D7.5 – A Guide for EU Citizens Addressing the Risks of Disinformation

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Table of contents

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Introduction: What, Who and How?

In recent decades, concerns have multiplied about threats to democratic governance in Europe. The rise of populist movements endorsing authoritarian measures, both inside and outside the Union, together with technological transformations that grant digital platforms disproportionate influence over public communication and enable large-scale manipulation through artificial intelligence, are widely perceived as destabilizing democratic life.

As a result, there is growing demand for state intervention to protect democracy and to secure the effective implementation of fundamental rights. Yet citizens often experience these debates as fragmented and opaque. The risks are diverse and sometimes presented without clear connection: the exposure of minors to harmful content on social media; the capacity of foreign actors to interfere with elections; the erosion of trust in scientific expertise on matters such as climate or health; or the disruptive impact of artificial intelligence on everyday life. In a global environment increasingly described as hostile and threatening to European societies forms of life, identifying specific threats and building common responses becomes urgent.

This guide seeks to clarify both the principal risks that have been identified and the responses formulated by European institutions, with particular attention to their consequences at the level of member states. It summarizes the EU's a **comprehensive strategy** on disinformation developed (2018–2025), outlining measures undertaken as well as decisions not to intervene, and explains how these decisions affect citizens' rights and their capacity to exercise them. Rather than offering detailed accounts of the policy and regulatory instruments, the guide focuses on the rationale behind them: what debates they refer to, and how they aim to reinforce the citizens rights' and their ability to exercise them within democratic societies.

The first point is that the Union has organized its overall strategy around the concept of **combating disinformation**. This framing has shaped regulatory choices, even though alternative approaches could have been pursued. It also legitimizes interventions which, while intended to protect democratic institutions, risk placing constraints on fundamental rights such as freedom of expression and freedom of the press.

The second point is that "disinformation" is the central notion not because of an abstract concern about fake news, post-truth, or conspiracy theories, but because it names intentional actions seeking political or economic advantage with the capacity to compromise electoral fairness, undermine democratic procedures, and distort public debate.

The third point is that the EU's approach reflects a specific understanding of democracy: one grounded in principles such as the rule of law, human rights, electoral integrity, and pluralist debate. From this perspective, disinformation is not simply an informational

disorder but a structural threat to the conditions under which democratic societies function. This logic underpins the European Democracy Action Plan (EDAP), which seeks to strengthen resilience by addressing disinformation as a systemic challenge

This guide, therefore, highlights how EU strategies against disinformation are not only institutional responses but also interventions to promote citizens' **ability to participate meaningfully in democratic life**.

Who? Citizens

The guide helps citizens—individually on their personal life as ordinary citizens as well as participants of public life—understand and benefit from EU policies and regulations designed to protect democracy from the disruptions generated by disinformation.

- Why the European Union is acting against disinformation.
- How these policies protect individual rights (i.e., as warning of manipulative online advertising or information).
- What changes on citizens attitudes or behaviors are required -from questioning information sources to exercising new rights under EU law.
- Where to learn more about these topics and improve personal skills to be more involved (including such things as reporting to fact-checking networks or denouncing infringements to institutional supervisors).

And there is an appeal to citizens to participate in countering it, playing different roles in countering the spread of disinformation

What? Disinformation

Disinformation is false or misleading information deliberately created and shared to deceive, manipulate, or influence people for economic or political benefit. It is not just false information (misinformation): it is intentional - often in coordinated campaigns - and spreads easily through social media, information websites, or messaging apps.

Disinformation can:

- Distort public debate, making it harder to form opinions based on facts and differentiate evidence-based public policies from unsubstantiated claims
- Undermine trust in political institutions and fundamental channels of the public debate such as the media, experts or social organizations

- Manipulate behavior, often in an unconscious way (as with the use of algorithms in social platforms or digital manipulation of images), from voting choices to online interactions.

But the specific identification of disinformation is confusing and debated. EU has clarified the scope of the disinformation policy also encompasses misinformation (false information) and the contents included in operations of foreign interference. But at the same time, it is different from satire and parody, misleading advertising, errors or clearly identified partisan news and commentaries. And its distinctive trait is that it has the **intention to deceive or obtain a gain that may cause public harm.**

Nevertheless, including intentionality and political gain as a part of the content of the concept of disinformation raises many doubts about the justification of institutional intervention: the fact that it might be used to suppress political critique or dissent. Moreover, in polarized contexts, the implemented measures can be perceived as censorship or the intent to restrict opposition and political pluralism.

That is why although the fight against information has been the leitmotiv of key new regulation, it is now being substituted by a wider approach oriented by the protection of **information integrity** (European Democracy Shield, 2025).

