

D7.2.1 – Process tracing, QCA and SNA analytical and methodological details

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Competing understandings of democracy in the struggle to regulate disinformation in the EU: Tracing the process from agenda setting to regulatory outcome (2018-2024)

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The objective of WP 7 is to analyse how normative conceptions of public debate in democracy relate to different policy alternatives and political strategies to fight disinformation by using political theory to conceptualize debates on regulation and public policy about post-truth (in cooperation with WP2); analyse public policy struggles to define the best way to fight disinformation at the European level and analyse the impact upon communication professionals and journalistic practices of the emerging regulations adopted by EU (in cooperation with WP4)². This paper presents the analytical and methodological design that the WP will use to develop these aims. This paper is based on two rationales. The first one is to meet the expectations of open science by facilitating transparency and reproducibility of the decisions of the research team by the rest of the academic community. The second one is to facilitate the usage of data by the stakeholder community beyond academia.

Objective: explain the adoption of EU regulations in response to the identified threats of post-truth on democracy and EU integration

¹ We are grateful for input from Elena García Guitián, Taru Haapala, Camille le Guigner, and Jorge Tuñón but the current paper and its potential mistakes are at this point our responsibility only.

² The WP also aims to involve European communication stakeholders (EU and national officials, MPs and MEPs, journalists, fact-checkers and foundations) in participant-led assessment of the research results and facilitate the dissemination of the research. This will be carried out after the final adoption of this analytical and methodological guide.

The co-regulatory approach as it exists in 2024 is the outcome of the process that we are attempting to explain as a result of decisions made from 2018. The regulatory agenda is defined across time, and the orientation requires (1) an analysis of the problems identified in each regulatory process, (2) the causal connection between the problems identified in a regulatory process and the policy follow-up (for example, the responsibility of social media platforms for the dissemination of disinformation and their obligation to disclose their content prioritisation strategies), (3) the connection with the mobilisation of actors and their influence strategies, and (4) elucidation of the public sphere and democracy conceptions underlying the different regulatory approaches. This is a combination of descriptive and explanatory questions that, as foreseen in the original description of the WP will be addressed with a combination of process tracing and Qualitative Comparative Analysis (QCA):

“Process tracing [...] is an analytic tool for drawing descriptive and causal inferences from diagnostic pieces of evidence— often understood as part of a temporal sequence of events or phenomena. [...] As a tool of causal inference, process tracing focuses on the unfolding of events or situations over time. Yet grasping this unfolding is impossible if one cannot adequately describe an event or situation at one point in time.”(Collier 2011: 824)

Process tracing will be used to a) identify regulatory response to a

“novel political and social phenomenon [disinformation] a and systematically describing them; (b) evaluating prior explanatory hypotheses, discovering new hypotheses, and assessing these new causal claims; (c) gaining insight into causal mechanisms; and (d) providing an alternative means—compared with conventional regression analysis and inference based on statistical models— of addressing challenging problems such as reciprocal causation, spuriousness, and selection bias.” (Ibid).

Policy outcome to explain

A three-part response based on a systemic understanding of democracy (García Guitián et al. 2024) consisting in 1. co-regulation of harmful but legal content by VLOPs, EU institutions and national regulators together with 2. measures to empower individual users into making informed decisions and 3. protecting democratic processes (elections and campaigns) and their key actors (journalists and civil society).

The adoption of this outcome is surprising in two regards. The first one is that any response has been adopted at all. The EU has traditionally been reluctant to address substantial issues in the media sector and conceived it as a matter of economic regulation (Harcourt 2005), EU democracies have different internal balances in the protection of fundamental rights vs the protection of public interests and the EU has limited competences. Secondly, the fact that the regulation follows traditional EU stakeholderism – by considering that digital gatekeepers are part of the solution rather than the problem – and usage of internal

The surprising sanctions against Russian media

The ban on the broadcasting of RT and Sputnik are the most striking contradiction to this outcome, since they are exceptional limitations of fundamental rights. Datzer and Lonardo (2023) have argued that therefore they cannot be considered as part of the disinformation policy and rather part as the packages sanctioning Russia for its aggression on Ukraine since 2022.

market leverage to respond to the problem – as in the DMA / DSA package – demonstrate a very strong continuity with EU policy making in the digital field rather than an extraordinary response to an extraordinary challenge, as the sanctions against Kremlin-backed media would suggest.

Outcome – explaining process tracing and theoretical condition

This outcome is therefore unique (there are no other instances of EU regulation against post-truth) and thus cannot be explored by using existing causal theories. Also, little is known about the reasons for the adoption of disinformation responses in other polities and these are difficult to compare to the EU's response at the time of writing (Neo's 2022 comparative study on South-East Asia explains the outcome opposing democracies and autocracies)³ so as to develop a broader theory. In this sense, the outcome will be considered unique and explained in itself.

