

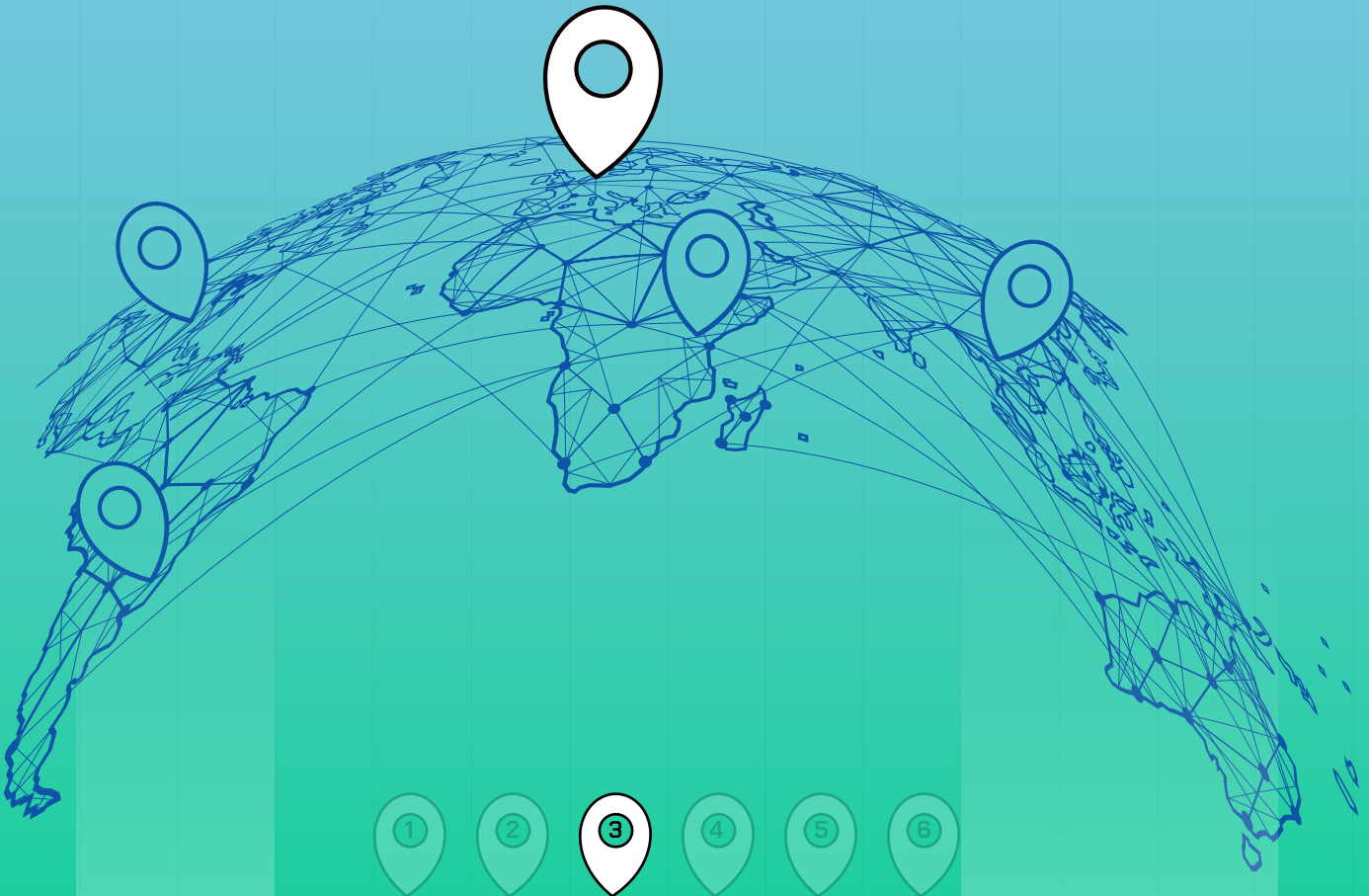
upgrade democracy

Research Series: Reinhard Mohn Prize

Mitigating disinformation in Europe

Challenges and opportunities for civil
society organisations and private actors

Wade Hoxtell



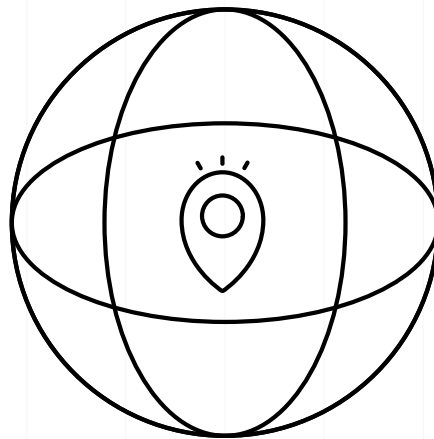
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This report is part of an international research series on
“Strengthening Democracy, Countering Disinformation.”

Preface

Dear Reader,

In today's digital world, countering disinformation has emerged as an essential endeavour to uphold democratic values worldwide. While there is a shared understanding that concerted efforts from various stakeholders and at different levels are needed to address this issue, we still lack a comprehensive understanding of the strategies and initiatives in place, let alone their impact and how to accurately measure it.

As part of the **Reinhard Mohn Prize** – 'Strengthening Democracy, Countering Disinformation', we sought to illuminate the way forward by identifying exemplary models and innovative approaches to countering disinformation around the world. Our goal was to gain insight into the where, how, and why of disinformation, and to respond accordingly. Across the globe, there are countless successful and impactful examples of individuals, initiatives, and organisations dedicated to countering disinformation. Our aim was to learn from them and empower us all to learn from each other.

This series of six reports covering Africa, Asia-Pacific, Europe, North and Latin America, and a global overview of government responses to disinformation, consolidates our findings in the hope of providing you not just with key insights, but also with actionable recommendations. These reports couldn't be clearer: We can all learn from each other. From the technology enhanced fact-checking approaches of **Chequeado** (Argentina) or **Aos Fatos** (Brazil), to the community-driven debunking of **JamiiCheck** (Tanzania) or the rapid response mechanism at **Real411** (South Africa), to the thought-provoking media literacy trainings by **Fact Shala** (India) and **Mafindo** (Indonesia) – there is so much knowledge out there that we could write entire books about it.

We invite you to explore, learn, and be inspired. Because there is hope for a healthier information ecosystem thanks to the efforts of everyone we encountered.

Finally, we would like to express our deepest gratitude to the outstanding authors of these reports, as well as to all the experts who participated in our workshops in Nairobi, Bangkok, Buenos Aires, Washington D.C., and Brussels. It is your expertise and your dedication to strengthening democracy – regardless of the challenges faced – that have made this series so insightful and special.

Our warmest,



Cathleen Berger



Charlotte Freihse

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Executive summary

In Europe, the proliferation of disinformation poses a significant threat, including the potential undermining of democratic processes and the erosion of trust in media and institutions. False narratives, which can spread rapidly through digital platforms, aim to manipulate public opinion, influence elections, and destabilise societies. It is therefore essential that the European Union and Member State governments not only develop effective rules to combat disinformation, but also to provide the necessary support to other protagonists in their efforts to do the same.

Various actors countering disinformation, including civil society organisations (CSOs), research institutions, the private sector, and the media, are actively engaged in combating this disinformation using multiple strategies. Fact-checking organisations and content moderation approaches serve as a first line of defence to verify facts and moderate online content, thereby curbing the spread of false information. Academia and research institutions, as well as CSOs and private companies, conduct in-depth research, analysis, monitoring, and auditing to understand disinformation patterns, develop effective strategies, ensure compliance with regulations and evaluate the effectiveness of countermeasures. In addition, media literacy and education efforts aim to equip citizens with critical thinking skills to evaluate media content, thereby building societal resilience to disinformation. Finally, self-regulation encourages platforms and publishers to voluntarily adhere to ethical standards to mitigate the spread of disinformation.