How?

At first, the EU saw disinformation as mainly an external security issue (for instance, linked to Russian interference). Today, it recognizes it as a deeper societal and economic problem affecting the foundations of democracy, as a menace for

- **Free speech** – ensuring people can express themselves without manipulation.
- **Free elections** – protecting voters from covert influence.
- **Public debate** – making sure citizens can form opinions based on accurate information.

The EU's strategy is **wide-ranging**: it tries to strengthen democracy by protecting all these dimensions at once. It has developed a regulatory framework that focuses on introducing more controls on large digital platforms and foreign malign interference in the media and information environment, combining legal obligations with mechanisms for stakeholder cooperation. Nevertheless, it includes many other provisions intended to protect some key democratic elements from current threats, as described in the European Democracy Action Plan (EDAP): ensuring fair and free elections, promoting democratic participation by citizens, strengthening media freedom, and developing targeted counter-disinformation measures.

This constitutes a comprehensive and adaptive strategy, continuously evolving in response to a shifting geopolitical and digital landscape. That is why to understand and evaluate the coherence of the various institutional measures taken under the banner of combating disinformation, it is essential to examine the underlying conception of democracy they rely on, as well as the interdependent and multiple impacts of the different policies developed

2 EU Debates, Policies and Regulation

The EU response is a comprehensive strategy grounded in a systemic view that intends to protect different dimensions of democracy (free speech, free elections, political deliberation) from the effects of disinformation.

A 360º Response

As part of this strategy against disinformation, the EU has developed regulatory responses, non-regulatory policy proposals and developed a framework for coordination between Member States on the matter in six interconnected strategies:

1. **Protecting citizens' rights and civic education** – Focus on digital skills, media literacy, and surveillance of the respect of fundamental rights (such as freedom of expression and information, rights to privacy and protection from hate speech).
2. **Regulating political spaces and elections** – Ensuring fair campaigning and transparent online ads to guarantee that the processes follow the ethical and procedural rules contained in legislation.
3. **Foreign interference** – Disinformation framed as hybrid warfare, trying to counter the "malign influence" of authoritarian countries as Russia and China.
4. **Big platforms' power** – Platforms' algorithms amplify harmful content. The DSA and EMFA impose obligations but preserve the principle of limited liability.
5. **Journalism and media pluralism** – The crisis of journalism makes societies more vulnerable to disinformation. Through different regulation as the important European Media Freedom Act (EMFA, put link) passed in this period (2024) the objective is to safeguard independence and diversity of the media to guarantee political pluralism and the circulation of accurate information.
6. **Science, knowledge, and conspiracy theories** – Disinformation also undermines trust in science and expertise, requiring an institutional intervention to favor the dissemination of scientific knowledge and the debunking of false theories and facts when they might provoke public harm. It also involves helping mediators (journalist, academics, experts) to address citizens in the public sphere.

2.1 Protecting citizens' rights and civic education

Fundamental Rights: One of the key concerns regarding the impact of technological changes on democracy is how these changes affect the basic rights of citizens. Disinformation has a direct impact on fundamental rights such as freedom of expression, freedom of information, and privacy. However, the issue extends beyond these rights, encompassing efforts to expand and secure digital rights while safeguarding democratic political processes.

Civic Education: In addition to protections, there is a strong emphasis on developing strategies for citizen education at all levels, helping individuals adapt to the new technological environment and enhancing their political participation. These strategies focus on teaching essential digital skills, such as understanding how to control their data on platforms, recognizing and reporting malpractice, staying well-informed, and fostering greater involvement in political decision-making. In alignment with strategies from the UN, UNESCO, and the Council of Europe, the EU is working to counter the challenges posed by the post-truth era through a variety of educational initiatives. To this end, the EU has funded projects focused on Media Literacy, Digital Education, and Civic/Democratic Education, with a particular focus on critical thinking and digital competencies. The goal is to combat disinformation and hate speech through education and training, while promoting open political debate. This is crucial for effective participation in society and democratic processes, as outlined in the Digital Education Action Plan.

Existing policies:

One of the main objectives of regulation is to create a thriving civic space for upholding fundamental rights in the EU. There is a special policy developed at the EU level on protection and supervision of human rights, that has incorporated questions related to disinformation menaces, expressed in diverse charters and regulation, and supervised with periodical plans, EU Action Plan on Human Rights and Democracy (2020-27), promoting human rights and democracy worldwide.

The protection of fundamental rights is a central priority in all relevant regulations. This includes legislation on personal data and privacy, consumer protection, advertising, trade secrets, business transparency, the rights of online service users, and the regulation of audiovisual media, among others.

