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Countering Disinformation: A Delicate Balance Between International Action and National Particularities

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Abstract

Policies to address disinformation aim to protect a number of key public goods, such as self-determination by citizens, fair elections, and a healthy media and information ecosystem. The literature on resilience to disinformation finds striking differences between states, resulting from particular combinations of factors. Consequently, there is a need to maintain a delicate balance between coordinated action at the global level and localized interventions in response to particular vulnerabilities. Starting from this premise, this article explores the complexities of local contexts that contribute to resilience and addresses the tensions in developing evidence-based policies grounded in a wider societal context and system of values. Our study relies on data collected in an EU-funded project, Strategic Planning to Strengthen the Disinformation Resilience and the Management of Hybrid Threats, implemented jointly by the Romanian Ministry of Foreign Affairs and the National University of Political Studies and Public Administration (Bucharest) between 2020 and 2023. By using insights from key project activities (public opinion survey and policy brief), we assess Romania's needs and vulnerabilities, which can be addressed through personalized interventions for countering disinformation; we distinguish a particular architecture of policy responses and debate the possible courses of action for a systematic approach to disinformation. Overall, our study contributes to a better understanding of how effective policies for countering disinformation need to be fed by an awareness of relevant global and regional contexts as well as local factors, values, vulnerabilities, and sensibilities.

Keywords

countering disinformation; disinformation; disinformation regulations; public policy; resilience to disinformation

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1. Introduction

This present study aims to discuss the importance of the domestic context in the architecture of sound, evidence-informed public policies for countering disinformation. Taking Romania as an example, we assess the country's needs and vulnerabilities to be addressed through a personalized design of countermeasures against disinformation. We show how these specific vulnerabilities require a particular combination of policy responses that need to answer two imperatives: to be effectual at protecting democracy and uncompromising at echoing a system of values that cherishes freedom of expression. While we focus on a single-country case study, we aim to distill some principles of broader relevance for the implementation of localized approaches in countering disinformation.

In recent years, disinformation has emerged as a significant societal challenge. Disinformation is produced and weaponized for multiple purposes, such as monetization of content, domestic political competition, far-right extremism, election interference, and state-driven information warfare (Baptista & Gradim, 2022; Buarque, 2022; Dowling, 2022; Henschke et al., 2020; Nizamani, 2019). The role of disinformation in shaping public opinion and political discourse is less clear, with studies failing to reach a definitive consensus on the size and nature of its impact. One of the more ambiguous avenues for research is the connection between disinformation, polarization of opinion, and changes in attitudes or voting behavior. Schünemann (2022), for instance, identifies several limited effects, such as the enhancement of foreign influence in the national public spheres, while noting there is little knowledge on more substantial effects on public opinion. Other political effects documented in the literature include the impact on voting behavior, reinforcement of negative evaluations of political candidates, and a change in attitudes (Iida et al., 2024).

Addressing the challenges raised by disinformation requires a focus on domestic vulnerabilities, and corresponding strategies to foster public resilience, whether these solutions come in the form of public policy recommendations, platform regulations, or direct laws. In this article, we focus on Romania, an Eastern EU member state characterized by a unique combination of strengths (derived mainly from the patronage of the European regulatory framework, membership of European agencies, projects implemented by civil society, and an emerging awareness of the social implications of disinformation) and weaknesses derived from the media ecosystem (e.g., unclear media ownership and funding), the media diet (using social media for news and an accompanying distrust in traditional media), exposure to anti-EU and anti-Western narratives and a general social context which has lately been characterized by political instability (see the recent claims of Russian interference in the presidential elections in late 2024). Elements for a future regulatory framework can be found in the Constitution, in the National Defense Strategy, in various national strategies, and in civil society initiatives.