We will therefore undertake a case-driven study. The identification of explanatory condition (X) that creates a causal sequence leading the outcome Y described above (the causal mechanism) must be deduced from the puzzle itself as well from existing literature. The work is, however, strongly influenced by theory assuming that regulation is adopted in and strongly shaped by the social microcosm of the digital policies field (Bouza and Oleari 2024). Theory informs our selection of cases and sampling methods as well as our formulation of explanatory mechanisms, but the empirical design does not attempt to test or build theory or build new ones (we recognize that Beach and Pedersen 2013: 60 explanation on the overlap between outcome explaining and theory building approaches may apply to our work), but to explain a puzzling outcome in the field where existing mechanisms did not produce the usual outcome: exposed to two external shocks (Russian interference between the Crimea occupation in 2014 and the Cambridge Analytica scandal in 2016 and the COVID-19 pandemic in 2020) the regulatory response has been substantially different. In doing so we will combine field theory, historical institutionalism and ideational mechanisms in an *eclectic theorization* that produces a minimally sufficient explanation of the outcome (Beach and Pedersen 2013: 63-64).

Both the theoretical ambition of the research package and the literature review suggest that the regulatory struggles and actors' strategies cannot be understood without considering the conflicting views of democracy at stake and also their mutual hybridization during the debates. Thus, the research is guided by the question *What has been the effect of different conceptions of the threat that post-truth poses to democracy in the EU in the adoption of the regulatory response?* This is a broad question that will require different subquestions. We will work with a number of expectations to be tested with process tracing, both to explain the outcome and to identify critical junctures and sequences, evaluate existing explanations and provide alternative ones, by including less considered explanations.

Firstly, we need to conceptualise the EU regulatory response in 2024 including the division of tasks between the member states and the EU (see García Guitián et al. 2024), but also identify the critical junctures and potential path dependency of past choices. We will ask *how did the EU come to adopt a co-regulation approach to disinformation, what is the policy-mix between MS and EU and what alternatives have been considered and discarded.* We expect the policy process to be characterised by a) policy entrepreneurship by different actors and coalitions, b) be non-linear and show signs of bricolaging (Kauppi 2022)⁴, and c) incremental change after the major critical junctures. It also implies that solutions tend to be

³ The adoption of national regulations and policies against disinformation by EU member states is an obvious case for comparative theory-driven case study approaches combining process-tracing and QCA. However, this is a moving target as member states have until 2027 to adopt national measures in response to the EU outcome of 2024, so these fall outside the frame of the RECLAIM project and will be addressed in future research.

⁴ We are grateful to Taru Haapala for this suggestion.



strongly tied to the economic nature of the Union, with other societal issues and alternatives not being considered. Policy narrows down as options are discarded. The incremental nature of the process makes it particularly suitable for an analysis with process tracing. This means that particular attention must be paid to critical junctures – often influenced by external events – and that policy options will be strongly influenced by the first agenda setting movements and policy options narrow down in each subsequent consultation.

Secondly, our review of geopolitical vs societal threats suggests the need to consider different types of framings of the post-truth challenge. We will thus *ask which are the narrative struggles for the definition of the ontological challenge of post-truth to the democracy in the EU.*

We expect a strong prevalence of narratives explaining disinformation as an existential threat to democracy in institutional discourses that is routinely challenged by alternative views emerging from different member states, political forces and civil society. The consequences of this are a) that all actors of the democratic public sphere are understood as partners in the solution b) EU institutional responses are expansive in scope and c) actors emphasizing different explanations are routinely dominated in policy making. This contrasts clearly with Schlag's (2023) findings, but we anticipate this for two reasons. Firstly, in relation to the second narrative she clearly outlines that geopolitical readings were mostly absent from the regulatory debate (see similarly Casero et al 2023), but we are covering a wider time frame and range of actors. Secondly, whereas the institutional debate is characterized by a fundamental consensus among dominant institutional actors, we expect alternative views to be framed by civil society actors.

Thirdly and finally, we will need to analyse *how the position and rooting of the actors in the emerging EU field of practices on disinformation* (Bouza García and Oleari 2024) – *including normative assumptions about democracy suggested above – influence EU policy making.* We expect that the position of actors in the emerging field of practice a) strongly influences their preferred policy solutions, b) routinises political competition by objectivizing policy goods and goals and c) determines the forms of collective action such as actor coalitions.

The puzzling propositions identified at the origin of the process (X condition) and existing literature suggest that the EU's adoption of a disinformation response is the result of external shocks, both geopolitical (Russia and China interference Datzer and Lonardo 2023, Wagnsson and Hellman 2018, Ördén 2020 and societal (the pandemic). However, and despite the strong securitized frame of the EU's understanding of disinformation (Casero et al. 2023) as revealed in 2018 Commission's strategy on the matter:

"disinformation campaigns by third countries can be part of hybrid threats to internal security, including election processes, in particular in combination with cyberattacks. For example, Russian military doctrine explicitly recognizes information warfare as one of its domains" (European Commission 2018: 2)

The EU has not adopted any type of mandatory content regulation and has followed instead a consensual approach.