However, these actors face several key challenges in their efforts to counter disinformation. First, it is difficult to keep up with the volume and speed of disinformation creation and dissemination. Moreover, the allure of sensational and fake information often garners more attention than factual information, complicating efforts to ensure that quality information is more accessible and engaging than disinformation. Furthermore, limited resources and expertise, particularly among civil society and research organisations, hamper their ability to effectively combat disinformation. In addition, both social media platforms and traditional media outlets each face complex dilemmas in striking a healthy balance between commercial interests and public responsibility.

The study provides a number of key insights to improve the effectiveness of the fight against disinformation, namely:

- Prioritise the enforcement of existing regulations over the premature adoption of additional measures.
- It is important to create a strong discussion on sustainable funding mechanisms to support ongoing anti-disinformation efforts.
- The issue of data access should be addressed by ensuring broader and more equitable access to data from social media platforms.
- Strengthening media literacy programmes and supporting independent journalism to build public resilience is critical.
- Adopting a long-term and integrated approach involving all stakeholders is [seen as] necessary to effectively mitigate the threat of disinformation and foster a resilient information ecosystem.

1 Introduction

The increasing digitisation of many aspects of European citizens' lives, from news and information consumption, social interaction and communication, to political participation and the proliferation of platforms for personal expression, among others, has been a double-edged sword. On the one hand, easy access to information and lower barriers to entry for information creation and widespread dissemination have brought many benefits to citizens. On the other hand, as with many innovative technologies, there are also risks. The democratisation of information creation and dissemination has also led to an increase in the prevalence and sophistication of disinformation, resulting in numerous societal challenges. In a 2018 Communication, for example, the European Commission warned that *“disinformation erodes trust in institutions and in digital and traditional media... harms our democracies by hampering the ability of citizens to take informed decisions... often supports radical and extremist ideas and activities... and impairs freedom of expression”* (European Commission, 2018). This is exacerbated in particular through powerful echo chambers of tailored, walled-off information environments, often created and amplified by non-transparent algorithms of social media platforms, which serve to magnify disinformation campaigns and drown out higher quality information.

The emergence of new technological advances and applications, the changing landscape and underlying economics of traditional media, and the interplay between social attitudes and identities, cultural or personal beliefs, and political agendas, are making these challenges even more acute. However, European societies are also taking broad approaches to combating disinformation and its effects. For example, the European Union has passed significant legislation aimed at addressing various aspects of the disinformation problem, including the Digital Services Act (DSA), the Digital Markets Act (DMA), and the AI Act, while European national governments have launched initiatives of their own, such as the Network Enforcement Act (NetzDG) Germany adopted in 2017.

In addition to regulatory efforts, the European Union (EU) and its Member States also support other societal actors in Europe in their efforts to counter disinformation. Civil society, research organisations, academia, independent media and the private sector, as well as networks consisting of different constellations of these actors, all aim to combat disinformation and its impacts on society. They use approaches such as fact-checking, research, knowledge-sharing and policy advocacy, compliance monitoring, media literacy, content moderation, and self-regulatory efforts by companies, among others.

The aim of this report is to better understand the landscape and approaches of civil society and private actors working to combat disinformation in Europe, and to determine how the EU can best support their efforts. To achieve this objective, the report seeks to answer the following questions:

- What is the state of (counter)disinformation in Europe? What are the main challenges? What are the dominant current and potential future trends in efforts to counter disinformation in Europe?

- Who are the key civil society, private sector, and public-private stakeholders involved in countering disinformation in Europe? What approaches and tools do they use to counter disinformation, what has (not) been successful, and why? What challenges do they face in their efforts to counter disinformation?
- What government and European Union initiatives exist that aim to support these actors working to counter disinformation in Europe? Are they effective? Why or why not?
- What can policy makers at European level do to better support actors in the fight against disinformation?

To answer these questions, this report relies on a methodology that combines desk research and a review of existing literature, as well as a handful of interviews with experts and practitioners. By design, the report focuses only on the European context and actors and approaches from civil society – broadly defined to include research organisations such as think tanks and universities – and the private sector.¹ Nor does this study take a comprehensive approach to answering the main research questions. Rather, it draws extensively on existing (mainly English-language) research and mapping to summarise key approaches and challenges in an illustrative manner and to draw conclusions to guide policy-making at the European level, as well as future research on these issues.

The report presents some key conclusions. Addressing the multifaceted challenge of disinformation in Europe requires a comprehensive, multi-stakeholder approach. While regulatory measures are essential, they need to be complemented by diverse strategies involving civil society organisations, research institutions, the private sector, and the media. In addition, while the European Union has made significant progress with recent legislation such as the DSA and the DMA, the focus in the coming years should be placed on effective implementation of existing measures and policies rather than rapid policy expansion. Furthermore, funding models for disinformation work need to be reassessed to foster a more sustainable and inclusive environment for actors fighting disinformation and ensure their access to comprehensive data from social media platforms, which is crucial for research and accountability. Also, media literacy initiatives inspired by successful models in countries like Sweden and Finland should be prioritised alongside support for independent media to foster public trust in institutions and resilience in the face of disinformation campaigns. Finally, adopting a long-term perspective and fostering cross-sectoral cooperation are essential to build societal resilience and effectively deter disinformation campaigns.

¹ Another report in this research series focuses on state actions against disinformation (Iglesias Keller et al., 2024).

2 The disinformation landscape in Europe: Actors and approaches

The proliferation of disinformation has emerged as a pervasive challenge to which democratic societies are struggling to respond. The European Commission defines disinformation as *“the creation, presentation and dissemination of verifiably false or misleading information for the purposes of economic gain or intentionally deceiving the public, and which may cause public harm.”* (European Commission, 2018). However, disinformation is also more complicated in that disinformation products are not always fabricated but may contain a mixture of facts and falsehoods or remove context that is important for understanding (Bradshaw & Neudert, 2021).

In both the European and wider context, disinformation is dangerous for a number of reasons. For example, while the legitimacy of European democracy depends on free and fair elections, disinformation risks manipulating public opinion to such an extent that it, and those who practice it, can potentially undermine the integrity of elections and erode trust in European and national institutions (European Court of Auditors, 2021). Disinformation can also undermine the integrity of the traditional media landscape, and negatively impact social media ecosystems, making it difficult to distinguish fact from fiction. In this respect, what makes disinformation particularly challenging to address is that it is not just about the power or impact of individual disinformation campaigns, but rather about sewing confusion, cynicism, and mistrust into the (social) media landscape, political and electoral processes, and thus society at large (Gunitsky, 2020).

Disinformation is not just a phenomenon of the digital age, and history is full of examples where actors have used disinformation to influence outcomes. For example, the public discourse around the adoption of the Maastricht Treaty in various European countries in the early 1990s was full of disinformation, misleading claims, and fringe views (Dyson et al., 1999). What has changed, however, is the widespread means and speed of spreading disinformation through social media, as well as the changing models of traditional media companies (Vilmer, 2021). Regarding the latter, at a time when many citizens get their information from social media, traditional media companies are trying to stay financially afloat by increasingly prioritising information that grabs people’s attention, generates clicks, and generates revenue. In doing so, media companies are increasingly treating the value of information as a product to be sold rather than a public good that benefits society (OECD, 2024).