Nevertheless, to fully enjoy these rights and protections, citizens should be aware not only of their existence, but of the diverse ways they can be restricted or violated. That is why the EU has developed different strategies and projects to help citizens acquire the skills they need to understand the dangers and to be able to report abuse and protect themselves against them. The goal is to improve information to understand the basic principles and functioning of democratic systems, as well as the digital capacities to address basic risks coming from the spread of disinformation. In this sense, the EU is aligned with perspectives provided by international organisations as UN, UNESCO or Council of Europe.

What's the Debate About?

Related to the protection of human rights, the key question is how to define the limits of freedom of expression, especially when it conflicts with values such as dignity and privacy, and how to eliminate hate speech.

The EU regulation addresses this concern.

Regarding minors, the issue lies in restricting their access to adult content while also tackling the addictive nature of online platforms, such as TikTok, and its impact on their development and mental health. This addictive aspect, coupled with the anonymity that facilitates the production and access to illegal content, has sparked debate about the need for algorithmic controls and mandatory identification.

Current strategies aim to combat disinformation by demonetizing harmful content through increased regulation and transparency, both internally and externally. This includes controlling political and advertising messages, enhancing transparency, regulating data access, and empowering the fact-checking community.

- In the realm of civic education, there is ongoing debate over the most effective strategy, as well as which skills, competencies, and content should be prioritized.
- There are also significant challenges and resistance when it comes to controlling content and ensuring compliance, particularly from major platforms.

Cases: Contestation of Meta's protection of minors

As of 22 September 2025, the EU Commission website reports that: "the EU is investigating Facebook and Instagram for not properly applying the DSA rules to safeguard minors online. In particular, the EU is inquiring whether the features and algorithms of both platforms might encourage addictive behaviours in children and lead them down endless content paths, known as 'rabbit-hole effects'."

Proposals / Alternatives

Proposals have been made to enhance the protection of minors and improve user identification online, for instance in Spain or France on access to adult content by children. The issue of maintaining anonymity remains one of the most controversial topics in this debate. While there has been an increase in the production of courses, particularly targeted at younger individuals, there is still a lack of concrete evidence regarding their impact.

Furthermore, there is no consensus on the best approach to integrating these topics into broader democratic education programs.

Key questions remain, such as whether these topics should be addressed as part of basic education in a transversal manner, incorporated into specific subjects, or offered as extracurricular courses.

Additionally, there is a significant gap in clear strategies for educating adults or particularly vulnerable groups, leaving a void in comprehensive educational frameworks on digital literacy and online safety.

2.2 Regulation of the political spaces, procedures and contents

Polarization fueled by disinformation—largely spread through media and digital platforms that neglect ethical standards in mediating citizens' access to information and debate—has become a major factor disrupting the public sphere in today's post-truth context. This also results in increased circulation of fake news, conspiracy theories, and misinformation, seriously threat to the proper functioning of democratic public space.

Regulation has aimed at developing measures to protect journalists, fact-checkers, and activists in carrying out their tasks, as well as involving them in policy-making. Such regulation is justified not only on the grounds of freedom of expression, but also on the right of citizens to be well informed and on the need to guarantee free and fair political processes.

EU Regulation

Guarantying a safe public space: The EU has included regulatory responses in broader regulations of the digital market, rather than **a specific "disinformation law"**. It conceives disinformation as a harmful but in most jurisdictions not illegal manifestation of post-truth.

- **Digital Services Act (DSA)** – obliges Very Large Online Platforms (VLOPs) to assess and mitigate risks of disinformation, especially around elections.
- **Regulation on Political Advertising** – requires transparency on who pays for political ads and why citizens see them.
- **European Media Freedom Act (EMFA)** – strengthens editorial independence and media pluralism, countering capture and undue influence.

Special control during electoral periods: The EU has introduced specific measures acting Code of Conduct on Disinformation and the Regulation on the transparency and targeting of political advertising. The aim is to protect voters' autonomy and ensure that electoral outcomes reflect informed public choices.

The objective is to maintain the Integrity of elections by ensuring that they are not unduly influenced by disinformation campaigns, the exploitation of data or the illegal financing of campaigns.

Unlike in the US, most European democracies impose strong controls on the organization of public debate and funding to guarantee a measure of equality between political forces before elections. The EU regulation complements the existing national rules on electoral processes, by developing particular emphasis on the political advertisements disseminated in very large platforms.

The EU regulation on political ads requires political content to be clearly identified as well as the identity of its promoters and help citizens to recognize the ideas at stake.

However, these regulations do not control or limit the ideological content.

Promote citizen participation: The EU emphasizes that a transparent and accountable digital ecosystem must be developed in collaboration with researchers, civil society, and journalists. Therefore, it has introduced a new generation of citizen dialogues aimed at promoting innovative forms of participation and deliberation. It has invested in supporting and strengthening civil society, fostering partnerships with various levels of public administration.

