

EU Defence of Democracy: Increasing Visibility and Coordination Against Disinformation

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Key Takeaways

- **Disinformation as a Democratic Threat and the Need for a Holistic Response:** The EU views disinformation not just as misleading content, but as a systemic threat to its core democratic values—democracy, human rights, and the rule of law. In response, it has adopted a comprehensive and evolving strategy starting in the European Democracy Action Plan (EDAP), including regulatory instruments like the DSA and EMFA and continued in the European Democracy Shield with civic participation, media support, and targeted counter-disinformation efforts to address the challenge across multiple fronts.
- **From Disinformation to Information Integrity:** The EU strategy has evolved from combating disinformation in isolation to reinforcing broader information integrity and democratic resilience, reflecting a more adaptive and comprehensive understanding of the problem.
- **Need for Institutional Coordination and Visibility:** To counter both internal and external authoritarian threats to democratic debate, the EU must reinforce coherence across Member States. The proposal of a coordinating institution—mirrored at the national level—aims to make the strategy visible, inclusive, and democratically anchored.

RECLAIM summary

RECLAIM is a three-year research project (2022-2025) funded by the European Union's Horizon Europe program. Consisting of a consortium of researchers from thirteen partner universities around Europe, the RECLAIM project addresses the implications of the challenge of post-truth politics for the future of liberal democracy in Europe, in order to (a) produce theoretically and empirically robust visions for the future of liberal democratic institutions, (b) to reflect on the meaning of liberal democracy in the 21st century in Europe and, (c) to develop recommendations, toolkits, narratives and methodologies to reinstate the legitimacy and effectiveness of liberal democracies.

Analysis and findings: From policy responses to comprehensive strategies

Analyzing political dynamics through the lens of post-truth discourse changes how we perceive the relationship between public debate and democratic decision-making. A central

concern is the declining quality of information circulating in the public sphere (Habermas, 2023; Trenz, 2025). This decline contributes significantly to growing mistrust in democratic institutions and weakens the capacity of both citizens and their elected representatives to make informed decisions. Moreover, the rise of disinformation is closely linked to political polarization. This polarization reaches levels that are increasingly incompatible with democratic norms and procedures, often fostering the emergence of powerful executive leaders with authoritarian tendencies (García Gutián, 2025). All of this happens within a broader context of increasing political disengagement. A deliberative approach to democracy provides a clear analytical framework for understanding and responding to the challenges of post-truth dynamics by clarifying democratic norms, assessing institutional functioning, and guiding efforts—such as those by the EU—to safeguard democratic values (García Gutián et al, 2024).

To address these abstract questions and analyse the political responses we build upon the RECLAIM project's systematic analysis of the European Union's official narratives that justify and guide its regulatory and policy strategies to combat disinformation and strengthen democracy (García Gutián et al. 2024; Bouza et al 2025). This work draws on a wide range of sources, including policy documents, official reports, and major legislative texts adopted between 2018 and 2024 (see references below). Our approach also involved comparing the EU's strategies with international standards and frameworks, particularly those developed by the UN and OECD, to understand the alignment and broader relevance of the EU's actions in the global context. We also analysed the consultations with stakeholders involved in each of the regulatory proposals, and analysed how this strategy and regulation has been framed and implemented in a selection of Member States, showing the complex dynamics between the EU's strategy and some governments. These factors affect not only how effective the regulation is, but also how it is understood as a way to protect democracy.

Related to this, we stress that the European Union's strategy against disinformation is deeply rooted in a normative understanding of democracy, human rights, and the rule of law, as articulated in the 2020 European Democracy Plan (EDAP, European Commission 2020). Central to this approach is the focus on disinformation as a deliberate and harmful manipulation of democratic channels. This approach attempts to prevent the use of democratic channels and rights by actors

attempting to manipulate information for political or economic gain. Combating disinformation therefore aligns with the broader goal of protecting fundamental human rights and enables more effective control over illegal content online. But it also aims to strengthen the capacity of individual citizens, civic organizations, journalists, and democratic institutions to defend themselves against manipulative or malign interference. These efforts are embedded within a broader conception of democracy—its spaces, procedures, and norms—which provides the necessary legitimacy for EU interventions in this area. But the EU’s commitment is further reflected in major legislative efforts such as the Digital Services Act, the European Media Freedom Act, and the now-mandatory Strengthened Code of Practice on Disinformation (European Commission 2022). From these foundations, six interconnected strategic areas emerge: protecting citizens’ rights and promoting civic education; reinforcing democratic processes; increasing oversight of major platforms; addressing foreign interference; supporting quality journalism; and promoting science and its integration into public decision-making. These elements together form a robust holistic response to the systemic threats of the post-truth era, especially disinformation.

