/annurev-publhealth-090419-102409

[180] https://www.carbonbrief.org/guest-post-how-climate-change-misinformation-spreads-online

[181] 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

[182] 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.

[183] https://www.adelphi.de/en

[184] 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

Commission, they are dragging the centre parties more towards their position which may lead to weaker results in the fight against climate change.[185]

Finally, as for the foreign sources of disinformation in Europe, according to euvsdisinfo.eu, a series of pro-Kremlin media reports on how harmful green energy is followed, 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[186]. They falsely claimed that "Alternative energy is a scam" and they articulated threats of increasing natural gas prices for the EU, what eventually happened[187]. Relying on conspiracy theory targeting Greta Thunberg, a 16-year-old climate activist[188], and accusing the West of allegedly exploiting the environmental agenda and climate change topic, "to stop its competitors, especially Russia, from economic development"[189].

3.2. Political interests & disinformation in France

3.4.1 Politics and disinformation

Social media can be used to systematically manipulate and alter public opinion. Evidence from the 2017 French presidential election shows that social bots drove the #MacronLeaks disinformation campaign. Most of the 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"[190]. Among the threads related to the 2017 French election mainly spread by 4chan.org[191], the coordinating cyber-attacks aimed at reveling sensitive information about then presidential candidate Emmanuel Macron was the most popular[192]. 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

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[185] https://e360.yale.edu/features/for-europes-far-right-parties-climate-is-a-new-battleground
[186] https://euvsdisinfo.eu/the-kremlin-on-global-warming-connecting-the-dots-disconnecting-the-facts/?highlight=climate
[187] https://euvsdisinfo.eu/report/green-energy-is-a-scam-gazprom-is-safer
[188] https://www.rt.com/op-ed/453730-greta-thunberg-environmental-activist-crusader-saint/
[189] https://euvsdisinfo.eu/report/the-west-invented-the-climate-hoax-to-stop-russias-economic-development/
[190] Ferrara, E. (2017). Disinformation and social bot operations in the run up to the 2017 French presidential election. *arXiv preprint arXiv:1707.00086*. P.1
[191] 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
[192] En Marche! (2017). Communiqué de presse - En Marche a été victime d'une action de piratage massive et coordonnée. https://en-marche.fr/article/communique-presse-piratage

Le Pen[193]. This gained more attention after an anonymous post shared on Twitter by alt-right activist and Trump supporter, Jack Posobiec[194], and ultimately, the leaked documents were shared on Twitter by WikiLeaks' official account itself, which made the ongoing disinformation campaign go viral, using the #MacronCacheCash hashtag. Many attacks against Macron have been identified, presenting him as a "US agent" or accusing him for having an extramarital gay relationship[195] [196]. 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.

Figure: Example about disinformation from a French politician regarding Covid-19 and a medicine that was falsely connected with fighting the virous[197]

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[193] https://www.cnet.com/tech/services-and-software/macron-french-presidential-campaign-says-it-was-hacked/

[194] https://www.thedailybeast.com/the-twitter-bots-who-tried-to-steal-france

[195] https://www.marianne.net/politique/rumeur-sur-sa-double-vie-emmanuel-macron-sort-du-silence

[196] https://www.liberation.fr/france/2017/02/07/macron-gay-la-fabrique-d-une-rumeur_1546935/

[197] https://medium.com/dfrlab/misinformation-regarding-frances-covid-19-health-passes-spread-on-twitter-ba344920bc16

This misinformation has been spread considerably by the French outlets of Russian-sponsored RT and Sputnik, which were responsible for most of the fake news about Macron during his electoral campaign[198]. Finally, there is evidence that there is a connection within 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 may exist [199].

Moreover, Le Monde, one of the leading French newspapers, acting as a fact-checker, observed 19 misleading statements made 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 statements were related to economic and financial issues, the EU, the welfare state and the benefits provided to immigrants/foreigners[200].

Maxime Vaudano, one of the journalists at Les decodeurs (the fact-checkers team of Le Monde), observed an increase in misleading information in 2017, confirming a "Trump-effect" in French politics. He argues that all the candidates during the electoral campaign presented false statements, 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."[201]. This tendency of the far-right party, Front National, to use more false information in their campaign than the other parties, is also observed by Julien Pain, a fact checker and the editor-in-chief of France 24's Observers[202].

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[203].

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[198] https://www.atlanticcouncil.org/wp-content/uploads/2019/06/The_Macron_Leaks_Operation-A_Post-Mortem.pdf
[199] Ferrara, E. (2017). Disinformation and social bot operations in the run up to the 2017 French presidential election. *arXiv preprint arXiv:1707.00086*.
[200] 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
[201] 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.
[202] 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
[203] Henry E, Zhuravskaya E, Guriev S. 2020. Checking and sharing alt-facts. CEPR Work. Pap. 14738, Cent. Econ. Policy Res., London

3.4.2. Covid-19 disinformation

In France, the most common topics of Covid-19-related disinformation revolve around medicine[204] as well as alternative remedies[205] or even breathing tests[206]. These types of disinformation appeared to be used towards serving several interests.
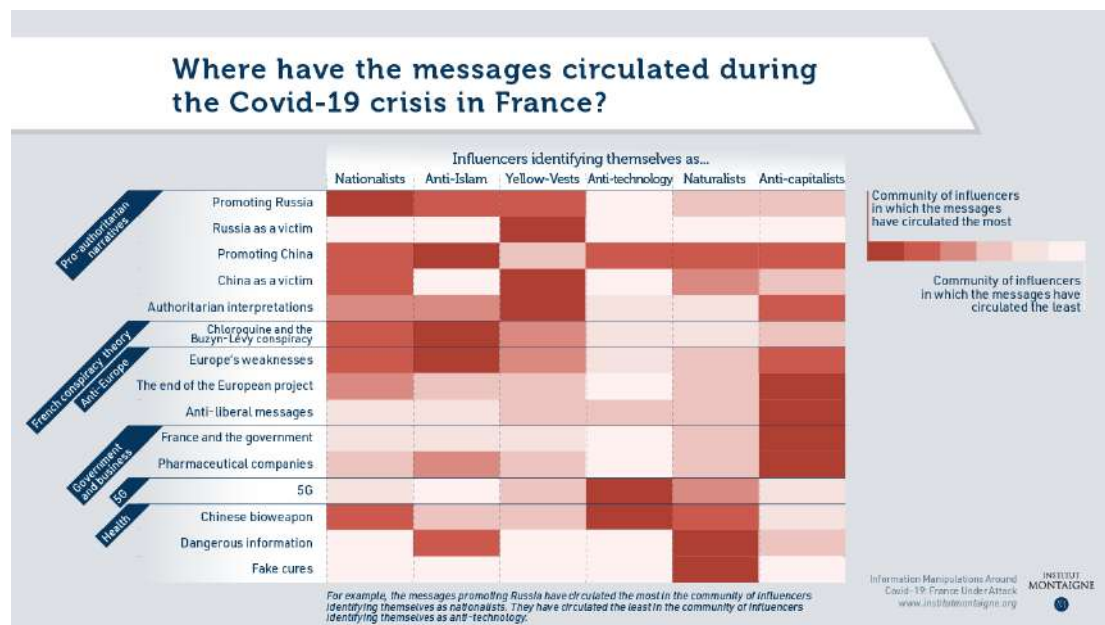
*Figure 6: Where the messages circulate during Covid-19 crisis in France (taken from Information Manipulations Around Covid-19: France Under Attach**Error! Bookmark not defined.**)*

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 **Error! Reference source not found.**, far-right supporters like nationalists and anti-Islam influencers have similar interests which include pro-authoritarian narratives, conspiracy theories as well as anti-Europe topics. On the other hand, far-left supporters (anti-capitalists) don't really occupy themselves with pro-authoritarian narratives but are only interested with 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

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[204] https://factuel.afp.com/non-la-chloroquine-na-pas-ete-interdite-par-un-arrete-en-janvier-2020

[205] https://factuel.afp.com/non-des-gargarismes-deau-tiede-melangee-du-sel-ou-du-vinaigre-ne-soigne-pas-le-coronavirus

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

as anti-technology and pro-naturalism mostly circulated messages and theories regarding technology, like 5G, as well as 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.[207]

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 incident of fake news is about a Covid-19 disinformation video called 'Hold-up" that was uploaded on YouTube on November 2020 and stayed 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 not only through 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.[208] 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.[209]

The disinformation in France exploded when vaccinations started. A well known event of disinformation that was used to serve political interests regards the "health passes" announcement during the summer of 2021.[210] Even though this decision was made by Macron, the French President, 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, political candidates as well as inauthentic accounts used the "health pass" announcement to amplify anti-vaccination messages. This resulted to increased fear and misinformation regarding vaccines and the "health

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[207] https://www.institutmontaigne.org/ressources/pdfs/publications/information-manipulations-around-Covid-19-france-under-attack-policy-paper_0.pdf
[208] https://www.politico.eu/article/french-viral-Covid-19-conspiracy-documentary-stayed-months-on-youtube-facebook/
[209] https://www.politico.eu/article/facebook-Covid19-misinformation-europe-united-states/
[210] https://medium.com/dfrlab/misinformation-regarding-frances-Covid-19-health-passes-spread-on-twitter-ba344920bc16

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.[211] A French YouTuber named Le Grasset that has over of 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 by the authorities, it was found that the PR firm contacting him had apparent ties to Russia.[212] [213]

3.4.3. 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.[214] 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.

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 police[215].

There is also evidence that many of the political rumors or hoaxes during the French presidential election campaign of 2017 come 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)[216]. For instance, there was misleading information regarding Alain Juppe, member of The Republicans and ex-Prime Minister of France from 1995

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[211] https://globalnews.ca/news/7894613/Covid-19-coronavirus-misinformation-influencer-france-sponsor-fake-news/

[212] https://www.pharmaceutical-technology.com/features/Covid-19-vaccine-disinformation-social-media/

[213] https://www.bbc.com/news/blogs-trending-57928647

[214] https://www.statista.com/statistics/752602/number-of-immigrant-arrivals-france/

[215] Sénécat, A. 2019. "La Galaxie Suavelos, Vitrine D'un Racisme Décomplexé." Le Monde, September 11. https://www.lemonde.fr/les-decodeurs/article/2019/09/11/la-galaxie-suavelos-vitrine-d-un-racisme-decomplexe_5509154_4355770.html

[216] Sénécat, Laurent et Adrien. "Présidentielle 2017." Le Monde.fr, May 5, 2017. http://www.lemonde.fr/les-decodeurs/article/2017/05/05/une-campagneplombee-par-les-rumeurs-et-les-fausses-informations_5122623_4355770.html

to 1997, suggesting that he was close to radical Islam and even misspelling his name as Ali Juppe[217].

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[218]. 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[219].

Another common narrative is about the secret plans of Macron to promote the islamisation of France and Europe[220], by teaching French children that Islam was always part of France[221]. To preserve the national identity against the islamisation of France, disinformation is used highlighting the overpopulation of Muslims living in France, due to the extreme number of children in Muslim-families, presenting misleading numbers[222]. Although French legislation forbids any religious symbols in schools or any public institutions, 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"[223]. In line with that a totally fabricated story according to which Pope that a mosque should be built at the site of Notre Dame de Paris[224].

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 rumor spread through messaging apps and social media that Roma were responsible for kidnappings. This rumor led to an attack against the Roma, after which 20 people

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[217] 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*.

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

[219] "Was Macron's campaign for the French presidency financed by Saudi Arabia?", Crosscheck, March 2, 2017

[220] https://diversitymachtfrei.blogspot.com/2017/05/macron-leaks-contain-secret-plans-for.html

[221] 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/69nn5j/french_media_is_shut_down_were_not_here_ are_5/?limit=500

[222] https://euvsdisinfo.eu/report/muslim-fertility-rate-in-france-is-much-higher-than-non-muslim

[223] https://euvsdisinfo.eu/report/germany-removes-baby-jesus-from-christmas-markets

[224] https://euvsdisinfo.eu/report/the-pope-might-suggest-a-mosque-to-be-built-at-the-site-of-notre-dame

were arrested.[225] Although, it is unclear who was behind these rumors, the European Roma Rights Centre (ERRC) claims that it seemed as a coordinated campaign[226].

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[227].

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[228]. 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 [229] [230] .

3.4.4. Climate change disinformation

Global warming is one of the topics that generates the most misinformation on social media[231]. According to notre-planete.info[232] some of the most popular fake news in France regarding climate change are the following: a new ice-age period[233], an increase in cannibalism of polar bears[234], and electric car emissions. Particularly, there is an increase in the spread of 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.

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[225] https://www.theguardian.com/world/2019/mar/27/roma-call-for-protection-after-vigilante-attacks-inspired-by-fake-news

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

[227] Adrien Sénécat, Sonia Krimi et les Frères musulmans, histoire d'une citation dévoyée, Le Monde, 7 February 2019.

[228] https://observers.france24.com/en/20180105-fake-images-racist-stereotypes-migrants

[229] 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

[230] 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

[231] https://www.linfodurable.fr/environnement/desintox-cinq-arguments-des-climato-sceptiques-passes-au-crible-9483

[232] https://www.notre-planete.info/actualites/fake-news.php

[233] https://www.notre-planete.info/actualites/3284-prochaine_ere_glaciaire

[234] https://www.notre-planete.info/actualites/4643-ours-polaire-changement-climatique-cannibalisme

Moreover, a number of articles have appeared to condemn electric scooters, in the same vein as those denouncing electric cars, sometimes even arguing that the good old diesel which suffocates cities is preferable[235].

Recently, it was announced that Wikimedia France, parent company of the Wikipedia, will help Internet users to identify misleading content, mostly shared by climate skeptics. Associated with the Digital New Deal foundation and the Francophone Union, the so-called #stopauxinfox will be based on artificial intelligence servers that supposedly identify in real time emerging infoxes and false information on global warming shared on social networks[236].

Figure : Example of false news in French media[237]

Furthermore, disinformation on climate change in France is highly related to wind power and wind turbines, mainly due to the public debate about this issue during the regional elections. Anti-eolian lobbies spread false rumors about the noise generated by wind turbines or the non-profitability of wind energy[238,239]. Considerable misleading information and fake news have been relayed about wind energy during the regional election campaign, which has made many headlines in the French media[240]. Much of

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[235] https://www.notre-planete.info/actualites/3072-trottinette-electrique-impact-environnement-CO2
[236] https://www.leparisien.fr/environnement/un-dispositif-pour-lutter-contre-les-fake-news-sur-le-climat-11-09-2019-8149683.php
[237] https://www.notre-planete.info/actualites/4643-ours-polaire-changement-climatique-cannibalisme
[238] https://www.ouest-france.fr/environnement/climat/vrai-faux-la-verite-sur-les-cliches-qui-collent-aux-eoliennes-6728319
[239] https://fee.asso.fr/actu/les-fakes-news-de-leolien-a-lheure-de-la-realite-le-fact-checking-des-medias/
[240] https://www.lepoint.fr/economie/eoliennes-stephane-bern-relaie-des-fake-news-sans-aucun-scrupule-04-06-2021-2429630_28.php

the misleading information is released by Stéphane Bern, a French journalist[241] who argues that wind energy is not ecological or renewable, that it seriously pollutes the environment, and destroys the natural and built heritage of the country[242].

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 political interests. Nevertheless, wind turbines were mostly criticized by the National Rally, right-wing candidates or the Communist Party, agitating the regional campaign. The criticisms are sometimes factual, but often outrageous and caricatured[243]. Most of the following statements do not rely on scientific studies or contain some misleading information[244].

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.[245]". 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[246]. 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."[247]. On the same page, 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[248] 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".