A key component of this initiative is the establishment of a deliberative democracy infrastructure, including the Competence Centre on Participatory and Deliberative Democracy, designed to enhance civic participation and public engagement in shaping priorities.

Additionally, the EU provides funding for initiatives like Deliberative Europe under the Horizon 2020 program, as well as special strategies and projects to improve participation among minorities and young people.

The EU also recognizes the crucial role of mediators in this ecosystem (journalists, NGOs, academics) and has developed new protections against persecution and defamation, such as the anti-SLAPP directive for journalists and activists.

What's the Debate About?

There is a tension between the EU's efforts to regulate digital platforms and the protection of freedom of speech.

- Critics warn that over-regulation could infringe on individuals' rights to express opinions and engage in political discourse, risking censorship of certain political views.

The balance between state control and market forces is discussed.

- While some advocate for more state involvement to protect democratic processes, others caution that excessive regulation could stifle innovation and disrupt digital markets.

The role of digital platforms is also central to the debate, particularly whether platforms should be required to remove political content or remain neutral in moderating it.

Case for debate: The annulment of the first round of the Romanian Presidential election.

In December 2024, Romania's Constitutional Court annulled the first round of the presidential election. The court's decision aimed to ensure the "correctness and legality" of the electoral process amid claims of external meddling, following intelligence reports that Russia had conducted a coordinated online campaign to promote candidate Călin Georgescu. This campaign reportedly involved approximately 25,000 TikTok accounts, significantly boosting Georgescu's visibility and support.

In this case, the issue laid in a possible breach to a possible TikTok's obligation under the DSA to properly assess and mitigate systemic risks linked to election integrity. It focused on the need to identify political advertising in electoral periods and its sponsors, as well as the functioning of the algorithms to promote contents. This case underscores the growing challenges democracies face from external interference, particularly through digital platforms. The annulment highlights the need for robust measures to protect electoral integrity and maintain public trust in democratic institution, not from the specific political ideology (extreme right, pro-Russia attitude) of the candidate.

Proposals / Alternatives

- Critics highlight that the EU has given tech platforms a salient role in the regulation of the digital public space by opting for co-regulation.
- On the contrary, other critics stress that EU regulation is already stringent and could be used to damage political rivals and limit political pluralism
- Of special concern now is the manipulative character of algorithms and the power of AI to influence beliefs and political attitudes of citizens in an unconscious manner, despite the fulfilment of these measures of transparency.

2.3 Risks of foreign (malign) interference from States and global companies

Explanation

From the outset, the EU viewed disinformation primarily as an external security threat, particularly after Russia's annexation of Crimea in 2014.

This led to a focus on foreign disinformation campaigns, handled by the European External Action Service (EEAS). The focus on external disinformation allowed the EEAS to develop a more specific approach compared to other EU bodies, which were bogged down by the complexities of domestic digital dynamics.

As a result, the EEAS shaped both EU policy and public perception, focusing on foreign threats and bolstering its position as the leader in countering disinformation. In 2021, the EEAS introduced the term "Foreign Information Manipulation and Interference" (FIMI), broadening the scope beyond false information to include manipulative behaviors, while still focusing on external threats like Russia.

This shift allowed for a more comprehensive approach to tackling harmful narratives and strengthening EU policy on disinformation.

What's the Debate About?

While EU regulation targets domestic disinformation, international action addresses foreign influences that transcend national borders, with different goals, tools, and challenges.

However, the EU's framing of disinformation as an external threat, especially with the introduction of the Foreign Information Manipulation and Interference (FIMI) strategy, raises questions about its alignment with the EU's previous strategies.

The EU has traditionally viewed itself as a normative power, using public diplomacy to influence international relations and promote its values through soft power, which focuses on attraction and persuasion rather than coercion. By contrast, FIMI adopts an adversarial stance, potentially blurring the lines between diplomacy and information warfare.

This shift towards a more defensive approach may undermine the EU's soft power and diplomatic image, making it more reactive and less constructive in global relations. There are concerns that this could harm the EU's ability to foster positive dialogue and maintain trust with both citizens and international partners.

Cases: The ban of Sputnik and RT

The European Union banned RT (Russia Today) and Sputnik, two Russian state-funded media outlets, ability to broadcast content in the EU as part of its response to Russia's invasion of Ukraine in 2022. The EU decision considers that Russian state-run media outlets amplify content that could potentially destabilize European societies, fuel division, and incite violence. The legal basis for the EU's actions lies in the regulations adopted by the EU to sanction Russia's occupation of Ukrainian territory since 2014. The bans have been challenged in court, but in July 2022, the EU's General Court upheld them.