The prevalence of disinformation in today’s digital landscape represents a significant and challenging shift for European society as compared to previous decades. Recently, Europe has faced a number of high-profile disinformation challenges that were amplified through social media, e. g. around the 2016 Brexit referendum, the German federal and French presidential elections in 2017, the COVID-19 pandemic, and the 2023 Slovak parliamentary elections (see Saurwein et al., 2020; Sauvage, 2023). In addition to these specifically European examples, a 2021 study found that the majority of North American and European civil society organisations working to combat disinformation cite the 2016 US presidential elec-

tion as the moment when digital disinformation hit the mainstream and had more tangible impacts, in particular increased funding for and interest in their work (Bradshaw & Neudert, 2021).

However, arguably the most directly influential recent events that shaped and catalysed the European response to disinformation were the Russian disinformation efforts during its invasions of Ukraine in 2014 and 2022. In response, the European Commission launched numerous initiatives, such as the establishment of the East StratCom Task Force in 2015 to counter Russian disinformation; the publication of the “*Communication on Tackling Online Disinformation: A European Approach*” and the “*EU Action Plan Against Disinformation*” in 2018; and the launch of the “*Code of Practice on Disinformation*” in 2018 and its update in 2022, which introduced self-regulatory standards for companies to combat disinformation, among many other efforts. The European Union has also passed important legislation such as the Digital Services Act, the Digital Markets Act, and the AI Act mentioned above – all of which contribute indirectly to addressing the issue of disinformation.²

2 For a timeline of European Union efforts, see e.g. European Court of Auditors (2021). Further, see [chapter 4](#) in this report for more detail on measures taken by the EU and its member states to counter disinformation, e.g. legislation, see Iglesias Keller et al., 2024.

2.1 Civil society and the private sector

In addition to the European Union and member state governments, there are numerous actors within Europe from the private, civil society, traditional media and academic sectors focusing on countering disinformation through both preventative and responsive activities.³ Civil society organisations (CSOs), including non-profit research organisations such as think tanks, universities as well as independent media outlets, serve a critical role through, for example, fact-checking; knowledge-sharing and policy advocacy; providing research and analysis; and promoting media literacy and education.

The private sector also plays a key role in countering disinformation, particularly though not exclusively at the level of prevention through content moderation; fact-checking and content verification, but also through efforts such as self-regulation and collaborations, including providing access to data on social media platforms. In particular, social media companies such as Facebook, X (formerly Twitter), YouTube, Instagram or TikTok, as well as messaging services such as WhatsApp and Telegram, represent the frontline of disinformation and thus for preventing false or misleading information from reaching the wider European public. In addition, large technology companies operating in Europe such as Microsoft, through initiatives like its Democracy Forward Program, as well as Google, through its Google Safety Engineering Center for Content Responsibility, also aim to better understand and stop the spread of false or misleading information online as well as offer platforms for multi-sectoral discussions and knowledge-sharing on challenges such as protecting election integrity and moderating content online.⁴

The following sections provide some additional context on the different approaches that civil society organisations, academia, researchers, the private sector, and the media are using to combat disinformation, but it is worth noting that these categories are not mutually exclusive, and organisations often use multiple approaches. Furthermore, given the complex and fast-changing nature of disinformation, coordination, and networking between actors in these different areas is crucial. For example, many actors working to combat disinformation through activities also participate in networks that aim to coordinate activities among actors and share new research, knowledge, and best practices.

Fact-checking and content moderation

Fact-checking and content moderation are two of the most prominent tools in the fight against disinformation. As a reactive approach, fact-checking aims to mitigate the impact of disinformation by analysing and verifying the credibility of information, images and videos and, given its importance, a number of European civil society organisations counter disinformation by debunking false or misleading claims. At the European level, for example, the **European Fact-Checking Standards Network (EFCSN)** has created the European Code of Standards for Independent Fact-Checking, a set of criteria designed to ensure that organisations fact-checking misinformation and disinformation adhere to the highest methodological, ethical and transparency standards (see European Fact-Checking Standards Network, 2024). In addition, a European Journalism Training Association (EJTA) project called **EUFactCheck** aims

³ Existing research has already mapped out many of these out in detail. See for example Pershan, Claire, 2021; Bradshaw und Neudert, 2021; Iglesias Keller et al., 2024; TechSoup, 2023.

⁴ See blogs of Google and Microsoft.

to promote fact-checking curricula in European journalism schools, as well as conducting its own fact-checks (EUFactCheck, 2019).

There are also numerous fact-checking initiatives and organisations operating at national level in the Member States, such as Correctiv in Germany and **Demagog** in Poland, as well as initiatives such as Agence France-Presse's '**Fact Check**' and Le Monde's '**Le Décodex**' in France and the BBC's '**Reality Check**' in the United Kingdom, among many others. These and similar efforts play a vital role in scrutinizing and verifying information, helping to counter the spread of disinformation, and thus maintain the integrity of public discourse. Indeed, the **European Digital Media Observatory** (EDMO) has produced a comprehensive and valuable mapping of European fact-checking organisations focusing on mis- and disinformation (EDMO, 2024).

Content moderation systems on internet platforms use a combination of automated technologies and human oversight to detect, assess, and mitigate disinformation and misleading content. These systems are designed to prevent the proliferation of harmful content by removing it and/or diminishing its visibility. In addition to these measures, digital platforms often establish specialised initiatives to monitor major global and political events in order to counter targeted disinformation campaigns. Notable examples include the **proactive measures taken by Facebook and X (formerly Twitter) during the 2019 European Parliament elections** and the Taiwanese general elections in January 2020 (Vilmer, 2021). Another interesting example is **Google's Jigsaw** unit, which worked with civil society and non-governmental organisations, as well as universities and resource organisations, to spot disinformation on YouTube and to run 'prebunking' ads during YouTube videos focusing on providing users with information on how to spot disinformation.⁵

Social media platforms' content moderation practices of have also been subject to significant criticism. For example, the platforms often lack transparency in the decision-making processes regarding their content moderation practices, they struggle to design and implement systems that effectively enforce their own policies, and they have yet to address concerns about bias in algorithmic decision-making, among other criticisms (Fertmann et al. 2022). In addition, the debate around content moderation activities highlights the complex challenges these platforms face in balancing regulation with freedom of expression rights. To help address these challenges, social media platforms have also begun to form **expert advisory panels** to refine and guide their content moderation practices. These include initiatives launched by X (formerly Twitter), Twitch, TikTok, and Facebook's Oversight Board. These bodies are tasked with reviewing content decisions, making policy recommendations, and ensuring that community standards are enforced in a balanced way.⁶ While such self-regulatory efforts are laudable, they have also been criticised for their lack of accountability and effectiveness (ibid).

Research, analysis, monitoring and auditing

There are a number of civil society organisations, universities, policy research organisations and corporate actors that serve to collect data and provide analysis to better understand disinformation and provide evidence-based recommendations on how to combat it. Academic research and conferences, for example, serve to highlight the threat of disinformation through

5 Interview.

6 For more information on these actions, see Saurwein & Spencer-Smith (2020).

new knowledge, and to raise awareness of the importance and danger of the issue by integrating it into academic curricula (Vilmer 2021). One of the most prominent European academic research institutions focusing on digital issues, including disinformation, is the **Oxford Internet Institute**, a multidisciplinary research and teaching unit at the University of Oxford, dedicated to the social science of the internet.⁷ Another interesting example was the **DORIAN project “Finding and Combating Fake News”** coordinated by the German research agency Fraunhofer SIT from 2017-2019.⁸ The project had a number of results, for example, it developed methods and practical recommendations for combating disinformation while preserving data protection and freedom of expression, produced a catalogue of possible technical, political-normative, and socio-cultural recommendations for combating disinformation on the internet that also protects fundamental rights.⁹

Think tanks, consultancies and other research organisations in Europe also provide applied policy research and analysis on disinformation issues as well as provide (compliance) monitoring and auditing services. Examples of prominent disinformation research include **Chatham House** in the UK and the Digital Analysis Unit of the **Institute for Strategic Dialogue**, which is based in London and has offices around the world. Other organisations, such as the **EU Disinfo Lab**, serve primarily as knowledge-sharing platforms for the dissemination of disinformation research, while also conducting their own original research.¹⁰

Some research centres also provide real-time analysis by monitoring information flows and detecting malicious campaigns, such as **Debunk.eu** or the **Center for Monitoring, Analysis and Strategy (CeMAS)** (Bradshaw & Neudert, 2021). Similarly, the **Global Disinformation Index** provides an index of websites’ risk of disinforming readers, tracks disinformation and extremism online, and provides data and research to policymakers and platforms around the world.¹¹ In addition, management consultancies such as Deloitte provide **audit services** to assess companies’ compliance with legislation such as the Digital Services Act as well as self-regulatory mechanisms such as the Code of Practice on Disinformation.