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[241] https://www.francetvinfo.fr/economie/energie/temps-de-fonctionnement-et-recyclage-des-eoliennes-qui-dit-vrai-entre-barbara-pompili-et-stephane-bern_4649343.html
[242] https://www.francetvinfo.fr/economie/energie/temps-de-fonctionnement-et-recyclage-des-eoliennes-qui-dit-vrai-entre-barbara-pompili-et-stephane-bern_4649343.html
[243] https://www.francetvinfo.fr/meteo/climat/vrai-ou-fake-regionales-les-attaques-de-certains-candidats-contre-les-eoliennes-sont-elles-fondees_4646077.html
[244] https://www.ouest-france.fr/environnement/climat/vrai-faux-la-verite-sur-les-cliches-qui-collent-aux-eoliennes-6728319
[245] https://www.youtube.com/watch?v=v4z-ZUOVjLU&t=730s
[246] https://premium.courrier-picard.fr/id192939/article/2021-05-15/elections-regionales-insecurite-eoliennes-marine-le-pen-au-soutien-dans-laisne
[247] https://twitter.com/HerveJuvin/status/1398945781978128388
[248] https://www.facebook.com/watch/?v=435136417564013

Figure: Example of how right wing candidates used some disinformation about wind turbines[249]

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"[250] [251]. The party's environmental 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[252] [253] [254].

3.3. Political interests & disinformation in Germany

3.3.1. Media independence and disinformation

Media in Germany are quite well organized as seen in the previous sections of the section 2. They 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.[255] Additionally, as found by the

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

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

[251] 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.

[252] https://www.lesechos.fr/elections/europeennes/jordan-bardella-le-%20meilleur-allie-de-lecologie-cest-la-frontiere-1007315

[253] https://www.lefigaro.fr/politique/bardella-c-est-par-le-retour-aux-frontieres-que-nous-sauverons-la-planete-20190414?utm_content=&redirect_premiumc

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

[255] https://rsf.org/en/ranking_table

MPM study,[256] they mark a quite 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 high-trust countries, such as Germany, partisan disinformation is not widely spread; online disinformation mainly reflects the controversial debate over the refugee crisis or other salient issues[257]. But even in this case, disinformation remains a serious problem among specific groups of citizens or political parties. In a study that analyzed disinformation in the 2017 German parliamentary elections,[258] it was shown that the less trust people had in both traditional media as well as in 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 a specific 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 to [259]. Neudert et al. found that most bots were supporting AfD[260]. Another study found that AfD[261]. This shows that disinformation can serve political interests and can influence the voting decision of the public.

3.3.2. Covid-19 disinformation

In the case of Germany, the topics of Covid-19 disinformation include among others: rumors about the effectiveness of medicines such as hydroxychloroquine/chlorine

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[256] https://cadmus.eui.eu/handle/1814/71947

[257] 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

[258] https://www.tandfonline.com/doi/full/10.1080/10584609.2019.1686095

[259] Stürzenhofecker, 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

[260] 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.oii.ox.ac.uk/wp-content/uploads/sites/89/2017/09/ComProp_GermanElections_Sep2017v5.pdf

[261] 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

dioxide[262], gargling water as a remedy, breathing tests for understanding if you have coved[263], nicotine as a way to decrease chances of getting Covid[264], 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 spreading were becoming more and more strict. The origin of these theories can be located among right-wing parties as well as promoters of 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 naturally since they already identified with conspiracy thinking, racism and anti-Semitism.

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[262] https://correctiv.org/faktencheck/medizin-und-gesundheit/2020/02/07/die-einnahme-von-chlordioxid-hilft-nicht-gegen-das-neue-coronavirus/
[263] https://correctiv.org/faktencheck/2020/03/16/falsche-tipps-in-whatsapp-kettenbrief-luft-anhalten-oder-wasser-trinken-helfen-nicht-gegen-coronavirus/
[264] https://correctiv.org/faktencheck/2020/05/05/es-gibt-keine-belege-dafuer-dass-nikotin-gegen-das-coronavirus-hilft/

Figure: Examples of disinformation in Germany regarding Covid-19. Left: Article about breathing tests to verify whether someone is infected by the virus[265], Right: False information about vaccination risks[266]

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 only3% of Green party voters, 5% of center-right Christian democrat voters and 7% center-left social democrat voters believe the same.

The AfD is exploiting the measures taken by the government to secure the public from Covid-19 spread, towards promoting 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[267], 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")[268] Their purpose initially concerned issues like individual freedom and they claimed to be unattached to political beliefs but that is not exactly the case.[269] shows that members of Querdenken in the previous elections (2017, prior to Covid-19 pandemic) have supported from the Greens

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[265]   https://www.wochenblick.at/horror-risiken-nach-corona-impfung-bekaempft-koerper-eigene-zellen/

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

[267] https://slate.com/news-and-politics/2021/02/germany-Covid-conspiracies-misinformation-querdenker-reichsburger-far-right.html

[268] https://www.opendemocracy.net/en/germany-ground-zero-Covid-infodemic-russia-far-right/

[269] https://osf.io/preprints/socarxiv/zyp3f/

and CDU/CSU to far right parties; however, after the pandemic the supporters of AfD nearly doubled in the circle of Querdenken whereas other parties did not get any support. Based on the research delivered by openDemocracy[270], the main means for delivering and spreading false information especially in the circle of Querdenken was Telegram, a messaging app that allows a group to have up to 200,0000 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 were the 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.[271] **Error! Bookmark not defined.**

The research of OpenDemocracy found that Russian media outlets have ranked high as the most shared media on Telegram. Specifically, the media network RT-DE, the German branch of Russian state-controlled media network, ranked 6th in the most shared media in Telegram. An example of disinformation is the video produced by RT DE titled "Dr Claus Köhnlein on "fatal coronavirus experiments" by the WHO" which was shared more than 200,000 times in telegram and received 1.5 million views on YouTube[272]. Additionally, Russian campaigns also tried to traffic 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.[273] This issue has been identified by YouTube which eventually deleted the Russian state-backed channels RT, saying that they had breached its Covid misinformation policy.[274]

3.3.3. Immigration disinformation

In Germany, disinformation is primarily focused on attacking and vilifying immigrants, especially Muslims, given the salience of the refugee situation in the national news

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[270] https://www.opendemocracy.net/en/germany-ground-zero-Covid-infodemic-russia-far-right/
[271] https://www.opendemocracy.net/en/germany-ground-zero-Covid-infodemic-russia-far-right/
[272] https://www.opendemocracy.net/en/germanys-Covid-sceptics-fuelled-by-russian-media-and-far-right-conspiracies/
[273]
https://www.europarl.europa.eu/thinktank/en/document.html?reference=EXPO_STU%282021%29653633
[274] https://www.theguardian.com/technology/2021/sep/29/youtube-deletes-rts-german-channels-over-Covid-misinformation

agenda for a long time[275]. Germany has suffered an increase of disinformation regarding immigration and 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.[276] 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[277].

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[278]. 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 were being reported, such as sexual assaults, connected to the migrants. But 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.[279]

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

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[275] 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

[276] https://www.dw.com/en/five-years-on-how-germanys-refugee-policy-has-fared/a-54660166

[277] 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

[278] 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

[279] https://www.vice.com/en/article/mb98pb/germany-fake-news-election-migrants

parties of the established political system (i.e., CDU/CSU, SPD, FDP, Green Party, and Left party)[280] [281].

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.[282] A research conducted by the Institute for Strategic Dialogue[283] 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 correlated with the 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.[284] The main narrative is about immigrants/refugees who are taken into the country under cover of the lockdown[285]. Also, false information in German media in March 2021 claimed that the majority of Covid-19 intensive care patients have an immigrant background[286]. Moreover, based on a fear of contamination some distorted stories were observed that immigrants do not accept any restrictions[287] or they break the lockdown rules [288] [289]. A study on German-language extremist social media, shows that Covid-19 pandemic also led to increased Islamophobia and anti-Muslim conspiracy theories[290].

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

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[280] 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

[281] 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

[282] `https://www.infomigrants.net/en/post/33301/germany-website-spreads-false-information-about-apparent-new-open-door-refugee-policy

[283] https://www.isdglobal.org/

[284] https://www.isdglobal.org/isd-publications/the-networks-and-narratives-of-anti-refugee-disinformation-in-europe/

[285] https://Covidinfodemiceurope.com/

[286] https://getthetrollsout.org/dig-deeper/germany-scapegoats-immigrants-Covid19

[287] https://euvsdisinfo.eu/report/the-situation-with-Covid-19-in-germany-is-worsening-because-of-migrants

[288] https://voiceofeurope.com/2020/03/immigrants-violently-defy-coronavirus-quarantines-in-germany-hungary/

[289] https://www.radicalrightanalysis.com/2020/04/10/how-is-the-far-right-capitalizing-Covid-19/

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

city[291]. 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[292].

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"[293].

Russia also has a big role in the spread of 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."[294] 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 Force[295], 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. that aim to fuel negative emotions towards refugees. In addition, in February 2020 Facebook removed a network of accounts which belonged to Russia's military intelligence services targeting Germany and sharing anti-immigrant and anti-Muslim content and sometimes content supporting the AfD[296].

3.3.4. Climate change

As explained in the previous sections, disinformation regarding climate change can manifest in many forms, one of which is through denying the existence of the issue all together. 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.[297] The AfD, that withdrew from the Intergovernmental Panel on

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[291] https://euvsdisinfo.eu/report/migrants-responsible-for-increase-in-robberies-murders-and-rapes-in-germany

[292] https://euvsdisinfo.eu/report/migrants-responsible-for-increase-in-robberies-murders-and-rapes-in-germany

[293] https://euvsdisinfo.eu/report/money-to-teach-children-in-kindergartens-now-goes-for-migrants-in-germany

[294] https://euvsdisinfo.eu/commentary-means-goals-and-consequences-of-the-pro-kremlin-disinformation-campaign/

[295] https://us11.campaign-archive.com/?u=cd23226ada1699a77000eb60b&id=8a3e5d1155

[296] https://graphika.com/reports/from-russia-with-blogs/

[297] 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

Climate Change[298] (IPCC) and the climate agreement of Paris[299], actively promotes that climate change is something that does not exist, claims that human-made CO_2 emissions do not impact the environment in a damaging way, calls the appearance of extreme weather events fake news and describes climate policies as "hysteria" [300] . As reported[301] by Correctiv[302] and Frontal21[303] , another actor promoting climate change denialism in Germany is the American Heartland [304], an US libertarian and climate skeptic 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 try to recruit young influencers to promote such beliefs in the target groups The Heartland Lobby report reveals that Heartland has a broad strategy of disinformation that includes paid scientists and experts that were willing to   downplay the health impacts of diesel pollution and coal-fired power plants if they were" properly funded". Instead of outrightly denying science, their aim is to sow doubt about it by promoting talking points such as the "false doctrine" of climate change and branding climate activists as hysterical "alarmists."

3.4. Political interests & disinformation in Greece

In this section, we examine the connection between media, political actors, and disinformation in Greece.

3.2.1. Media independence

The Media Pluralism Monitor report 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,[305] they present study results related to media pluralism and political independence in Greece. The indicator of political independence assesses[306] political independence in general but when looking to the sub-indicators of this cluster of indices, three out of five are ranked as high risk. These three sub-indicators are "political independence of media",

[298] https://unfoundation.org/blog/post/intergovernmental-panel-climate-change-30-years-informing-global-climate-action/?gclid=EAIaIQobChMIgNWKs56X6AIVjLTtCh1CsQDCEAAYASAAEgJbovD_BwE
[299] https://dserver.bundestag.de/btd/19/224/1922450.pdf
[300] https://www.theguardian.com/world/commentisfree/2020/mar/18/climate-change-denial-germany-far-right-afd
[301] `https://correctiv.org/en/top-stories-en/2020/02/11/the-heartland-lobby/
[302] https://correctiv.org/
[303] https://www.zdf.de/politik/frontal/undercover-bei-klimawandel-leugnern-100.html
[304] https://en.wikipedia.org/wiki/Heartland_Institute
[305] https://cmpf.eui.eu/mpm2021-results/
[306] https://cadmus.eui.eu/handle/1814/71948

"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.

*Figure 7: Political independence sub-indicators for all countries of interest taken from the "MONITORING MEDIA PLURALISM IN THE DIGITAL ERA**Error! Bookmark not defined.**" report.*

The results of the aforementioned report are not surprising when considering that currently most of the media outlets in Greece are owned by a few businessmen who have close ties with the ruling parties. This can in fact mean that the government can potentially have an indirect control of what is being reported by those outlets and therefore affecting the quality of journalism.[307] A result of this is the fact that the Greek population gradually loses their trust in the mainstream media, such as traditional television and directs it towards online means of information.[308]

3.2.1. Covid-19 disinformation

The 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 deaths and cases but disinformation related to refugees and immigrants, autovaccination claims and other health/medical issues occupy a big portion of these theories as well.[309]

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

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[307] https://ipi.media/the-Covid-19-crisis-highlights-greeces-media-problem/
[308] https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2019-06/DNR_2019_FINAL_0.pdf
[309] https://digicomnet.medium.com/a-racist-aspect-of-Covid-19-disinformation-in-greek-social-media-9e5118942dbb

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.[310]

Such observations naturally lead to questioning the people behind these stories and their profiles. The same study has concluded that the main people that spread disinformation through social media about Covid-19 in combination with refugees as well as other topics 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.[311]
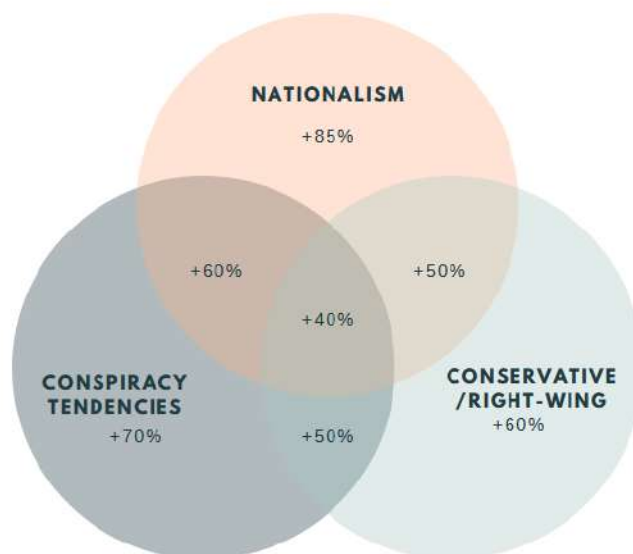
Figure 8: Profiles of people that spread disinformation in social media in Greece

Disinformation regarding Covid-19 includes rumours about alternative medicine that can be used to fight the virus, or existence of medicines that can potentially 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[312] [313] stations. 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 information

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[310] https://digicomnet.medium.com/a-racist-aspect-of-Covid-19-disinformation-in-greek-social-media-9e5118942dbb

[311] http://dcn-see.org/tpost/y4415isima-fake-news-hunters-part-2

[312] https://bit.ly/3mOzOsH

[313] https://bit.ly/3DsbzXK

were transmitted, for which the channel was fined with the amount of 30,000 euros.[314] Another similar example includes some episodes of a Radio show hosted by the journalist Georgios Tragas in several local radio stations, a tv channel as well as some web sites.[315] Specifically, for Tragas, it is clear that he is trying to win over voters, targeting anti-vaxxers and Covid deniers, for his newly created right-wing[316] party. On the other hand, based on research conducted by Marc, we see that most of the anti-vaxxers are supporting parties from both the left-wing, such as Syriza (19,6%) and the right-wing, such as [317]16,4%). 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 at about 4,5% nationally but is extremely popular among anti-vaxxers. Additionally, the same research showed that most of the supporters of the leader of the Greek Solution party (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 Holly 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.[318]

Finally, an interesting case of Covid-19 disinformation regards four different webpages (Brighteon.com[319], rumble.com[320], ugetube.com[321], ellinesithagenis.gr[322]) that are administrated by anti-vaxxers and that they were transmitting "fake news" about different topics among which is Covid-19. They were identified by the Cyber Crime division of the of the Greek Police Authority along with some Facebook and Twitter profiles, and they were prosecuted with the accusation that they are urging the citizens to take actions against public health, safety and the State. At the time (29/09/2021),