The EU argued that these outlets were spreading disinformation and propaganda that aligned with Russia's strategic goals, particularly the justification of its military actions in Ukraine. RT and Sputnik are seen as part of Russia's broader hybrid warfare tactics, which blend conventional military action with non-military methods like cyberattacks, political interference, and disinformation campaigns.

Critics of the ban argue that RT and Sputnik, as media outlets, are entitled to freedom of speech even if their content is controversial or biased. They contend that censorship, even in the context of disinformation, can set a dangerous precedent.

- The EU's "Ban" of RT and Sputnik: A Lawful Measure Against Propaganda for War, VerfBlog
- Understandable, but still wrong: How freedom of communication suffers in the zeal for sanctions

Proposals / Alternatives

Currently, the application of the FIMI framework is limited to the two key actors identified by the EEAS: Russia and China.

This selective focus is justified by the EEAS mandate and strategic priorities, aligning with the EU's recent geopolitical concerns.

However, this approach reveals a central paradox: while the FIMI framework is intended as a comprehensive tool for identifying and combating information threats, its application is restricted to a predefined set of adversaries—actors for whom the intent to manipulate is already presumed.

Therefore, what does FIMI ultimately signify? The turn of events at the time of writing at the end of 2024 with the election of Trump raises questions about FIMI's appropriateness to address attempts to influence European public opinion by actors such as the USA or Israel.

Also, if FIMI is a form of information warfare, the EU could instead carry out a public diplomacy of global democracy, promoting global collaboration to uphold democratic values and global standards on social media platforms with countries such as Brazil, Canada, UK or Australia.

Find out more: Countering FIMI through Digital Diplomacy in Europe - RECLAIM Policy Brief.

2.4 What about the big platforms?

Explanation

While democracies have always coexisted with economic oligarchies – the United States more than most European ones – the power acquired by a few men is beginning to take on new economic and political characteristics.

The technological revolution – satellites, software and search engines, AI – provides them with an extraordinary global power, as governments and decision-makers increasingly depend on their services. This grants them an unmatched capacity to influence policies by controlling data, as well as through the lack of alternatives to several services.

Historically, platforms have been exonerated from liability for user-generated content under EU and global regulations, primarily because of the platform neutrality model. This concept holds that online platforms should not be treated as publishers or distributors of user content, meaning they are not responsible for the content unless they have actual knowledge of its unlawful nature. This safe harbor provision has allowed platforms such as Facebook, YouTube, and Twitter to grow into dominant players in the digital space without taking on legal responsibility for the vast amount of content generated by their users.

While platforms are now obliged to remove illegal content promptly upon notice, the lack of liability until they are aware of such content has played a significant role in their expansion and profitability, as it reduces legal risks and costs associated with content moderation.

EU Regulation

The Digital Services Act (DSA), as a key piece of EU regulation, establishes a framework for the governance of online platforms, particularly in relation to user-generated content.

But its critics argue that it does not sufficiently break with the tradition of exonerating platforms from liability for harmful user-generated content.

Even though the DSA attempts to introduce more stringent obligations for VLOPs, such as greater transparency, content moderation practices, and risk assessments for harmful content, the core principle of non-liability remains intact.

Originally a code of conduct on Disinformation signed voluntarily by most platforms and civil society organizations, in 2018, it was revised and strengthened in 2022 and open to new signatories. The only VLOP that did not adhere is X. On 13 February 2025, the Commission and the European Board for Digital Services endorsed the official integration of the voluntary Code of Practice on Disinformation into the framework of the Digital Services Act (DSA). The strengthened Code aims to address the shortcomings of the previous Code, with stronger and more granular commitments and measures, which build on the operational

What is the debate about? Impact of Platform Algorithms on Content Curation

While the DSA emphasizes the importance of non-liability based on a platform's awareness of harmful or illegal content, platforms are still curating content through algorithms that promote specific posts based on user interactions, preferences, and engagement metrics, often amplifying content that might be sensational, misleading, or harmful.

The algorithms that determine what users see and engage with are central to how platforms operate today. While they are not directly held liable for the content users post, platforms can curate and amplify content in ways that influence public opinion, political discourse, and even social behavior.

The DSA acknowledges the responsibility of VLOPs to manage certain risks associated with their algorithms (e.g., disinformation), but it does not prevent them from actively curating content in ways that might exacerbate harm. Instead, the DSA promotes algorithmic transparency to avoid manipulation and requires an annual report on the functioning of internal controls.