"All relevant stakeholders, including online platforms, news media organizations (press and broadcasters), journalists, fact-checkers, independent content creators and the advertising industry, are called upon to commit to a Code of Practices." (High-Level Group on Fake News and Online Disinformation 2018).



Even more interesting, influential member states like Germany and France took strong content control measures that have not been replicated by the EU. Indeed, the EU's response has also had an external and security dimension as well as recommendations regarding policies for digital literacy.

Therefore, the explanation must start at the point where the external shock are received in the area of the political system where it can be translated in regulatory effects. The main causal condition which this project will test using Social Process Tracing (SPT, Kaas et al . 2024) is that the response of the EU is the result of the impact of these external shocks in the field of digital policies. We conceptualise fields in the relational perspective of political sociology (Georgakakis and Rowell 2013) and neo-institutionalism (Fligstein and McAdam 2012) as a delimited and autonomous space of relatively stable positions and relationships, in which actors compete for social goods and resources produced in the field itself (see Bouza and Oleari 2024). The field of digital policies is the social space of struggles relating to the digitalization of economies and democracies.

This struggle has several dimensions, but one of the most salient is the economic struggle between new platforms using networking technologies to generate platform power and building on data about individual behavioural pattern to maximise the so-called surveillance capitalism (Zuboff 2019) and the attention economy (Lanham 2006), thereby detracting advertisement revenues from other forms of public communication such as traditional media (Harper 2016). This harms incumbents that are losing important part of their business – copyright based content creators, media companies, traditional quality journalists (see Heerman 2023 and Bonnamy 2023 for work on the struggles on copyright regulation)– but who still hold significant positions of power in the EU and national fields of power.

The X condition of the project is, therefore, that the outcome results from the demands and understanding of the problem of the actors of this structured space that is the field of digital policies. In other words, the EU has addressed post-truth politics as the result of the convergence of two major external shocks (foreign interference and the COVID19 pandemic), but the specific outcome – both in the fact that regulation has been adopted and its specificities – is the result of specific policy struggles among actors within the field of EU digital policies. We expect this to be a minimally sufficient explanation (Beach and Pedersen 2013) even if other intervening conditions cannot be ruled out. Alternative explanations that cannot be fully discarded by this approach and that may also contribute to the outcome are the Commission's concern about regulatory divergence in national platform regulation or the interest by EU institutions and Member States to regulate platforms because of other (non-post-truth related) reasons.

Conceptual mechanisms explained: strategies, claims and frames

As mentioned above, actor's understandings of the issues (frames) and their regulatory demands (claims) are the key causal concepts the project relies on, therefore adopting an SPT inspired intermediate position between positivistic materially inspired causal explanations focusing on material and structural conditions and moderate constructivist positions assuming that actor's agency must be understood in relation to actors' identity and discourses. These intermediate positions correspond well with the constructivist ontology and epistemology of field inspired political sociology approaches and will be the basis for the conceptual developments below.

Preemptive cooperation and co-regulation

As discussed before, we assume that the field of digital policies is the broadly defined area of the EU political system that processed the response to the post-truth shocks. This means that existing knowledge about its functioning, in particular about the issues of domination, patterns of collective action, institutional interests and issue connection can be used to infer the dynamics in the struggle on disinformation. Existing



approaches have analysed the role of Big Tech GAFAM lobby pointing out different degrees of success upon the DMA and DSA (Bank et al. 2021; Tarrant and Cowen 2022; Wolfs and Veldhuis 2023). Other studies have similarly analysed the differences in national mobilisation that have created unusual coalitions on issues such as copyright protection (Heermann 2023; Bonnamy 2023) or focused on the EU regulatory response to the societal (economic, social, cognitive and political) disruption brought about by digitalisation (Eiffert et al. 2021; Cioffi et al. 2022).

Big Tech lobbyists work closely with policymakers to influence legislation, preventing them from questioning their business models. At the same time, they use their economic and communication power to push back against political actions that threaten their dominant position. This situation has two key implications. First, despite their power, digital companies are still not at the center of EU decision-making, as their influence doesn't lead to a new political consensus and is often seen as "disruptive" (Bennet and Pfetsch 2018, Cioffi et al 2022). Second, the role of challengers in the broader field does not correspond with an actual role as insiders in the emerging strategic action field of regulation. The consensus that digital platforms need regulation—and that disinformation is a problem—shapes this field and brings actors together. Within this space, different actors compete to promote their solutions as the best option. There have been struggles between policy groups, such as free internet advocates, Big Tech lobbyists, journalists, and policymakers, over the best regulatory approach to tackling disinformation in Europe (Tuñón Navarro et al. 2019; Ördén 2020). This debate is closely tied to differing definitions of what disinformation is and where it originates. While the issue is linked to other areas like data privacy and geopolitics, there is a specific regulatory struggle over how to handle disinformation.

Hence, big tech plays a crucial role in shaping how to define disinformation policies at the EU level, and have done so through both 'pre-emptive' and 'conflictual' co-operation (see Rone 2021). On one hand, Big Tech lobbyists co-operate closely with policymakers not only to shape legislation, but also to become policy implementors through their role in co-regulation, thereby pre-empting policy-makers from fundamentally questioning their business model. On the other, they use their communicative and economic power to challenge political actions that undermine their dominant position.

