Public survey for European Democracy Action plan

Fields marked with * are mandatory.

Introduction

The Commission's Political Guidelines announced a European Democracy Action Plan under the headline ambition of a new push for European Democracy. The Commission intends to present the Action Plan towards the end of 2020.

The aim of the European Democracy Action Plan is to ensure that citizens are able to participate in the democratic system through informed decision-making free from interference and manipulation affecting elections and the democratic debate.

The Commission has started the preparation of the European Democracy Action Plan and would like to consult the public on three key themes:
- Election integrity and how to ensure electoral systems are free and fair;
- Strengthening media freedom and media pluralism;
- Tackling disinformation.

In addition, the consultation also covers the crosscutting issue of supporting civil society and active citizenship.

When providing your contribution, you may opt to fill in one or more of the four sections, according to their relevance to your areas of interest. Please note that a specific public consultation on the Digital Services Act package is open until 8 September 2020 and covers also elements relevant in the context of the European Democracy Action Plan.[1]

[1] https://ec.europa.eu/digital-single-market/en/news/consultation-digital-services-act-package

About you

* Language of my contribution
- Bulgarian
- Croatian
- Czech
- Danish

- ○ Dutch
- ● English
- ○ Estonian
- ○ Finnish
- ○ French
- ○ Gaelic
- ○ German
- ○ Greek
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- ○ Portuguese
- ○ Romanian
- ○ Slovak
- ○ Slovenian
- ○ Spanish
- ○ Swedish

*I am giving my contribution as

- ○ Academic/research institution
- ○ Business association
- ○ Company/business organisation
- ○ Consumer organisation
- ○ EU citizen
- ○ Environmental organisation
- ○ Non-EU citizen
- ● Non-governmental organisation (NGO)
- ○ Public authority
- ○ Trade union
- ○ Other

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* Surname

Hajdu

* Email (this won't be published)

dominika.hajdu@globsec.org

* Organisation name

255 character(s) maximum

GLOBSEC in the name of the Alliance for Healthy Infosphere

* Organisation size

- ○ Micro (1 to 9 employees)
- ○ Small (10 to 49 employees)
- ○ Medium (50 to 249 employees)
- ● Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](). It's a voluntary database for organisations seeking to influence EU decision-making.

903680223573-18

* Country of origin

Please add your country of origin, or that of your organisation.

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- ○ Åland Islands
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- ○ Algeria
- ○ American Samoa

- ○ Djibouti
- ○ Dominica
- ○ Dominican Republic
- ○ Ecuador
- ○ Egypt

- ○ Libya
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- Argentina
- Armenia
- Aruba
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- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
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- Nauru
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland

○ Bosnia and Herzegovina	○ Guam	○ Nepal	○ Syria
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○ Bouvet Island	○ Guernsey	○ New Caledonia	○ Tajikistan
○ Brazil	○ Guinea	○ New Zealand	○ Tanzania
○ British Indian Ocean Territory	○ Guinea-Bissau	○ Nicaragua	○ Thailand
○ British Virgin Islands	○ Guyana	○ Niger	○ The Gambia
○ Brunei	○ Haiti	○ Nigeria	○ Timor-Leste
○ Bulgaria	○ Heard Island and McDonald Islands	○ Niue	○ Togo
○ Burkina Faso	○ Honduras	○ Norfolk Island	○ Tokelau
○ Burundi	○ Hong Kong	○ Northern Mariana Islands	○ Tonga
○ Cambodia	○ Hungary	○ North Korea	○ Trinidad and Tobago
○ Cameroon	○ Iceland	○ North Macedonia	○ Tunisia
○ Canada	○ India	○ Norway	○ Turkey
○ Cape Verde	○ Indonesia	○ Oman	○ Turkmenistan
○ Cayman Islands	○ Iran	○ Pakistan	○ Turks and Caicos Islands
○ Central African Republic	○ Iraq	○ Palau	○ Tuvalu
○ Chad	○ Ireland	○ Palestine	○ Uganda
○ Chile	○ Isle of Man	○ Panama	○ Ukraine
○ China	○ Israel	○ Papua New Guinea	○ United Arab Emirates
○ Christmas Island	○ Italy	○ Paraguay	○ United Kingdom
○ Clipperton	○ Jamaica	○ Peru	○ United States

○ Cocos (Keeling) Islands	○ Japan	○ Philippines	○ United States Minor Outlying Islands
○ Colombia	○ Jersey	○ Pitcairn Islands	○ Uruguay
○ Comoros	○ Jordan	○ Poland	○ US Virgin Islands
○ Congo	○ Kazakhstan	○ Portugal	○ Uzbekistan
○ Cook Islands	○ Kenya	○ Puerto Rico	○ Vanuatu
○ Costa Rica	○ Kiribati	○ Qatar	○ Vatican City
○ Côte d'Ivoire	○ Kosovo	○ Réunion	○ Venezuela
○ Croatia	○ Kuwait	○ Romania	○ Vietnam
○ Cuba	○ Kyrgyzstan	○ Russia	○ Wallis and Futuna
○ Curaçao	○ Laos	○ Rwanda	○ Western Sahara
○ Cyprus	○ Latvia	○ Saint Barthélemy	○ Yemen
○ Czechia	○ Lebanon	○ Saint Helena Ascension and Tristan da Cunha	○ Zambia
○ Democratic Republic of the Congo	○ Lesotho	○ Saint Kitts and Nevis	○ Zimbabwe
○ Denmark	○ Liberia	○ Saint Lucia	

* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

○ **Anonymous**

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

● **Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

☑ I agree with the [personal data protection provisions](#)

Questions on election integrity and political advertising

Fair democratic debates and electoral campaigns as well as free and fair elections in all Member States are at the core of our democracies. The space for public debate and electoral campaigns has evolved rapidly and fundamentally, with many activities taking place online. This brings opportunities for the democratic process, public participation and citizen outreach but also challenges, inter alia concerning the transparency of political advertising online and possible threats to the integrity of elections. Ahead of the 2024 European Parliament elections, changes to the role of European political parties might also be considered.

(i) Transparency of political advertising

Q1 Have you ever been targeted[2] with online content that related to political or social issues, political parties (European or national), political programmes, candidates, or ideas within or outside electoral periods ('targeted political content')?

[2] Paid for ads and any form of personalised content promoted to the user

☐ 1. No, never

☐ 2. Yes, once

☑ 3. Yes, several times

☐ 4. I don't know

Q2. If you receive such targeted political content, are you checking who is behind it, who paid for it and why you are seeing it?

☐ 1. No, I am not interested

☐ 2. I don't know how to do it

☑ 3. Yes, occasionally

☐ 4. Yes, all the time

☐ 5. I don't receive targeted political content

Q3. To what extent do you agree with the following statements related to targeted political content you have seen online?

	Fully agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Fully disagree	I don't know /No reply

	Not at all	A little	Neither a lot nor a little	A lot	Absolutely	Don't know
1. Targeted content was labelled in a clear manner	○	●	○	○	○	○
2. It was easy to distinguish paid for targeted content from organic content	○	●	○	○	○	○
3. It was easy to identify the party or the candidate behind the content	○	●	○	○	○	○
4. The content included information on who paid for it	○	●	○	○	○	○
5. The information provided with the content included targeting criteria	○	○	○	○	●	○
6. The ad was linked to a database of targeted political content	○	●	○	○	○	○
7. The targeted political content offered the possibility to report it to the platform	○	○	●	○	○	○

Q4. Which of the following initiatives/actions would be important for you as a target of political content?