Funders of research as well as other activities also play a key role. For example, the **European Media and Information Fund**, a collaboration between the European University Institute and the Calouste Gulbenkian Foundation, financially supports “*collaborative efforts to debunk disinformation, amplify independent fact-checking, and enable targeted research and innovation tools designed to strengthen resilience and ecosystem response to disinformation.*”¹²

Knowledge sharing and policy advocacy

The dissemination of quality data and analysis on disinformation as well as the development and advocacy of good information production policies and standards, are key aspects of the fight against disinformation. The European Commission has not only recognised this, but has also officially acknowledged the need for knowledge, evidence, and consultation with civil

7 For more information see: www.oii.ox.ac.uk/. Last accessed 4 March 2024.

8 For more information see: <https://dorian-projekt.sit.fraunhofer.de/>. Last accessed 4 March 2024.

9 ibid.

10 For more information see: www.disinfo.eu/. Last accessed 9 March 2024.

11 For more information see: www.disinformationindex.org/product. Last accessed 8 March 2024.

12 For more information see: <https://gulbenkian.pt/emifund/>. Last accessed 11 March 2024.

society organisations, as well as policy advocacy from them and other experts, as a part of its efforts to effectively implement the Digital Services Act and the Digital Markets Act.¹³

Most, if not all, of the research organisations and think tanks that conduct research also have policy advocacy components for promoting recommendations on how to better combat disinformation and conducting outreach and dissemination activities for sharing new knowledge. Civil society organisations also play a key role in these areas by advocating for policies that promote, for example, transparency, accountability, and integrity in the media, on online platforms, and in democratic processes and institutions. They also advocate for stronger regulations to combat the spread of disinformation, as well as efforts to strengthen digital literacy education in schools. As civil society organisations often have insights into different (constituent) communities, they can also serve as a valuable conduit for communicating concerns and advocating for better policies that are independent of political or commercial interests.

One of the most prominent clearinghouses for disinformation resources in **Europe is the European Digital Media Observatory (EDMO)**. With its 14 national or multinational hubs covering 28 countries in the European Union and the European Economic Area, it aims to act as a reference point for data and policies on disinformation, public trust, media literacy and quality information.¹⁴ In addition, the **EU Disinfo Lab** maintains an independent European platform of tools, resources and knowledge on disinformation, and conducts or commissions original research, runs outreach initiatives and undertakes policy advocacy.¹⁵ Similarly, **Democracy Reporting International** does valuable work providing analysis, election monitoring, providing training and awareness-raising on online disinformation.¹⁶

Policy advocacy also includes efforts to develop standards or norms for information production and for improving the digital information environment more generally. For example, the **Credibility Coalition**, a community of journalists, researchers, academics, students, policy makers, technologists and engaged laypeople, aims to develop common standards for information credibility.¹⁷ In addition, the **Journalism Trust Initiative**, launched by Reporters Without Borders (RSF), has created an ISO-standard certification system to reward trustworthy journalism and adherence to professional standards, and now includes more than 1000 media outlets in over 80 countries.¹⁸ An interesting study and website, 'The Many of Faces Fighting Disinformation', launched by the EU Disinfo Lab in 2021, provides many examples of organisations that have been successful in influencing policy and legislation to combat disinformation in different European countries (Pershan, 2021).

Media literacy and education efforts

Media literacy and education efforts are one of the most powerful tools in the anti-disinformation toolbox. Unlike fact-checking and content moderation, for example, media literacy efforts

13 Interview.

14 For more information see: <https://edmo.eu/about-us/edmoeu/>. Last accessed 4 March 2024.

15 For more information see: www.disinfo.eu/. Last accessed 4 March 2024.

16 For a very useful and up-to-date mapping of European Union member state policies for combating disinformation, see: Mohan Pai, Joshita et al., 2023.

17 For more information see: <https://credibilitycoalition.org/>. Last accessed 8 March 2024.

18 For more information see: www.journalismtrustinitiative.org. Last accessed 8 March 2024.

focus on empowering citizens to access and critically evaluate different media sources, to identify good information and sources, and to cope with disinformation techniques and media manipulation (Bateman and Jackson, 2024). Such efforts, as well as basic media education in schools, promote critical thinking and equip citizens with the necessary skills to navigate an often confusing information environment.

Media literacy in Europe plays an outsized role in addressing the challenges of disinformation, as access to and evaluation of information sources is critical for informed citizen participation in democratic processes. Given this importance, as well as the prominence of media literacy in the priorities of both public and philanthropic funding mechanisms, a number of European civil society organisations are focusing on media literacy and educational activities such as curriculum development, promotional campaigns, and the design of training materials or programmes to improve citizens' ability to critically engage with information online (Bradshaw & Neudert, 2021). For example, **Lie Detectors**, based in Belgium, aims to counter the corrosive effect of online disinformation and online polarisation on democracy by *“empowering young people and teachers to tell fact from fake online and to understand how professional journalism works [through] interactive training sessions for schools and teacher training communities.”*¹⁹

In addition, major promotional campaigns also aim to educate the European public on media literacy and disinformation issues. For example, **the European Festival of Journalism and Media Literacy**, organised by a handful of European civil society organisations and funded by the European Union, aims to draw attention to the central role of journalism and an informed citizenry in societies and to promote critical thinking about disinformation.²⁰ The festival will begin with a three-day event in Florence, Italy, before embarking on a journey through European cities, starting with Zagreb in 2025.

At the national-level, **Media Literacy Ireland**, for example, is a network of over 250 organisations from different sectors as well as interested individuals working together to promote media literacy in Ireland through promotional campaigns, information dissemination, as well as support to media literacy stakeholders in Ireland and abroad.²¹ The European Digital Media Observatory (EDMO) has conducted a very interesting and useful mapping of actors across Europe focusing on media literacy initiatives.²²

An important success factor for media literacy approaches is not to focus only on young people. Indeed, recent research suggests that older people are more likely to share misleading or false information on Facebook (Guess et al., 2019). Therefore, media literacy initiatives need to find creative ways to reach adults, for example, through work programmes, online courses, or other channels that meet them where they are in different socio-economic or other circumstances. Research also suggests that the most effective media literacy initiatives teach audiences both how to seek out and consume information and build confidence in their ability to proactively

19 For more information see: <https://lie-detectors.org/>. Last accessed 9 March 2024.

20 For more information see: <https://voicesfestival.eu/>. Last accessed 9 March 2024.

21 For more information see: www.medialiteracyireland.ie/about/. Last accessed 9 March 2024.

22 For more information see: <https://edmo.eu/resources/repositories/mapping-the-media-literacy-sector/>. Last accessed 9 March 2024.

seek out higher quality information sources.²³

Self-regulation

Governments and regulators face a 'disinformation dilemma', which makes it particularly difficult to regulate disinformation without compromising freedom of expression. For similar reasons, online platforms are also reluctant to ban disinformation or misleading information, opting instead to reduce its visibility or flag it as disputed through the use of in-house or third-party fact-checkers and moderators. Nevertheless, the public and policymakers have put pressure on online platforms to combat disinformation through self-regulation. The European Commission in its 2018 Communication 'Tackling online disinformation: A European approach' highlighted that platforms have long failed to respond adequately to disinformation and called on them to step up their efforts, noting that "self-regulation can contribute to these efforts, provided it is effectively implemented and monitored" (European Commission, 2024).