The model establishes platforms obligations against illegal and harmful content, but still allows platforms to curate content to maximize engagement and profits, albeit not having editorial responsibility. Critics of the DSA argue that platform neutrality, as maintained by the Act fails to address the contemporary challenges posed by the digital space. They

contend that platforms should be held more accountable for the broader consequences of their algorithmic content curation, not just the content that users upload.

Case for debate: EU vs X

The European Union (EU) is investigating X (formerly Twitter) under its Digital Services Act (DSA) and Digital Markets Act (DMA).

> In July 2024, the European Commission formally charged X for alleged violations of the DSA, particularly regarding the platform's handling of misinformation and user deception. The Commission's preliminary findings indicated that X's blue checkmark system misled users, potentially breaching EU online content regulations. Subsequently, in January 2025, the Commission intensified its investigation by requesting internal documents from X concerning its algorithms and recent changes to its recommender system.

These proceedings address concerns over content moderation, user data usage, and platform transparency. This action aims to assess whether X's platform manipulates content visibility, potentially influencing political discourse and election outcomes.

Find out more:

- RECLAIM's podcast episode 3: Navigating the Digital Whirlpool: the Struggle over the EU's DSA

Proposals / Alternatives

1. Greater algorithmic transparency: The DSA introduces transparency obligations according to which large online platforms have to set out in terms and conditions the main parameters used in their recommender systems, and they have to provide at least one option for each of their recommender systems which is not based on profiling.

- By making citizens aware of how algorithms function and how their engagement can be manipulated, public trust would increase, and there would be greater accountability for social media platforms.
- There is the duty to give access to independent external controllers (academics) and to report it, as well as the duty to give information when content is flagged.

2 An alternative public-service social media platform:

- A EU platform would be publicly owned and serve as a digital space for genuine debate and discussion among citizens, free from commercial interests that promote hate speech and misinformation, or political interference.
- It could build greater trust with EU citizens and help combat the polarization and misinformation that currently disrupt the European public sphere. It may also serve as an important tool for renewing citizen engagement and democratic participation in the EU.

2.5. Journalism in a democratic public sphere

Explanation

Journalism is experiencing a crisis resulting from a "perfect storm" resulting from the coincidence of 3 related but distinct phenomena:

- A socio-technological transformation that has decreased the cost of entry into the market, devaluated information per se and changed the reading habits.
- A transformation of public spheres where the multiplication of information alternatives has disintermediated political communication and disempowered traditional media
- A business model crisis where decreased readership from the previous phenomena meets a strong decline in ad revenue from the competition with platforms.

Media are key actors to maintain political pluralism and generate public opinion(s). To fulfil their role, it is fundamental to achieve media diversity, independence, and democratic accountability.

This is done fostering a media sector that can effectively respond to technological changes and global challenges like digital platform dominance, disinformation, and shrinking revenue for traditional journalism.

What's the Debate About?

- Balancing Regulation and Freedom:
  - Proponents of regulation argue that the EU needs to enforce stronger media freedom safeguards, protect journalists from political or commercial pressures, and ensure that independent media thrive in the digital age.
  - Opponents argue that regulation is a form of government intervention in the media and can stifle freedom of expression, lead to overreach, or become too cumbersome for smaller, independent media organizations.
- Media Pluralism vs. Media Concentration : Media concentration is a key concern, as the concentration of media ownership in the hands of a few companies can limit diversity of opinion.
  - There's a need for regulatory frameworks to prevent monopolistic practices.

  - However, some argue that enforcing stricter rules around media ownership might lead to inefficiencies or unfair burdens on businesses, since competitors such as platforms are not similarly screened for concentration.
  - These critics suggest that fostering competition and innovation in the market could be a better approach.
- Sustainability of Journalism: The shift to digital-first news consumption and the decline in traditional revenue models (like print subscriptions) pose a threat to the viability of many media organizations, especially local outlets.
  - There is a debate over whether the EU should step in with financial support and subsidies for struggling media or if such intervention would be unsustainable in the long run.
  - Others suggest that media organizations need to adapt to the changing market by embracing new technologies, business models, and digital tools.
  - The role of fact-checking is particularly discussed, since for some critics it is a form of journalism that abandons opinion and framing and that it can be carried out by professionals other than journalists.

EU Regulation

The EU has introduced measures like the European Media Freedom Act (EMFA), which provides a regulatory framework to safeguard media independence and transparency across member states.

Other initiatives aim to tackle disinformation, improve transparency in digital advertising, and ensure journalists' safety (such as the anti-SLAPP directive).