	Not at all	A little	Neither a lot nor a little	A lot	Absolutely	Don't know
1. Disclosure rules (transparency on the origin of political content)	○	○	○	○	●	○
2. Limitation of micro-targeting of political content, including based on sensitive criteria, and in respect of data protection rules	○	○	○	○	●	○
3. Creation of open and transparent political advertisements archives and registries that show all the targeted political content, as well as data on who paid for it and how much	○	○	○	○	●	○
4. Political parties to disclose their campaign finances broken down by media outlet	○	○	○	○	●	○
5. Prohibit foreign online targeted political content	○	○	○	○	●	○
6. Prohibit online targeted political content altogether	○	●	○	○	○	○

7. Rules limiting targeted political content on the election day and just before	○	○	○	○	●	○
8. Other	○	○	○	○	○	○

Q5. Online targeted political content may make use of micro-targeting techniques allowing advertisers to target with high precision people living in a specific location, of a certain age, ethnicity, sexual orientation or with very specific interests. Do you think that:

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Micro-targeting is acceptable for online political content and it should not be limited	○	○	○	○	●	○
2. Criteria for micro-targeting of political content should be publicly disclosed in a clear and transparent way for every ad	●	○	○	○	○	○
3. Micro-targeting criteria should be strictly limited	●	○	○	○	○	○
4. Micro-targeting criteria should be banned	○	●	○	○	○	○

Please explain

Q3: Targeted content is usually labelled in a relatively clear manner as "sponsored" or "ad". However, the Alliance members identified several occurrences of accounts (on Facebook) not disclosing all necessary information despite promoting their own post for political purposes, as well as of Facebook ads library missing the posts that had been paid for. There is thus a room for improvement - more precise information than a range of finances spent on an ad (vague especially for smaller markets), estimated potential reach, gender and age of the target audience, regional focus of an ad and the payer, should be provided. Also, disclaimers indicating that a post is a paid ad should not disappear when such post is shared by other users.

Users, on the other hand, receive very little information on the basis and reasons behind the targeting. The information provided about micro-targeting for advertising purposes is very general. Phrases such as "estimation of your interest", "there could also be more factors not listed here" or "based on your activity on the internet" are disrespecting the users' right to be informed about how their data are being used and sold to third parties.

Moreover, recommended content on online platforms such as Facebook and YouTube completely lacks any option to check the data and reasoning behind recommending given content.

The enforcement of rules that secure transparency of targeted ads should be implemented, together with a possibility to access a full set of data on why a user is seeing the targeted ad. At the same time, online platforms should be tasked with automatic and regular delivery of information about all paid ads to national institutions supervising the financing of political campaigns.

Q4: All the measures stated above (with the exception of prohibiting political advertising altogether) are a necessary and crucial step forward. While the Alliance recognises the online space (including social media online platforms) as a new natural space for political advertising, the online information sphere also became a crucial source of information for many EU citizens. Thus, full transparency and rules must be implemented to establish basic control mechanisms and allow national authorities, media and users to regularly check political advertisers for compliance.

Q5: Due to the disproportionately high potential of voter manipulation occurring at the micro-targeting, it should be strictly limited and allowed only on a limited set of basic criteria, which should be made available for all users and national authorities.

Q6. EU countries regulate offline political advertising on traditional media (e.g. press, television) in the context of local, national or EU elections. These rules limit the amount of airtime or maximum expenditure permitted for political advertising on broadcast TV or print media. Do you think similar rules should also apply to online targeted political content?

- ☑ 1. Yes
- ☐ 2. No
- ☐ 3. I don't know

Please explain your answer

Since the election campaigns have moved to a large extent to the virtual space, same rules should apply also to online political advertising to safeguard fair conditions for all candidates. While the maximum airtime is not applicable to online platforms, maximum expenditure should be rigorously controlled by relevant authorities and enforced by dissuasive sanctions against both political subjects as well as online platforms. The details and links to studies can be found on the link of the call for Universal Advertising Transparency: https://epd.eu/wp-content/uploads/2020/09/joint-call-for-universal-ads-transparency.pdf

(ii) Threats to electoral integrity

Q1. Do you believe the following are real and existing threats to the electoral process in the EU and its Member States?

	Yes	No	Don't know
1. Intimidation of minorities	●	○	○
2. Intimidation of political opposition	○	●	○
3. Micro-targeting of political messages, that is messages targeted to you or a narrowly defined group	●	○	○
4. Information suppression, that is the purposeful lack of information on a topic	○	●	○
5. Disinformation or fake accounts run by governments, including foreign governments	●	○	○
6. Divisive content, that is content created to divide society on an issue	●	○	○
7. The amplification of content that makes it difficult for you to encounter differing voices	●	○	○
8. Intimidation of women candidates	●	○	○
9. I or someone I know has been targeted based on sensitive criteria such as gender, ethnicity or sexual orientation	●	○	○
10. Content where I could not easily determine whether it was an advertisement or a news post	●	○	○
11. Other	○	○	○

[IF Q1=11: Please define]

Q1.1 IF Q1=YES for any answer option

☐ 1. Have you felt personally intimidated/threatened by targeted political content?

☑ 2. Could you tell us more about your experience?

Please explain your answer

1. Intimidation of minorities – online threats and harassment against ethnic, religious and sexual minorities are very real issues in a number of EU Member States and might lead, among other negative consequences, to voter suppression and lower voter turnout among the targeted groups.

3. Microtargeting – despite voluntary measures taken by the online platforms, there have been numerous instances when EU citizens have been targeted by online political messaging specifically aimed at them due to their online behaviour and characteristics. Such practices, if abused and carried out on a large scale, could alter the outcome of election processes.

5. Disinformation, fake accounts, including by foreign governments. Information operations using disinformation as a tool have been documented in the run-up to EU parliamentary elections and national elections by numerous organisations:
- https://www.globsec.org/publications/slovak-parliamentary-election-2020/
- http://www.pssi.cz/download/docs/500_parlamentni-volby-2017-analyza.pdf
- http://www.pssi.cz/download/docs/545_presidential-election-2018-analysis.pdf
- http://www.pssi.cz/download/docs/709_european-elections-2019-analysis.pdf
- https://www.globsec.org/publications/9204/
- https://www.globsec.org/publications/european-elections-in-central-europe-information-operations-and-disinformation-campaigns/
- https://www.globsec.org/publications/character-assassination-conspiracies-and-manipulation-slovak-presidential-election-through-the-lens-of-disinformation-channels-on-facebook/

There is no doubt that elections are a primary target for interference of an increasing group of actors using disinformation, fake accounts, sock puppets, botnets, and other techniques to influence and disrupt democratic processes. Special attention needs to be paid to the fact that election interference need not necessarily only be carried out by state actors. Growing number of disinformation actors can be non-state actors motivated by either economic or ideological reasons. In 2016, Macedonian youth peddled hoaxes prior to U.S. elections for profit (https://www.wired.com/2017/02/veles-macedonia-fake-news/) and thus effectively interfered in the election. Disinformation actors and networks often do not need foreign state support any longer (see e.g. report by Avaaz and ISD (https://www.isdglobal.org/wp-content/uploads/2019/05/Disinfo-European-Elections-Interim-report-ISD-2-V2.pdf) GLOBSEC Slovak Election 2020 Report (above). Due to lack of action taken by tech giants, disinformation ecosystems are now profitable models generating vast incomes through advertising revenues, as Global Disinformation Index reports confirm. Furthermore, polarising messaging and conspiracy theories have found their way into political agendas of mainstream and far-right public figures who benefit from these, while further polarising societies and disseminating hateful messages.

6. Divisive content – Exponential increase of divisive, hyperpartisan, and polarising content on social media has a potential to significantly alter voter preferences, destabilise our societies and decrease public trust. It is worrying that such content is often accelerated by algorithms on particular online platforms, which further amplify and contribute to polarisation.

8. Intimidation of women candidates - Women candidates are often harassed online not only due to their political preferences or opinions, but also due to their gender. Women of colour or women representing ethnic, religious, or sexual minorities are disproportionately more targeted if they decide to take part in politics.

10. Political content posing as media - Many political parties have set up their own media outlets – websites posing as media promoting a particular candidate or party while often lacking any editorial staff or internal rules and policies. Facebook repeatedly failed to label such media as affiliated to a particular political party and thus as being part of election campaigns. Even in cases of successful identification of such content and subsequent take-down of the public pages which refused to admit their affiliation to particular parties, the pages' administrators reacted by creating alternative pages with almost identical names and visuals and continued in their activity.