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[314] https://bit.ly/3v5a52E
[315] https://www.avgi.gr/koinonia/386893_se-mpelades-ennea-radiofona-logo-tragka
[316] https://bit.ly/2YKhpVS
[317] https://www.capital.gr/epikairotita/3584283/dimoskopisi-marc-ti-psifizoun-oi-anemboliastoi
[318] https://www.nytimes.com/2020/12/05/world/greece-orthodox-church-coronavirus.html
[319] https://www.brighteon.com/
[320] https://rumble.com/
[321]
https://ugetube.com/?__cf_chl_jschl_tk__=pmd_SbexFhplpzO5REMtGlBdk6tBJKhauQ6HiN.amwLKR9k-1632919453-0-gqNtZGzNAhCjcnBszQd9
[322] https://ellinesithagenis.gr/

there is no decision on any sanctions towards the administrators of the websites and especially the "Ellines Ithagenis[323]

3.2.2. Immigration disinformation

Greece has always been a country with immigration issues especially due to its strategic position. In the last decade the pick of immigration is found in 2015 when nearly 900K 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 urgent to tackle.[324]

Along with the immigration/refugee issues, anti-refugee disinformation is also something that is very much alive in Greece. In a research conducted by the Institute for Strategic Dialogue (ISD), it was 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 between all networks during major incidents involving refugees, such as the fires in the refugee camp in Moria Lesvos in September 2020, both on Greek Twitter and Facebook. Additionally, the same ISD research showed that elected officials play a key role into refugee disinformation and hatred since it was found that comments made by such officials, specifically members of the current governing party New Democracy, helped fuel the disinformation. 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.[325] Accusations for "fake news" have been 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 10K pushbacks in the Greek-Turkish border only in 2020[326]. They claimed that in these incidents are involved other than the Greek coast guard also the European border agency Frontex. These accusations were declined by both the Greek government but also the agency 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.[327] Another practice the Greek media sometimes follow is to present past information as current,

[323] https://www.thetoc.gr/koinwnia/article/entopistikan-oi-protes-4-istoselides-arniton-pou-diadidoun-fake-news-ellines-autoxthones-ithageneis-kai-ugetube/

[324] https://data2.unhcr.org/en/situations/mediterranean/location/5179

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

[326] https://www.infomigrants.net/en/post/30229/unprecedented-rights-violations-against-migrants-in-aegean-sea-ngo

[327] https://euobserver.com/migration/151392

especially for incidents that involve refugees. For example, for such an incident a known TV channel was fined with 30.000 euros in 2020.[328]

Another situation that sometimes arises in Greece is not exactly related to disinformation, but rather connected with obstruction of the press. Again, related 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 letter[329] to the Greek authorities signed by 7 different press freedom organizations.[330] Such events have resulted in Greece ranking 65th out of 180 countries in the RSF's 2020 World Press Freedom Index.[331]

All these incidents, spreading disinformation, calling news as disinformation as well as obstructing the press, most often than not emanate from political parties that aim to decline accusations made towards them regarding their strategies on the immigration issue, to promote their own agendas or even hide facts from the public.

3.2.3. Climate change disinformation

In Greece, even though the available information about climate change is minimal, a study showed that around 87% of Greek people are concerned that climate change will personally harm them during their life time. Additionally, from the ones participating in the research around 90% are willing to make a change to help reduce the effects of climate change.[332]

Nevertheless, the Greek fact-checking website is marking several public statements in Greek media as a hoax that regard climate change[333]. Some of the news that were fact-checked include articles about the climate change happening due to volcanos[334], 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 articles repeat news or conspiracy theories that have already circulated online by foreign media or actors.

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[328] https://bit.ly/3Awbtwn
[329] https://www.ecpmf.eu/concerns-over-access-for-media-workers-in-greece/
[330] https://rsf.org/en/news/greek-police-uses-brutal-violence-and-arbitrary-bans-obstruct-reporting-refugee-crisis
[331] https://rsf.org/en/ranking
[332] 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/
[333] https://bit.ly/3iP2QqQ
[334] https://www.ellinikahoaxes.gr/2021/10/03/volcanoes-climate-change-pseudoscience/

Figure: Example of false news about climate change in Greek media[335]

Greece's pro-Nazi, extreme right-wing party that was in the European Parliament in the past, 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 to "against" and "for" around 50/50.[336]

3.5. Political interests & disinformation in Italy

3.6.1 Politics and disinformation

As shown in the MPM study,[337] Italy has a medium risk (49%) regarding the political independence of the press. There is a general variance regarding the risk of the sub-indicators, meaning there is one with low risk and another one with high, but most are still at medium risk. The medium risk is attributed to the lack of effective laws or the existence of laws that don't 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. Adding to that the selection criteria were not made public. Another example that shows the risk of political dependence is the fact that there are no rules regarding political advertising online, which can lead to publishing ads with a bias towards specific political parties or opinions.

Great examples of disinformation in Italy come from the 2019 European elections. The main controversial and polarizing topics of debate at the time were immigration,

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[335] https://www.ellinikahoaxes.gr/2021/10/03/volcanoes-climate-change-pseudoscience/
[336] https://bit.ly/3DvPOXc
[337] https://cadmus.eui.eu/handle/1814/71951

national safety and nationalism. In a study focused on deceptive information circulating on Twitter before the 2019 European elections,[338] 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 focusing 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 parodistic imitations of a wide range of online partisan topics[339]. Mocanu et al. show that misinformation was particularly likely to be shared by users who mistrusted the mainstream media.

Pierri et. al. found [340] that the most influential accounts involved in the disinformation were identified to be connected to the Italian far-right and conservative community. 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 which have profited the most from directly exploited hoaxes and misleading reports related to their populist and nationalist views[341] [342].

The large amount of disinformation, especially when it regards elections, would naturally arise the question whether they affect voting behaviour or not. The research[343] 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, which is an EU-funded project that aims to diminish disinformation by

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[338] https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0227821
[339] 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.
[340] 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.
[341] Giglietto F, Iannelli L, RossiL, ValerianiA, RighettiN,Carabini F, et al. Mapping Italian News Media Political Coveragein the Lead-Upto 2018 General Election. Available at SSRN: https://ssrncom/abstract=3179930.2018
[342] Cantarella M, Fraccaroli N, Volpe R. Does Fake News Affect Voting Behaviour? Available at SSRN: https://ssrncom/abstract=3402913.2019
[343] https://ideas.repec.org/p/mod/depeco/0146.html

promoting scientific knowledge on the issue, advance the fact-checking services as well as support media literacy programmes.[344]

3.6.2. 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 collapses, and there is a sudden shift of the people to pay attention to more reliable sources[345]. 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[346].

Several false stories have been written and fact-checked such as the ones identified by IFCN.[347] This large amount of disinformation shared in Italian media has led the Italian government to create a page that showcases the most popular false information spread 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. [348] [349]

Covid-19 was not only exploited by national individuals and organizations as a means to spread disinformation and serve their own interests. Italy was a target for disinformation from foreigners as well. 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 was proved to be disinformation was related to a shipment of medical supplies Russia had sent to Italy. A Russian Senator had tweeted

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[344] https://www.euractiv.com/section/digital/news/italy-launches-national-hub-to-fight-disinformation/

[345] 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

[346] 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

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

[348] https://www.thenewfederalist.eu/the-effect-of-Covid-19-disinformation-across-europe?lang=fr

[349] https://time.com/5789666/italy-coronavirus-far-right-salvini/

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 fact that was denied by the Polish government. These "news" about Poland's denial, even though they were false, they had great traction on the internet with several posts, views and engagements from thousands of people. This event 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.[350]

Figure: Examples of disinformation in Italian media from foreign sources[351] [352] [353]

As said above, 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 (#thanksChina) with the ultimate aim to show how China provided more support than EU or US when

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[350] https://medium.com/dfrlab/russia-exploits-italian-coronavirus-outbreak-to-expand-its-influence-6453090d3a98

[351] https://archive.vn/X6OBV

[352] https://www.facebook.com/1663899447222803/posts/2564731400472932

[353] https://medium.com/dfrlab/russia-exploits-italian-coronavirus-outbreak-to-expand-its-influence-6453090d3a98

Italy was in need.[354] 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 coming 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.[355]

3.6.3. Immigration disinformation

Disinformation about immigration, as seen above, is quite 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 Italy[356] through Sicily[357]. At the end of 2017, several popular Italian websites and Facebook pages appeared as news organizations, but trafficked in misinformation, posting misleading stories that echo nationalist and Islamophobic rhetoric[358]. Nowadays, illegal immigration is still one of the key points in the right-wing political parties' agendas[359] which was used by right-wing parties (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 have contributed significantly to the electoral success of these parties[360].

With the rise of the Covid-19 pandemic, the disinformation about immigrants switched from them bringing a danger 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 several anti-immigrant "stories" that were proved to be disinformation but had a large amount of engagements nonetheless.[361] Such false stories and propaganda can lead people to show 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.[362] Based on the narrative that immigrants do not obey to the restrictions of Covid-19 or

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[354] https://medium.com/dfrlab/china-exploits-italian-coronavirus-outbreak-to-expand-its-influence-967a6998fea3

[355] https://www.ifj.org/fileadmin/user_upload/210512_IFJ_The_Covid_Story_Report_-_FINAL.pdf

[356] https://www.statista.com/statistics/623514/migrant-arrivals-to-italy/

[357] https://www.pri.org/stories/2017-12-30/italys-migrant-crisis-saw-huge-turning-point-2017

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

[359] https://www.economist.com/europe/2021/05/22/italys-populist-right-looks-menacing

[360] https://www.american.edu/soc/news/italy-fake-news-helps-populists-and-far-right-triump.cfm

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

[362] https://lacuna.org.uk/blog-archive/how-Covid-and-fake-news-fuelled-anti-immigrant-sentiment-in-italy/

the lockdown rules, Severino Nappi, Regional Councilor of the Lega, tweeted about it presenting a video which was filmed in earlier times[363].

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,[364] 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. [365] Moreover, far-right parties spread disinformation about the Roma breaching Covid-19 restrictions, via social media platforms[366].

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"[367]. 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[368].

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[369]. Chiara Appendino, a member of the Five Star Movement and mayor of Turin was accused of

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363
https://twitter.com/severino_nappi/status/1239823334289874945?ref_src=twsrc%5Etfw%7Ct wcamp%5Etweetembed%7Ctwterm%5E1239823334289874945&ref_url=https%3A%2F%2F voiceofeurope.com%2F2020%2F03%2Fitaly-video-clip-shows-migrants-invaders-ignoring-coronavirus-lock-down-orders%2F

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

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

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

367 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)

368 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

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

converting the city of Turin into a "halal city"[370]. 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 he 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[371]. 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[372]. However, the video was filmed in October 2016 during a protest by hundreds of Muslims against the closure of mosques in Italy.[373] 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 northeastern city of Padua[374].

Issues related to immigration, crime and national safety were highlighted as the most debated topics of disinformation during the 2019 European Parliament elections [375] . The same study provided evidence of connections between the Italian disinformation sources and other disinformation outlets across Europe, U.S. and Russia, featuring similar, even translated, articles in the period before the elections[376] in particular, strong ties observed with "Lega" party, since most of the users manifested explicit affiliation or support to the party agenda via key words and hashtags.

3.6.4. Climate change disinformation

Italy is one of the countries in Europe that has quite high awareness (90%) of the issues regarding 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

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[370] https://monitoring.bbc.co.uk/product/c200tx5h
[371] https://monitoring.bbc.co.uk/product/c200tx5l
[372] https://twitter.com/SapereAudeDE/status/1130194902221037568
[373] https://www.reuters.com/article/us-italy-mosques/muslims-pray-at-colosseum-protesting-against-rome-mosque-closures-idUSKCN12L2AU
[374] https://www.theatlantic.com/international/archive/2018/02/europe-fake-news/551972/
[375] Pierri, F., Artoni, A., Ceri, S.: Investigating Italian disinformation spreading on twitter in the context of 2019 european elections. PLOS ONE15(1) (2020)
[376] Pierri, F., Artoni, A., Ceri, S.: Investigating Italian disinformation spreading on twitter in the context of 2019 european elections. PLOS ONE15(1) (2020)

the people in the center (39%) or left (47%), but still the differences are not that large.[377] All of 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 regarding climate change and sustainability in the civics curriculum in every grade.[378]

An example of disinformation is a 2019 petition called "Petition on anthropogenic global warming"[379] that was signed by 83 people, some of which were scientists, and was sent to the presidents of the Chamber of Deputies, the Council, the Republic and the Senate. This petition included false information and the scientific blog climalteranti.it managed to fact-check[380] it and prove that the signatories, with few exceptions, had no knowledge on climate science. [381]

Most of the 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[382]. 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[383]. 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[384]. More recently this situation changed and discourse of coalitions emerged from the political debate on climate change in Italy[385]. The Italian right-wing party Lega has clearly stated that the anthropogenic climate change exists and that it is necessary

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[377] https://dpart.org/wp-content/uploads/2020/11/Comparative_report.pdf
[378] https://thehill.com/policy/energy-environment/469198-italy-to-require-students-to-study-climate-change-and
[379] http://www.scienzanazionale.it/e-nata-astri-per-la-ricerca-italiana/petizione-sul-riscaldamento-globale-antropico/
[380] https://www.climalteranti.it/2021/02/01/gli-uomini-di-scienza-che-negano-lorigine-antropica-del-riscaldamento-globale-si-occupano-raramente-di-clima/
[381] 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
[382] 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)
[383] 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
[384] 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
[385] 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)

for measures, national or otherwise, to be taken in order to tackle the issue.[386] Similarly, the Five Star Movement created in 2005 as an antiestablishment party, and one of its main objectives was the protection of the environment, a stance which they used in their election campaigns especially in 2013[387]

3.6. Political interests & disinformation in Spain

3.5.1 Politics and disinformation

Based to the Media Pluralism study (MPM) [388], Spain has an overall medium risk (47%) with regard to political independence of the press. Most sub-indicators are set to medium risk mainly because there is a general lack of specific regulations regarding political control of the media. For example, there is some sort of political influence upon the private media organisations as well as on the appointment or dismissal of editors-in-chief even though there is no direct ownership of media from official political actors. Additionally, even though there are some attempts towards the creation of laws about elections and governance of public media services, there is no convergence between political parties to actually implement them.

Additionally, as identified by the EBU research about trust in media[389], Spaniards have no trust in the media, including broadcasting media, legacy media as well as online media. This can be justified in several ways. First, as reported by AVAAZ, although Spanish is the fourth most spoken language in the world[390], Facebook does not enforce in the same way its anti-disinformation policies on Spanish-language content compared to English content, mainly due to the language barrier.[391] More specifically this research discovered that even though 70% of the disinformation on Facebook in English is flagged, only 30% of the disinformation stories in Spanish are flagged due to lack of efficient moderation mechanisms.[392]

A study focusing on social bots during the 2019 Spanish General Elections, found that social bots targeted the mainstream national events and were sensible to trending topics supporting each of the five principal political parties. In addition, social bots had interactions with more than one political party which shared similar ideology and they

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[386] https://www.greeneuropeanjournal.eu/nationalising-the-climate-is-the-european-far-right-turning-green/
[387]
https://ecfr.eu/article/commentary_the_european_green_deal_a_political_opportunity_for_italy/
[388] https://cadmus.eui.eu/handle/1814/71963
[389] https://www.ebu.ch/publications/research/login_only/report/trust-in-media
[390] https://www.statista.com/statistics/266808/the-most-spoken-languages-worldwide/
[391] https://www.theguardian.com/technology/2021/mar/03/facebook-spanish-language-misinformation-Covid-19-election
[392] https://secure.avaaz.org/campaign/en/facebook_coronavirus_misinformation/

seemed against political parties opposed to the inferred ideology. Specifically, social bots related to both right-wing (PP and VOX) and left-wing (PSOE and UP) parties appear to be closely connected; while the central party (Cs) does not report a high level of interaction within the network[393].