Romanians aged 16–64 spend around 7 hours and 12 minutes online daily, with older cohorts spending less time online. The number of Meta and YouTube users aged 45–54 is increasing. TikTok is used across all 16–54 age groups, although preferred in rural areas and among users with lower education (Media Factbook, 2024). According to recent survey data, "most people are minimalists (52.9%), not regularly following any type of news" (Buturoiu et al., 2023, p. 181). According to the same source, those who do choose to follow the news predominantly turn to social media and instant messaging platforms (17.1%), followed by 16.7% of respondents who prefer mainstream media sources. The percentage of people who consume both mainstream and social media for news is lower (13.3%). Additionally, Romanians rely heavily on information

received from family and friends, which they send in turn via direct messaging or social media platforms (Aspen Institute Romania, 2021).

Romania ranks 49th in the Reporters Without Borders Index (2024), largely due to unclear mechanisms for funding the media, secrecy surrounding media ownership, and editorial policies subordinated to the interests of the owners (Free Press Unlimited, 2023). Journalists rank second to lowest in the trust rankings, with politicians faring worst (Pricop, 2024).

The Media Pluralism Monitor assessment of Romania for 2023 resulted in "a high risk score in three out of four areas: Market Plurality, Political Independence and Social Inclusiveness" (Toma et al., 2024, p. 9). The Disinformation Resilience Index, following three key indicators (population exposure to Kremlin-led media, quality of systemic responses, and vulnerability to digital warfare), finds that pro-Kremlin misinformation is indirect. It exploits existing democratic weaknesses and targets vulnerable groups (nationalists/ right-wingers, religious conservatives, communist nostalgics), grafting itself on already existing home-grown nationalistic discourses and disinformation generated internally, by local sources. The ultimate goal of pro-Kremlin disinformation is to undermine truth and cultivate confusion and mistrust in Western values (Moga, 2018, p. 269): "The Romanian media ecosystem has developed its own alternative news networks and channels that spread anti-EU and anti-Western narratives, combined with apocalyptic news, conspiracies, pro-Kremlin narratives, fascist content, Dacian mythology, etc." (EU Disinfo Lab, 2023, p. 3). Autonomous narratives about a nostalgic past combine with false narratives designed to create hostility towards the West (Bârgăoanu & Durach, 2023). They are sometimes picked up by mainstream media and members of the Romanian parliament, who exploit the rise of populism and nationalism (Calistru & Burtan, 2022). In this way, although historical distrust of Russia is deeply embedded, with over 60% of Romanians expressing negative perceptions of the country (Kraiev et al., 2024, p. 14), there is a receptive audience to extreme narratives. This audience distrusts public institutions and official sources of information and has very low resilience to disinformation.

In what follows, we explore relevant literature, focusing on individual and country-level factors that create vulnerabilities to disinformation, and discuss a number of cross-country studies that explore differences in the levels of resilience to disinformation. The literature review suggests that resilience factors may act differently from country to country. Based on these insights, we advocate for the need to follow a localized, fine-tuned approach to countering disinformation, especially when developing evidence-based policies grounded in a wider societal context. For the purposes of this argumentation, we assess data from the key deliverables (public opinion survey and policy brief) resulting from the EU-funded project Strategic Planning to Strengthen the Disinformation Resilience and the Management of Hybrid Threats (hereafter SIPOCA 865), which we analyze in conjunction with key insights in the literature in order to formulate recommendations for the design and implementation of public policies for countering online disinformation in Romania.

2. Literature Review

2.1. Vulnerability to Disinformation

The proliferation of disinformation, especially on social media, comes from a mix of technical, human, political, and commercial factors (Saurwein & Spencer-Smith, 2020). In literature, some of these factors have been explored at the individual or country levels (Humprecht, 2019).

In regards to media-related factors, research indicates that consumption of legacy media sources is associated with more accurate beliefs and a smaller inclination to access "fake news" websites (Guess et al., 2019; Jamieson & Albarracin, 2020), while social media use decreases resilience to misinformation (Boulianne et al., 2022). Media trust also plays a role. The less one trusts news media and politics, the more one believes in online disinformation (Zimmermann & Kohring, 2020).