(iii) European Political Parties:

Q1. Is there scope to further give a stronger European component to the future campaigns for EU elections? Please list initiatives important to you in this regard

	Not at all	A little	Neither a lot nor a little	A lot	Absolutely	Don't know
1. Better highlighting the links between the national and European Political Parties, for example by displaying both names on ballot papers and in targeted political content	○	○	○	○	◉	○
2. More transparency on financing (e.g. information about how much national parties contribute yearly to the European Politicla Parties budgets)	○	◉	○	○	○	○
3. Bigger budgets for European Political Parties	◉	○	○	○	○	○
4. Strengthening the European campaigns by European Political Parties in Member States	○	○	○	◉	○	○
5. Better explaining the role of European Political Parties in the EU	○	○	○	○	◉	○
6. Other	○	○	○	○	○	○

Please explain

> European political parties should be much more visible not only at the level of the European Parliament, but also in each EU Member State via their national members. By doing so, European policies, measures and decisions taken in the European Parliament would become much closer to European citizens. Displaying names of European political parties on ballots and strengthening awareness-raising campaigns are important elements of a system leading to increased visibility of European political parties in EU Member States.
>
> European elections have generally much lower voter turnout than national elections. This is to some extent the result of inefficient communication by the EU towards its key audiences, using largely bureaucratic language. To foster more engagement and hence to limit the impact of potential disinformation campaigns, the EU needs to change the way it communicates with its audiences through diversification and targeted communication. Significant improvements in strategic communication are required including the creation of a common European public sphere and a production of a more emotionally engaging content. https://www.globsec.org/wp-content/uploads/2020/06/Ideas-for-Resilient-Democracies.pdf

(iv) European Elections

Q1. In your opinion what initiatives at national level could strengthen monitoring and enforcement of electoral rules and support the integrity of European elections (multiple selections possible)?

- ☑ 1. Strengthened sharing of information and monitoring activity across borders and between authorities
- ☑ 2. Technical interfaces to display all political advertisements as defined by online service providers
- ☑ 3. Technical interfaces to display all advertisements (political or not)
- ☑ 4. Clear rules for delivery of political ads online in electoral periods, similarly to those that exist in traditional media (TV, radio and press)
- ☑ 5. Independent oversight bodies with powers to investigate reported irregularities
- ☑ 6. Enhanced reporting obligations (e.g. to national electoral management bodies) on advertisers in a campaign period
- ☑ 7. Enhanced transparency of measures taken by online platforms in the context of elections, as well as meaningful transparency of algorithmic systems involved in the recommendation of content
- ☑ 8. Privacy-compliant access to platform data for researchers to better understand the impact of the online advertisement ecosystem on the integrity of democratic processes
- ☑ 9. Greater convergence of certain national provisions during European elections

☑ 10. Stronger protection against cyber attacks

☑ 11. Higher sanctions for breaches of the electoral rules

☐ 12. Other – please specify

Please explain your answer

All of the above-mentioned measures are necessary to strengthen monitoring and evaluation of electoral rules and support the integrity of European elections.

Q2. In your opinion what initiatives at European level could strengthen monitoring and enforcement of rules relevant to the electoral context?

☑ 1. Strengthened sharing of information and monitoring activity across borders and between authorities

☑ 2. European-level obligations on political advertising service providers

☑ 3. European-level shared online monitoring and analysis capability being made appropriately available to national authorities

☑ 4. Cross border recognition of certain national provisions

☑ 5. Other

Please explain your answer

National authorities often lack resources, expertise or access to tools which would enable them to effectively monitor real-time implementation of electoral legislation and take corrective measures. By pooling resources, sharing access to information, and adopting European level obligations for advertising service providers national authorities would have a much better chance to actually implement these rules in the digital space.

The Alliance believes that regulatory authority on the EU level responsible for enforcement of regulation of online platforms that will be set out within the Digital Services Act is necessary to secure elections integrity. Digital platforms' operation in the EU is a multi-faceted complex phenomenon spanning important issues such as free market rules, respect for national legislations, human rights, freedom of speech as well as technology development, deployment, and innovation.

Far simpler products have regulatory regimes and oversight bodies, and nobody questions the need for those. Given the immense importance that digital platforms have in individuals' lives, as well as societies and state of democracies more broadly, creation of a regulatory authority to oversee performance and impact of digital platforms is, in fact, long overdue.

On a European level such authority would also ensure that digital platforms pay equal attention to following the rules and regulations in each European member state, not only those with the largest user bases. So far, the impact of digital platforms on European smaller markets prior to the elections have been neglected. This issue is of urgent importance to ensure all users' rights are respected in the EU, that everyone has a chance of redress and that hate crime, micro-targeting, political advertising and spread of disinformation are addressed and regulated to protect elections in all EU member states.

Questions on strengthening media freedom and media pluralism

Freedom of expression and freedom and pluralism of the media are enshrined in the Charter of Fundamental Rights of the European Union (Article 11), and their protection is underpinned by Article 10 of the European Convention on Human Rights. They are essential elements of a healthy democratic system. Whilst in general the EU and its Member States score well on a global scale, there are signs of deterioration (as shown by the Media Pluralism Monitor) and the sector is facing challenges from threats to the safety of journalists (including strategic lawsuits against public participation – 'SLAPP lawsuits') to the transformation of the sector, with digital technologies and new players transforming the established business model of advertising revenue. The COVID-19 pandemic has worsened the situation, both in the EU and outside of the EU, from restrictive national legislation to critical loss of revenues for the media sector.

Initiatives to strengthen media freedom and media pluralism will build in particular on the analysis and areas covered by the upcoming Rule of Law Report, with a focus on improving the protection of journalists, their rights and working conditions. Please note that the Commission also intends to propose, by the end of the year, an Action Plan for the Media and Audiovisual sector to further support the digital transformation and the competitiveness of the media and audiovisual sectors and to stimulate access to quality content and media pluralism.

(i) Safety of journalists / conditions for journalistic activities

Q1. Are you aware of issues regarding safety of journalists and other media actors or conditions for journalistic activities in your country?

- ☑ 1. Yes (please justify)
- ☐ 2. No (please justify)
- ☐ 3. I do not know

Please explain your answer

In Central and Eastern Europe, media and investigative journalists are often targets of smear campaigns and attacks from politicians. Taking journalists to courts is a common practice in some CEE countries, especially if the judiciary is under the control of the government, as is the concentration of media ownership among few influential oligarchs or businessmen turning politicians.

High media concentration can be especially problematic in countries with high corruption and close ties among politicians and oligarchs. Media takeovers by wealthy businessmen have often led to forced leave or resigning of prominent journalists or reports. In addition, a change of the ownership tends to change the direction of outlet's reporting.

Concentration of media ownership in the hands of a few oligarchs and politicians is a rising long-term concern in Czechia. With 30% of private media being owned by Prime Minister Andes Babiš, representatives of International Press Institute point out unprecedented conflict of interest.

In addition, Czech President, Miloš Zeman, is known for his hostility and criticism of media. He had joked about journalists being murdered and even 'welcomed' journalists holding a mock assault rifle with an inscription which read "toward journalists" at a news conference in 2017. Such antagonism openly declared by the highest public representative, as the President of the Czech Republic undeniably is, can influence public perception of the media.
https://monitoring.bbc.co.uk/product/c2018slu
https://www.trtworld.com/europe/czech-president-zeman-jokes-about-murdering-journalists-not-ready-21210

In Slovakia, an investigative journalist, Jan Kuciak, has been killed in February 2018 and as the ongoing legal proceeding suggests, his assassination was based on his professional work. The investigation has uncovered wide evidence that journalists in Slovakia have been surveilled and intimidated by wealthy individuals, which was made possible only thanks to cooperation with state authorities. Nonetheless, the majority of media in the country are free to operate without any strong external influences.
https://domov.sme.sk/c/20798649/kuciak-vrazda-naka-odmietla-stihat-kocner-vyhrazanie-prepis-rozhovoru.html
https://www.aktuality.sk/clanok/666053/telefonat-medzi-kocnerom-a-kuciakom-vy-ste-zly-clovek-pan-kuciak-autenticka-nahravka/

A different kind of hampering of the journalistic activities is happening in Hungary where the government influences the media. Most of the media outlets in the country belong under an umbrella of the Central European Press and Media Foundation (KESMA). In August 2019, KESMA controlled over 470 Hungarian media outlets. At the same time, recent cases of independent outlets' editors being pressured into resignation (such as a recent case of index.hu) due to a lack of freedom to perform independent journalism demonstrate the fragility of media freedom in the region. https://cmds.ceu.edu/article/2019-08-08/report-establishment-kesma-exacerbates-overall-risk-media-pluralism-hungary
 https://rsf.org/en/2020-rsf-index-europes-journalists-face-growing-dangers
https://www.euronews.com/2020/07/24/index-more-than-80-journalists-resign-from-hungarian-news-site-after-editor-sacked

Q1.1 If yes, what kind of issue?