The changing policy framing: from ontological threat to alternative conceptions of democracy

One of the areas where policy dissonance between the geopolitical consideration of the threat and society driven responses is clearer (see Casero et al 2023) has to do with the type and intensity of regulatory intervention. Where information control responses have gone so far to ban foreign owned channels such as Russia Today and Sputnik, most EU attempts at tackling the role of technological change have consisted in establishing a need to monitor risks.

However, whereas original EU action has been strongly characterised by a geopolitical understanding of the threat, the Cambridge Analytica (2016) scandal first and the 2020 pandemic secondly opened a window of opportunity to consider issues of pluralism that had been neglected in the original security agenda (Ördén, 2020). On the one hand, for the first time the EU regulates online platforms (beyond voluntary cooperation) because of the Digital Services Act, and cooperation includes disinformation as one of the systemic risks that platforms must act against. On the other, the Action Plan for Democracy is therefore a milestone in the European approach to disinformation, insofar as it moves from considering it a mere threat to security to giving it the status of one of the four pillars of defense of European democracy. This has been obvious on the evolution of the EU towards self-regulation. The first Code of Practice on disinformation, signed in 2018, was "the first time worldwide that industry has agreed, on a voluntary basis, to self-regulatory standards to fight disinformation" (European Commission, 2022). In 2022, however, the second version of the Code of Practice on disinformation was framed by the Commission in a different way: "For



signatories that are Very Large Online Platforms, the Code aims to become a mitigation measure and a Code of Conduct recognised under the co-regulatory framework of the DSA” (European Commission, n.d.). Thus, interestingly, the DSA breaks away from the EU’s previously dominant approach of self-regulation to digital platforms and disinformation, albeit were drafted in close cooperation with Big Tech companies. Schlag (2023) finds 4 dominating institutional narratives that emphasise the move towards regulation: subjecting the online world to laws, taking back control, citizens and consumers vs big tech and international agenda setting via extraterritorial effects.

The limitations of the societal agenda are explained by Eiffert et al (2021 :1025):

“The EU lacks the power to define for itself the kinds of user-generated content and activities that are classified as “illegal” and thus are subject to removal. Also, under the DSA, the national legal systems will have to specify whether content posted, for example on social media platforms, that is defamatory, degrading, obscene, intrusive or otherwise harmful to the interests of others, can remain online or must be removed. The limitation of EU powers regarding the regulation of content poses serious problems with a view to the core obligation that the DSA defines for platforms. Namely, they must balance the interest in free speech of the user against the personality rights of a third party, while both interests are protected under the EU Charter of Fundamental Rights.”

The EU's Digital Services Act (DSA) focuses on addressing disinformation from a market perspective, aiming to "decommodify" or demonetize it. The European Commission distinguishes freedom of speech from freedom of reach, targeting the amplification of disinformation rather than defining truth or falsehood. The policy emphasises transparency and accountability for companies, especially regarding content and algorithms. The regulation of disinformation reflects political preferences about the public sphere and democracy, with different understandings leading to varied definitions and regulatory approaches. The EU has framed online risks as hybrid threats to security, emphasizing security-focused solutions over censorship, but some.

Insiders and outsiders in the field of Eurocracy

Firstly, the European preference for co-regulation is a policy innovation, which in the field theory perspective implies that at this time norms and policies are “up for grabs” (Fligstein and McAdam 2012: 32). The EU’s response to information manipulation was carried out in response to the occupation of Crimea in 2014 and the victory of Trump and Brexit in 2016, a massive external shock to geopolitical, political and economic foundations of EU integration. This implied that a potentially radically novel response to these events was possible, as evidenced in the wide range of scenarios contemplated in the Juncker’s commission white paper in 2017. In relation to the protection of democracy in digital spaces this could have ranged from a stronger involvement of the EU in media markets and civic education to a devolving of powers to EU member states. The EU response consisted in a strong cleavage between the internal and external dimension of the threat, emphasising the geopolitical challenge of weaponised disinformation within hybrid threats, whereas internally disinformation has been addressed as part of a broader challenge of the regulation of digital technologies (Casero et al 2023). The relatively incremental response certainly relates to broader issues within the field of Eurocracy such as the overall response to the pandemic, the renewed hope in the Atlantic alliance after the 2022 Russian aggression on Ukraine or the sustained discussion on “strategic autonomy”. However, it also shows specific dynamics in the establishment of new policy: who should have competence, what balance between market, society and institutions, what professional practices are to be recognised and which internal governance issues will be at stake (indicators, standards and procedures and appropriate forms of knowledge).