Concerning human psychology, the psychological traits of individuals have been linked to the propensity to believe (and distribute) disinformation: for instance, interpersonal trust (Sindermann et al., 2020), news consumption habits (Calvillo et al., 2021), or conspiracy mentality in relation to political orientation (Imhoff et al., 2022). Confirmation bias, motivated reasoning, and naïve realism are all factors established in the literature (Bringula et al., 2022; Humprecht, 2019). These psychological traits can cause people to believe information that confirms their preexisting beliefs, to be overly confident in the accuracy of their own perceptions of reality, and to discard opposing views, thus increasing vulnerability to disinformation. Conspiratorial worldviews and schizotypal personality also predict belief in disinformation (Anthony & Moulding, 2019). Another strain of research focuses on cognitive styles, with the most vulnerable individuals relying on less analytical and more reflexive modes of thinking (Bryanov & Vziatysheva, 2021).

As for political factors, citizens need a reasonable level of knowledge about political and social issues to make informed decisions, participate in democratic life, and express voting choices that represent their interests (Carpini & Keeter, 1996). In this context, concerns arise regarding the extent to which citizens exposed to misleading information or disinformation form beliefs based on inaccurate or incorrect data, leading them to make disadvantageous decisions (Kuklinski et al., 2000). Some studies indicate that increasing societal polarization, partisanship, and isolation in echo chambers are drivers of disinformation. Increased issue-based polarization can cause people to change their attitudes according to what the preferred party supports, irrespective of the strength of the argument, while partisan cues influence the voters' likelihood of believing in rumors (Tucker et al., 2018). Partisan polarization has been identified as the most important psychological motivation for sharing political disinformation (Osmundsen et al., 2021). The spread of rumors takes place in partisan community structures, based on the target of the rumor, and these rumors are resistant to debunking and continue to spread despite the emergence of contradicting facts (Shin et al., 2017). Partisan communities can take the form of echo chambers, i.e., "well separated and polarized groups of like-minded users sharing a same narrative" (Zollo, 2019, p. 13). Here, digital disinformation thrives, and corrections of information backfire. Political ideology is another important driver of disinformation. For instance, the reach of online, pro-Russian disinformation into US audiences was found to be distinctly ideologically asymmetric (Hjorth & Adler-Nissen, 2019). Evidence suggests that political leaning can influence the capacity to recognize disinformation (Calvillo et al., 2020; Clemm von Hohenberg, 2023), as well as the likelihood of sharing rumors and ignoring corrections (DeVerna et al., 2024).

Further analyses explore the distinct profiles of people (trust in media/politicians, satisfaction with the government, conspiracy mentality, and media consumption) to understand how disinformation belief varies within populations and how the broader sociopolitical context plays a role in citizens' susceptibility to fake news (Szebeni et al., 2023). Increased awareness of the social media information environment, political knowledge, and epistemic political efficacy (confidence in understanding and finding the truth in politics) converge to explain fake news literacy levels in individuals (Zhang et al., 2024).

During election campaigns, exposure to partisan messages in social media, deprived of the gatekeeping and context offered by traditional news media, affects the voters' level of objective political knowledge and causes knowledge polarization (Munger et al., 2022). The use of social media for news is, paradoxically, both a measure of political engagement and a factor in spreading misinformation; this paradox needs to be taken into consideration by any policy recommendation (Valenzuela et al., 2019).

2.2. Resilience to Disinformation: Insights From Cross-Country Comparisons

Studies focusing on cross-country comparisons shed valuable light on individual and country-level factors that impact resilience to disinformation. For instance, Humprecht et al. (2020) compare 18 Western democracies, clustered from the most to the least resilient. The most resilient countries were characterized by high levels of media trust and shared media consumption, strong public service broadcasting, greater political consensus, less polarization, and lower levels of populist communication. By contrast, low-resilience countries featured high levels of polarization, populist communication, social media news use, and low levels of trust and shared media consumption.

There is evidence that resilience factors are, in part, country-specific and highly dependent on the political and information environments (Humprecht et al., 2023): There are a number of cross-national indicators of resilience (i.e., heavy social media use, the use of alternative media, and populist party support), while other variables work in contextual ways (extreme ideology, age, level of education, and gender). Disinformation is more impactful in societies where trust in the political institutions and the media is low (Humprecht, 2019). However, the relationship between trust and vulnerability to disinformation could be contextual in nature since, in a cross-national study, trust in national news media was not found to build individual resilience, with the only exception being the UK (Boulianne et al., 2022).