To address the problem of disinformation, the Spanish government aims to constantly monitor the internet for fake stories. To achieve that the national Security Council of Spain has approved the "Procedure for Intervention against Disinformation" document which indicates 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.[394]

3.5.2. Covid-19 disinformation

Covid-19 has been a common topic for disinformation stories, some of which have been identified and documented by IFCN.[395] Popular disinformation stories include people being vaccinated without their consent, vaccines being unsafe for humans or having unverified side-effects and many more. Additional topics include misinformation about potential medicine[396], natural remedies[397], breathing tests[398] or even nicotine[399]. It has been found that most false stories in Spain circulate through messaging apps, such as telegram and WhatsApp, as well as social networks.[400] At the same time, a study released by the Reuters Institute shows that Spaniards attribute most responsibility for Covid-19 disinformation to politicians.[401]

A large number of protests against the extensive 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 social media such as Facebook and Twitter. These platforms

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[393] 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.

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

[395] https://www.poynter.org/ifcn-Covid-19-misinformation/

[396] https://maldita.es/malditaciencia/20210903/mms-clorito-sodio-coronavirus-cientifico-aleman-cura/

[397] https://maldita.es/malditobulo/20200315/enjuagarse-garganta-prevenir-coronavirus/

[398] https://maldita.es/malditobulo/2020/03/22/contagio-coronavirus-contener-respiracion-sorbos-agua-15-minutos/

[399] https://maldita.es/malditaciencia/2020/05/06/nicotina-coronavirus-estudio-francia/

[400] https://www.statista.com/statistics/1167849/Covid-19-information-false-or-deceitful-by-source-of-information-in-spain-2020/

[401] https://reutersinstitute.politics.ox.ac.uk/infodemic-how-people-six-countries-access-and-rate-news-and-information-about-coronavirus

have attempted to shut down accounts that promote false stories as well as remove the false information. This led the people to turn to the Telegram messaging app. For example, a very 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.[402] Palacios proclaims to be one of the first to denounce the Covid-19 conspiracy.[403] Through his telegram channel, that reaches 137,000 subscribers[404], several articles that spread false information have been shared. A lot of these articles were originally published in Russian-backed Spanish-language media such as the RT en[405].

Another source of disinformation in Spain, besides the aforementioned telegram channels, are groups with far-right ideology, such as the political party Vox. Vox has supported several times that the restrictions set by the government were not necessary[406], something that could definitely be up for debate, but also, they spread several false information regarding the current government. Vox also used telegram channels, such as Noticias Rafapal, to spread their agenda as well as to reach people that have the same opinion in order to increase their supporters.[407] A study made by ElDiario even makes an analogy of Vox's disinformation to the flat earther movement.[408] An example of the type of disinformation made by Vox is a post that was published in the party's Twitter account, that was vastly shared, showing a doctored photo of Madrid's Gran Via filled with coffins, while below they were commenting that this was something the government wanted hidden.[409] Adding to this, they were the only ones that accused the well-known 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 consist only the 10% of the ones they fact-check since they cover the entire political spectrum.[410]

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 Pais 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 interesting finding of the same survey shows that 40% of Spaniards believed

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[402] https://www.mandalaediciones.com/autores/palacios--rafael.asp
[403] https://worldfreedomforum.es/ponentes/mesa-divulgadores-escritores-artistas/rafael-palacios-rafapal/
[404] https://telegram.me/s/rafapalreal
[405] https://www.codastory.com/disinformation/spain-telegram-Covid19-disinformation/
[406] https://www.jstor.org/stable/26939973?seq=1#metadata_info_tab_contents
[407] https://www.codastory.com/disinformation/spain-telegram-Covid19-disinformation/
[408] https://www.eldiario.es/tecnologia/conspiracion-gobierno-coronavirus-organizado-cacerolada_1_1220976.html
[409] https://www.opendemocracy.net/en/can-europe-make-it/coronavirus-fake-news-and-future-spanish-left/
[410] https://ipi.media/journalists-operate-in-increasingly-suffocating-atmosphere-in-spain/

there was some sort of conspiracy behind the vaccines, while the same percentage rises to 55% when talking about Vox voters. Adding to this, 65% of Spaniards believe the coronavirus was man made, a number that goes to up to 85% among Vox voters.[411] Almost a year after this survey, the vaccination rates of Spain have increased and a total of 79,3% of the population have had at least one dose (the equivalent of the 90% of the population able to get vaccinated), with the anti-vaxxers now representing only the 4% of the population.[412]

3.5.3. Immigration disinformation

In Spain, immigration is an issue that caused increased concern among Spaniards between 2017 and 2020, according to an investigation[413] conducted by the Centre of Sociological Investigations (CIS). This concern is inflated by the large amount of disinformation in the Spanish media regarding immigrants in combination with the large number of migrants entering the country (around 750K in 2019[414]). An example of such disinformation can be found in a video of young Arab migrants that was showing them entering Spain and speaking in Arabic saying threats such as "We are going to cut the throats of all Spaniards". Later on, it was discovered that this was false information and that erroneous translations were used to promote hate towards them, when in reality they were just singing a song.[415]

These types of false stories are identified by the Maldita[416], a well-known organization that fights disinformation through fact-checking, which had identified 321[417] disinformation items between 2017 and 2020 related to migration and religion.

Another common belief is to blame migrants for assaults and believing they are a threat to the local population. These accusations, even though sometimes true, they are often part of disinformation. In 2016, there was a story that some people assaulted a woman in Manresa, which had a large engagement from social media users. Even though the general 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

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[411] 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
[412] 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
[413] http://www.cis.es/cis/export/sites/default/-Archivos/Indicadores/documentos_html/TresProblemas.html
[414] https://elpais.com/espana/2020-06-08/la-llegada-de-inmigrantes-mantiene-el-crecimiento-de-la-poblacion.htmlhttps://elpais.com/espana/2020-06-08/la-llegada-de-inmigrantes-mantiene-el-crecimiento-de-la-poblacion.html
[415] https://www.eldiario.es/desalambre/videos-personas-hablando-arabe-difunden-mensajes-falsos-atacarles_1_6743171.html
[416] https://maldita.es/
[417] https://migracion.maldita.es/bulos/1

it was discovered that they were Spanish, Cuban and one was from Argentina.[418] Sometimes similar stories circulating in Spain are not even from there.

During the 2019 electoral campaign, disinformation about migrants has been weaponized; a report focusing on messaging app WhatsApp shows that 14 % of the stories were anti-migrant and a further 25 % contained racist and hateful content.[419] 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[420].

Additionally, the immigration issue has been used by right-wing parties, such as VOX, to make untrue or mostly untrue statements with the ultimate motive 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[421] as found by the EUfactcheck.eu[422] organisation. An older example of how Vox used fake news to promote their ideas is an image that was published on their Facebook account through which they were suggesting the deportation of legal immigrants that had committed a crime. Even though this picture had some traction online. With these tactics, by increasing fears, promoting xenophobia and nationalism, Vox has managed to become one of the leaders with regard to social media followers[423]. In their study, Carr et al. present false statements that Vox representatives have 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.[424]

3.5.4. Climate change disinformation

Climate change is an issue that Spaniards are generally aware about. Based on 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.[425]

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[418] https://www.theatlantic.com/international/archive/2019/09/fake-news-feeds-anti-migrant-sentiment-spain/598429/

[419] https://avaazimages.avaaz.org/Avaaz_SpanishWhatsApp_FINAL.pdf

[420] https://www.euractiv.com/section/digital/news/as-election-looms-spaniards-are-hit-by-whatsapp-disinformation-campaign/

[421] https://eufactcheck.eu/factcheck/mostly-false-spanish-government-pull-effect-makes-spain-the-main-european-entrance-of-illegal-immigrants/

[422] https://eufactcheck.eu/

[423] https://elpais.com/politica/2018/12/12/actualidad/1544624671_005462.html

[424] https://d-nb.info/1198966378/34https://d-nb.info/1198966378/34

[425] 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/

Regardless of the awareness of Spaniards of the issue, similarly to other European countries, Spain also has an issue of disinformation on climate change in the form of denialism. This denialism was present in the Spanish press, based on research conducted by Dominguez et al. that reviewed articles published in the Spanish newspapers El Pais, El Mundo and ABC in the years 2007 and 2014. The same research points out that 7 years later (2014) this denialism was reduced.[426]

The right-wing party Vox has become well known for their stance as climate change deniers in the past.[427] Nevertheless, during recent years they have re-considered their stance and they do accept the scientific evidence of climate change. [428]
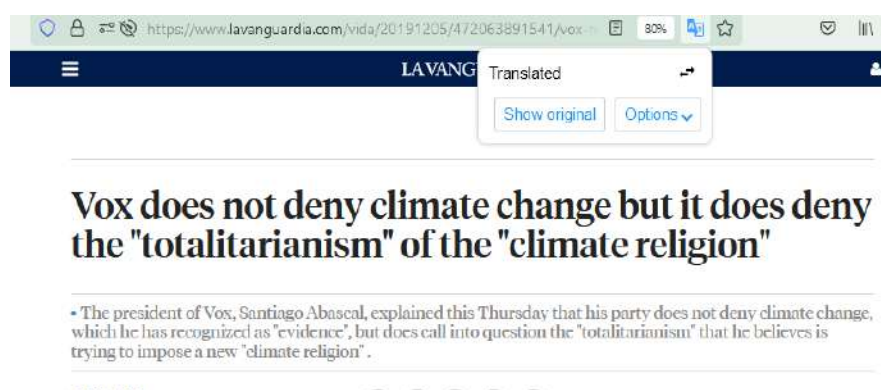
Figure: An article that reports how Vox is not denying climate change[429]

3.7. Summary

In this section, we presented some general findings and information 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 overgeneralizations should be avoided, there are some notable trends worth mentioning. Our study showed, that disinformation targeted against EU citizens is linked both to 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 which were included in this study. In these cases, we presented information regarding the political forces which would possibly benefit or get damaged/hurt the most, relying on relevant studies and literature.

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[426] https://journals.sagepub.com/doi/full/10.1177/0963662516641844
[427] https://newrepublic.com/article/155669/far-right-climate-denial-growing-europe
[428] https://www.opendemocracy.net/en/can-europe-make-it/spains-vox-party-and-the-threat-of-international-environmental-populism/
[429] https://www.lavanguardia.com/vida/20191205/472063891541/vox-no-niega-el-cambio-climatico-pero-si-el-totalitarismo-de-la-religion-climatica.html

In general, there was evidence that some disinformation campaigns and fake news spread online and particularly 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 about relevant topics, like vaccines, self-protection measures, disease repercussions, measures taken by the government, etc. This gives an opening to anyone, from individuals related to politics, to scientists as well as citizens, to spread along with factual information, false news in order to serve personal interests or, in more dark scenarios, 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 countries[430] and not necessarily related to politics.
- On a national level, disinformation more often originates by right wing parties and politicians and it mostly concerns the current government and their decisions.
- Disinformation was also generated on an international level 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 longstanding 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 presented as

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[430] https://Covidinfodemiceurope.com/#graphics

     criminals (e.g. Spain, Germany). Finally, disinformation regarding immigrants has been increased during the Covid-19 pandemic, presenting migrants and minorities as a **threat to public health**. The most relevant examples were found in Italy, the country that suffered the most during at least 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 aforementioned countries were the main recipients of the major migration flows, due to 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 specifically 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 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 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[431].

Nowadays, climate change is becoming more and more pertinent in the public debate, globally. In Europe, 93% of Europeans consider climate change a serious problem[432], which indicates that they have some awareness of the facts and the issues around it. The Paris Agreement confirms the need for action, common strategy, and measures regarding global warming and climate change. The information and news regarding climate change are a lot, some of which are based on scientific research and others can be considered as 'fake news'. During 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 (93% as mentioned above) believe in climate change and understand the devastating effects it may have on their life, if decisive action is not taken immediately. There were of course, specific topics that had taken 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:

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[431] see also
https://www.europarl.europa.eu/RegData/etudes/IDAN/2021/653641/EXPO_IDA(2021)653641_EN.pdf
[432] https://ec.europa.eu/clima/citizens/citizen-support-climate-action_en

- The population is generally aware of the climate change issue and they are concerned of the effects it will have on their lives therefore relevant 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 about 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 European level.

4. POLICY RECOMMENDATIONS

4.1. The disinformation ecosystem

Disinformation is a complex phenomenon that cannot be efficiently addressed with monolithic solutions. What is required is a set of complementary policies that will try to effectively 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 it cannot alone be blamed for it. The disinformation ecosystem constitutes a toxic swamp 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 this spider web of lies.

The 2018 report of the High Level Group (HLEG) on fake news and online disinformation[433] tries to decode the disinformation ecosystem of the European Union 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[434]. Foreign electoral interference and disinformation in national and European democratic processes has been a serious problem for many years as recognized in the relevant European Parliament resolution of October 2019[435,436]. 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

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[433] "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

[434] https://www.dw.com/en/eu-accuses-russia-china-of-Covid-vaccine-disinformation/a-57367812

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

[436] https://carnegieendowment.org/2020/08/18/european-lessons-for-tackling-election-interference-pub-82561

and Slovenian authorities to silence independent media[437,438]. 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"[439]. 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"[440]. This behaviour results in weakening the trust of many European citizens towards public authorities, politicians and democratic processes[441]. In a recent survey by the Reuters Institute[442], it was 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.

News media

Several news media contribute to disinformation either by willingly promoting fake news or propaganda in order to serve or please economic and political interests, or by failing to adopt rigorous policies and tools for efficient fact-checking, often being held hostage to ratings and the pressure for fast news production[443,444]. 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 Brexit[445] by publishing fake

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[437] https://www.europarl.europa.eu/news/en/agenda/briefing/2021-03-08/6/media-freedom-under-attack-in-poland-hungary-and-slovenia
[438] https://ipi.media/european-union-must-act- on-media-freedom-in-poland-hungary-and-slovenia/
[439] https://www.ecpmf.eu/22-slovene-editors-write-joint-public-letter/, October 2020
[440] https://www.coe.int/en/web/commissioner/-/it-is-high-time-for-hungary-to-restore-journalistic-and-media-freedoms
[441]
https://www.europarl.europa.eu/RegData/etudes/STUD/2021/653635/EXPO_STU(2021)653635_EN.pdf
[442] https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2021-06/Digital_News_Report_2021_FINAL.pdf
[443] http://polecom.org/index.php/polecom/article/viewFile/74/264
[444] Bennett WL, Livingston S. The disinformation order: Disruptive communication and the decline of democratic institutions. *European Journal of Communication*. 2018;33(2):122-139. doi:10.1177/0267323118760317
[445] https://www.theguardian.com/media/2016/jun/24/mail-sun-uk-brexit-newspapers

stories against the EU, focusing on hot-topics like migrants[446] and taxes[447]. Many newsrooms on the other hand struggle to keep up with fact-checking processes, overwhelmed by the gigantic volume of fake news, especially in light of the pandemic[448]. In addition to the aforementioned cases of fake news promotion that are either deliberate or a result of not-so-rigorous fact-checking processes, there's 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[449], data also shows that the wider public hears about fake news stories through mainstream media. As explained in a recent study[450], 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[451]. Citizens may individually or collectively share false content (mainly through their social media accounts and online presence)[452], especially in societies that are divided or

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[446] https://www.theguardian.com/media/2016/jun/17/daily-mail-publishes-correction-story-migrants-from-europe

[447] https://wayback.archive-it.org/11980/20191016212732/https://blogs.ec.europa.eu/ECintheUK/expresss-eu-2600-tax-bombshell-story-completely-wrong/

[448] https://www.politico.eu/article/coronavirus-fake-news-fact-checkers-google-facebook-germany-spain-bosnia-brazil-united-states/

[449] https://reutersinstitute.politics.ox.ac.uk/our-research/measuring-reach-fake-news-and-online-disinformation-europe

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

[451] "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

[452] Vosoughi S, Roy D, Aral S. The spread of true and false news online. Science. 2018 Mar 9;359(6380):1146-1151. doi: 10.1126/science.aap9559

polarized over important political and social issues[453] 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, disinformation awareness campaigns for the general public, etc.