One example is the **European Union's voluntary Code of Practice on Disinformation** (Saurwein & Spencer-Smith, 2020). Initially launched in 2018 and most recently updated in 2022 in response to Russian disinformation during its invasion of Ukraine, the Code of Practice sets self-regulatory standards for industry to follow, including demonetisation of disinformation, transparency of political advertising, enhancing cooperation with fact-checkers, and easier access to data for researchers. The Code has been signed by most major platforms, including Meta, Google, TikTok, Microsoft, and others, committing them to publish public transparency reports on content moderation and other disinformation practices. Although the Code of Practice does not include any sanctions for non-compliance, a wide range of anti-disinformation actors, including the **European Regulators Group for Audiovisual Media Services** (ERGA), the **European Digital Media Observatory** (EDMA), the services company **TrustLab**, as well as numerous civil society organisations, such as **AlgorithmWatch**, are monitoring signatories' compliance. While the Code of Practice is a positive step towards greater transparency, evidence to date suggests that online platforms have largely failed to live up to their commitments, with online platform practices still focussed on often ineffective reactive steps to combat disinformation, rather than proactive efforts to prevent it in the first place (European Commission, 2023).

23 See Bateman & Jackson, 2024; Fleming, J., 2013; PEN America & Stanford Social Media Lab, 2022.

2.2 European Union and member state support for civil society organisations and private actors

The European Union and European governments are tackling disinformation directly through legislative and regulatory efforts such as the DSA, the DMA and the AI Act, all of which aim to address different aspects of disinformation.²⁴ However, there are other reasons why regulating disinformation is a complex challenge for public authorities. For example, the ‘disinformation dilemma’ is challenging in that any regulatory efforts should not infringe on fundamental rights and freedoms, e. g. through censorship, or negatively and unduly stifle technological or business model innovation to a significant degree (European Court of Auditors, 2021). Furthermore, while legislation, regulation, and tools to combat disinformation within the European Union and its Member States may be well-intentioned and effective in the domestic context, the same approaches and tools may be used by authoritarian governments to, for example, curtail freedoms (European Commission, 2018a).

Outside of direct regulation, the EU has also developed the overarching ‘EU Action Plan against Disinformation’, a broad effort to address many aspects of countering disinformation including raising awareness of the negative impact of disinformation, supporting the work of independent media and quality journalism, and setting legislative priorities (ibid.). In addition, in 2015, the European External Action Service’s East StratCom Task Force launched its flagship project EUvsDisinfo to “better forecast, address, and respond to the Russian Federation’s ongoing disinformation campaigns affecting the European Union, its Member States, and countries in the shared neighbourhood... and to help citizens in Europe and beyond develop resistance to digital information and media manipulation.” (European Commission, 2023).

However, in addition to direct regulatory efforts and EU-led initiatives, the EU and Member States also provide support to other European actors working on disinformation in four keyways, namely by supporting research; by supporting fact-checkers; by leading or supporting multi-stakeholder/multi-sectoral cooperation; and by supporting media literacy and education initiatives.

Providing financial support for research and cross-sector collaboration

The EU and its Member States provide significant support for research to better understand the trends in, drivers and impact of, and responses to disinformation. According to the European Commission, the Horizon 2020 research programme has funded around 40 projects on disinformation for a total of almost €76.5 million (ibid.). Horizon Europe, Europe’s research framework up until 2027, “dedicates funding to issues relating to foreign interference, aiming at strengthening democratic accountability and the resilience of citizens against disinformation”; the first work programmes aim to mobilise around €60 million for research into the fight against disinformation in general and pandemic-related disinformation in particular (ibid.; European Commission).

European governments are also funding impactful research on disinformation. For example, the Swedish Government’s Civil Contingencies Agency has funded numerous research projects on countering disinformation, including funding Lund University to produce a highly influenti-

24 This study does not go into detail on directly implemented European Union or state approaches to countering disinformation. For more information, see Iglesias Keller et al. (2024).

al handbook entitled ‘Countering Information Influence Activities: A Handbook for Communicators’.²⁵

Further, given the diversity of challenges in the fight against disinformation, cooperation between the public and private sectors, civil society, academia, and the media is crucial to ensure more effective responses. The European Union has played an important role in bringing together different actors e.g. through the **Social Observatory for Disinformation and Social Media Analysis (SOMA)**, launched with funding from the Horizon 2020 research and innovation programme. It brings together researchers, fact-checkers, and media organisations to provide support to a European community that will jointly fight disinformation.²⁶

Supporting fact-checkers

Recognising the importance of fact-checking in the fight against disinformation, the European Union and its Member States have launched numerous efforts to strengthen such efforts across the continent. One prominent example is the **European Digital Media Observatory (EDMO)**, which was launched in June 2020 to ensure closer coordination between fact-checking organisations, the academic community, media professionals, and teachers with tech companies and national authorities. Among other activities, the EDMO’s work includes reporting on digital platforms’ compliance with the **Code of Practice on Disinformation**; it thereby serves as a mechanism to provide evidence of violations to the European Commission.²⁷

In addition, in 2023 the European Commission launched a call for proposals under its Horizon Europe programme to support EU fact-checkers in their efforts to combat disinformation. With funding of up to €850,000 and projects set to start on 1 April 2024, the main objective of this funding line is to “boost the capacity of the European fact-checking community to respond rapidly and effectively to crises” by better understanding the needs of fact-checkers, to provide recommendations and solutions on how best to support them with different resources, to test these solutions in with regards to climate change and other crisis events, and to carry out training and dissemination activities (European Commission, 2023a).

In addition, the European Fact-Checking Standards Network, which was initially funded by the European Commission and is now funded by membership fees and external donations, also holds meetings to discuss critical issues and coordinate activities, including regarding its role in holding technology companies to account in relation to the Digital Services Act. Members of the network met in December 2023 and discussed, for example, elections and voting, including the 2024 European Parliament elections; migration; climate change; and a possible common database for European fact-checking work.²⁸ During this meeting, Vincent Couronne of the French fact-checking group Les Surligneurs, commented that European fact-checking organisations “have started to use the [provisions of the] DSA to ask both the platforms and

25 For an excellent collection of examples of state efforts to combat disinformation, including in Sweden, the UK and France, see Vilmer, 2021a.

26 For more information see: <https://www.disinfobservatory.org/about-us/>. Last accessed 24 March 2024.

27 For more information see: <https://www.poynter.org/fact-checking/2023/european-fact-checkers-prepare-for-elections-under-a-new-law-that-regulates-tech-companies/>. Last accessed 24 March 2024.

28 For more information see: www.poynter.org/fact-checking/2023/european-fact-checkers-prepare-for-elections-under-a-new-law-that-regulates-tech-companies/. Last accessed 24 March 2024.

the EU institutions to adhere to their commitments.” (ibid.)

European Member States have also launched interesting initiatives to fact-check and debunk false or misleading information. For example, the Lithuanian Ministries of Defence and Foreign Affairs and the Lithuanian Armed Forces, together with journalists and local civil society organisations, and with funding from the Google Digital Innovation Fund and the Baltic internet portal Delfi, created the website ‘Demaskuok.It’, which analyses about 10,000 articles per day in Lithuanian and Russian languages to identify disinformation, and is able to debunk them within two hours (Gerdziunas, 2018).