☑ 1. Lack of proper sanction applied to perpetrators of attacks against journalists– Yes/No

- ☑ 2. Abuse of defamation laws or other laws aiming at silencing journalists and news media – Yes/No
- ☑ 3. Lack of legal safeguards for journalistic activities – Yes/No
- ☑ 4. Lack of institutions to protect journalists – Yes/No
- ☑ 5. Online hate speech – Yes/No
- ☑ 6. Cyberbullying – Yes/No
- ☑ 7. Physical threats – Yes/No
- ☐ 8. Other – please specify

Please explain your answer

In countries where the Alliance for Healthy Infosphere spans, all the above is problematic in one or another. In general, the 2020 World Press Freedom Index of Reporters without Borders, indicates that European journalists face growing dangers (https://rsf.org/en/2020-rsf-index-europes-journalists-face-growing-dangers).
Here are the examples:

- Comments below the public profiles of journalists or media that publish the journalists' articles on online platforms are full of hate speech personally directed at the journalists concerned. Whether they are trolls or real people, they often shape the discussion and divert the attention from the issue discussed in the article. Hate speech, threats and bullying continues within the private messages on online platforms or e-mailbox.

- Abuse of defamation laws has been reported in Bulgaria (https://balkaninsight.com/2019/06/03/media-watchdogs-condemn-bulgarian-journalists-defamation-sentence/; https://www.coe.int/en/web/media-freedom/detail-alert?p_p_id=sojdashboard_WAR_coesojportlet&p_p_lifecycle=0&p_p_col_id=column-3&p_p_col_count=10&_sojdashboard_WAR_coesojportlet_alertPK=48860750)

- while concerns over the media freedom and safety of journalists have been raised in Hungary (https://europeanjournalists.org/blog/2019/12/03/new-report-hungary-dismantles-media-freedom-and-pluralism/; https://www.osce.org/representative-on-freedom-of-media/374944)

- in both Slovakia and Czechia, there were several cases of journalists being subjected to hate speech or death threats with the police force not being active in solving the cases, which, in case of Slovakia, resulted in a death of a journalist (https://ct24.ceskatelevize.cz/media/2711213-zverejneni-osobnich-udaju-pomluvy-i-vyhruzky-smrti-kam-az-muze-dojit-nenavist-vuci; https://www.aktuality.sk/clanok/666053/telefonat-medzi-kocnerom-a-kuciakom-vy-ste-zly-clovek-pan-kuciak-autenticka-nahravka/)

Q2. Are you familiar with the concept of 'strategic lawsuits against public participation' (SLAPPs)?
- ☑ 1. Yes
- ☐ 2. No
- ☐ 3. Don't know

Q2.1 If yes, are you aware of such lawsuits in your own Member State?

☑ 1. Yes

☐ 2. No

☐ 3. Don't know

Please explain your answer

> SLAPPs are a common practice to silence political opponents or critics in the region. In Slovakia, the SLAPPs have mostly been used by conservative or far-right actors against their vocal critics. A well-known and ongoing case is linked to a writer, publicist and theologian Michal Havran investigated for a critical article of a Slovak controversial priest Marian Kuffa, known for his very strong anti-liberal statements. https://dennikn.sk/1893466/michal-havran-kuffa-nam-nadava-a-ked-sa-ohradime-stihaju-nas/
>
> Threats of SLAPPs are also being used against civil society organisations and members of the Alliance.
> - konspiratori.sk has been a target of such lawsuits due to its efforts to warn the public against unreliable sources of information and for advising private companies against advertising their products and services on pages deemed unreliable. Lawsuits against 14 independent board members have been launched in an effort to silence civil society actors trying to create more transparent information space.
> - GLOBSEC has been threatened with a lawsuit several times, especially when conducting election monitoring and disclosing tactics and techniques of actors spreading manipulative content and disinformation.

Q3. In your opinion, on which SLAPP related aspects should the European Union-level action be taken (multiple answers possible):

☑ 1. Regular monitoring of SLAPP cases in the European Union

☑ 2. Financial support for journalists facing SLAPP lawsuits

☑ 3. Rules on legal aid for journalists facing SLAPP lawsuits

☐ 4. Cross-border cooperation to raise awareness and share strategies and good practices in fighting SLAPP lawsuits

☑ 5. EU rules on cross-border jurisdiction and applicable law

☐ 6. None of the above

☐ 7. Other – please specify

Please explain your answer

> The intervention from the EU would help protect journalistic freedom and safety across the Union, especially in problematic countries. In addition to regular monitoring of SLAPPs, they should also be regularly publicly reported.

Q4. Do you think that the EU should act to strengthen safety of journalists and other media actors / improve conditions for journalistic activities?

☑ 1. Yes (please justify)

☐ 2. No (please justify)

☐ 3. I do not know

Please explain your answer

> Yes, country-specific examples prove that national authorities cannot fully guarantee the protection of journalists. The role of the EU should therefore be enhanced in the area of guaranteeing the safety and freedom of media.

Q4.1 If yes, how?

☐ 1. By issuing guidance – Yes/No
☐ 2. By setting up dedicated structured dialogue with Member States – Yes/No
☑ 3. By providing financial support – Yes/No
☑ 4. Other – please specify

Please explain your answer

> The protection should first be established through the acknowledgment that the safety of journalists has been compromised and/or the conditions have worsened. The EU should create a platform/directory for independent assessment of media bias to create an indirect pressure on authorities to increase their efforts in the area of free media and safety for journalists. Prior to establishing the independent evaluator, a clear definition of a journalist should be applied in order to distinguish individuals following key journalistic standards from the rest.
>
> Second, in case a severe and constant decline of media freedom or journalistic standards is noticed with no remedies being put in place by national governments, the media freedom and independence should belong under the EU conditionality principles necessary to fulfil for the entitlement to receive the EU structural funds.
>
> Third, the anti-monopoly laws and principles should be applied to the media landscape in the EU as well.
>
> And fourth, in countries where safety of journalists is not guaranteed by national authorities, financial support is necessary to maintain a small degree of quality journalism in each EU member state.

Q5. Are you aware of any issues regarding the protection of journalistic sources in your country?

☐ 1. Yes (please provide concrete examples)
☐ 2. No
☑ 3. I do not know

Please explain your answer

> Not within our scope of expertise

Q6. Are you aware of any difficulties that journalists are facing when they need access information / documents held by public authorities and bodies in your country?

- ☐ 1. Yes (please provide concrete examples)
- ☐ 2. No
- ☑ 3. I do not know

Please explain your answer

> Not within our scope of expertise

(ii) Media independence and transparency

Q1. How would you characterise the situation with regards to independence of media and journalism in your country?

	Not at all	To a limited extent	To a great extent	Don't know
1. The government controls or exerts pressure on media outlets	○	○	○	◉
2. Powerful commercial actors control or influence editorial policy of media outlets	○	○	○	◉
3. Journalists are afraid of losing their job or of other consequences and avoid voicing critical opinions	○	○	○	◉
4. News media, in particular public broadcasters, provide balanced and representative information, presenting different views, particularly in times of electoral campaigns	○	○	○	◉

Q2. How important is the support for independent journalism (including free lance journalists and bloggers/web journalists) and the protection of the safety of independent journalists to supporting democracy in the EU and internationally?