Comparative research on resilience offers compelling arguments to suggest there is no "one-size-fits-all" when it comes to measures for building resilience to disinformation. Differences between countries stem from the intricate action of structural characteristics, especially those resulting from the media and information environment, as well as the political environment. Based on the assessment of the national information resilience in four European countries, Dragomir et al. (2024, p. 2) argue that in order to understand "national information resilience to inform policies and other measures to support democracy," country contexts need to be examined from multiple perspectives, and the conclusions of this examination need to be reflected against "disinformation narratives in their specific national contexts and national strategies to combat disinformation." In the same vein, a case study on the experience of the Baltic states with countering disinformation finds differences and similarities with respect to countermeasures against disinformation, resulting from varied governmental approaches and strategic cultures (Teperik et al., 2022).

2.3. Best Practices for the Design of Public Policies

Public policies are designed to engage with societal challenges so that the state of insecurity can be governed. They are not merely instruments of intervention. They reflect an outlook on the problematic situations and phenomena in a society that require engagement in the form of action. At the same time, they derive from a particular understanding of risk and change in society. In this respect, policy recommendations aim to restore order in a previously disorderly and, hence, dangerous state of affairs. The centrality of

vulnerability to the reinvention of social governance (Heath-Kelly, 2023) shows that risk is perceived as inherently embedded in contemporary society; moreover, it reflects the conviction that risk can be mitigated through pre-emptive action. As a consequence, policymakers expand their claims of governance upon a society of the future (Heath-Kelly, 2023, p. 1), imagining it as low-risk, resilient, and governable.

Designing policies is thus a deliberative process of exploring the best institutional approaches to reach objectives, grounded in a wider context. In fact, the complexities of this context have transformed policy design: it is done by "a variety of actors in diverse governance sites and arenas" rather than in specialized governance structures; it explores policy mixes and patching of various instruments, objectives, and tools; and, finally, it is dynamic, using the lessons of history to project the effects of policymaking (Chou & Ravinet, 2019, p. 6).

Evidence-informed policymaking relies on policy briefs as a knowledge-transfer strategy that should: address the high-priority issue in a relevant context; present various options and their consequences; employ systematic, transparent methods to build evidence; and consider a range of applicability (Lavis et al., 2009) in order to offer well-grounded scenarios, especially in regard to potentially contentious or high-impact topics. Equally important for building the credibility of policy briefs and confidence among policymakers is due consideration of context and the actors facilitating communication between different stakeholders (Arnautu & Dagenais, 2021).

In the case of policies against disinformation, the literature examines how governments can uphold the values of social media companies (Marsden et al., 2020; Pielemeier, 2020), while also discussing regulation from the viewpoint of free speech rights (Gielow Jacobs, 2022). It is argued that interventions need to target the lack of transparency as well as the excessive power concentration of social media companies (Susskind, 2018, pp. 397–402). More broadly, a regulatory framework needs to consider the emergence of public arenas where established communication practices and consensus-seeking processes coexist with alternative narratives and outlooks (see Tuñón Navarro et al., 2025).

3. Methodology

This present study looks at the importance of assessing local vulnerabilities in designing the architecture of public policies for countering disinformation, taking Romania as a case study. The following research questions guide this endeavor:

> RQ1: What are the unique traits of the Romanian context that need to be taken into consideration in the design and implementation of public policies for countering online disinformation?

> RQ2: What are the main building blocks of these public policies?

By means of secondary data analysis, we take and comment upon information from two key deliverables (public opinion survey and policy brief) created within the EU-funded project SIPOCA 865, implemented jointly by the Romanian Ministry of Foreign Affairs and the National University of Political Studies and Public Administration (Bucharest) between 2020 and 2023. The analysis of additional empirical data in the two deliverables is outside the scope of the article. Instead, we discuss the two project documents as they were

delivered in the project, in corroboration with key insights from the literature, in order to distill principles and recommendations for the implementation of localized approaches in countering disinformation.