Key elements of the EMFA include:

- Protection Against Political Influence: The regulation seeks to safeguard media from political interference, ensuring editorial independence for journalists and media organizations.
- Transparency: It mandates clear ownership and financing disclosures for media outlets to prevent concentration of media power that could distort public discourse.
- Media Freedom: The EMFA includes measures to protect journalists, including protections against surveillance, harassment, and censorship. It also ensures journalists' access to information and safeguards whistleblowers.
- Media Pluralism: The regulation aims to create a level playing field for media outlets, enhancing diversity in the media sector, preventing monopolistic practices, and ensuring a wide range of views and opinions.
- Cross-border Cooperation: The EU encourages collaboration among member states to address cross-border challenges, such as disinformation and digital platform accountability, and ensure that media freedom is upheld throughout Europe.

- Funding and Support: support for media organizations, especially smaller or independent outlets, to promote diversity and innovation in the sector.

Proposals / Alternatives

- Reconsider platform non-liability and regulate them as media when they recommend political content.

Media competition for attention with online platforms is an issue that looms over the debate, but that is not addressed in a broad sense, beyond the abovementioned media exemption from platforms' content moderation.

A potential reform would address the issue of platform (non) liability for third party content and assume that platforms' algorithms play similar functions to media editorial lines, and should be therefore subject to similar obligations regarding public service obligations, political coverage during election time etc.

However, some defenders of online digital rights are strong defenders of the principle of non-liability of the platforms, since it avoids negative incentives for privatised censorship.

On the contrary, a stricter regime of responsibility may lead to over-censorship or the chilling of speech.

The concern is that platforms may overcompensate and restrict legitimate discourse, including political, artistic, or journalistic expression, if they are forced to take on more responsibility for user-generated content.

- Increase public funding mechanisms for quality journalism in the EU

Both the European Commission and member states should increase funding for quality media through accessible online and offline channels. Eligibility for funding should be based on stringent criteria such as quality news coverage, investigative journalism, good working conditions, and independence from corporate interests, to prevent misuse of public funds.

RECLAIM Policy Brief - Protecting Quality Journalism and Media Freedom

2. 6. Science and knowledge: lies, conspiracy theories and expertise in a post truth context

Explanation

The common uses of the term “post-truth" presupposes that it is interchangeable with other concepts, such as “fake news”, disinformation or conspiracy theories, without taking into consideration that they all involve different theoretical and political debates. It refers to the meaning of truth; the production of scientific knowledge; the political effect of relativism of postmodern theories; the relationship between science and politics; or the epistemic character of democracy.

But it is also related to more ordinary moral and political questions, such as the strategic use of conscious lies to justify political decisions or to frame political narratives that influence citizens’ preferences and public opinion formation.

The novelty of present-day concerns with truth seems to rely on a growing social acceptance that different “truths” can coexist in the social body, which is related to what has been considered a “post-factual” context.

But it is more than that.

The term also refers to a real situation where (scientifically validated) facts no longer have any particular influence on the shaping of public opinions or on debates taking place in the public sphere. This is often connected with having some leaders and parties in power that ignore facts when it comes to defending their policies.

This mistrust of scientific knowledge as the justification for political decisions has been exacerbated in the recent successive crisis by an appeal to “objectivity”, that did not allow for alternatives to be considered: for instance, the use of economic orthodoxy to justify austerity policies; the use of scientific evidence during the covid crisis; and the role played by “non-political” global institutions and actors such as the IMF, ECB, WHO.

These factors all raise important questions that demand reflection on the essence of our democracies and how their institutions and procedures connect scientific knowledge, opinion, and political decision, in a way that generates (or not) epistemic content.

What’s the Debate About?

Post-truth fears do not reflect just the problem of fake news or misinformation (this is just a partial way to approach them). There is a wider reflection on how facts are being put in an interpretive context that claims public recognition.

But that takes place amidst an upsurge of populist politics that discards normal procedures of validation, argumentation, and avoids debate – thus refusing to recognize the

legitimacy of other positions. Their lies - whether considered as “alternative” truths or not - as well as the extension of conspiracy theories, have a serious impact on democracy.

This relates to the question of the way digital platforms are helping to amplify and consolidate these narratives. They are altering the traditional way of understanding the validity of scientific knowledge (questioning some types of expertise), the construction of public opinions (questioning the mediation of the press) and the systemic representative political decision-making (rejecting political parties as well as other types of institutional or social mediators).

The risk is that demagogic politicians tend to delegitimize expert knowledge, lie and try to monopolize democratic institutions. They do so within a conspiratorial monistic discourse, less inclined to accept evidence-based policies, which poses a risk to achieving certain ends.

Existing policies

The approach of the EU is not to control the content (“truthness”) of information, but the use of disinformation (intentional use for economic or political benefit). Any restriction of a fundamental right as freedom of expression is conditional on potential damage to other public goods and fundamental rights.