- ☑ 1. Very important
- ☐ 2. Important
- ☐ 3. Not important
- ☐ 4. Don't know

Q3. Do you feel sufficiently informed about the ownership of the media outlets you are consulting?

- ☐ 1. Yes
- ☑ 2. No (please explain)

☐ 3. I do not know

Please explain

All online outlets should disclose the information about their ownership as it would help increase transparency of the media landscape and accountability of the sources. So far, the information disclosed by outlets, especially online, is very limited, particularly in cases of disinformation and conspiracy outlets. In the Czech Republic, it took 2-3 years until the best investigative journalists in the country found out who was actually standing behind the most influential disinformation portal, Aeronet.cz. (https://ct24.ceskatelevize.cz /domaci/3056786-po-stopach-dezinformatora-reporteri-ct-odhalili-utajeneho-provozovatele-aeronetu)

The response to Q1 cannot be applied in case of multinational Alliance.
In the region, there have been increasing attempts to control the media either by the government or by large financial groups. People in the region believe it too, as our recent publication Voices of Central and Eastern Europe examining attitudes in 10 EU countries in the region observed – 43% of respondents believe that the government influences the media in their country and 43% as well believe that it is influenced by oligarchs and financial groups. https://www.globsec.org/publications/voices-of-central-and-eastern-europe/

Q4. Should it be mandatory for all media outlets and companies to publish detailed information about their ownership on their website?

☑ 1. Yes (please explain)

☐ 2. No (please explain)

☐ 3. I do not know

Please explain

Easy access to information about media ownership can help the consumers identify the bias of the given media and increase the transparency of the media landscape. Also, the obligation to publish the ownership information would help uncover the owners of the outlets and websites promoting harmful content, including disinformation and conspiracy theories, who often hide their identity. Revelation about media-ownership would help prevent the attempts to monopolise the media landscape.

Q5. Should content by state-controlled media, where governments have direct control over editorial lines and funding, carry specific labels for citizens?

☑ 1. Yes (please explain)

☐ 2. No (please explain)

☐ 3. I do not know

Please explain

Transparency and accountability are key principles, which should be applied everywhere across the EU. If citizens do not have the information about the government's potential editorial control of the media they are consuming, their decision-making may be influenced and manipulated. In case the national authorities would refrain from labelling their media as under their editorial control, the EU should create a platform with a board of independent evaluators examining and labelling each larger medium. Good ranking would also motivate

the outlets to promote their evaluation on their websites / platforms.

These labels should be enforced at search engines and social media platforms.

Q6. Do you think information from independent media and trustworthy sources should be promoted on online intermediary services (such as search engines, social media, and aggregators)?

- ☑ 1. Yes (please explain)
- ☐ 2. If yes, please give examples of how it could be achieved and how to distinguish sources to be promoted?
- ☐ 3. No (please explain)
- ☐ 4. I do not know

Please explain

The independent evaluator would establish an objective evaluation system linked to media ownership, editorial policies and impartiality of content. This would create a whitelist of media outlets, which could be promoted as best in the EU / in a given country. Media outlets would be motivated to increase their standards in order to be placed on the "whitelist" and thus promoted as quality media.

Such whitelists already exist in several European countries. In the Czech Republic, the Foundation for Independent Journalism conducts ranking of news websites on the scale A (best quality) to C (lowest quality). Among the criteria considered are ease of accessing information about the board of editors, information about the organization and owner, use of sources, etc. https://www.nfnz.cz/rating-medii/zpravodajske/

Q7. Do you think further laws or institutions should be put in place in your country to strengthen media independence and transparency in any of the following areas?

- ☑ 1. Transparency of state advertising and state support to news media / journalism – Yes/No
- ☑ 2. Transparency of media ownership – Yes/No
- ☑ 3. Promotion of information from independent media and trustworthy sources– Yes/No
- ☑ 4. Ownership limitations of commercial actors – Yes/No
- ☑ 5. Ownership limitations of political actors – Yes/No
- ☑ 6. Rules to prevent foreign (extra-EU) based manipulative and hate-spreading websites from operating in the EU - Yes/No
- ☐ 7. Other – please specify
- ☐ 8. No, what is in place is sufficient
- ☐ 9. No

☐ 10. I do not know

Please explain your answer

> All of the above would help protect democracies in the EU and make them more transparent towards the citizens and resilient towards the efforts aiming to undermine it.
>
> Ownership limitations should be subjected to antitrust laws.

Q8. Do you think that the EU should act to strengthen media independence and transparency in any of the following areas? (Multiple answers possible)

☑ 1. Transparency of state advertising and state support to news media / journalism – Yes/No

☑ 2. Transparency of media ownership – Yes/No

☑ 3. Promotion of information from independentmedia and trustworthy sources– Yes/No

☑ 4. Ownership limitations of commercial actors – Yes/No

☑ 5. Ownership limitations of political actors – Yes/No

☐ 6. Other – please specify

☐ 7. No

☐ 8. I don't know

Please explain your answer

> Already explained above.

Q9. If you answered yes to some of the options of the previous question, how should the EU act in these areas?

☐ 1. By issuing guidance – Yes/No

☐ 2. By setting up dedicated structured dialogue with Member States – Yes/No

☑ 3. By providing financial support – Yes/No

☑ 4. By adopting legislation – Yes/No

☐ 5. Other – please specify

Please explain your answer

> Guidance and structure dialogue will not be effective in the areas of media independence protection. Financial support should be increased particularly for struggling independent quality outlets whose funding was either cut by the decision of a respective national authority or was strongly affected by the COVID-crisis and the lack of revenues from the advertisement with the rise of social media.

Q10. EU countries have rules applying to media content such as news or current affairs, in general (e.g. rules on editorial independence, objectivity/impartiality), and in particular during elections (rules on scheduling and the balance of the programmes, moratoria on political campaign activity, opinion polls). Do you think similar rules should apply online?

- ☑ 1. Yes
- ☐ 2. No
- ☐ 3. I don't know

Please explain your reply.

> The online information space is overburdened by uncontrolled flow and spread of information. The consumption of information has been largely moving online and social media now serve as a source of information for a great part of the society. Thus, it is indispensable for democracies to regulate the online space as soon as possible. One of the key principles the Alliance advocates for is the rule of "what is regulated offline should be regulated online".

Q11. Should the role of and cooperation between EU media regulators in overseeing respect for such standards, offline and online, be reinforced?

- ☑ 1. Yes
- ☐ 2. No
- ☐ 3. I don't know

Please explain your reply.

> So far, the bodies responsible for overseeing the implementation of online standards have had limited competences. Functional cooperation needs responsible bodies with capacities to sanction.

(iii) Cross-border cooperation, media and press councils, self-regulation

Q1. Are you aware of the existence of a press or media council or another media self/co-regulation body supervising journalistic ethical standards and conduct in your country?

- ☑ 1. Yes
- ☐ 2. No

Q1.1 If yes, what are the main activities of a press or media council or another media self/co-regulation body in your country?

- ☑ 1. Please specify
- ☐ 2. I do not know

Please explain your answer

> Not applicable to the Alliance

Q1.2 Do you think press or media councils should be established in all EU countries?

- ☑ 1. Yes (please explain)
- ☐ 2. No (please explain)

Please explain

> Independent press and media councils that would be free of the government influence help increase the transparency and accountability of the media as they ensure that rules and regulations are followed.

Q1.3 In order to address the challenges in the media sector, which activities should be prioritised by press and media councils or other media self/co-regulation bodies?

- ☑ 1. Incentivising exchanges of best practices and promoting journalistic standards, in particular online – Yes/No
- ☑ 2. Providing support for journalists in the process of digitalisation of media sector – Yes/No
- ☑ 3. Ensuring effective complaints handling mechanisms – Yes/No
- ☑ 4. Establishing links between journalists and citizens to increase trust – Yes /No
- ☑ 5. Contributing to the fight against disinformation online – Yes/No
- ☐ 6. Other - please specify

Please explain your answer

> However, the situation is very different in every country. Where a capture of media is already ongoing, the cooperation of support of media council would be counter-productive. The financial support should go directly through the EU funding, for which the media outlets and journalists could apply directly.