To answer these questions, we turn to two types of data and information collected within the context of the aforementioned project, in which we took part as experts. First, we analyze the policy brief entitled "The Regulatory Framework for the Online Environment." This document analyses current measures and best practices across the EU and details the Romanian context to formulate a number of policy recommendations and three potential policy scenarios for Romanian authorities. The document is a key project deliverable, the result of desk research, and an extensive literature review on the topic.

Second, we analyze a public opinion survey. The methodological information about the survey made available in the project deliverable is the following: a national survey with an online panel ($N = 1{,}070$), using soft quotas for age, gender, occupation, and geographical region in Romania. Data were collected by Cult Market Research, a Romanian-recognized market research company, in June 2022. The survey has a margin of error of $\pm3\%$ and a confidence level of 95%. The survey explored people's news consumption habits, trust in the information received through different media channels, trust in media, fact-checking and correct informing behavior, and perceived exposure to disinformation and knowledge of disinformation effects. The sample had a mean age of 45 years with a standard deviation of 15.80 years and was gender-balanced, with 51% women and 49% men. The sample comprised 41% of employees in the private sector, 19% in the public sector, and 40% unemployed. The sample was skewed toward urban residents, who accounted for 62% of the participants.

In the next section, we use the insights from the policy brief and the public opinion survey to describe and analyze key elements from the specific domestic context in Romania that impact the design and implementation of public policies for countering online disinformation.

4. Findings

4.1. Insights From the Public Opinion Survey

The academic literature links misinformation and disinformation to the quality of information sources (Keshavarz, 2014). The online environment, described as the "information highway" (De Maeyer, 1997), is characterized by speed, interactivity, and a lack of conventions typical of other media. Consequently, evaluating information circulating on the internet differs from assessing traditional information sources. The "authorless environment" (Warnick, 2004) places a high degree of responsibility on regular users to become the ones who determine the quality of information sources.

Starting from this premise, we look at vulnerabilities stemming from the news consumption habits and fact-checking practices of the Romanian population, as indicated by the survey data. According to the survey results, 87% of respondents have internet access. This result can be corroborated with findings from other studies noting an increase in internet usage between 2018 and 2023, especially from the perspective of age groups (age categories of 35–44, 45–54, and 55–64 years old; Momoc, 2024). Social media is popular in Romania. According to our survey, over half of Romanians have accounts on Facebook (78%), WhatsApp (73%), or YouTube (62%). Additionally, more than a third have accounts on TikTok (42%) or Instagram (41%).

A high proportion of Romanians check the news daily, with 65% keeping themselves informed on topics of interest each day. The respondents most often get their information from television (48%) and social media (Facebook, Instagram, TikTok, and YouTube; 35%), followed by newspapers, magazines, online news (12%), and radio (5%). Social media is one of the important gateways to news, and news sharing becomes a social experience. More than half of respondents (56%) receive news on topics of interest through social media or messaging platforms on a daily basis.

As far as trust in information sources is concerned, radio is the most trusted source of information (66% trust). Additionally, over half of Romanians trust the news on TV (59% trust) or on their associated websites (52% trust). On the other hand, the information sources viewed as distrustful are online public opinion leaders (i.e., influencers and bloggers; 65% distrust), and social media (65% distrust).

The survey items cover a number of fact-checking practices, indicating mixed results in terms of emerging vulnerabilities. Over half of respondents (68% cumulated answers) report that they frequently or always assess the credibility of information. Furthermore, more than half of respondents (62% cumulated answers) claim they often or always check the news before sharing it on social media or instant messaging platforms, although this might be a socially desirable response. The majority of respondents (56%) do not use fact-checking tools in this process. Another recommended method for verifying information is cross-checking it across multiple sources. In this context, a total of 60% of respondents report that they always or often verify the news they have seen by consulting other media sources; the veracity of the results of this verification effort depends greatly on the quality of the sources consulted. Over half of respondents (57%) report that they often or always check what others say about the news they have encountered. Although this is a common method of verifying information, it is not necessarily a reliable one, as peers may themselves be victims of disinformation or subject to their own cognitive biases. Approximately three-quarters of respondents (72%) often or always rely on their knowledge and intuition to verify news credibility. Reliance on intuition and prior knowledge can expose individuals to cognitive biases that distort the way they evaluate information.