Nevertheless, the EU is actively promoting a system of science through Research programmes, institutional procedures that guarantee the impact of expert knowledge in a context of political pluralisms, and appealing also to citizen involvement in policy making (ECI, consultations, citizen panels). The EU also promotes the institutional debunking of disinformation that can harm public interest.

Cases

The rapid development of vaccines to react to the COVID-19 pandemic crisis gave rise to a multiplicity of conspiracy theories and disinformation campaigns about their safety. Considering the serious implications for public interest of these un-sustained claims, the EU has developed a specific check-list and guidelines to help citizens identify and debunk false news, report them to stop their spread and facilitate access quality information.

Proposals / Alternatives

A robust approach to addressing the spread of conspiracy theories and fake news is essential in fostering an informed public and ensuring the integrity of democratic processes.

Central to this effort is the defense of evidence-based policies, which rely on accurate, verifiable information to guide decision-making and maintain trust in public institutions.

The involvement of fact-checkers plays a crucial role in identifying and eliminating false or misleading content, helping to prevent the distortion of facts that can harm public discourse.

Moreover, integrating participatory procedures in policy-making allows for diverse citizen input, promoting transparency and accountability while strengthening democratic participation.

These interconnected elements work together to create a more resilient, well-informed society.

An Appeal to Citizens Democratic Commitment

What Citizens Need to Know? The EU Expects You to Your Part

The EU's response has sparked debate from several angles:

- Despite assuming that disinformation is a threat, the EU assumes citizens can and must play a role, individually and collectively, to respond
- Citizens' commitment is expressed in different ways: by exercising a critical attitude to information, by engaging in debates in a responsible way, participating in public debates and consultation or acting as experts by flagging disinformation or exploring algorithms
- Understand the place of public debate in democracy
- Assume the centrality of respect to the rules of the game in institutional processes, such as elections
- Engage with the specific position of verifiable information in democratic institutions
- To protect and improve the quality and diversity of sources accessible to citizens the EU response intervenes to prioritise quality sources

The outcome is a regulatory patchwork that prioritises risk management, transparency, and empowerment—while leaving room for further action at both EU and national levels.

Funded by the European Union

What Citizens Can Do? Monitor your Devices to Defend Democracy

- Citizens are trusted to be able to form their opinion based on a plurality of diverse but quality sources
- Be aware that we are exposed to a variety of attempts to manipulate our behaviour, from criminal networks to foreign interference, including political and commercial operations

1. More Control and Transparency about what you see in platforms and streaming devices and news apps

- **Recommender systems (algorithms)**: The DSA allows you to know why you are suggested the type of content you see, and you can opt for a non-profiling option, such as a chronological feed.
- **Customisation of information environment**: The EMFA goes a step further and grants users an **active ability to configure how media content is displayed or prioritized**, rather than passively accepting default settings in devices and apps.
- Platforms and media must provide these options **in a clear and accessible language**, and you need to develop the digital skills to customise your options.

2 User Empowerment in a Democratic Digital Sphere

- **Advertising transparency**: Citizens must be able to see who paid for an ad, why they were targeted, and who else is being reached. Citizens must understand that political advertising is a particular category of regulated ads, and identify contents that have a political intention. Citizens can search in the repositories that platforms can created with their previous political ads.
- You cannot be targeted with personalized ads based on political profiling.
- **Independent oversight**: Academia and civil society are expected to play a role in supervising algorithmic design, audits, and risk reporting, helping to keep platforms accountable.

3. Greater Rights & Accountability

- **Users collaboration**: you must have options to flag illegal or harmful content with simple tools.
- **Appeal mechanisms**: Users must receive clear reasons when content is removed or accounts restricted, and they have the right to contest such decisions.

- **Transparency and accesibility**: Platforms must report moderation and transparency decisions, including for people with disabilities.

For individual citizens, the DSA and EMFA mean more transparency about why you see content, more control over how it is presented, safer mechanisms to protect against manipulation, and stronger rights to contest decisions. At the same time, these laws acknowledge platforms' power over democracy itself and attempt to re-balance the digital public sphere toward openness, fairness, and pluralism.

Useful Links

- RECLAIM Policy Brief - EU Defence of Democracy https://reclaim.hi.is/is/publication/165/
- European Commission – Disinformation: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/fighting-disinformation_en
- European Media Freedom Act overview: https://digital-strategy.ec.europa.eu/en/policies/media-freedom-act
- Digital Services Act package: https://digital-strategy.ec.europa.eu/en/policies/digital-services-act-package
- EU vs Disinfo – Fact-checking database: https://euvsdisinfo.eu/
- Media Literacy projects – European Education Area: https://education.ec.europa.eu/
- RECLAIM's podcast feed