Q2. What role, if any, should the EU play to facilitate cross-border cooperation?

- ☐ 1. Provide financial support to media councils or other media self/co-regulation bodies – Yes/No
- ☐ 2. Set up an EU-level coordination network – Yes/No
- ☐ 3. Promote citizens' awareness about their activities – Yes/No
- ☑ 4. Other (please specify)
- ☐ 5. No role

Please explain your answer

> The effectiveness of these measures is questionable as they do not impose any sanction or reward mechanism. Also, the support for the media councils in countries which cannot guarantee the protection of their media safety and freedom would be counter-productive and only enhance the tendencies of increasing lack of media independence where it applies.

Questions on tackling disinformation

Designed to intentionally deceive citizens and manipulate our information space, disinformation undermines the ability of citizens to form informed opinions. Disinformation can also be a tool for manipulative interference by external actors.

(i) Scope

Q1. The April 2018 Commission Communication on Tackling online disinformation: a European Approach defines disinformation as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm.[4]

Do you think this definition should be broadened and complemented to distinguish between different aspects of the problem?

[4] Public harm includes threats to democratic processes as well as to public goods such as Union citizens' health, environment or security. Disinformation does not include inadvertent errors, satire and parody, or clearly identified partisan news and commentary.

- ☐ 1. Yes (please specify)
- ☑ 2. No (please specify)
- ☐ 3. Don't know

Please explain your answer

> The Alliance agrees with the proposed definition on disinformation, however the definition on public harm appears to be in contradiction with the disinformation definition. For example, one could understand these two definitions in a way which excludes partisan news, commentary or parody and satire from deploying disinformation. This needs to be properly addressed to make sure no uncertainties and loopholes exist.
>
> The fact that an outlet claims that it is partisan or commentary should not serve as an excuse for peddling disinformation. No news outlets including hyper-partisan ones should be allowed to share false or misleading information under any pretext.

> In addition, its need to be recognized that systematic spread of disinformation is part of information operations and hybrid warfare.

Q2. So far, the European Commission has addressed the spread of disinformation through a self-regulatory approach, which has resulted in a Code of Practice on Disinformation being subscribed by major online platforms and trade associations representing the advertising industry. Do you think that this approach should be:[5]

[5] This question complements the questionnaire for the public consultation on the Digital Services Act, which focuses on illegal content

- ☐ 1. Continued as it is currently pursued (status quo)
- ☐ 2. Pursued but enlarged to a wider range of signatories
- ☐ 3. Pursued but combined with a permanent monitoring and reporting programme
- ☐ 4. Pursued but on the basis of a substantially reviewed Code of Practice
- ☐ 5. Pursued but accompanied by a regulatory framework fixing basic requirements for content moderation, data access and transparency, as well as respective oversight mechanisms
- ☑ 6. Pursued but accompanied by a regulatory package fixing overarching principles applicable to all information society services and establishing more detailed rules for dealing with disinformation under such general principles
- ☐ 7. Replaced by special regulation on disinformation
- ☐ 8. abandoned altogether, as all forms of restriction or control on content posted online by internet users and which is not illegal in nature (e.g. illegal hate speech, incitement to terrorism) could endanger freedom of speech
- ☐ 9. Other (please explain)

Please explain your answer

> As included in the Alliance for Healthy Infosphere's consultation to DSA, it is clear that even though Code of Practice on Disinformation (CoP) represents an important step in the right direction, a number of evaluations including ERGA's conclude that it does not go far enough. Without a common European approach to digital environment, member states are creating their own rules (NetzDG in Germany for example) which leads to further fragmentation of Single market, while the problem with illegal content and disinformation online persists because of lack of regulatory oversight and transparency.
> https://erga-online.eu/wp-content/uploads/2020/05/ERGA-2019-report-published-2020-LQ.pdf

Q3. Have you ever encountered the following measures to reduce the spread of disinformation on social media platforms?

	Yes	No	Don't know
1. Alerts when attempting to share or publish content that has failed a fact-check by journalists or a fact-checking organisation	○	◉	○
2. Notifications to users who have previously engaged with content or sites that have failed a fact-check by journalists or a fact-checking organisation	○	◉	○
3. Clear labels above content or sites that have failed a fact-check by journalists or a fact-checking organisation	◉	○	○
4. Mechanisms allowing you to report disinformation	◉	○	○

Q3.1 If yes, on which platforms have you encountered this?

- ☐ 1. Google
- ☑ 2. Facebook
- ☑ 3. Twitter
- ☐ 4. YouTube
- ☐ 5. WhatsApp
- ☐ 6. Other (Please specify)

Please explain your answer

Users may not come across certain measures because they do not share disinformation and hence do not need to receive notification from social media. Facebook does have reporting measures on disinformation but due to their internal policies and capacities, very little is being done about removing or limiting the reach of such content. When it comes to clear labels above content or sites which failed fail-check, in smaller markets such as Czechia, Hungary, Slovakia and others, there are literally one or no fact-checkers to cover content produced by millions of users. This means that although theoretically the measure of labelling hoaxes does exist, very few posts actually get fact checked.

In Czechia, although the impact of the cooperation between Facebook and demagog.cz is relatively new (since May 2020), it looks promising due to Facebook's multiplication measure which allows labelling fact-check content regardless of how many times it has been checked, as long as it is identical. Such positive steps could be scaled up.

Furthermore, the measures for labelling content and fact-checking appear to be applied more in the US, whereas in the EU, particularly in the smaller markets represented by the Alliance for Healthy Infosphere such measures are almost non-existent.

(ii) Disrupting the economic drivers for disinformation

Q1. What type of measures should online platforms and advertising networks operators take in order to demonetise websites that create, present or disseminate disinformation?[6]

[6] Please note that this question refers to monetisation of websites that systematically publish false or misleading information, which is not illegal in nature. Monetisation via advertisement placements of web sites publishing illegal content is addressed within the context of a separate questionnaire for the public consultation on the Digital Services Act.

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and publish them	●	○	○	○	○	○
2. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and remove the ad accounts concerned	●	○	○	○	○	○
3. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and temporarily suspend the ad accounts concerned	○	●	○	○	○	○
4. Establish and regularly update lists of websites identified by fact-checkers as occasional sources of disinformation (grey list approach) and give the advertisers the possibility to selectively exclude such websites	○	○	○	●	○	○
5. Block ad accounts only for those websites that engage in deceptive behaviour (e. g. spamming, misrepresentation of identity, scraping content from other sources, containing insufficient original content, etc.)	○	●	○	○	○	○
6. Ensure a systematic scrutiny of websites providing advertisement space and limit ad placements only on those websites that are considered trustworthy by reputable indexes (white list approach)	●	○	○	○	○	○

7. Ensure transaparency of platforms vis-à-vis advertisers and provide for third-party verification (e.g. position of the ads, the content the ads are run next to, metrics)	◉	○	○	○	○	○
8. Other	○	○	○	○	○	○

Q2. Paid-for content on issues of public interest is promoted on social media platforms both during and outside electoral periods. Due to the special prominence given to such paid-for content in news-feeds and other systems for displaying content online, users may be misled as to its credibility or trustworthiness, irrespective of the veracity of the content. Do you think that issue-based advertising / sponsored content of political context:

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Should be systematically labelled	◉	○	○	○	○	○
2. Should be systematically labelled and collected in public, searchable repositories	◉	○	○	○	○	○
3. Should be subject to the same rules as on political advertising (see above section)	◉	○	○	○	○	○
4. Should not be regulated	○	○	○	○	◉	○

(iii) Integrity of platforms' services

Q1. Do you think there should be targeted regulation at EU or national level to prohibit deceptive techniques such as the use of spam accounts and fake engagement to boost posts or products?
- ☑ 1. Yes
- ☐ 2. No
- ☐ 3. Don't know
- ☐ 4. Other

Q1.1 If you replied yes to the previous question, what do you think should be the most appropriate measures to tackle the above-mentioned manipulative techniques and tactics?