Lastly, the survey informs on the perceived severity of disinformation and the public's appetite for regulation. Over two-thirds of respondents (57%) believe they have been exposed to a significant extent to fake news or disinformation in recent months. A greater proportion (66%) believe their close others have been exposed to fake news or disinformation to a significant extent in recent months. An even greater proportion (84%) believe that the population of Romania has been exposed to fake news or disinformation to a significant extent. From the responses to the three questions, we can observe that participants believe close and distant others are more affected by this phenomenon than themselves, a phenomenon widely documented in the literature as the "third-person effect" (Ştefăniţă et al., 2018). The perception that others are more susceptible to influence than oneself can lead to decreased vigilance in assessing new information and may increase a person's vulnerability to disinformation. Compared to previous studies, the level of awareness of the severity and impact of disinformation seems to have improved in recent years (Bârgăoanu & Radu, 2018).

In the view of the respondents, the information sources most prone to the spread of disinformation are social media platforms. Over half of respondents (59%) consider that the majority of disinformation cases occur on social media, followed by television (28%).

In regard to preferences for regulation, the respondents value freedom of speech both in general and on the internet. The large majority of Romanians value freedom of speech (cumulated answers: 91% believe it is

either important or very important) and the unrestricted use of the internet (cumulated answers: 90% it is either important or very important). Asked who should protect citizens from fake news, disinformation, and propaganda, preferences are split between individual responsibility (40%), state intervention (38%), and, to a lesser extent, mass media and journalists (22%).

The relationships between variables show that respondents who primarily obtain news from social media (Facebook, Instagram, TikTok, and YouTube) also consider social media to be the main source of disinformation (Table 1). This indicates a paradoxical situation in which people prefer to consume news from a source they do not trust.

Table 1. Preferred sources of information and perceptions of the sources most prone to disinformation.

	What sources of information do you think are most prone to disinformation?				
Where do you get your information from most often?	Social media (Facebook, Instagram, TikTok, etc.)	Television	Radio	Newspapers, printed and online press	Instant messaging apps (Whatsapp, Messenger, and Signal)
Social media (Facebook, Instagram, Tik-Tok etc.)	50%	34%	2%	8%	6%
Television	63%	26%	2%	5%	5%
Radio	66%	13%	5%	7%	9%
Newspapers, printed and online press	67%	23%	2%	7%	2%

Nearly two-thirds (63%) of respondents who follow the news on a daily basis believe they have been exposed to fake news or disinformation to a large or very large extent in recent months (Table 2). The fact that avid news consumers perceive themselves as exposed to fake news and disinformation is an indicator of potentially heightened vigilance of avid news consumers when it comes to the veracity of information.

Table 2. News consumption and perceived exposure to fake news/disinformation.

	To what extent do you believe you have personally been exposed to fake news or disinformation in recent months?	
How often do you follow the news on topics of interest?	To a small extent + To a very small extent/Not at all (cumulated responses)	To a large extent + To a very large extent (cumulated responses)
Daily	37%	63%
Once every few days	49%	51%

Individuals who follow the news on a daily basis generally trust information broadcast by television (64% report some level of trust), radio (71% trust), and the websites of media channels (58% trust; Table 3). However, active news consumers have significantly less trust in information from social networks (Facebook, Instagram, YouTube, and TikTok; 37% report some level of trust) and from influencers and bloggers (38% trust). This data is somewhat encouraging, as radio, TV stations, and media websites often employ more robust verification and filtering tools, unlike social networks or influencers/bloggers, where information is generally less filtered

and more susceptible to contamination with fake news and disinformation. The same conclusion applies to individuals who consume news every few days.