1. From Self- to Co-Regulation: Actor Fragmentation and Geopolitical Pressures Reshape EU Governance with Big Tech

Our research combined empirical analysis of actor involvement (via a unique dataset Bouza García et al 2025) with a systematic review of EU policy documents, legislative texts, and official narratives (2018–2025), offering insights into how political responses have evolved in line with—and in response to—the challenges of disinformation. The information collected in the dataset documents the contributions of over 200 actors involved in shaping legislation, illustrating the complex interplay between Big Tech companies, policymakers, civil society, and interest groups. The dataset highlights how actors’ problem-framings shape policy demands and regulatory strategies.

A significant finding is the shift from self-regulation to co-regulation, particularly through instruments like the Digital Services Act (DSA) and the Strengthened Code of Practice on Disinformation (European Commission n.d.). These developments have been driven by both internal policy evolution and external pressures. Our analysis shows how Big Tech companies deploy a mix of cooperative and confrontational tactics to influence outcomes, particularly around disinformation frameworks. This confirms concerns about the influence of powerful private actors on democratic norms in a fragmented media environment. The data also reveals competing democratic visions—with some stakeholders favouring market-based approaches, while others emphasize civic rights and media freedom.

At the same time, tensions persist among Member States over the appropriate level of regulation. This empirical research provides critical insights into the social, economic, and institutional dynamics at play, and points to the EU’s increasing

reliance on collaboration with Very Large Online Platforms (VLOPs) as de facto co-regulators, as evidenced by their role in the first code of practice (European Commission, 2022). While the regulation obliges platforms to act more responsibly, it still allows them to define much of their assumed responsibility. As platform compliance wanes and geopolitical tensions rise, including growing friction with the US administration, the EU’s relationship with these actors has become more contested.

2. Changes in the comprehensive strategy based on the geopolitical approach and disinformation

As of May 2025, the EU strategy has evolved from a concern about disinformation to an overarching strategy grounded in information integrity (European Parliament 2024). This is significant as it reflects a response to both the growing complexity of digital information environments and the increasing challenges posed by authoritarian interference. Initially, the EU’s focus was primarily on combating disinformation, particularly in the context of election periods and foreign influence, such as interference by Russia and China. However, with the 2024 European elections and the re-nomination of Ursula von der Leyen for a second mandate, the EU has shifted towards an emphasis on “information integrity” and foreign information manipulation and interference (FIMI), which together assume that the protection of the democratic debate must be more comprehensive. The EU now recognizes that addressing disinformation alone is insufficient and has expanded its approach to include a more systemic focus on information manipulation. This new focus aligns with the proposal of a “European democracy shield” (2024) underscoring the importance of a healthy, transparent, and trustworthy information space, free from manipulation, whether domestic or foreign.

This regulation results from the growing concern about the rise of authoritarianism, particularly in the context of the radicalization of populist movements and leaders that challenge traditional democratic values and procedures (Newman and Conrad 2024). This trend is not only challenging democracy and the rule of law worldwide, but also within the EU itself. While the EU’s regulatory responses to the spread of disinformation aim to protect democracy from such threats, there is a critical risk of unintended consequences. As it seeks to safeguard democratic values, the EU must be cautious not to inadvertently empower its own populist or authoritarian figures. Measures designed to counter disinformation could, if not carefully crafted, be weaponized by those with populist or authoritarian inclinations to restrict free speech or manipulate the public sphere.

By adopting a comprehensive and evolving response, EU institutions can maintain their legitimacy by effectively competing with authoritarian alternatives. At the same time, it is imperative to clearly explain how the new geopolitical landscape is changing our understanding of friends and foes—including hostile actors who may try to interfere—while also recognizing the rise of political forces and states that oppose this view despite pretending to stand for other forms of democracy and

freedom of expression. This requires coordination with policies that explain the EU's vision of democracy to be defended and protected, by specifying the role of its core elements—the public sphere, the role of the media, and the rule of law.

3. Divergent National Contexts and Fragmented Measures as a Challenge to Implementation

Our research work has highlighted the dissonance between the support for and coherence of this comprehensive strategy at the EU level and the strategies developed within Member States. There are notable differences in the implementation of these EU policies, reflecting varying national contexts, political climates, and institutional capacities. This uneven implementation can hinder the overall effectiveness of EU initiatives, particularly in areas such as media regulation, digital governance, and foreign interference.

The regulatory response of democracies to the fragmentation of political debate, the disruption of traditional communication forms, and the intensification of partisan and emotional polarization remains a normative and political issue, still under discussion. It is increasingly evident that there is no easy or one-size-fits-all solution, and regulatory initiatives may even produce counterproductive effects—such as concentrating power in executive bodies, raising tensions around respect for the rule of law.

Our research on the implementation of this strategy by Member States shows that the main challenge arises from an implementation split—a collection of disconnected measures. In this respect, the absence of alignment with a coherent vision of democracy—and the lack of agreement on how democracy is being challenged—dilutes the overall effort into fragmented national disputes, which in turn contributes to growing polarization.