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 in 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[454]. In 2020, online news became the main source to access the news in many European countries, with TV following[455], 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[456]. 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" [457]. Platforms may contribute decisively in empowering and shaping well-informed citizens by allowing them to form their views though 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 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

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[453] https://www.brookings.edu/techstream/how-partisan-polarization-drives-the-spread-of-fake-news/
[454] https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf
[455] https://www.statista.com/statistics/422687/news-sources-in-european-countries/
[456] https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf
[457] "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

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 like the freedom of speech, media pluralism and media freedom is what is required to strengthen our defence against disinformation and increase the resilience of the citizenry. 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.

4.2. Proposed policy recommendation frameworks for combating disinformation in Europe and beyond

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 produced by international organisations like the OECD, the UN and UNESCO.

4.2.1 Report of the independent High-level Group on "Fake news and online disinformation" (March 2018)

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[458]. 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 2018[459] that identifies the roles and responsibilities of various stakeholders[460] and formulates recommendations for tackling disinformation.

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[458] https://digital-strategy.ec.europa.eu/en/news/commission-appoints-members-high-level-expert-group-fake-news-and-online-disinformation

[459] "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

[460] See section 4.1 above.

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[461].

1. Transparency

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

a) **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.

b) **online news sources and journalistic processes**: Appropriate indicators for source transparency should be developed to indicate 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 algorithm functioning.

c) **fact-checking and verification practices**: Increased cooperation is necessary among fact-checkers, verification organizations, and professional newsrooms in the EU to improve their operation and efficiency, keep-up-to-date with recent advances in disinformation technologies, and create an open market for fact checking. European Centres for interdisciplinary and independent research on disinformation should be created and funded within national research organizations to continually monitor new technologies, tools and impact of disinformation and develop tools and mechanisms for combating it. Platforms should provide privacy-compliant access to their data to identify disinformation actors, assess fact-checking strategies and allow in-depth study of the phenomenon by academia.

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 and is considered crucial for resisting disinformation. The report proposes improving media literacy along two axes:

a) **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

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[461] Ref to report

OECD's PISA. Similar training programmes should be mandated for teachers and funded by programs like Erasmus.

b) **media and information literacy programmes for citizens of all ages**: Europe-wide initiatives for developing 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 user's control over the platform content they are being fed but also supporting journalists in mastering new technologies that will allow them to verify online content are considered essential in increasing the society's resilience to disinformation. The report proposes the following actions to empower users and journalists:

a) **Empowerment of users**: Platforms should consider developing appropriate interfaces (browser and smartphone plugins or apps) that will increase the control of users over the selection of the content presented in their news feeds or search results, while recommendation systems that present different sources and points of view on trending topics should also be made available.

b) **Empowerment of journalists**: Newsrooms should invest in professional tools for automatic audiovisual/text content verification, source checking tools as well as in the creation of interdisciplinary fact-checking teams specialised in disinformation identification. Training of journalists in new technologies & tools for identifying disinformation should also be examined as well as R&I funding for media innovation projects.

4. Diversity and sustainability of the 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:

a) **Europe**: European public authorities should provide an enabling environment for media pluralism by protecting freedom of expression and free 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 online media services and augmented newsrooms.

b) **Member states**: National authorities and regulatory bodies should refrain from interfering with media independence in their effort to compact disinformation. 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 of this Code by a Coalition of relevant actors, as well as for its implementation, monitoring and assessment. It also provided ten 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, mentioned in point (1) above.

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 presented in Annex I and discussed in section 2.4. 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 ten principles of the HLEG report and sets a set of commitments that signatories agree to comply with in voluntary basis, ranging from "transparency in political advertising to the closure of fake accounts and demonetization of purveyors of disinformation"[462].

The European Court of Auditors published in May 2021 a report[463] analysing the EU action plan against disinformation, which concluded that "the code of practice fell short of its goal 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 communication[464] 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.

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[462] https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation
[463] https://op.europa.eu/en/publication-detail/-/publication/e166653a-c72a-11eb-a925-01aa75ed71a1/language-en/format-PDF/source-218929381
[464] https://digital-strategy.ec.europa.eu/en/library/guidance-strengthening-code-practice-disinformation

4.2.2 Report of the European Policy Centre on "Disinformation and democracy: The home front in the information war" (Jan. 2019)

A discussion paper focusing on the impact of disinformation to European democratic processes was published in 2019 from the European Policy Centre[465]. The report 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 while regular independent evaluations of how they are doing should be issued.
- The Code of Practice should take precedence over security sector actions like the EU vs Disinfo service[466] to make sure disinformation fight remains in the civil space. In this vein, the role of the EU vs Disinfo service should 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 that 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.

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[465] https://www.epc.eu/en/publications/Disinformation-and-democracy-The-home-front-in-the-information-war~21c294
[466] EU vs Disinfo service: https://euvsdisinfo.eu/

- Member states should increase their efforts to involve their citizens in European politics, e.g. via consultations, in order to fight against 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 combat to platforms will increase their power over users while disproportionately affecting smaller platforms with limited resources. However, there are specific actions that can be undertaken by platforms to contribute to the solution of this problem:

- Social media platforms should voluntarily share more of their data as well as 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'[467].
- 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 experiment with new 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 widely-adopted practices such as click-bait.

3. Media consumers and civil society.

Several surveys, such as the ones discussed in section 2.3, show that European citizens overwhelmingly believe that disinformation is a major problem for democracy while they also willingly recognize their own responsibility in the effort to address this phenomenon[468]. The reality is that 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 prioritize vulnerable groups and especially

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[467] "Let's make private data into a public good", MIT Technology Review: https://www.technologyreview.com/2018/06/27/141776/lets-make-private-data-into-a-public-good/
[468] https://europa.eu/eurobarometer/surveys/detail/2183 - Summary

people that are not 'digital natives'. Media literacy should not be restricted to schools but effort should be focused on designing interventions for older people as well.

- Users should realize that they have power. If they are not satisfied with how a platform addresses the problem of disinformation, they should express their dissatisfaction by using another medium. If there is demand for it, platforms will change or new alternatives will prevail.

4.2.3 Report of the Council of Europe on "Information Disorder: Toward an interdisciplinary framework for research and policy making" (Sept. 2017)

A report on disinformation was published by the Council of Europe in 2017[469]. The report proposed a new conceptual framework for examining "information disorder", including three types (dis-information, mis-information and mal-information), three phases (creation, production, distribution) and three elements (agent, message, interpreter). It also discussed the phenomenon of filter bubbles and eco chambers and how they amplify information disorder.

A key argument of the report is that "we need to understand the ritualistic function of communication". Communication is not just the transmission of information but also 'drama'[470] that plays into people's emotions and is used to "represent shared beliefs". This means that simply putting more factual information out there will not solve the problem; 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 briefly summarized below.

1. Technology companies (platforms).

Technology companies should increase their transparency and invest in fact-checking, content moderation, and presentation of diverse content to users. 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 info about efforts to amplify content.
- 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 content.

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[469] https://rm.coe.int/information-disorder-toward-an-interdisciplinary-framework-for-researc/168076277c
[470] Carey, J. (1989), Communication as Culture: Essays on Media and Society, London: Routledge.

- 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 tools for customization of user feed and search algorithm, diversification of the content presented to users, and private consumption of information. Also, change the existing terminology to a more neutral one (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 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 also 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 click-baits.
- 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 advertisement networks to make disinformation unprofitable.
- Demand transparency about Facebook ads to increase accountability.
- Support public service media and local news ecosystems.
- Roll out cyber-security training for government employees.
- 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. More specifically, they could:

- Create an international standardized news literacy curriculum for all ages that will cover a variety of issues with regard to disinformation, including necessary skills to combat it and education about 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 to enable collaboration between the different stakeholders in the fight against information.

6. Funding bodies.

Funding bodies like the EC through its Horizon2020 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 big multi-partner international 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.

4.2.4 European Commission Communication on the "European democracy action plan" (Dec. 2020)

The Democracy Action Plan[471] 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.

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

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 production/distribution channels (platforms, advertisers, political consultancies). It will enable monitoring and enforcement of rules and consider restrictions in 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 with international organizations to exchange best practices on tackling foreign interference and disinformation in elections.

2. Strengthening media freedom and pluralism.

Free and pluralistic media are essential to democracy. By providing citizens with reliable information, they can play a significant role in fighting disinformation and manipulation of democratic debate. The report proposes several actions to support the free press (e.g. addressing journalists' safety); in the following, we present only those that are most 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[472] and are typically launched against those with a watchdog role such as journalists, activists, or civil society organisations[473]. SLAPPs can seriously damage the reputation of individuals and limit freedom of the press and freedom 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 that aim to train professionals and share 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 publicly available database containing relevant information on media outlets. It should also enforce transparent rules and fair criteria for allocating state aid and state advertising to media (e.g. by making this info public) to avoid indirect political pressure on newsrooms.

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[472] https://en.wikipedia.org/wiki/Strategic_lawsuit_against_public_participation
[473] https://www.ecpmf.eu/ending-gag-lawsuits-in-europe-protecting-democracy-and-fundamental-rights/

3. Countering disinformation.

Disinformation can impose a direct threat to democracy by manipulating public opinion, discouraging participation in elections, and casting doubt on democratic institutions and government. The report proposes actions that will 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 (e.g. sanctions) on perpetrators, as well as strengthening the EEAS strategic communication activities and taskforces. Finally, it should support work to build 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 basic set of rules that would help reduce disinformation. However, as previously discussed, its voluntary nature made it in practice unenforced. The Guidance on Strengthening the Code of Practice on Disinformation that was published in May 2021 [474] proposes a more robust approach with clear commitments for all involved stakeholders and strong oversight mechanisms as part of a strengthened Code of Practice.
- **Empower citizens to make informed decisions**. The EC should increase its efforts on strengthening media literacy by supporting relevant campaigns both at national level and under various EU programmes. It should support the development of common educational guidelines to tackle disinformation through education, also with the direct involvement of journalists. Finally, the EC should support and fund civil society initiatives that promote media literacy to help citizens of all ages to identify disinformation.

4.2.5 ITU/UNESCO Broadband Commission for Sustainable Development report on "Freedom of expression and addressing disinformation on the Internet" (Sept. 2020)

This report[475] by the Broadband Commission for Sustainable Development (BCSD), co-founded by UNESCO and the International Telecommunication Union, 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

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[474] https://digital-strategy.ec.europa.eu/en/library/guidance-strengthening-code-practice-disinformation
[475] ITU/UNSECO 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/

disinformation as shown in Figure 9 while also proposing an assessment framework for disinformation responses with 23 reference points (questions), including impact on freedom of expression. For each of the eleven types of responses, the authors provide an in-depth analysis of relevant responses around the world developed by governments, the 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 in the fight against disinformation and underlines the need for "increased transparency and proactive disclosure".

Identification responses
• Monitoring and fact-cheking responses
• Investigative responses

Responses aimed at producers and distributors
• Legislative, pre-legislative, and policy responses
• National and international counter-disinformation campaigns
• Electoral responses

Responses aimed at the production and distribution mechanisms
• Curatorial responses
• Technical and algorithmic responses
• De-monetisation responses

Responses aimed at the target audiences of disinformation campaigns
• Ethical and normative responses
• Educational responses
• Empowerment and credibility labelling efforts

Figure 9: Novel typology for the classification of responses against disinformation: four top-level response categories and their eleven sub-categories. Source: ITU[476]

In the following, we briefly 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.

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[476] Source: https://www.broadbandcommission.org/Documents/working-groups/FoE_Disinfo_Report.pdf (Figure 2)

- 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 increase knowledge and develop better solutions on how disinformation networks work.
- Support independent media, including public service and local media, especially in light of the pandemic that threatens their sustainability.
- Avoid criminalising disinformation to ensure legitimate journalism and other public interest information is not affected by such laws.
- The judicial branch should make sure that laws against disinformation do not violate international standards on freedom of expression and privacy.

2. Political parties and political actors.

- Do not engage in disinformation tactics in political campaigns.
- Be vocal about the danger of politicians as amplifiers of disinformation and work to 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 and misleading content, and share data about developed responses and their efficiency.
- Develop curatorial responses (content moderation, curation of sources and resources, fact-checking, etc.) 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 since they can too be life-threatening.
- Ban online violence targeting journalists.
- Apply fact-checking to all political content (advertising, opinions, speech) published by politicians, political parties, etc.
- Produce public transparency reports on disinformation in platforms (origin, scale, etc.) and actions to address it (removal of content, demonetization, suspension of accounts, etc.).

4. Media sector.

- Increase investment in fact-checking, debunking, disinformation investigations, 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.

5. Civil society.

- Partner with other stakeholders on investigative and monitoring projects about disinformation and responses to it.
- 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.

4.2.6 OECD working paper on "Governance responses to disinformation: How open government principles can inform policy options" (2020)

This OECD report[477] 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". As shown in Figure 10 below, 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.
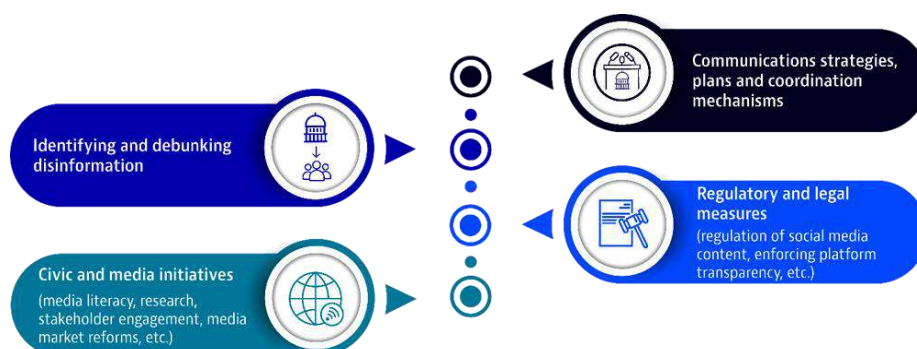
Figure 10: Range of governance responses to disinformation. Source: OECD[478]

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. Governments should concentrate their efforts in:

- **Development of strategies, plans, guidelines and codes of conduct** to help public officials in planning and executing consistent and effective

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[477] 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 https://www.oecd.org/gov/governance-responses-to-disinformation-d6237c85-en.htm

[478] Source: 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

communication activities[479]. This also 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 and of the citizenry. Governments can leverage platforms to improve two-way interaction with citizens, allowing them to inform public policies and thus ensuring greater transparency[480].

2. Efforts to directly counteract disinformation.

Governments can formulate policies and undertake actions to directly 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** ecosystem to understand the phenomenon, the role of stakeholders, the impact on society and democracy, and challenges encountered by attempted responses. Governments should create expert groups and commission reports that will help legislators and regulators develop effective policies[481,482].
- **Collaboration and co-ordination** at national and international level to exchange knowledge and skills, develop best practices and launch effective coordinated responses to disinformation. A successful example of such a policy initiative is the EU's Rapid Alert System, a digital platform where EU Member States and EU institutions can share insights on disinformation and coordinate responses[483], which was used to address coronavirus disinformation.
- **Increased capacity to counteract disinformation**. Governments can develop toolkits and training material to help identify and respond to disinformation. An example is UK's RESIST Counter Disinformation Toolkit[484].