			Neither agree			I don't

	Fully agree	Somewhat agree	not disagree	Somewhat disagree	Fully disagree	know /No reply
1. Label the content as artificially promoted	●	○	○	○	○	○
2. Demote the content to decrease its visibility	●	○	○	○	○	○
3. Suspend or remove the content because the use of manipulative techniques is contrary to platforms' terms of service	●	○	○	○	○	○
4. Suspend or remove the accounts engaging in manipulative techniques	●	○	○	○	○	○
5. Invest in internal intelligence systems to detect manipulative techniques	●	○	○	○	○	○
6. Invest in artificial intelligence to detect manipulative techniques	●	○	○	○	○	○
7. Other	○	○	○	○	○	○

Please explain

Whatever measures taken to limit the reach of manipulative techniques should be implemented, particularly the investment in Artificial Intelligence to detect these techniques. Of course, redress and appeal mechanisms need to be put in place to ensure such a system is fair.

On the EU level, there should be an independent oversight of the functioning of digital platforms' algorithms, carried by Joint Research Centre or other independent scientific body, to oversee the implementation and impact as well as the ability of digital platforms to detect and trace manipulative techniques.

NATO Strategic Communication Centre of Excellence has documented the ease with which users can purchase thousands of fake engagements online to promote their content very cheaply. The study further documents that 95% of reported fake accounts and engagements remained online. https://www. buzzfeednews.com/article/albertonardelli/facebook-twitter-google-manipulation-nato-stratcom

(iv) Enhancing users' awareness

Q1. Do you agree that the following kinds of measures would help enhance user's awareness about how platforms operate and prioritise what users see first?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree
1. Promoting content from trustworthy sources	◉	○	○	○	○
2. Promoting factual content from public authorities (e.g. on election date)	◉	○	○	○	○
3. Providing tools to users to flag false or misleading content	◉	○	○	○	○
4. Demoting content fact-checked as false or misleading	◉	○	○	○	○
5. Labelling content fact-checked as false or misleading without demoting	○	◉	○	○	○
6. Platforms should inform users that have been exposed to fact-checked content	◉	○	○	○	○
7. Removing content which is found false or misleading and contrary to terms of service (e.g. threatening health or public safety)	◉	○	○	○	○

Which sources do you consider as trustworthy?

- Investigative media that are unbiased and impartial. They use factual information which is updated and valid sources of information and provide a balanced point of view – offer both sides of the argument to voiced their cause and this is overlooked by independent board.
- Scientific papers, work of recognised universities and scientific journals should fall under the trustworthy category as well. The work of recognised fact-checkers should be promoted as such as well.

Q2. In your opinion, to what extent, if at all, can the following measures reduce the spread of disinformation?

	No contribution	Minor contribution	Little contribution	Major contribution	Don't know
1. Demotion of posts or messages that have failed a fact-check by journalists or a fact-checking organisation in the newsfeed	○	○	○	◉	○
2. Alerts if attempting to share content that has failed a fact-check by journalists or a fact-checking organisation	○	○	◉	○	○

3. Notifications to users who have previously engaged with content that has failed a fact-check by journalists or a fact-checking organisation	○	○	●	○	○
4. Clear labels above content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	●	○
5. Mechanisms enabling readers to flag content that is misleading	○	○	○	●	○
6. Mechanisms to block sponsored content from accounts that regularly post disinformation	○	○	○	●	○
7. Closing of fake accounts and removal of automated social media accounts like bots	○	○	○	●	○
8. Closing of accounts that continuously spread content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	●	○
9. Allowing more diversity in suggestion algorithms designed to find videos, posts or sites that you might be interested in	○	○	○	●	○
10. Other	○	○	○	●	○

Q2.1. IF your answer=10, Please specify:

A lot of platforms' policy measures fighting disinformation are dependent on human moderators or independent fact-checkers, which are scarce or completely missing in EU many countries. EU countries need more independent fact-checkers, 1 person for 5 million country fact-checking over 2,5 million Facebook users is not enough.

All policies and measures taken should be translated to all local languages.

Furthermore, in-depth research to analyse the impact of clearly labelled content (positively or negatively) needs to be carried out to inform proper policy making process. This data is already available to digital platforms who conduct content labelling at least in some markets (such as Facebook and Twitter). This data should be shared with researchers and public authorities to measure the extent to which such data has been further shared. We believe that analysis of such data would provide insight into whether measures taken by platforms (labelling, warnings, etc.) are effective or not.

Q3. To what extent, if at all, do you support the following measures to reduce the spread of disinformation?

	Do not support at all	Do not support	Neither support nor discourage	Support	Support fully	Don't know
1. Demotion of posts or messages that have failed a fact-check by journalists or a fact-checking organisation in the newsfeed	○	○	○	○	●	○
2. Alerts if attempting to share content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	●	○
3. Notifications to users who have previously engaged with content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	●	○
4. Clear labels above content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	●	○
5. Mechanisms enabling readers to flag content that is misleading	○	○	○	○	●	○
6. Mechanisms to block sponsored content from accounts that regularly post disinformation	○	○	○	○	●	○
7. Closing of fake accounts and removal of automated social media accounts like bots	○	○	○	○	●	○
8. Closing of accounts that continuously spread content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	●	○
9. Allowing more diversity in suggestion algorithms designed to find videos, posts or sites that you might be interested in	○	○	○	○	●	○
10. Other	○	○	○	○	○	○

Q3.1 IF your answer=10, Please specify:

What safeguards and redress mechanisms do you consider appropriate and necessary to avoid errors and protect users' rights?

Social media platforms should establish a designated contact/office for each EU Member State, which will be responsible, among others, for communication with state institutions, delivery of comprehensive databases about political advertisements, as well as reported and deleted content.

Ensure the enforcement of rules and platform's code of conduct in all EU countries and accelerate and increase the effectiveness of the removal of problematic content reported to Facebook, or other social media platform, by a verified trusted flagger.

Develop a complaint system for cases when social media fail in the removal of content sharing hate speech, extremism or targeted bullying of individuals. The complaints should be promptly taken over by relevant EU institutions with possible competences to issue a financial penalisation of the social media platform for such failures.

Social media platforms need to hire more local experts to oversee the quality of content-moderation and provide data about the numbers and language competence of the personnel responsible for resolving individual cases to independent institutions and analysts for auditing purposes.

Social media platforms need to provide reasoning behind any account deletion or post-removal to provide content owners with opportunity to appeal such decisions and to prevent the spread of conspiracies about censorship. Such reasoning could be stored in a "library" of removed content with an explanation why it was removed. In that library a history of removed content of an account and thus credibility of that page could be stored. Information in the library could be interlinked with transparency information/section of social media accounts.

Q4. Which information would you like to receive when reading the information on social platforms:

	Yes	No	Don't know
1. Better information about the source of the content	◉	○	○
2. Whether the content is sponsored or not	◉	○	○
3. Information about the micro-targeting (why the information is addressed to you)	◉	○	○
4. Whether there are advertisements linked to the content	○	○	○
5. Liability of the provider for supplying false or misleading information	◉	○	○

Other: please list

Identification of social media accounts affiliated with political parties. While some measures were already applied by social media platforms, in some cases, they are not enforced and social media accounts breaching such policies are not being taken down.

More transparency measures could be introduced by digital platforms to increase user awareness. For instance, information on how much content has been removed from a certain page, profile or group based on accurate application of community standards in accordance with national and European legislation should be clearly made available on the relevant page. This way, a user would know that for example, certain page had several content removals due to spreading hate speech or artificially boosting content engagement. Currently, no such information is available to users which means pages regularly breaking community standards still appear as trustworthy sources of information.