Supporting media literacy and education efforts

The European Union also contributes to the media literacy and education of European citizens. The Citizens, Equality, Rights and Values (CERV) programme, managed by the European Executive Agency for Education and Culture (EACEA), promotes media literacy by channelling funding to civil society organisations and other non-governmental organisations to empower citizens to make informed choices by helping them to identify disinformation (European Commission, 2023). The Commission also supports media literacy campaigns such as #SaferInternet4EU and “Media Literacy for All”, initiatives launched in 2018 to promote online safety, media literacy, and cyber hygiene, and to document and disseminate good practices in the field of media literacy.²⁹

Likewise, the European Union has been active in promoting media literacy in view of the upcoming European Parliament elections in 2024. For example, in June 2023 the European Economic and Social Committee (EESC) hosted an event with participants from civil society, media and youth organisations to “better highlight the need for a more bottom-up approach with a strong civil society network countering disinformation on the ground.” (EESC, 2023) EU-funded projects have also produced resources for teachers to integrate into their curricula. For example, The Implementation of Media Education in Schools (iMES) project developed a curriculum for teaching ‘Media and Society’ in secondary and vocational schools in Croatia, Greece and Lithuania.³⁰

European Member States have also launched notable media literacy initiatives. In Germany, for example, the ‘Live Democracy!’ programme of the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth (BMFSFJ) funds projects to teach people how to deal with disinformation and conspiracy theories, while the Federal Agency for Civic Education and the Federal Government Commissioner for Culture and the Media also support initiatives to improve media and news literacy (Bundesregierung, 2023). These include the ‘News test’ initiative launched by the German think tank Stiftung Neue Verantwortung in cooperation with the design agency Nach Morgen, which enables citizens to test and improve their digital media skills.³¹

29 For more information see: www.betterinternetforkids.eu/de/saferinternet4eu and <https://all-digital.org/gyfs-mleg/>. Last accessed 24 March 2024.

30 For more information see: <https://erasmus-plus.ec.europa.eu/projects/search/details/2018-1-LT01-KA201-046996>. Last accessed 23 March 2024.

31 For more information see: <https://der-newstest.de/>. Last accessed 24 March 2024.

3 Key challenges for civil society organisations and private actors in countering disinformation

Countering disinformation effectively and consistently is complicated for a variety of reasons. In addition to the specific challenges for civil society organisations and private actors outlined below, there are numerous broader societal and technological developments that further complicate their efforts. For example, the rise of social media as a primary source of news where disinformation can flourish, combined with the weakening of professional news organisations – traditionally a more reliable source of accurate information³² – has created a media landscape where it is harder than ever for information consumers to separate fact from fiction (Saurwein & Spencer-Smith, 2020). The sheer volume of content uploaded to various internet platforms every day, and the speed with which this information can spread within and across platforms, is impressive, and poses significant challenges for those seeking to combat disinformation and those seeking to disseminate more accurate information.

At the same time, the business models of (social) media platforms, driven by financial incentives, use opaque algorithms to keep users in their own bubbles or echo chambers, suggesting (dis)information that confirms existing beliefs or biases. All of this can lead to the amplification of false or misleading information, which not only leaves audiences misinformed or disinformed, but also erodes public trust in both traditional and social media as sources of news (Higgins 2024). Moreover, there is a strong possibility that this will only become more challenging in the years ahead. The creation and dissemination of disinformation will become even faster and more sophisticated with the emergence of accessible generative artificial intelligence (Gen AI) tools that can create ever more realistic text, images, and videos, and provide human users with the tools to shape and disseminate them for maximum effect.

In addition to these and other broader challenges, civil society organisations and private actors also face more specific challenges in their efforts to combat disinformation, including keeping up with the volume and speed of disinformation; the fact that disinformation is often more interesting to consumers than factual information; the lack of resources and expertise needed to adequately combat disinformation; and the difficulty of balancing commercial interests with the public good.

³² It is worth noting that traditional media also serves to disseminate disinformation as well, both through inaccurate reporting as well as republishing false or misleading content. (e.g. Dragomir et al., 2024).

3.1 Keeping up with the volume and speed of disinformation

Technological advances have turned traditional models of information creation and dissemination on their head. The barriers to entry into and contribution to information ecosystems are now so low that anyone can produce and distribute content simply by having access to the internet via a device and a piece of (often free) software. This development, combined with the decline of traditional (local) media and high-quality public interest journalism, has led to a situation where low-quality or agenda-driven (dis)information increasingly fills information spaces.³³ In addition, posts on social media platforms such as X (formerly Twitter), Facebook, Instagram, or TikTok are easily shared with other users, allowing disinformation to spread quickly not only on the respective platform, but also across different social media and subsequently across traditional media platforms. Furthermore, social media platforms are designed in such a way that false content from disreputable or otherwise unprofessional sources is often indistinguishable from more trustworthy content from professional news sources.

Taken together, the volume of false or misleading content and the speed at which it is disseminated pose massive challenges to actors working to combat disinformation, particularly those involved in eliminating the spread of disinformation at its source, namely, social media platforms and fact-checking organisations. With regard to the former, social media platforms try to prevent the spread of disinformation from spreading across their platforms through such measures as content moderation that uses human moderators or tools to detect and remove disinformation, or mechanisms that allow users to report false or misleading information, among others. However, the effectiveness of such efforts for making a real difference is debated. A recent study by the European Commission found that approaches by social media platforms to mitigate the spread of Russian disinformation targeting the European Union over its war against Ukraine were largely ineffective (European Commission, 2022).

Fact-checking organisations also face significant challenges in keeping up with and breaking through all the noise in the information landscape to inform audiences of their conclusions. Fact-checking websites are not major news sources themselves, so they need traditional media or social media platforms to report their findings in order to reach audiences large enough to make a difference (Saurwein & Spencer-Smith, 2020). In addition, false or misleading information can be produced extremely quickly, but fact-checking and disseminating a response are time-consuming tasks and often too slowly accomplished to prevent disinformation from reaching large audiences before it is debunked (see Vilmer, 2021).

In addition, research and policy advocacy organisations also struggle to keep up with demands, including analyzing the latest disinformation tactics, understanding legislative proposals, and taking a forward-looking approach to combating disinformation, among others. These challenges are also compounded by the reality of unpredictable or inaccessible funding environments that prevent them from building sustainable research programmes as well as focusing on longer-term or niche research issues that may not be as attractive to funders (see section below on funding).

3.2 Disinformation is more interesting than information

³³ Interview.

Fake or misleading news that fits in with pre-existing opinions, or even (dis)information presented in a more sensational way, can often be more interesting than factual information presented in traditional news formats. In this sense, it has become less important that information be factual in order to get attention, but rather that it be presented in a compelling way. A particularly challenging dilemma is that those who seek to provide truthful information and counter disinformation are competing for attention on the same platforms as those who peddle disinformation – and the latter benefit from a more favourable playing field, as they are not bound by facts. As Jean-Baptiste Jeangène Vilmer noted in a study for the Atlantic Council, “It matters very little that we are right: as long as our adversaries tell better stories, and more quickly – which they are able to do because they do not have to ground their claims in facts – they will win.” (ibid.) A study by the EU Disinfo Lab in 2021 found that actors fighting disinformation struggle to reach audiences on social media, and that it is particularly difficult to measure and report this reach to those funding their work, who may demand such metrics (Pershan, 2021).