As in other areas of the field of Eurocracy, interest groups are involved in the policy making sphere because of their governance functions. This means that they possess technical, political and bureaucratic European capital, which is compatible with a wide array of objectives, albeit almost all favourable to more European action in their demands. The main categories of interest groups that this project encounters are business lobby groups representing transnational or national interests – and this rooting in specific action fields is an important line of opposition –, defenders of citizens’ digital rights – ranging from freedom of expression to consumption rights –, defenders of general causes affected by disruption of the public sphere – from defenders of transparency to promoters of deliberative democracy – and professional communities such as journalists or teachers involved in civic education. This is a community of actors that is relatively similar to other areas of the “EU bubble”.

The literature on elite pluralism in EU lobbying suggests that business groups have greater access to policy-making than other organizations. However, the real distinction lies between “insider” organizations—those regularly engaged in EU processes—and “outsider” organizations (Greenwood, 2011, p. 234). These interactions are based on a trade-off: interest groups provide resources like expertise and information, while EU institutions gain legitimacy by consulting diverse stakeholders. While some insider groups, such as trade unions or digital rights organizations, are involved, businesses, particularly Big Tech, exert significant influence due to their ability to provide essential resources for creating a digital market in the EU. This makes them key players in co-regulation, which contrasts with more interventionist national approaches. Big Tech companies work proactively with the EU because the co-regulatory model supersedes most national policies, especially as no major European competitors have emerged. This process leads to policies that align with the interests of these influential actors. Furthermore, the response to disinformation is part of a wider technology agenda, which includes media literacy, IP and AI, and there is already evidence of the “ideational business power” (Obendiek and Seidl, 2023) exerted in the EU by these Big Tech actors.

Social struggles on the EU policy on disinformation

Between 2018 and 2022, the EU developed two codes of practice against disinformation, promoting co-regulation as a middle ground between self-regulation by platforms and stricter public intervention, such as content control. This approach makes large online platforms jointly responsible for tackling disinformation and encourages collaboration with civil society, including fact-checkers and experts. The EU's regulatory packages, like EDAP, DSA/DMA, and EMFA, were developed with input from diverse stakeholders, making this a civil society-driven response.

The process involves competing interests from various interest—political, institutional, economic, and social— where regulation is attempting to catch up to newly emerging technologies. Key issues include the shift in advertising revenue from publishers to platforms, the monetization of (dis)information, and challenges to copyright. These shifts create new social and political hierarchies, especially regarding professional standards and democratic communication in the public sphere. Interest groups involved in EU digital policy are mainly competing over two dimensions: economic control and the definition of democratic communication.

The EU's approach, especially in the DSA/DMA and EMFA packages, is often market-driven, drawing from the e-commerce directive and media market creation. Some actors, particularly outsiders, challenge this logic, questioning the need for EU intervention or denying the existence of a European media market. However, most insiders accept the EU's role in regulating the market.



Digital regulation at the EU level is shaped by institutional and interest group conflicts. Key debates include the extent of regulation, economic and societal implications, and the role of social actors. Conflicts arise over issues like the distribution of advertisement revenue, copyright protection, and the influence of public actors. The regulation will create winners and losers, raising questions about who should be empowered or disempowered. Additionally, the broader social struggles around disinformation and other digital issues will impact the discourse on regulation.

The patterns of competition in the field of Eurocracy focused on digital regulation has given place to different types of groupings among actors. On the first dimension (economic competition in the EU market), lines of action tend to oppose large multinational lobby groups advocating for the positive effect of their activity on the EU market and national business groups and defenders of citizens' rights denouncing abusive practices or monopolistic tendencies and asking large technological actors to assume the costs of externalities. On the second dimension (scope of regulation and amount of issues included) the main conflict line does not really oppose actors favourable to regulation to those opposed, but those favouring regulation – usually citizens' rights associations – to those opting for self or co-regulation – business lobbies but also often promoters of general causes fearful of interventionism. There are also cross-cutting lines of conflict, for instance the demands for a public recognition of the value of some practices – such as “journalism as a public good” to the need to provide support for new practices such as fact-checking and data journalism. The overall result of the combination of these lines of struggle is a relatively blurred political field where GAFAM lobbies can coalesce with defenders of citizens' right on the net on issues such as copyright (Heerman 2023) but be in different coalitions when it comes to demanding algorithmic transparency.