The national adoption of measures to apply the EU strategy could pave the way for models of administrative content control or delegate to platforms unprecedented responsibility over freedom of expression, especially through the extrajudicial dispute resolution mechanisms envisaged in the DSA. One of the main focal points of regulation is the strong emphasis on media oversight—transparency, financing, and ethical standards—and the protection of journalism, which is framed as a key democratic actor, mediating public opinion and securing the right to accurate information. Yet, our findings show a persistent gap between EU-level objectives and national-level realities. This gap remains a major barrier to achieving the minimum democratic standards foreseen in legislation, particularly through the EMFA.

Regulatory instruments are essential, but they must be reinforced by institutional coordination, transparency, and active citizen engagement to counter both external authoritarian threats and internal democratic erosion. Rather than expanding regulatory scope, the priority must be to improve coherence across Member States, enhancing visibility and impact, and

strengthening mechanisms that empower citizens, civil society, and independent media in the face of authoritarian threats.

Proposal: Beyond Regulation: A Coordinated Institutional Strategy to Defend Democracy Through Public Discourse in the EU

The European Union now has a set of regulatory tools, such as the Digital Services Act (DSA) and the European Media Freedom Act (EMFA), which must be effectively implemented and rigorously assessed. While the EU's regulatory framework is an important step in addressing disinformation and preserving democratic values, the focus should not solely be on creating more regulations. This is especially critical given the risk—well documented in current literature—of regulatory frameworks being co-opted by populist or authoritarian actors to suppress dissent or centralize power (García Guitián, 2025). Instead, the EU should prioritize standing up for democracy through political discourse and fostering an informed public. By prioritizing democratic principles over restrictive policies, the EU can strengthen its democratic foundations and resist authoritarian pressures without over-regulating the digital space.

To do that and following international organizations' advice, the EU should create a body (with a distinguished name) coordinating the whole strategy and giving it a salient voice among institutions and citizens. This organism should create a network of similar named national organisms, with the same functions, at the Member States level. Its function will be to make visible and inform about these complex initiatives in order to:

1. Coordinate the EU's Democratic Defence Strategy Across Member States

To improve coordination between the European Union and Member States (MS), particularly in situations like Romania's handling of election interference, it is crucial to establish clearer mechanisms for joint decision-making and implementation. A more structured framework for coordinating responses to disinformation and foreign interference would ensure that both EU-level regulations and national actions are complementary rather than fragmented. Additionally, the EU could enhance support for MS by providing technical assistance, data-sharing platforms, and best practice exchanges to help member states strengthen their capacity to detect and respond to digital threats in real time. By fostering this closer cooperation, the EU can ensure that regulatory frameworks like the Digital Services Act (DSA) are more effective at the national level, enhancing democratic safeguards across the Union. It is essential to establish a stronger coordination between the rule-of-law monitoring mechanisms and the new strategies on information integrity to ensure the coherence of member state actions and EU responses. This will help identify discrepancies and prevent authoritarian governments from exploiting gaps in the EU's democratic framework. By monitoring and aligning member state policies, the EU can better safeguard democratic principles and counter external threats to its unity.

2. Foster Multi-Stakeholder Collaboration but changing the role of big tech lobbying

A key recommendation emerging from our analysis is the necessity to ensure the effectiveness and coherence of EU policies by fostering multi-stakeholder collaboration, involving regulatory bodies, civil society organizations, journalists, and experts in the decision-making and implementation processes. The visibility and availability provided by a central organism will help engage civil society and citizen groups to ground policies in the values of democracy, accountability, and public interest, while journalists and experts can contribute to articulate a diversity of perspectives about the evolving digital landscape.

The information provided by these organisms can also help to introduce some differentiations on the democratic role played by different actors – as well as the ethical requirements attached to them – than those provided by the generic interest group approaches (reflected in standard transparency registers) or references to generic stakeholders. By diversifying input and ensuring an approach that empowers other actors, the EU can move away from an over-reliance on platforms and foster a more inclusive, accountable, and effective policy framework that upholds democratic values and fundamental rights.

Contribute to facilitating mediators' surveillance, media information and citizen education, grounding this strategy in a specific view of democracy.

To centralize information and make visible the normative concern on democracy contributes to the comprehension of the adopted strategy to fight disinformation. By grounding media and digital literacy in this broader understanding of democracy, the EU can cultivate a more informed, engaged, and responsible citizenry. This approach will not only empower citizens, academics, activists and media to critically assess information about all these questions – that is gathered in many different institutional settings, organisms and legislation – that just specialists can understand and interest groups can manage, but will also guide them in recognizing which interventions support democratic values and which may undermine them.

In the face of rising polarization, authoritarian pressures, and fragmented public discourse, the EU's strategy to defend democracy must move beyond regulatory proliferation toward a more integrated approach, based on a wider consensus on the menaces to democracy. Grounded in democratic values, this vision requires stronger coordination across Member States, visibility for existing initiatives, and genuine citizen engagement. Our research shows that the tools are largely in place—from the DSA to the EMFA—but their effectiveness depends on coherent implementation and institutional trust.

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