3. Regulatory responses.

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[479] GCS Emergency planning
Framework: https://gcs.civilservice.gov.uk/publications/emergency-planning-framework/
[480] GDS Social Media Playbook: https://www.gov.uk/guidance/social-media-playbook
[481] "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
[482] J.-B. Jeangène Vilmer, A. Escorcia, M. Guillaume, J. Herrera, "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
[483] Rapid Alert System (RAS) factsheet:
https://eeas.europa.eu/sites/default/files/ras_factsheet_march_2019_0.pdf
[484] RESIST Counter Disinformation Toolkit: https://gcs.civilservice.gov.uk/publications/resist-counter-disinformation-toolkit/

Governments can also adopt a wide range of responses aiming to better 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 & platforms) and set rules 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, as already mentioned, the success of such approaches lies on the willingness of signatories, which may in practice not be enough. Another approach is the "co-creation of regulation" based on direct collaboration between governments and platforms[485],[486].
- **Regulation of social media platforms** includes several approaches: promotion of competition and removal of barriers (e.g. by requiring user data portability[487]); increasing transparency by requiring platforms to share more data on the functioning of their algorithms or the funding of advertisement; addressing the problem of bots and anonymity; restricting micro-targeting and psychological profiling; empowering users.
- **Direct regulation of platform content**, aiming at disinformation or hate speech. Governments should refrain from such regulatory attempts, which may lead to overbroad censorship and restrict freedom of speech[488].

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. aiming to disseminate evidence-based and factual information for the pandemic and other major societal issues), etc.
- **Supporting and expanding media pluralism**. As already discussed above, the share of traditional media in the market continues to decline while social

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[485] 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

[486] 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/

[487] Art. 20 GDPR (EU) 2016/679: Right to data portability. https://gdpr-info.eu/art-20-gdpr/

[488] Hyman Rights Watch, "Germany: Flawed Social Media Law" (2018): https://www.hrw.org/news/2018/02/14/germany-flawed-social-media-law

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[489].

- **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.

4.2.7 United Nations Human Rights Council report on "Disinformation and freedom of opinion and expression" (April 2021)

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[490]. The reports finds that responses by both states and companies are inadequate and calls for states to 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 and provides a series of recommendations summarized below.

Recommendations for states.

- States should refrain from engaging in disinformation in any way or restricting freedom of expression.
- Criminal law should only be used in exceptional circumstances (incitement to violence, hatred or discrimination).
- States should not require companies to remove content that is lawful or make determinations about its legality 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.

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[489] https://www.cjr.org/watchdog/europe-fights-fake-news-facebook-twitter-google.php
[490] 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

- 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 and data collection and processing adhere to international human rights standards and national law.
- Conduct regularly 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 targeted 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 about 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 (shares, views, complaints, etc.).
- Establish internal appeals mechanisms to allow user recourse and explore creation of external oversight mechanisms.
- Introduce policies and mechanisms to confront gender disinformation and apply a gender perspective in the platform experience.
- Invest in understanding local contexts of disinformation, e.g. with regard to developing countries, minorities etc., by collaborating with local civil society and targeted groups.
- Make platform data available to help research and policy making.

4.2.8 A quick overview of responses against disinformation adopted by European governments

European governments have taken a variety of approaches to fight disinformation. These are nicely summarized in the latest Poynter guide to anti-misinformation actions[491] 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[492]. It has also engaged in some media literacy efforts. In Netherlands, the government launched a campaign to inform people about online disinformation[493]. In Belgium, the government established a group of experts to propose solutions and also launched a

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[491] https://www.poynter.org/ifcn/anti-misinformation-actions
[492] https://www.poynter.org/ifcn/anti-misinformation-actions/#denmark
[493] https://www.poynter.org/ifcn/anti-misinformation-actions/#netherlands

website to inform the public of the disinformation problem[494]. In Sweden, the government launched a new "psychological defense" to counteract disinformation and foreign influence campaigns with factual public information[495].

In France, a new law has passed that allows authorities to remove manipulated content spread via social media and block the sites that publish it via a judicial procedure while it requires platforms to publish specific information about sponsored content and campaign ads[496]. 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 with fines up to 50 million euros[497], 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[498].

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[499], 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.

4.3. Analysis and synthesis of policy recommendations for combating disinformation

Several attempts to decode the disinformation ecosystem and provide relevant policy recommendations have been presented in the previous subsection. What is obvious from all these proposals is that the phenomenon of disinformation cannot be addressed with fragmented, one-dimensional or simply 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 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 & 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

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[494] https://www.poynter.org/ifcn/anti-misinformation-actions/#belgium

[495] https://www.poynter.org/ifcn/anti-misinformation-actions/#sweden

[496] https://www.poynter.org/ifcn/anti-misinformation-actions/#france

[497] https://www.poynter.org/ifcn/anti-misinformation-actions/#germany

[498] https://www.poynter.org/ifcn/anti-misinformation-actions/#italy

[499] https://www.hrw.org/world-report/2021/country-chapters/hungary

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 policy recommendations of subsection 4.2, we propose a disinformation policy classification framework that consists of six main dimensions and several sub-dimensions, called policy categories, inspired by the pillars of the HLEG report (section 4.2.1), the pillars of the Democracy Action plan (section 4.2.4) and the typology proposed in the BCSD report (section 4.2.5). The framework is illustrated in Figure 11 below. As you can see, under the dimension "*Empowering stakeholders*" there are three policy categories: *empowerment of platform users, citizens, and journalists.*
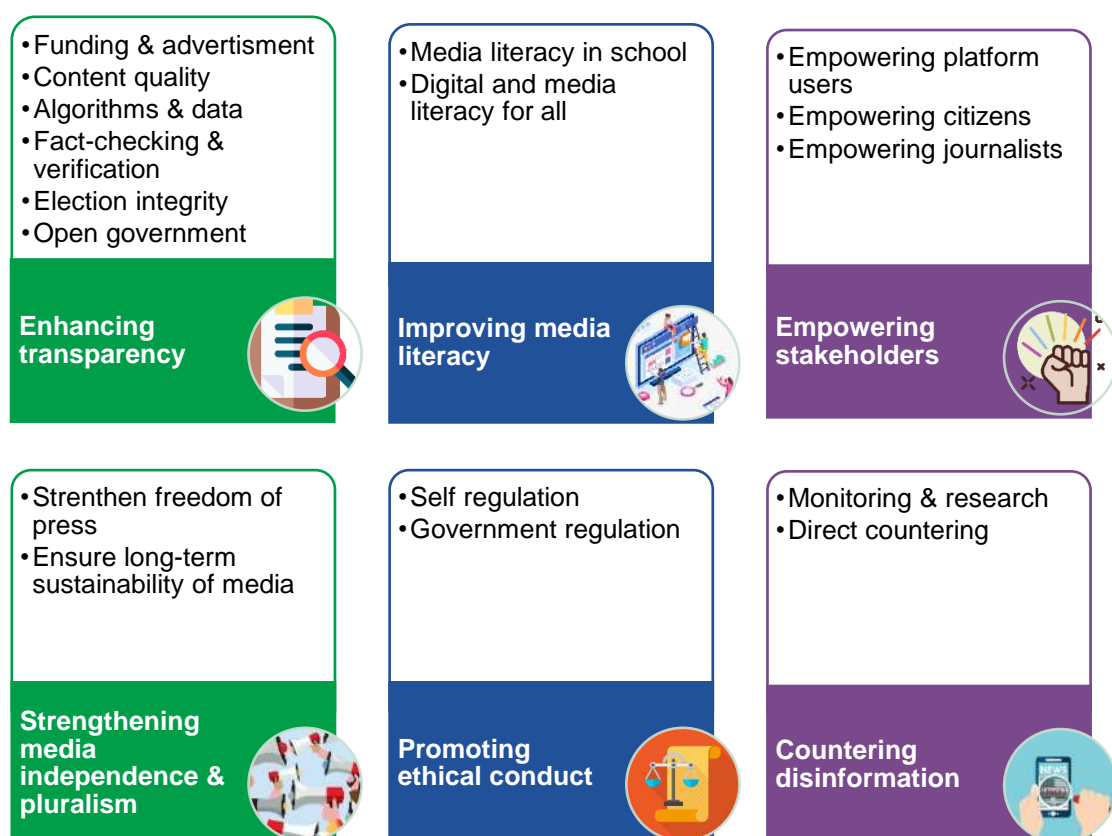
Figure 11: Disinformation policy classification framework. The framework comprises of 6 dimensions while under each dimension there are several policy categories.

Under each framework sub-dimension/policy category, several policy interventions and responses have been proposed as shown in Section 2.4. In Figure 12, we attempt to broadly group these policies/responses and assign them to each framework sub-dimension.

Moreover, based on the extended framework of Figure 12, in Table 1 we attempt to summarise the policy recommendations of subsection 4.2, indicating what kind of recommendations are suggested by each work. This allows to obtain a clearer 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 some basic assumptions on which

researchers and organisations agree when it comes to the necessity, efficiency and applicability of these policies. In the same table, we further clarify 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.

Figure 12: Disinformation response classification framework including main policy recommendations/responses per policy category
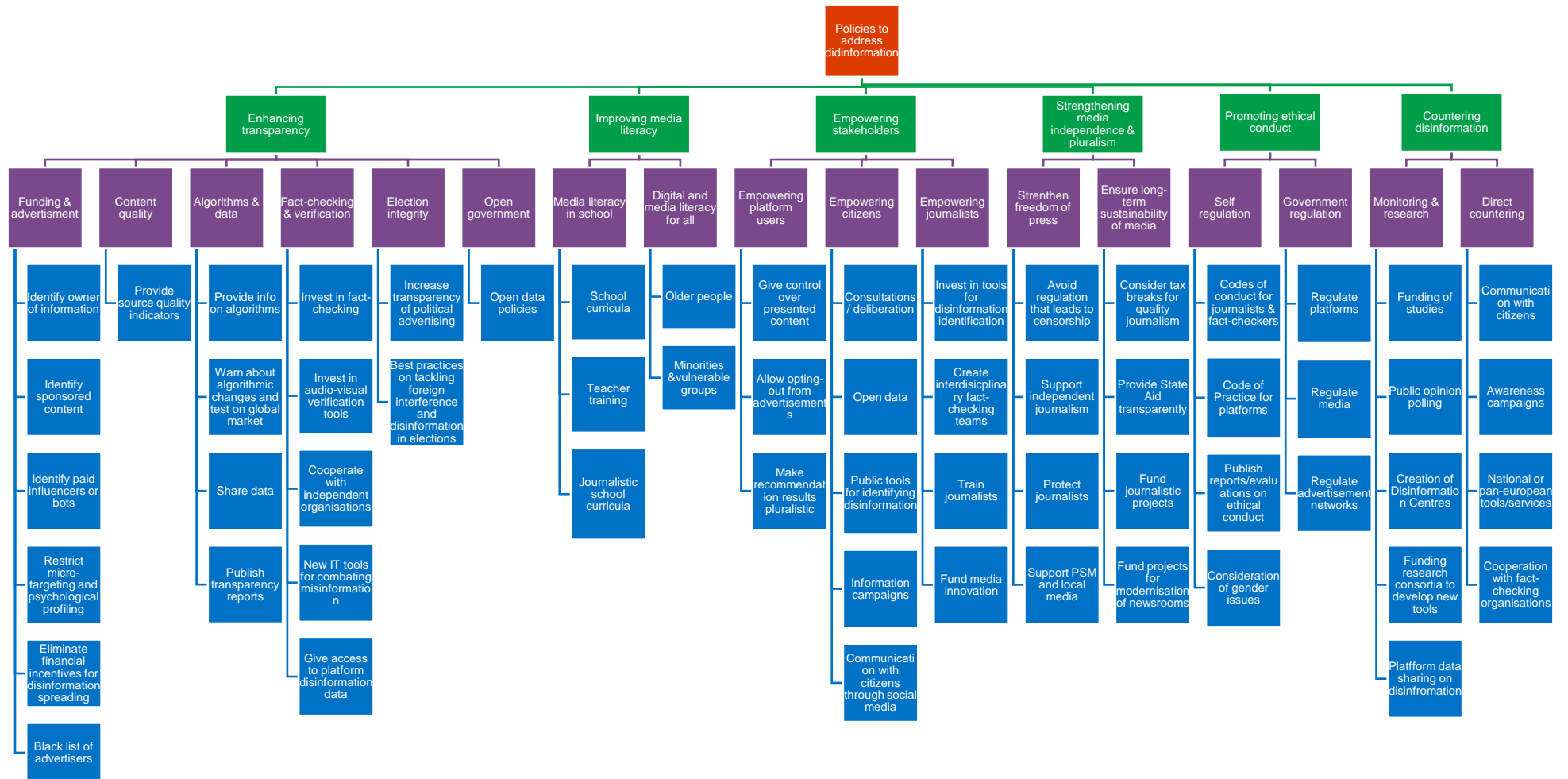
Table 1: Summary of the policy recommendations proposed by different institutions and organisations (see section 4.2).

Policy dimension	Policy category/ Policy recommendation or response	Recommended by							Primary actor (who will initiate the response)	Target (who will benefit / be affected by the response)	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

								Actor	Beneficiary	Scope
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
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		x			Media, platforms	Journalists, platform moderators	Platform, outlet
Invest in audio-visual verification tools	x		x		x			Media, platforms	Journalists, platform moderators	Platform, outlet
Cooperate with independent organisations	x		x	x	x			Media, platforms	Journalists, platform moderators	Platform, outlet (national, European, international)
Develop new IT tools for combating disinformation	x				x			Platforms, researchers, civil society	Journalists, Governments,	Platform, international

									Platform moderators	
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 political advertising				x	x			Government, 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, Civil 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, Civil 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, Civil society	Citizens	National, European
	Older people	x	x			x	x	x	Ministries of Education, Civil society	Citizens	National, European
	Minorities & vulnerable groups		x					x	Ministries of Education, Civil 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)
	Allow opting-out from advertisements							x	Platforms	Users	Platform (international)
	Make recommendation results pluralistic	x		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
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

	Measure								Actor	Target	Level
	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, fact-checkers	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)

	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, outlet
Communication with citizens						x		Government, civil society	Citizens	National, European

Awareness campaigns					x	x		Government, civil society	Citizens	National, European
National or pan-European tools/services		x		x		x		Government, civil society	Governments (and citizens)	National, European
Cooperation with fact-checking organisations	x			x	x			Government, civil society, media, platforms	Users, citizens, journalists, governments	National, European, platform, outlet

In the following, we briefly analyse the policy recommendations/responses of each category and discuss the challenges involved in their implementation.

4.3.1 Enhancing transparency

Enhancing the transparency of the whole digital media ecosystem is considered fundamental for combating disinformation. Transparency should be requested from platforms, media, advertisers, governments and political actors and it should apply to online advertisement, to political messaging and funding, to algorithms and data, and to content and content sources. It 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 trustworthiness of sources; and empowers the society by providing the means and data to understand how disinformation spreads.

4.3.1.1 Funding and advertising

A lot of research papers and media articles have been written focusing on how fake news websites and other sources make money from spreading disinformation. In 2019, the nonprofit Global Disinformation Index published a study based on 20,000 sites collected from sources such as PolitiFact and Le Monde[500]. The study showed that $ 235M of advertising ended up on domains that were flagged for disinformation, contributing decisively to their sustainability and making disinformation a very profitable business.

To address this issue, policies that eliminate financial incentives for disinformation spreading must be enforced by social media giants. This can be done by demonetizing sites that have been found to promote disinformation by independent fact-checking organizations like IFCN, creating black-lists of such sites but also by being transparent about advertisement in general, especially advertisement in the political context (e.g. creating a database of advertisement funding: who gets the money and from whom, who is being targeted and how, or even creating a market for financially penalizing false claims in political advertisements[501]). 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 also clearly identify the source or owner of content. Another important response proposed by several studies is the

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[500] https://disinformationindex.org/wp-content/uploads/2019/09/GDI_Ad-tech_Report_Screen_AW16.pdf
[501] Marshall W. Van Alstyne, "Proposal: a market for truth to address false ads on social media", Communications of the ACM, Volume 63, Issue 7,July 2020, pp 23–25, https://doi.org/10.1145/3401724

restriction or banning of micro-targeting and psychological profiling of users, which is mainly adopted for political advertisement[502]. For example, in the case of the Cambridge Analytica[503], Facebook profile information was used to predict an individual's personality. This data was then matched against voter registration records to create psycho-political profiles and voter lists, which were sold to political parties that used them to micro-target the users 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.