In light of this, anti-disinformation actors must not only refute false or misleading information, but do so in a way that is equally, if not more, compelling than the information or narrative being refuted. A 2021 study by The Hague Program for Cyber Norms analysed national responses to COVID-19-related disinformation, and found evidence that framing counter-narratives in a compelling way can be highly effective. The authors highlight the ‘whodunit’ counter-narrative following the leak of over 20,000 largely benign emails from French President Emmanuel Macron, which were interspersed with false documents intended to influence the outcome of the 2017 French presidential election (Vériter et al. 2021).

3.3 Limited resources and expertise

The approaches taken by civil society organisations, research organisations, and private companies to combat disinformation require resources, whether in the form of funding, expertise, or tools. Civil society, and research organisations in particular, often cite limited funding as being the key challenge they face in their work on disinformation, especially given the scale and impact of the problem (e.g. Bradshaw & Neudert, 2021; Saurwein & Spencer-Smith, 2020). This problem also extends to the broader issue of organisational sustainability and effectiveness. Funding for work is often project-based, meaning that organisations have to apply for funding for a limited period of time, and in many cases for projects that are more focused on current issues, rather than less compelling but potentially more impactful longer-term projects.³⁴ While such projects can produce excellent results, without clarity beyond short-term funding, organisations are still faced with the challenge of sustaining such work programmes over longer periods, retaining talented staff, developing more technical expertise, or strategically planning more longer-term efforts with potentially greater impact (e.g. Bradshaw & Neudert, 2021). Furthermore, limited funding and fierce competition for it leads civil society and research organisations to look to governments or business to fill the gaps, creating situations of conflict of interest.³⁵

This is problematic because there is a great need for organisations to play a constructive role in the fight against disinformation. As highlighted in the policy brief “The Digital Services Act is in effect – now what?” published by the German think tank Stiftung Neue Verantwortung in February 2024: “*Making the [Digital Services Act] work requires the development of a community of practice that includes not only regulators but also platform users, researchers, civil society, and businesses... Civil society groups are explicitly mentioned in the [Digital Services Act] to support enforcement in a variety of ways, from advising regulators to representing consumers... Researchers now have a legally guaranteed way to request data from platforms to investigate potential risks. Platforms are encouraged to work together on industry codes of conduct.*” (Jaursch 2024). For their part, civil society and research organisations are eager to play a role, as this is an area where they can have an impact on policy-making – often a key goal in their mission statements.³⁶ However, adequate resources are needed to enable these organisations not only to respond to the European Commission’s call for support, but also to play a constructive and sustainable role in the fight against disinformation more generally. In this connection, while civil society organisations are keen to play a constructive role in the Code of Practice on Disinformation processes and to monitor corporate compliance, resource constraints make it difficult for them to keep up, for example, with the necessary preparations for meetings and to contribute to reports.³⁷ This is worrying given that companies that are signatories to the Code of Practice, with greater resources at their disposal, do not have this problem.

While the European Union provides funding for organisations and networks through various initiatives, including through the Horizon Europe research and innovation framework, this funding is often inaccessible to many organisations. For example, significant up-front invest-

34 From AlgorithmWatch’s Mackenzie Nelson in Bradshaw and Neudert (2021).

35 Interview.

36 Interview.

37 Interview.

ment is required to prepare proposals, which are often rejected due to strong competition or failure to comply with an administrative formality. Furthermore, complicated administrative and reporting requirements discourage applicants, especially those from smaller, newer organisations, while the need to develop and adhere to long-term project plans, often drawn up well in advance of the start of the grant, can have a negative impact on the ability of projects to have a real impact in a rapidly changing and evolving issue area that requires adaptation to new developments (e. g. Bradshaw & Neudert, 2021). Such a high bar for funding can make it difficult for new actors, as well as those with different and potentially more innovative approaches, to access funding and potentially have a positive impact.

Finally, [the lack of] networking and coordination among counter-disinformation actors remains an issue. Often, organisations and companies working on these issues do so in silos, with little coordination or knowledge sharing. This can lead to sub-optimal duplication of efforts in an environment of limited expertise and resources.³⁸ In addition, the networks and conferences that do exist are often dominated by actors from large technology companies, better-resourced civil society and research organisations and universities, and actors from France, Germany and the UK, which are able to devote more resources to disinformation issues.³⁹

38 Interview.

39 Interview.

3.4 Balancing commercial interests with the public good

The business models of online platforms are based on user engagement and advertising revenue, so it is in their interest to have content that generates high levels of user engagement and, ultimately, revenue. However, it is often the case that sensationalist, misleading, or false information leads to higher levels of engagement, meaning that such posts receive more visibility than other, less controversial content. This creates an incentive for online platforms as well as traditional media companies, to prioritise lower quality information in order to maximise revenue.

As more and more users appear to be turning to social media as a primary source of news, this has had, and will continue to have, a significant impact on the quality of discourse.⁴⁰ This is compounded by recent platform changes, such as the monetisation of the blue tick by X (formerly Twitter), which has made it even more difficult to separate authentic from false information, as the blue tick indicator no longer represents verified and credible sources. This is problematic because, as Bellingcat Founder Eliot Higgins warned in the *Financial Times*, “If the distinction between genuine authority and purchased prominence becomes ambiguous, discerning truth from noise becomes a Herculean task for the everyday user.” (Higgins 2024).

As discussed in the previous chapter, self-regulatory initiatives such as the Code of Practice on Disinformation are a positive step forward in providing some transparency about online platforms’ efforts to combat disinformation. However, self-reported information is often selective, opaque, or even formatted in lengthy documents that make it time-consuming to find relevant information (e.g. European Commission, 2018b; Saurwein & Spencer-Smith, 2020; Freihse & Berger, 2024). Furthermore, the lack of a common approach to presenting meaningful commitments and reporting on consistent indicators and targets often makes it difficult to verify compliance.

This raises another particularly challenging issue: access to data on social media activity. In order to conduct research, monitor compliance, and track and understand emerging trends, civil society organisations and researchers rely on the goodwill of the very platforms that the Code of Practice seeks to hold accountable to provide them with access to data. This raises several worrying issues. In particular, it creates a conflict of interest for researchers and analysts who may lose access to this data if their conclusions are too critical (Bradshaw and Neudert, 2021). In addition, the data provided by the platforms is often opaque, limited, and accessible only to a few organisations, and it is becoming increasingly difficult and expensive to access. For example, in March 2024, Meta decided to shut down CrowdTangle, a research tool used by researchers to track how content is shared on Facebook and Instagram (e.g. Flores, 2024). In addition, X’s (formerly Twitter’s) application programming interface (API) – used by researchers to collect data and conduct various analyses – has become increasingly inaccessible, and the processes for approving data access can be lengthy, and access is often denied.⁴¹

40 According to a 2022 Eurobarometer survey, 26% of respondents indicated that social media platforms were primary news sources. In a similar survey conducted in 2023, this percentage rose to 37% – an 11% jump. (European Parliament, 2023).

41 Interview.

4 Conclusion

Disinformation is a complex issue. While regulation at the European and national level is critical to addressing the myriad of challenges, it can only be one tool among many to make progress in curbing the potential harm disinformation causes to European societies. Europe is not a homogeneous continent and, as with so many critical issues, there is no single solution. This research has shown the need for a whole-of-society approach involving a broad range of actors across Europe, including civil society organisations, research organisations, the private sector, the media, and others, and a broad range of activities including, but not limited to, fact-checking, research, advocacy, media literacy, and independent media.

The good news from the research and expert interviews is that much is already being done. On the regulatory side, the European Union has recently passed several important pieces of legislation, including the Digital Services Act, the Digital Markets Act, and the AI Act, all of which address different aspects of the disinformation problem (see Iglesias Keller et al., 2024). Universities across Europe and in other countries like the United States are creating disinformation studies programmes to train new generations of researchers, activists, programmers, and policymakers who will help to continue addressing the problem in the future. Funders are increasingly recognising the challenge of disinformation and are providing funding for research, policy advocacy, fact-checking initiatives, media literacy campaigns, and compliance monitoring, among other things.