Q5. As a user, when you come across information that you perceive as false or misleading, which options should be available to deal with such content (more than one reply is possible)?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Removing that content from your feed	◉	○	○	○	○	○
2. Removing that content from your feed and excluding similar content from being algorithmically promoted in your feed	◉	○	○	○	○	○
3. Flagging the content to the platform for fact-checking	◉	○	○	○	○	○
4. Receiving feed-back about the action taken by the platforms after flagging, including possible demotion	◉	○	○	○	○	○
5. Flagging the content to competent authorities	◉	○	○	○	○	○

Q6. End-to-end encrypted messaging services (such as WhatsApp, Telegram or Signal) can be used to spread false and harmful content. In your view, should such platforms introduce measures to limit the spread of disinformation, with full respect of encryption and data protection law (more than one reply is possible)?

			Neither agree			I don't

	Fully agree	Somewhat agree	not disagree	Somewhat disagree	Fully disagree	know /No reply
1. Introduce easy-to-find reporting or flagging system for users	●	○	○	○	○	○
2. Limit the possibility to forward the same content to many users	●	○	○	○	○	○
3. Limit the amount of people in a discussion group	●	○	○	○	○	○
4. In exceptional cases, proactively contact users about potential disinformation wave or promote authoritative conent (e.g. in cases like Covid-19 pandemic)	●	○	○	○	○	○
5. Other (please elaborate)	○	○	○	○	○	○

Please explain

- These measures very much depend on engaged and educated users, who will flag and report such problematic content.
- Social media platforms need to provide regular delivery of comprehensive databases about reported and deleted content and amount of taken down disinformation and their reach.

Q7. Do you easily find information about how content is fact-checked on online platforms, and by whom?

☐ 1. Yes
☑ 2. No
☐ 3. Don't know

Q8. If your post is being fact-checked or labelled, do you know how to contest this if you do not agree?

☐ 1. Yes
☑ 2. No
☐ 3. Don't know

Q9. Which information should online platform publish about their factchecking /content moderation policy?

	Yes	No	Don't know
1. If they pay directly the factcheckers or if they work with an external factchecking organisation	●	○	○
2. How they decide which posts are factchecked	●	○	○
3. How many posts are factchecked	●	○	○
4. How to flag posts to be factchecked	●	○	○
5. Other, (please specify)	●	○	○

Please explain

- Social media platforms need to provide reasoning behind any account deletion or post-removal to provide content owners with opportunity to appeal such decisions and to prevent the spread of conspiracies about censorship.
- Social media platforms should publish information on how many fact-checkers as individuals are working for them in a particular country.
- Social media platforms should regularly publish info comprehensive databases about reported and deleted content, including bots and fake accounts taken down in a particular country.

Q10. Do you think it should be mandatory for online platforms to offer oversight bodies that enable users to seek recourse in case their account has been locked or content they have posted has been deleted?

- ☑ 1. Yes
- ☐ 2. No
- ☐ 3. Don't know

Q11. Do you think it should be mandatory for online platforms to provide points of contact for each Member State in their language?

- ☑ 1. Yes
- ☐ 2. No
- ☐ 3. Don't know

Q12. What kind of data and/or transparency tools do users/researchers/fact-checkers need to be better able to detect and analyse disinformation campaigns, including by foreign state and non-state actors? Please specify.

- Social media platforms should regularly publish comprehensive databases about political advertisements, as well as reported and deleted content, including bots and fake accounts taken down in a particular country.
- A lot of policy measures taken in the name of GDPR have disabled a lot of tools researchers used to detect botnets or troll farms. While protection of private information is important, a lot of seemingly fake accounts, with fake or stolen photos, when flagged to social media platforms are not properly investigated by platforms

and taken down. Accounts using stolen photos of other people and their profile pictures, concerning the identity theft, should be banned or taken down.

Q13. How should the EU respond to foreign state and non-state actors who interfere in our democratic systems by means of disinformation (multiple answers possible)?

	Yes	No	Don't know
1. Analyse and expose state-backed disinformation campaigns	◉	○	○
2. Conduct public awareness-raising campaigns	◉	○	○
3. Support independent media and civil society in third countries	◉	○	○
4. Impose costs on state who conduct organised disinformation campaigns	◉	○	○
5. Develop more effective public outreach and digital communication strategies	◉	○	○
6. Other, (please specify)	◉	○	○

Please explain

It should regulate social media platforms that spread disinformation and earn a lot of money doing it by selling personal data of their users. The EU should be also targeting other monetary aspects of spreading disinformation such as black market of trolls and bots, which are accessible and which services can be very easily bought.

Q14. In your opinion, should content by state-controlled media outlets be labelled on social media?

- ☑ 1. Yes
- ☐ 2. No
- ☐ 3. Don't know

Questions on supporting civil society and active citizenship

As a crosscutting issue, civil society faces increasing pressure, but plays a key role in the democratic system, holding those in power to account and stimulating public debate and citizen engagement, as well as in combatting some of the identified threats. In addition to this, participatory and deliberative democracy gives citizens a chance to actively and directly participate in the shaping of planned or future public policies. A major element in the context will be the upcoming Conference on the Future of Europe.

Q1. Do you think civil society is sufficiently involved in shaping EU policies, notably through consultation?

- ☑ 1. Yes

☐ 2. No

☐ 3. Don't know

If Q1=2 What more could be done?

> There is an option for citizens to actively participate on European legislative shaping, nevertheless this option is not sufficiently advertised and there is a lack of awareness among the citizens about this possibility.

Q2. Do you think civil society should be more involved in concrete EU-level actions to promote democratic debate?

☑ 1. Yes

☐ 2. No

☐ 3. Don't know

Please explain your answer

> - More initiatives to ask the public about their opinion, like in the case of scraping the daylight-saving time.
> - Funding schemes such as Europe for Citizens should be restructured to focus on smaller-scale events and more awareness-raising and engagement activities in local communities.
> Moreover, more resources should be invested into developing platforms that would include the citizen engagement and communication outside of capitals and large cities, including projects covering:
> - Increasing capacities of local governments to communicate with citizens and tackle disinformation
> - Investing resources into citizen engagement and small-format discussions on a local level

Q3. Do you think actions should be taken at EU level to strengthen cooperation among civil society actors across borders?

☑ 1. Yes

☐ 2. No

☐ 3. Don't know

Please explain your answer

> More Interreg project funding opportunities from the EU level to strengthen multi-national and multi-regional cooperation inside the EU, that would lead to stronger unity among the EU citizens.

Q4. Do you think the EU should provide more financial support for civil society (for example under the 'Rights, equalities and citizenship' programme)?

☑ 1. Yes

☐ 2. No

☐ 3. Don't know

Q5. Are you aware of measures to increase media and information literacy/develop media literacy skills? What type of action do you deem to be most efficient/most appropriate in this area:

- ☑ 1. Formal education in school/university
- ☑ 2. Education online via social media platforms
- ☑ 3. Life-long learning
- ☑ 4. Exchange of best practices in expert fora
- ☐ 5. Don't know

Q6. Do you think that more participatory or deliberative democracy at the European level, with more possibilities for public deliberation and citizen engagement, beyond public consultations, would be:

- ☑ 1. A good thing
- ☐ 2. Neither good nor bad
- ☐ 3. A bad thing
- ☐ 4. Don't know

Please explain your reply

> More participation of citizens and deliberative democracy would improve democratic deficit of the EU and bring deeper involvement of citizens in legislative processes at European level. However, the problem is not the lack of opportunity for citizens to participate in the legislative processes, but the lack of awareness about public consultations and other options of citizens how to get involved in policymaking. There should be stronger communication towards citizens how to get involved.
>
> These processes should be simple and user friendly, without creating a massive administrative burden, and questionnaires should be logically structured, where details are asked.

Q6.1 If given the opportunity, would you take part in a European participatory or deliberative democracy event?

- ☑ 1. Yes, absolutely
- ☐ 2. Yes, probably
- ☐ 3. Maybe
- ☐ 4. Probably not
- ☐ 5. No, not at all
- ☐ 6. Don't know

Q7. Are you familiar with the European Citizens' Initiative?

- ☐ 1. Yes, I have taken part in one before

☑ 2. Yes, but I have not taken part in one before

☐ 3. Not sure

☐ 4. No, I do not know what a European Citizens' Initiative is

Contact

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