4.3.1.2 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 NewsGuard's browser extension[504]. What is important about these labels is that they provide accurate information without overwhelming the user. This is why simple visual quality indicators are favoured.

What is recommended is that platforms, media and civil society 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 thus help them to responsibly consume it.

4.3.1.3 Transparency of algorithms and data

One of the policy recommendations 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 operational data. This is necessary for several reasons:

- The wealth of data collected by platforms is valuable to researchers and civil society in order to better understand the mechanisms for disinformation production and distribution as well as its impact on citizens, elections & democracy, trust to government and institutions, public health, national security etc.
- By sharing information about how their algorithms work and which are the parameters that feed recommendation systems, search queries, newsfeeds as

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[502] https://www.palgrave.com/gp/blogs/social-sciences/madsen
[503] https://www.theguardian.com/news/series/cambridge-analytica-files
[504] https://www.newsguardtech.com/how-it-works/

- well as about 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 ultimately is an issue of human rights, 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 info on algorithms was up to this point voluntary. Platforms shared any kind of information they wanted and as much information as they wanted, which given the private nature of their business model was not much. However, it seems that this approach is not working. Most of the studies suggest that social media companies should be obliged to provide specific information and if they do not do it voluntarily then this should be mandated by regulation. To this end, it should be required by social media companies to regularly provide detailed and comprehensive reports on transparency, including detailed information about disinformation spreading in their platforms, actions taken to address it and how their effectiveness was assessed.

4.3.1.4 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[505]. Half of fact-checkers are affiliated with media organizations (national news publishers and broadcasters, local news sources, digital-only outlets) while others are affiliated with non-profit groups and NGOs or academic institutions.

The 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 other similar organisations as well as with independent fact-checking projects. Moreover, they emphasize cooperation of civil society with all relevant stakeholders (journalists, platforms, and fact-checkers) for coordinated efforts with better results. Special attention is required to visual-based disinformation (e.g. memes) and new forms of audiovisual content manipulation (deepfake video or audio) that has shown to be way more persuasive and engaging than text. Investments should be made on new tools to combat and debunk this type of disinformation.

Finally, what is also important is to share data that are relevant to disinformation, including fact-checking and verification attempts, consequent actions to remove or demote or label content, and the efficiency of these approaches.

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[505] https://reporterslab.org/fact-checking-census-shows-slower-growth/

4.3.1.5 Election integrity

Election integrity is the cornerstone of democracy. At the same time, it is an important tool 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.

Two of the studies presented in section 2.4 deal with this issue. First by proposing regulatory responses that aim to increase transparency of political funding and advertising by requesting from politicians, political parties and platforms to publicly disclose relevant information; and second, by encouraging 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.

4.3.1.6 Open government

Governments should not only require transparency by other stakeholders but should also be transparent themselves. The OECD working paper (see section 4.2.6) proposes a set of responses to disinformation that rely on the open government principles.

Open data and information sharing is the cornerstone of this approach, along with communication with and engagement of citizens (the latter are examined as part of the citizen empowerment category of responses). Indeed, since disinformation is mainly 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 that study various socio-economic phenomena to provide information and opinions that are driven by evidence and will equip citizens to be able to deal more effectively with disinformation.

4.3.2 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, consuming news responsibly and navigating the online world knowledgably.

To this end, all proposed policy frameworks highlight the need for large-scale media literacy initiatives, addressing different groups of citizens and promoting the development of skills that will allow navigating the digital media 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 - from print to video to the Internet" and builds "an understanding of the role of media in society as well as essential skills of inquiry and self-expression"

[506]. It has been shown that such literacy campaigns can significantly improve the ability to discern between mainstream and false news[507]. Two main lines of action are proposed as discussed below.

4.3.2.1 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 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 as well as the use of existing well-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 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[508]. To this end, UNESCO is partnering with youth organisations to guide them to integrate media literacy in their organization policies and programs[509].

4.3.2.2 Digital and media literacy for all

The second line of action proposes the development and promotion of media literacy initiatives for all citizens. Media literacy should not only be addressed to school children but should target all citizens, with emphasis given on older people, vulnerable groups and minorities, and in general on people that are not digital natives, who 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.

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[506] https://www.medialit.org/media-literacy-definition-and-more
[507] https://www.pnas.org/content/117/27/15536
[508] https://www.dw.com/en/empowering-young-people-and-adults-to-tell-fake-news-from-facts/a-55128051
[509] https://en.unesco.org/news/network-youth-organisations-south-east-europe-adopts-mil-policies

Such literacy 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 also be required. For their development, existing best practices and models like the Safer Internet Centres[510] could be adopted and adjusted to the needs and characteristics of the targeted citizen groups. To highlight the importance of media literacy, some suggest the provision of regular reports by Member States, detailing the actions undertaken towards this direction.

4.3.3 Empowering stakeholders online

In the same vein as media literacy policies, empowerment of 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, opportunities for enhanced communication with the government and access to helpful and reliable data, and journalists the necessary resources and knowledge to effectively do their job and provide high-quality news in an online environment polluted by disinformation. Three main lines of action are proposed as discussed below.

4.3.3.1 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 to provide them with content or advertisements or what kind of data are collected to enhance user experience but it is as important that the users have some 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 the 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 required by platforms 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 eco-chambers and information bubbles. Another response often recommended is the development of mechanisms that allow users to exercise their right to reply and correct false stories or object to and get more information to content moderation decisions.

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[510] https://digital-strategy.ec.europa.eu/en/policies/safer-internet-centres

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 (see section 4.2.7) cleverly 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."

4.3.3.2 Empowering citizens

While empowering users to confidently 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 world and be able to identify and resist disinformation is the duty of governments. This aspect is particularly highlighted in the OECD report that perceives responses against disinformation through the lenses of open government principles. However, 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 upon existing EU or national experience on the issue. The aim is to inform citizens about critical issues, provide them with the data to make their own decisions and assess the truthfulness of other opinions or sources, and ultimately develop the critical thinking and debate skills that will allow them to effectively deal with the disinformation pandemic 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 and will provide a sense of agency over the decisions made, an aspect that becomes increasingly important in the online disinformation landscape where scepticism over institutions and distrust towards elites that make decisions fuels decisively conspiracy theories and makes citizens susceptive to fringe points of view as long as they seem to be against the 'system'.

- **Access to open data**: As already discussed in section 4.3.1.6, public sharing of governmental data can be decisive in the fight against disinformation, giving citizens but also civil society actors and journalists the necessary knowledge and evidence to identify disinformation attempts. In addition, open data initiatives (by both government but also research institutions) can empower citizens to be 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 for a variety of issues that concern citizens, also responding to specific disinformation campaigns that may affect the citizenry 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**: In addition to deliberations, information campaigns and open access to data, it is important for governments to open a two-way communication channel with their citizens that will facilitate real-time interaction. Social media is the most suitable medium for reaching a wide audience, given the increasing trend of citizens turning to their social media to be informed about what is going on the world 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 but also communication with the citizenry in general, governments are encouraged to develop a toolbox of digital communication strategies, including clear guidelines to help public officials to effectively reach a wide or targeted audience.

- **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.

4.3.3.3 Empowering journalists

Empowerment of journalists with confidence, tools and skills to combat disinformation is crucial. Given the overwhelming amount of disinformation circulating online but also disinformation 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 tools 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[511]. These projects could receive funding by social media but also by governmental research funding programmes.

4.3.4 Strengthening media independence & pluralism

Freedom of the press and pluralism of media is a cornerstone of democracy that governments are obliged to guarantee. Their importance is as highlighted as ever in the age of disinformation and filter bubbles.

It is not incidental that every policy recommendation framework makes it explicitly 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 line of response in the combat against disinformation. In the following, we examine what kind of recommendations have been proposed along those two directions.

4.3.4.1 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 point of view, all the frameworks of section 4.2 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 important to support both independent journalism as well as 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 media at the national level.

This support can have two forms: either 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 direct or indirect 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

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[511] https://www.ai4media.eu/

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 under new laws a variety of sanctions including prison terms for allegedly spreading false information about Covid[512] 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"[513]. 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[514]. Such government 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 by the appropriate institutions.

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 definitely encouraged by impunity of such behaviours. As the aforementioned 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 behavior against journalists. In the same vein, action should be taken to protect journalists from strategic lawsuits against public participation, the so-called SLAPPs (see section 4.2.4).

Another issue to consider with regard to media pluralism, is ownership concentration both in the supply of information and in its distribution as well as ownership transparency (i.e., disclosure of ownership to public bodies and to the public). According to the Media Pluralism Monitor 2020 report[515], concentration of media to a few super 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 not really examined by the reports studied in section 4.2, however it is important for

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[512] https://www.coe.int/en/web/media-freedom/-/press-freedom-must-not-be-undermined-by-measures-to-counter-disinformation-about-Covid-19

[513] https://www.coe.int/en/web/media-freedom/-/press-freedom-must-not-be-undermined-by-measures-to-counter-disinformation-about-Covid-19

[514] https://rm.coe.int/final-version-annual-report-2021-en-wanted-real-action-for-media-freed/1680a2440e

[515] https://cmpf.eui.eu/mpm2020-results/

ensuring diversity and pluralism. In this direction, governments could impose some rules and limits on horizontal concentration in traditional media markets to ensure sufficient diversity.

4.3.4.2 Ensuring long-term sustainability of media

As mentioned above, apart from legislative responses and other types of 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 media and especially independent and local media ecosystems. Several vehicles can be considered by government in national and European level to support media sustainability, besides direct and indirect funding.

- Support quality and independent journalism, e.g., through funding of European or national journalism projects that propose innovation in addressing disinformation, make use of novel 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 that is connected to both sustainability and media independence. According to the Media Pluralism Monitor 2020 report[516], 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 lack the framework to ensure that state advertising is distributed 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"[517].

4.3.5 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: either by following a self-regulatory

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[516] https://cmpf.eui.eu/mpm2020-results/
[517] https://cmpf.eui.eu/mpm2020-results/

approach that allows journalists and platforms to set their own codes and rules and police themselves in their implementation or by applying governmental regulations to media and platforms and monitoring compliance through independent authorities.

4.3.5.1 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 which promote principles such as truthfulness, accuracy, objectivity, impartiality, fairness, and public accountability[518] as presented in detail in section 2. The need to adhere to such codes and promote ethical journalism is considered of paramount importance in most of the examined studies, which also suggest efficient 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[519] 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 self-regulation of the platforms and adherence to some basic ethical obligations to combat disinformation. The efforts of social media companies however to regulate themselves and battle disinformation in their own services has not been particularly successful, as shown by Facebook's failure to take seriously disinformation activities in their platform and their impact on the outcome of the 2016 US elections[520,521,522]. In addition, the Cambridge Analytica scandal[523] 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 in making the platforms more aware of their social role and 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 (see section 2.4) 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

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[518] https://guides.lib.uw.edu/research/commstudies/ethics

[519] 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).

[520] https://www.theguardian.com/technology/2016/nov/10/facebook-fake-news-us-election-mark-zuckerberg-donald-trump

[521] https://www.nytimes.com/2018/11/14/technology/facebook-data-russia-election-racism.html

[522] https://link.springer.com/article/10.1007/s43681-021-00068-x

[523] https://www.theguardian.com/technology/2019/mar/17/the-cambridge-analytica-scandal-changed-the-world-but-it-didnt-change-facebook

and more robust monitoring mechanisms. This need has been also recognized by the EC, which recently published a guidance to strengthen the Code to become a more effective tool for countering disinformation[524].

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 but also signatories themselves so that the public holds signatories accountable when not doing enough. To this end, it is suggested that platforms 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 pointedly by a relevant news article[525] 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[526]. 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.

4.3.5.2 Government regulation

Another line of response in ensuring ethical conduct and battling disinformation is regulation imposed by governments. Governments can adopt a wide range of responses aiming to better regulate the media and digital news market.

Media regulation is already addressed by several national and EU bodies and independent authorities as discussed in section 2. It is noteworthy that almost none of the examined proposals focuses on recommendations for traditional media regulation but rather call for better implementation of existing frameworks and specifically point

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[524] https://digital-strategy.ec.europa.eu/en/library/guidance-strengthening-code-practice-disinformation

[525] https://www.codastory.com/disinformation/how-disinformation-became-a-new-threat-to-women/

[526] https://cdt.org/insights/facts-and-their-discontents-a-research-agenda-for-online-disinformation-race-and-gender/

out the danger of regulation that may limit freedom of the press and lead to some kind of censorship or penalizing of journalists (see section 4.3.4.1).

On the other hand, what almost all studies (with the exception of the HLEG report, which however has been heavily criticized for the voluntary nature of the proposed Code of Practice – see section 2.1.4) 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 is has been shown to be awfully inadequate. Platform regulation is increasingly considered as a necessary next step to protect users and human rights and save democracy. As the OECD study points out, the problem is effectively summarized and intelligently positioned in the right framework by historian Ann Applebaum in a WaPo opinion article[527]: "*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 to build on and adapt or expand 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 (for algorithms, data, advertisement, policies, online 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 GDPR, DSA, and DMA, aiming to create a more open and safe online space for European citizens.

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[528], the French government has 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[529]. In Germany, a law against hate speech

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[527]   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

[528]   https://www.poynter.org/ifcn/anti-misinformation-actions

[529]   https://www.poynter.org/ifcn/anti-misinformation-actions/#france

requires platforms to remove 'obviously illegal' content within 24 hours and fines them with fines up to 50 million euros[530], if they fail. As pointed out in the European Policy Centre study, the laws in France and Germany have hardly been used up to this point, 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[531], 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 as is the case in Hungary. 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 the judiciary should make this determination.

Special attention is also given to responses focused on regulating Internet advertisement similarly to how broadcast advertising has been regulated, with emphasis on political advertisement. This issue and proposed responses have also been discussed under transparency policies (see section 4.3.1.1). In any case, it is important to ensure that citizens know when and why they are being shown ads and who funds them, regardless of whether they come across them in broadcast media or platforms.

4.3.6 Countering disinformation

Under this category, we discuss responses that have to do with two main issues: what 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.

4.3.6.1 Monitoring and research

Understanding the phenomenon of disinformation and monitoring its continuous evolution is of paramount importance in order to develop successful policies for combating it. The examined studies strongly recommend that national governments and the EU should generously invest in multidisciplinary projects that analyse the phenomenon, its impact on society and democracy as well as the challenges and effectiveness of proposed 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

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[530] https://www.poynter.org/ifcn/anti-misinformation-actions/#germany
[531] Human Rights Watch, "Germany: Flawed Social Media Law" (2018): https://www.hrw.org/news/2018/02/14/germany-flawed-social-media-law

disinformation and thus obtain a better picture of whether adopted policies against disinformation have an impact.

A particularly important contribution to studying and understanding this phenomenon would be to share platform data that are relevant to disinformation production and dissemination and the assessment of the effectiveness of responses trialled 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, the aforementioned information would be really helpful for the studies mentioned above 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, 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, if we want to be the winners in the battle against disinformation.

Finally, the HLEG report proposes the establishment of a network of European Centres for Research on Disinformation, also involving national research organisations, which could 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".

4.3.6.2 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 citizenry, e.g., debunk disinformation with regard to the efficiency and dangers of Covid vaccines, or the integrity of European elections. To this end, an important step would be for governments to develop toolkits and training material to help government agencies or institutions identify and respond to disinformation.