Table 1. Details of causal mechanism and process

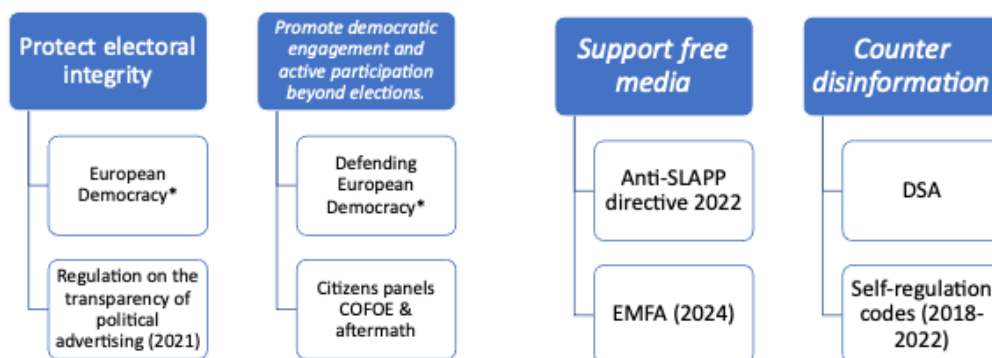
Condition X	Agenda-setting		Policy shaping		Policy adoption		Policy reform and completion		Outcome Y
SAF of digital policies and regulation as space.	<u>EU institutions</u> conceive information disorder as an ontological threat to democracy and the EU.	In 2018 <u>EU institutions</u> design a comprehensive response that extends the EU strategy from monitoring of foreign interference to regulation of political digital communication.	<u>Actors of the SAF</u> formulate a wide range of demands to regulate the digital field from platform liability to copyright and media revenue protection.	<u>Insider Stakeholders of digital policies</u> shape policy response in the HLEG and EDAP and exclude alternatives to regulated self-regulation.	<u>Large online platforms and allies</u> (some digital rights groups and fact checkers) pressure to adopt co-regulation instead of other alternatives.	<u>European Commission</u> proposes a co-regulatory approach by including harmful content in DSA and a new code of practice.	<u>Actors whose demands where not considered</u> and dissatisfied with solution and platform dominance (content creators and journalists & national civil society) seek compensation via additional policies.	European Commission proposes legislation introducing media exemption, journalist protection and user empowerment via enhanced transparency (EMFA, anti-slapp and political ads).	EU co-regulatory model with democratic choice support policies.
	<u>Evidence:</u> official documents. Frame bridging and amplification (Snow & Benford 86)	<u>Evidence:</u> interviews & official documents. Frame extension (Snow & Benford 86) resulting from field effects: policy proposals addressing internal processes and actors.	<u>Evidence:</u> Formulation of conceptual alternatives for regulation in position	<u>Evidence:</u> Claims & DNA: map of ideas circulation. All the alternatives that	<u>Evidence:</u> position papers, interviews & SNA <u>Priors:</u> influence	<u>Evidence:</u> official documents (including code) and interviews. <u>Priors:</u> significant	<u>Evidence:</u> interviews and consultation documents <u>Priors:</u> very unlikely that a	<u>Evidence:</u> interviews and consultation documents <u>Hoop</u> , it confirms EMFA is rooted in the same field as other hypotheses instead of alternatives	The policy is the result of a specific social struggle in which regulatory

	<p><u>Priors:</u> Result coherent with existing theories on securitization BUT very unlikely for the EU to regulate information otherwise.</p> <p><u>straw in the wind test</u></p>	<p><u>Priors:</u> measures carried out under EEAS leadership, how to explain frame extension?</p> <p><u>Hoop:</u> if no distinct design, no agenda setting</p>	<p>papers. Quantitative text analysis.</p> <p><u>Priors:</u> Actors from the SAF will formulate different demands from those outside the field.</p> <p><u>Hoop:</u> if alternatives did not exist, there would be no struggle</p>	<p>challenged platform power were discarded.</p> <p><u>Priors:</u> What is the likelihood of systematic rejection in a single direction if the agenda has not been shaped?</p> <p><u>Hoop (strongly specific):</u> it does not demonstrate the success of preemptive cooperation but sidelines other alternatives.</p>	<p>difficult to prove. But EU institutions unlikely to act if not receiving support from society.</p> <p><u>Smoking gun very unlikely, rather straw in the wind</u></p>	<p>break with previous positions AGAINST regulation (HLEG)</p> <p><u>Straw in the wind:</u> additional evidence that co-regulation was supported by platforms</p>	<p>new policy (EMFA) changes a recent decision (DSA)</p> <p><u>Doubly decisive:</u> confirms field effects and discards alternative origins of EMFA</p>		<p>claims for platform business model regulation are sidelined and platforms framed as necessary partners.</p>
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Methods: dataset

The project works with 3 types of evidence: the main body of evidence is constituted by stakeholders' responses to the consultation processes on the 8 pieces of regulation; 40+ in-depth interviews with stakeholders and evidence about coalitional patterns. Each body of evidence is examined with a combination of techniques and these are triangulated against the rest of the evidence.

Figure 1. Consultation cases selection



The project builds upon the contributions of actors to figure 1 policy consultations on the regulation of post-truth. These consultations are significant because, beyond their actual influence on policy, they serve as a public platform for showcasing expertise and policy positions—an ideal opportunity for analyzing civil society claims. Despite their importance in the field and the wealth of data they provide, to our knowledge, these consultations have not yet been analyzed.