The following are five insights that emerged from the research for this study:

4.1 Effective implementation of existing regulation

With each new election and new European Commission, there is a natural tendency for politicians, experts, and policy advocates to focus on new policy priorities. However, the research and expert interviews suggest that it is worth recognising that the European Union has already achieved important regulatory successes that can play a strong role in the fight against disinformation, and there is a strong case to be made that the new Commission's main priority should be to prioritise the enforcement of these successes, rather than moving forward too quickly with new efforts.⁴² The Digital Services Act and the Digital Markets Act alone are far-reaching pieces of legislation, and the updated 2022 Code of Practice on Disinformation, while not perfect, is a positive step forward. However, it will take time for the European Union, Member States, and stakeholders from other sectors to get to grips with the implications, needs, and challenges of these changes, to build the capacity and resources to do the work required, and to identify, share, and scale up good practice. While new challenges will emerge over time and different actors will need to (re)prioritise actions, the current baseline of these new regulatory efforts provides a solid foundation for moving forward.

⁴² Interview.

4.2 New funding models for anti-disinformation efforts

The research also underlines that financial resources are essential for organisations working on disinformation to play their role effectively and have an impact. Given the complex nature of the disinformation problem, it is crucial that a wide range of stakeholders, particularly at the local level, have the resources they need to do their work effectively and sustainably.

It is tempting to repeat the refrain that more funding is needed. While this is true, it would be equally useful to have more – and more nuanced – discussions that focus on the relationship between, on one hand, the expectations and requirements of public authorities regarding the role that civil society and research organisations should play, and, on the other hand, whether the available funding – and existing funding mechanisms – are adequate to meet these expectations and roles. Civil society organisations and academia are called upon to help enforce the Digital Services Act and monitor compliance with the Code of Practice on Disinformation. Open discussions are needed on how existing funding models, both at EU and Member State level, need to be changed or complemented to meet these new expectations and to fund actors fighting disinformation in a more sustainable way.

Similarly, protecting the integrity of elections is a top priority for the European Union and (most) European governments. However, efforts to combat and understand disinformation approaches cannot only focus on the months before elections, but must be continuous, ongoing, and vigorous. Without such an approach, fact-checking organisations, for example, are at a huge disadvantage against disinformation actors who do not stop their activities just because an election is over (e. g. Habte & Watson, 2023).

It has been repeatedly emphasised that that this longer-term, more accessible, and non-reactive funding would help to give organisations some planning certainty to continue to build their work, maintain expert capacity and potentially increase the impact of their activities.

Given that both government and corporate funding can be sensitive in this area, pooling funds from a variety of public, private and philanthropic donors, together with mandatory fees on large platforms used for this purpose, and managing these funds independently could be both an effective way of scaling up funding and a hedge against some of the key risks for civil society and research organisations.⁴³ This diversification could also help to address the criticism that other forms of funding, such as grants through the Horizon Europe programme, are inaccessible to smaller organisations due to complicated and extensive application procedures, as well as the large up-front investments and ongoing administrative needs required to manage them.

43 Interview.

4.3 The data access problem

In addition, the research and expert interviews show that civil society organisations, researchers, academics, the media, and other observers need access to data from social media platforms – and that this data needs to be comprehensive. Such access is crucial not only for enforcing regulations or holding platforms accountable to self-regulatory efforts such as the Code of Practice on Disinformation, but also for basic research. For example, understanding certain demographic behaviours, such as why men of a certain age group are more likely to believe and spread certain types of disinformation, is essential to better understanding a particular problem and designing effective countermeasures.⁴⁴ Furthermore, access to data is crucial to understanding the impact of new policies or, alternatively, the impact of the status quo. Moreover, this access needs to be more inclusive, involving a broader range of actors than the current researcher vetting process allows. This is particularly important given the backsliding on access we are seeing, for example, with the recent behaviour of X (formerly Twitter) and the closure of CrowdTangle, which has made it even more difficult for researchers to access platform data.

⁴⁴ Interview.

4.4 Media literacy efforts and support of independent media

It has been repeatedly emphasised that while it is important to combat disinformation across all vectors, media literacy and public trust in information are particularly important. That this is a proverbial recommendation comes as no surprise, as the evidence clearly shows that countries with a long tradition of media literacy are much less vulnerable to disinformation campaigns than those without. And the European Union has taken notice. The European Commission's 2018 High Level Expert Group on Fake News and Online Disinformation, for example, strongly recommends focusing on strengthening "media and information literacy, digital citizenship, stronger independent news media, and digital debates free from interference by public authorities and powerful private actors" (European Commission, 2018b).

We should learn from successful initiatives in countries like Sweden and Finland, and seek to replicate these successes in Member States' communities in a localised way, focusing on different target groups, and with tailored approaches (Dragomir et al. 2024). A key success factor in this respect is to find effective and creative ways to reach not only young people through education systems, but also communities of all ages, which is inherently more difficult. In this connection, there are already a number of case studies highlighting good practices as well as mappings of European actors focusing on media literacy, including a 2016 study by the European Audiovisual Observatory, as well as ongoing efforts by the European Digital Media Observatory (EDMO 2021, Chapman 2016).

Supporting (local) independent news media can also contribute to the public good. In the absence of local media or accessible high-quality public interest journalism, low-quality information and disinformation are more likely to fill the vacuum – and there is strong evidence that this dynamic undermines civic engagement and societal trust (Bateman & Jackson, 2024). But this is a thorny issue, especially given the abundance of choice for media consumers and the financial cost of supporting a broad independent news ecosystem in the face of trends such as declining subscription rates.

Nevertheless, providing incentives for local, independent, public-interest media is important – and we can draw on existing experience. A 2020 study by the Organisation for Economic Co-operation and Development (OECD) identified a number of approaches, including subsidising (provincial) newspapers, as in the case of Sweden, France, Austria, and Norway, or providing a free newspaper subscription to 18-year-olds for one year, as in France (OECD, 2024). It would be important, however, that such subsidy funds, which could be augmented by private philanthropic donations, are managed independently and not influenced or controlled by public authorities (Bateman & Jackson 2024).

4.5 Playing the long game

Finally, research has shown that countering disinformation requires a long-term approach. Only by planning for the longer term and fostering a comprehensive infrastructure of actors and approaches can the problem of disinformation be meaningfully and effectively addressed. Not only will such an approach increase society's resilience to disinformation, but an overtly strong infrastructure and long-term posture can also deter disinformation campaigns targeting Europe in the first place.⁴⁵ This requires consistent and integrated efforts, not just measures linked to events such as elections or pandemics. In this context, the development of networks and cooperation between the public, private, civil society, academic, research, and media sectors is crucial for leveraging collective expertise and approaches to combat the problem and to more effectively deter and respond to disinformation campaigns. This long-term approach must also consistently address other challenges, such as closing the gap between funding and expectations gap, continuing to identify and disseminate best practices in the areas of media literacy and support for local media, ensuring access to relevant data.

⁴⁵ Interview.

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Responsible for content:

Global Public Policy Institute (GPPI), Germany

Responsible for the publication series

Cathleen Berger
Co-Lead Upgrade Democracy
cathleen.berger@bertelsmann-stiftung.de
www.upgradedemocracy.de
www.bertelsmann-stiftung.de

Charlotte Freihse
Project Manager Upgrade Democracy
charlotte.freihse@bertelsmann-stiftung.de
www.upgradedemocracy.de
www.bertelsmann-stiftung.de

Author

Wade Hoxtell

Design

nach morgen

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Lara Wagner

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