Another response that according to the OECD report can be integrated with communication and awareness efforts is "pre-bunking". Analogous to medical immunization, research finds that "pre-emptively warning and exposing people to weakened doses of misinformation, can help cultivate "mental antibodies" against fake

news"[532]. This approach entails warning people about fake-news and pre-emptively exposing them to arguments used by disinformation while also providing them accurate information that shows how flawed these arguments are[533].

Another popular suggestion are policies that aim to foster collaboration at national, European or international level in order to co-ordinately counter disinformation but also to exchange data, knowledge and best practices for better responses. For example, close cooperation and exchange of information in the European level is required to debunk coronavirus related disinformation, something that can be facilitated by tools like the Rapid Alert System or services like EU vs. Disinfo. Similarly, cooperation and coordination with international organizations and other countries could help Europe address Russian disinformation about elections.

But governments cannot become fact-checkers of every half-truth or lie. This is why another policy recommendation is the support for independent fact-checking organizations as well as some type of cooperation with them. Such cooperation is also beneficial for platforms, media and civil society organisations that wish to enhance their fact-checking capabilities.

4.3.7 The importance of collaboration among stakeholders

What is abundantly clear from the previous analysis is that multi-stakeholder cooperation is absolutely essential to effectively combat disinformation. The works examined in section 4.2 propose cooperation 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 (including 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 actions to combat disinformation that may involve citizens on the global level as was the case of Covid.
- Between international organisations and governments and platforms to ensure that freedom of the press, freedom of expression and human rights in general are not violated by government regulation or platform policies.

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[532] https://misinforeview.hks.harvard.edu/article/global-vaccination-badnews/
[533] https://www.frontiersin.org/articles/10.3389/fpsyg.2020.566790/full

4.4. Our recommendations

In section 4.2, we presented some of the most important policy recommendation frameworks for combating disinformation proposed by European and international institutions. Subsequently, in section 4.3 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 (see Figure 11). In this section, we offer specific recommendations for policy measures that could be undertaken by the various actors of the disinformation ecosystem in order to efficiently address the phenomenon at the European level. The recommendations are yet again classified based on the dimensions and sub-dimensions of the aforementioned disinformation policy classification framework.

4.4.1 Policy measures to enhance transparency

In this subsection, 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

- Platforms should adopt demonetization policies that aim to make disinformation spreading an unprofitable business. This, for example, can include black-lists of sites that have been repeatedly found to promote disinformation, which are then excluded from advertisement funding.
- Platforms and digital media should publicly share information about advertisement, especially political one, disclosing who funds it, who is the recipient of the funding, and who is targeted by the advertisement and how. In the same vein, governments and the EC should adopt similar strict rules for transparency in political funding and advertising.
- The EC should promote more decisively regulations for 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 disinformation combat. 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 for food or agricultural products) 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

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- Media and platforms should heavily invest on fact-checking tools/services while also pursuing collaboration between them and with independent fact-checking organizations, to speed-up and coordinate fact-checking efforts.
- Platforms should invest more on tools that detect new forms of audiovisual content manipulation (deepfake video or audio). The EC should consider funding research & industry consortia that pursue this kind of research through its H2020 programme.

Election integrity

- The EC should require that member states increase transparency of political funding and advertising and impose regulations that require the public disclose of relevant information.
- The EC should enhance existing mechanisms for collaboration between EU states and institutions, with the aim to exchange information and develop coordinated actions for tackling foreign interference and disinformation in national and European elections.

4.4.2 Policy measures to improve media literacy

In this subsection, we present recommendations that aim 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.

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 journalistic school students.

Media literacy for all

- 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 that are not digital natives, who may be more susceptible to disinformation.
- The EC should promote and support with funding such media literacy programmes on member state level, also requiring member states to provide regular reporting on actions undertaken on this issue.

4.4.3 Policy measures to empower stakeholders

In this section, we propose policy recommendations 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

- Platforms should develop tools that will allow their users to better control access to information, e.g. by selecting the parameters that define what will appear in 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.
- Platforms should enable a minimum amount of pluralism by default by including different views on some topic in their search results or presenting results from different independent sources so as to combat the phenomenon of eco-chambers and information bubbles.

Citizen empowerment

- 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 on EU institutions.
- 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 on a regular basis but also in response to major disinformation campaigns, e.g. disinformation with regard to the efficiency of Covid vaccines.
- 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 disinformation topics that have the potential to cause harm on EU citizens (e.g. Covid-related disinformation).
- The EC should fund research and development of open-source tools that would help citizens tackle disinformation as they navigate the online world. This can be done through the H2020 programme as well as via dedicated open calls.

Journalists' empowerment

- Media should invest on 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 journalistic and media associations and fact-checker organisations.
- The EC can fund media innovation projects implemented by consortia of media organizations and ICT researchers, aiming to modernize newsrooms and exploit new capabilities offered by AI and big data technologies.

4.4.4 Policy measures to strengthen media independence and pluralism

In this section, we propose policy recommendations that aim to strengthen media independence, pluralism and sustainability. Strengthening the free press is crucial for challenging disinformation falsehoods and pursuing facts.

Strengthening freedom of the press

- 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. Government overreach should be closely monitored by the EC and decisive action should be taken to address it.
- Member states should refrain from regulating disinformation to avoid censorship or restricting freedom of speech. Regulation should only be used

for exceptional cases, e.g. when content incites to violence, hatred or discrimination, a determination that however should be made by the judiciary.

- The EC should require the member states to legislate and create institutional safeguards to prosecute and discourage abusive behavior against journalists.
- 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

- 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 to fight disinformation or provide multi-disciplinary independent reporting on socio-economic or political issues.
- The EC should require that member states adopt transparent and fair processes for providing State Aid and funds for state advertisement to media.

4.4.5 Policy measures to promote ethical conduct

In this section, 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

- 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.
- The EC needs to strengthen the Code of Practice on Disinformation. Following, the Guidance on Strengthening the Code of Practice on Disinformation[534], the EC needs to impose stronger commitments to the signatories, a robust mechanism for monitoring compliance with these commitments, 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

- The EC should build on and adapt or expand existing regulatory tools (e.g. used 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

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[534] https://digital-strategy.ec.europa.eu/en/library/guidance-strengthening-code-practice-disinformation

underway with regulations such as the GDPR, DSA, and DMA but should be strengthened. Areas where legislation effort should concentrate at include transparency with regard to platform algorithms, data, advertisement, moderation policies; restrictions in micro-targeting and psychological profiling of users; provision of tools that support user empowerment like control over algorithm results and data; safeguards for data protection and privacy; limitations in the use of AI and automation (e.g. bots); portability of user data among platforms etc.

- The EC should develop mechanisms to monitor member states' initiatives against disinformation and adherence with human rights so as to make sure that governments also behave ethically and do not abuse their power in the fight against disinformation.

4.4.6 Policy measures to counter disinformation

In this section, we propose recommendations on how the EC and member states can directly fight disinformation.

Disinformation monitoring and research

- The EC should invest in multidisciplinary projects (either H2020 research projects or commissioned independent committees) 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 be supported by or take place in the context of the European Digital Media Observatory (EDMO)[535].
- The EC should invest on H2020 research projects that study the development of new technologies and tools to fight disinformation, especially focusing on audiovisual content manipulation and deepfakes.
- The EC should further 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 European Digital Media Observatory.
- Via regulation efforts like those mentioned in section 4.4.5, the EC should require that platforms share data on disinformation with the research community to facilitate both study of the phenomenon and also development of appropriate tools to address it. In the same direction, very helpful can be the dialogue that the European Digital Media Observatory has initiated with big social media platforms to provide such data for research purposes.

Direct countering of disinformation

- 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.
- The EC should exploit the European Digital Media Observatory and also the EU vs. Disinfo platform to monitor disinformation phenomena across Europe

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[535] European Digital Media Observatory: https://edmo.eu/

and provide alerts when some disinformation campaign is perceived as poising a serious threat to the EU citizenry, 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 the citizenry. Special effort should be dedicating towards developing efficient pre-bunk campaigns to more effectively immunize EU citizens against disinformation.

Collaboration among stakeholders

- 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 absolutely necessary.

- The connections of the European Digital Media Observatory with independent fact-checking organisations should be strengthened and exploited to improve the capabilities of the EU to effectively monitor the changing disinformation landscape and reacting to disinformation danger on a timely and data-driven manner.

- The EC should pursuit 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 examine their efficiency.

4.4.7 Recommendations to political parties and actors

In this section, we move a step beyond the dimensions of the proposed disinformation framework, to provide some recommendations for political parties and actors.

- European political parties should establish internal codes of conduct with regard to disinformation, discouraging their representatives from spreading disinformation and penalizing or imposing sanctions to those who do.

- 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.

- European political parties should adopt online 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.

- European political and social actors should collaborate with EU institutions in promoting media literacy and information awareness campaigns against disinformation.

ANNEXES

ANNEX I – 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
- 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 tvuço 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.

ANNEX II – 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:

7. To address citizens equally, without distinction of national origin, sex, race, religion, political views, economic situation or social position.
8. 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.
9. To respect the presumption of innocence and to not anticipate judicial decisions.
10. To respect the protection provided for by international conventions of minors and individuals with special needs and serious health problems.
11. 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.
12. Not to reveal, either directly or indirectly, the identity of rape victims who survived the criminal act.
13. 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.
14. To gather and crosscheck information and to ensure its substantiation (writing, photographs, cassettes, television images) through journalistically legitimate methods, always disclosing their journalistic origin.
15. To adhere to professional discretion as to the source of information which has been obtained in confidence.
16. 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:

17. To vigorously defend the democratic constitution, which ensures a free press and the unobstructed exercise of the journalistic profession.
18. To reject and condemn manifestations of state authoritarianism and the arbitrariness of mass media proprietors, especially that of oligopolies.
19. 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.
20. 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:

21. 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.
22. To reject any attempt at reduction of workers' rights in the workplace and any violation of ethical standards.
23. 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:

24. To neither pursue nor accept rewards from private appropriations of state departments and public or private organizations for his journalistic work.
25. 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.
26. To neither pursue nor accept the promotional use of his name, voice or image, except for purposes of public benefit.
27. To neither report nor self-interestedly utilize exclusive information which influences the course of stock exchange values and the market.
28. 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:

29. 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.
30. To consider any plagiarism to be a grave and unprofessional act.
31. Not to appropriate the work of his colleagues. To always refer to the name of the author whose texts or extracts are used.
32. 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:

33. To contribute to the re-evaluation of the journalistic word, avoiding grammatical, syntactic and semantic violations.
34. To avoid vulgarisms, vulgarity and linguistic barbarity, observing , even in satire and caricature, the standards of professional ethics and social responsibility.

35. To protect the Greek language from the excessive use of foreign words and terms.
36. 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)[536]

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

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[536] https://accountablejournalism.org/ethics-codes/Germany-Press-Council

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' 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 Journalists[537]

A journalist worthy of the name:

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[537] https://accountablejournalism.org/ethics-codes/France-Charter

1. Assumes responsibility for all that he writes.
2. Considers slander, unfounded accusations, alteration of documents, distortion of facts, and lying to be the most serious professional misconduct.
3. Recognizes the jurisdiction of his colleagues as the only one which is sovereign in matters of professional honour.
4. Accepts only such assignments that are compatible with his professional dignity.
5. Declines to invoke an imaginary title of quality, use dishonest means to obtain information or take advantage of the good faith of anybody.
6. 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.
7. Does not sign articles which are commercial or financial advertising
8. Does not commit any plagiarism.
9. Does not claim the position held by another colleague nor cause him to be dismissed by offering to work under inferior conditions.
10. Respects professional secrecy.
11. Does not make use of the freedom of the press with profit-seeking intentions.
12. Demands the freedom to honestly publish his information.
13. Respects justice and gives it top priority.
14. 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 Profession[538]

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.

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[538]   https://research.tuni.fi/ethicnet/country/spain/deontological-code-for-the-journalistic-profession/

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 professionality 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 critizise.

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 interferring 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 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 indentification 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 professsional 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 guarantess 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 recouse 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 simultaneusly 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 Journalists[539], 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 1963[540].

"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).

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[539]   https://accountablejournalism.org/ethics-codes/italy-national-federation-of-the-italian-press-and-national-council-order-o

[540]

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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.

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.
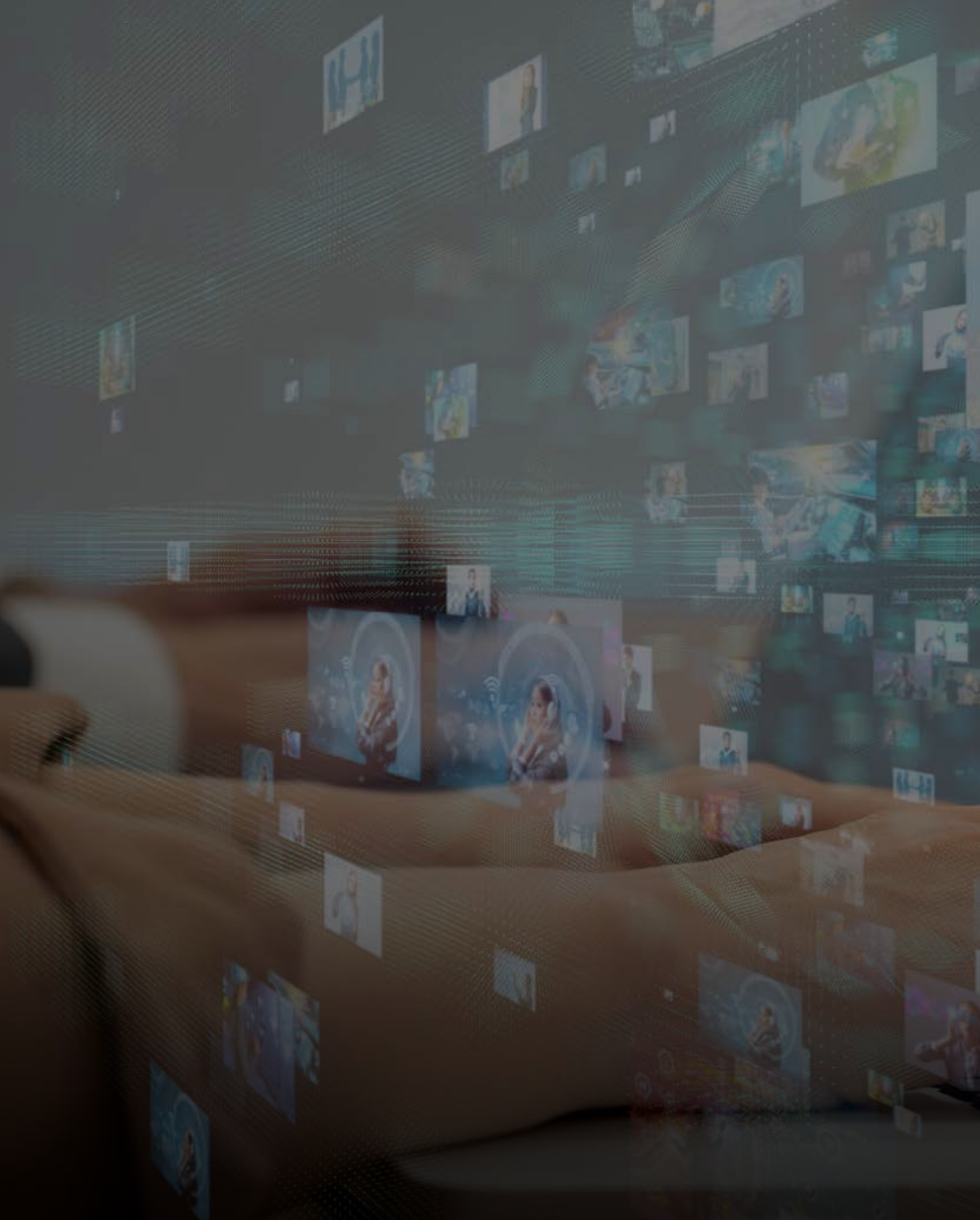
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