An extensive review of the European Commission's webpages for six consultations (see Table 1) uncovered 647 policy responses. After excluding responses that were position papers from identifiable organizations, the final sample for this analysis consists of 309 documents, representing 230 distinct actors, of which 43 participated in more than one consultation. The criterion of responding to more than one consultation serves as a baseline and an inclusive one to distinguish between insider and outsider organizations. This approach does not require us to pre-define or theorize the actors but rather focuses on those who self-select by submitting responses to the Commission. We assume that insiders are organizations that are both sufficiently informed and aware of the stakes in the SAF to identify and engage with the relevant consultations, as well as sufficiently resourced to submit responses. The threshold of responding to just two out of eight consultations is not particularly demanding, yet only 19% of participating organizations submitted responses to more than one. This low percentage likely reflects the fact that it represents only a small fraction of the hundreds of policy consultations the EU organizes annually. Table 2 below indicates the number of documents extracted from the Commission consultations. Out of the total number of documents, 121 of them come from insiders.

First, the content and relevance of co-regulation vs self-regulation rests strongly upon primary data and the actors' conception, strongly supported by a critical reading of literature suggesting that the EU has taken a regulatory approach (Polanyian interpretation as per Cioffi et al 2022). The analysis of the process conducting to the outcome builds upon the analysis of said primary documents' definitions of the problem about (lack of) regulation and studies the policy proposals of the EU and the stakeholders to understand the proposals that were considered and those that were not. We do so by a combination of descriptive

coding – what the stakeholders speak about, in order to identify themes, diagnoses and frames – aimed at understanding policy narratives and framing with claims making – more specific and targeted demands and blames – aimed at understanding what actors demand specifically.

Table 1. Regulatory processes database of documents to analyse in the project

Policy document	Type of consultation process	Number of documents/ stakeholders
Digital Services Act	Consultation	93
Public Consultation on Fake News and Online Disinformation	Consultation	82
European Media Freedom Act	Call for evidence; Consultation; Commission Adoption.	73
European Democracy Action Plan	Roadmap; Consultation.	30
Defending European Democracy Package	Call for evidence; Consultation.	13
Regulation improving transparency Political advertising –	Roadmap; Commission Adoption.	12
Anti-SLAPP directive	Roadmap; Commission Adoption.	6
Total		309

Secondly, interviews are used to clarify meanings with actors' via questions or debates (ie. opposing them with other actors' views) confirm emerging interpretations and to obtain information on actors' strategies. They are coded in a separate category with information on strategies in order to complement the interpretation based on discursive strategies emerging from documents. The main objective is not to find the "smoking gun" decision – which as described above would consist in very unlikely to be found direct evidence of platform successful pressure for coregulation, but instead to trace the origin, evolution and consolidation of a policy response, by considering the impact of external events and moments when the agenda opened or narrowed down. Interviewees involved in the policy process and with significant expertise can provide significant information that is turned into evidence via careful triangulation.

Finally, network analysis allows us to map the field, analyzing resource sharing and agency patterns, as well as map the cooperation and competition networks of actors attempting to influence the debate to combat disinformation at the EU level. In doing so, we aim to distinguish the different types of links in the network, which facilitates the identification of 'clusters', coalitions and oppositions. The census of the actors that are to be included in the analysis can be carried out through a systematic search theoretically supported by the identification of the different alternatives on disinformation indicated by the literature, as well as interviews and/or a systematic analysis of the EU public consultation responses. Data about coalitional patterns are extracted from consultation databases, position papers, interviews and secondary sources such as transparency registers⁵. These are incorporated into spreadsheets directly for observations and via the Discourse Network Analyze software (Leifeld 2023).

The dataset is therefore composed of the following dimensions. Firstly, a record of actors classified by the following attributes: type of actor; degree of involvement in policy-making (insider or outsider) level of organization; main policy domain of activity, number of documents submitted and membership in coalitions.

⁵ We are grateful to Claudia Neuray for her suggestion to reproduce the analysis of lobbying transparency data on DSA employed in her MA dissertation.

Secondly, it includes two codebooks, one grouping the frames and the second the claims. These codebooks will be searchable according to the attributes described above. Thirdly, it will comprise two networking datasets, one for DNA and the second for SNA. These will be analysed with actor centrality (degree, closeness, betweenness) and structural measures (modularity and equivalent positions). Finally, a fsQCA dataset will be produced, calibrating the relative number of regulatory demands and presence of insider vs outsider groups. Even though interviews are an invaluable part of the research, they cannot be included in these datasets without compromising the interviewees identities and in some cases, consent.

Analysis techniques

Coding and analysing frames and claims

Coding has been carried out inductively by one researcher, re-coded by a second one and checked by a third, with discrepancies being solved through discussion. The two categories are studied in depth by using NVIVO 14 queries allowing the comparison of coding content, the chronological evolution of demands, the types of actors making the said demands and a qualitative study of linguistic aspects such as collocations, adjectives or tropes. The qualitative analysis is triangulated with quantitative textual analysis with topic modelling to identify the most salient topics in the overall corpus. We then run a specific comparison to detect the main differences between the actors involved in several of the policy conversations which we have termed “insiders” and those involved only in one (“outsiders”). This allows us to test the relevance of the field effect.

The analysis of narrative struggles is carried out building on the re-coding of actor’s themes into frames about the nature of the threat, the culprits and the normatively preferable solutions⁶. The focus of the analysis is placed, in this case, on qualitative and linguistic aspects of the argumentation, albeit also considering the social dimension of the argumentation – the emergence of discourse coalitions – and the chronological dimension, both within the policy process and in relation to the connected policy issues. Snow and Benford’s classical notions of frame bridging, amplification, extension and transformation will be used to understand these evolutions in relation to the actors’ strategies.

We then qualitatively code the policy claims of the actors into statements:

“statement is a verbal or written expression of discontent with a policy or in favor of a policy. Statements need to be public to qualify as an element of political discourse because only public claims will be instrumental for the goals actors want to pursue in a discourse.” (Leifeld 2017: 3).

This operationalises the distinction between frames as the terms in which the policy conversation is structured – what actors speak about – and made sense of – how they speak about it – from claims, understood as actors’ specific demands in terms of who is for and against specific demands. These claims are used to study policy formulation, shaping and adoption, by mapping which kinds of demands are made and adopted, which are made but not adopted and which ones are not formulated.

Network analysis

Furthermore, focusing on statements on which the actors can adopt for / against positions allows us to study the collective action contribution to the advancement of claims, in particular the discursive networks

⁶ The combination of the study of policy alternatives not taken and actors’ normatively preferred policies will be used to formulate the hypothetical alternatives to the EU regulatory model.

contributing to structure policy conversation. Discursive Networks Analysis regroups actors that support or oppose statements into patterns of relations. The rationale for using network analysis to understand coalition making is

“that the existence of coalitions is an expression of cross-sectional clustering of actors around similar statements. Analyzing the co-presence of coalitions in a system of actors permits an evaluation of the overall level of cooperation and conflict within the system and therefore effectively reveals the degree of polarization of actors in the system” (Leifeld 2017: 5).

The DNA dataset will be invaluable to represent and analyse discursive patterns, but it does not in itself reflect other forms of collective action important in policy pressure, such as coalition making and joint lobbying. In order to obtain evidence about these aspects of the policy mechanism, we will use SNA to analyse the multiple observations about collective action. The analysis will focus both on the individual actors’ centrality and structural measures such as modularity and equivalent positions. This will allow for a complex representation of the underlying social structure, and thus contribute to a better representation of the actors involved. This is particularly important considering the discrete role of big tech lobbying in consultation processes (Bouza and Olear 2024), in contrast with their salient role in lobbying (Neuray 2024).

QCA analysis

QCA will be used as a complement to process tracing (see Álamos Concha et al 2022). The assumption behind the process tracing design that we have established is that the outcome is the result of the causal interconnection of each of the mechanisms in table 1. However, each consultation is a case in itself, addressing specific issues and policy stakeholders. Therefore, it is important to test rigorously whether consultations have common characteristics that contribute to explaining their specific outcome. The objective is to achieve a systematic analysis of actors’ demands across each of the consultation processes. This will contribute to strengthening each of the process tracing tests by better understanding the sufficient and/or necessary nature of each of the causal relationships specified, but in particular in the policy shaping phase.

Following a MSDO logic each of the seven consultation processes will be treated as case with very similar characteristics – consultations on post-truth related issues – and different outcomes (co-regulatory vs regulatory proposals).

Table 2. MSDO case classification

Cases with regulation options	Cases with co-regulatory options
EMFA, anti-SLAPP, political ad reg, DDP	HLEG, EDAP, DSA,

The expectation is that actors formulate different claims and that insider actors shape the policy response. The conditions therefore will focus on claims-making and insiders’ action presence in each of the consultations. Since in each of the consultations there will be demands for regulation and self-regulation and they are open to any actor -insider or outsider and their coalitions– both conditions will be formulated as fuzzy set, where the value of the condition will be calibrated according to the presence of claims and actors as a proportion of those involved in the process.



This will allow a more precise analysis evaluation of the role of continuous presence of claims and actors in the emergence of the elements of the outcome, for the consideration of alternatives and the relative importance of the presence or absence of some types of actors. In doing so, it will allow us to test policy shaping and timing: if actors keep articulating specific demands on topics along time, it will be an indication that the Commission is deliberately choosing not to incorporate them.

Relevance of the dataset for open science and policy recommendations and debates

Process tracing is often criticized for not sufficiently separating theoretical and analytical design from empirical analysis. Specifically, outcome explaining approaches produce continuous dialogues between data and theory. This paper does not intend to respond specifically to these criticisms. However, it is published in the moment when the causal mechanisms have been clearly identified, but when the specific tests laid out in table 1 have not been carried out. This will facilitate both transparency and an increased ability to confirm or disconfirm the expectations laid out in the table in any future work using these expectations and datasets. Secondly, we hope that these datasets will not only be relevant to the academic community, but to policy-makers. Work carried out in this work package (see Rone and Oleari forthcoming) shows that the policy debate still revolves around alternatives that were formulated during the policy debate. This dataset will allow for a systematic review of the types demands, the actors making them, the composition of the different coalitions and the moments when they were considered or discarded. This should facilitate a more comprehensive policy debate in the future.

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