Table 3. News consumption and trust in information sources.

How often do you follow the news on topics of interest?	Do you personally tend to trust or not to trust the following...?									
	Information on television		Information on the webpages of news media		Information on social media (Facebook, Instagram, YouTube, and TikTok)		Information on the radio		Information shared by influencers, bloggers	
	Tend to trust	Tend not to trust	Tend to trust	Tend not to trust	Tend to trust	Tend not to trust	Tend to trust	Tend not to trust	Tend to trust	Tend not to trust
Daily	64%	36%	58%	42%	37%	63%	71%	29%	38%	62%
Once every few days	54%	46%	47%	53%	35%	65%	62%	38%	35%	65%

4.2. Policy Brief Findings

The recommendations of the policy brief developed within the project started from an extensive analysis of best practices within the regulatory framework for online disinformation provided by the EU. Among member states, Sweden, Finland, Latvia, Lithuania, Poland, and Slovakia, those directly targeted by hybrid threats from the Russian Federation, focus on countering such actions by addressing cyber security concerns, but also by building psychological defense and increasing critical media literacy. A second category of responses focuses on regulating disinformation and monitoring the activity of social networks, corroborated with media literacy campaigns and efforts to increase platforms' accountability. Countries have implemented legislation to regulate online content (Germany), to fight disinformation used during electoral campaigns (France), and to monitor media companies (Italy). Whole-of-society approaches in Finland and Sweden integrate coherent communication by various communicators (from governmental institutions to actors in the private sector and civil society), intervention, and regulation to build a resilient society (Wigell et al., 2021). Finally, a hard approach to combating foreign interference, such as the one taken by France, involves the creation of a network of strong institutions to monitor, detect, and fight disinformation.

Starting from the unique case of Romania, the policy brief made a series of recommendations. At the macro level, they focused on three key issues: First, to launch a national hub for fighting disinformation in collaboration with academia, telecommunication companies, media companies, and civil society. This hub would help further scientific knowledge about online disinformation, develop fact-checking services, and initiate media literacy programs. The second recommendation was to deplatform actors exploiting digital services, which would require the establishment of an organization to check content distributed on digital platforms (as in Hungary's case). A final recommendation was to consolidate citizens' psychological resilience. Following Finland's footsteps, Romania could ensure basic educational and cultural services to boost citizens' critical thinking and digital literacy.

The recommendations derived from the study of best practices in the EU and the analysis of the state of affairs in Romania pointed towards the need for a systematic approach to disinformation, fed by an awareness of

relevant global narratives, but also a deep understanding of local social, political, and economic factors, and the media ecosystem.

The first pillar of this systematic approach would be institutional: to create a specialized, autonomous governmental structure dedicated to detecting, studying, and fighting disinformation online and building an intergovernmental network reuniting various governmental agencies, both capable of functioning irrespective of a particular political context. Such governmental agencies would be responsible for situation awareness, consolidation of response capabilities, and coordination in managing incidents. An "ambassador" for the relationship with technology companies could be appointed to create and support cooperation with social networks.

Another pillar would be creating infrastructures: first, diversifying and improving digital instruments to comprehend disinformation and, secondly, educating specialists to use these instruments judiciously in the right context.

Finally, the operationalization of a "whole-of-society" approach to resilience to disinformation would feed on an understanding of resilience as a distinct, transdisciplinary field, incorporating elements of cyber security and national defense, but not restricted to them. It would involve the harmonization of various communications: governmental institutions, the private sector, civil society, media actors, and academia to raise digital literacy, nurture critical thinking, and reduce citizens' vulnerability to disinformation.

At the same time, this systematic approach should rely on a mix of legislation and self-regulation of professional organizations. In the case of Romania, drafting legislation needs to be addressed conservatively, for several reasons. First, the continuous development of digital giants hinders regulatory efforts. Furthermore, the juridical operationalization of concepts can be difficult. Laws employing broad, vague definitions or which risk infringing human rights could be used selectively or discriminatorily, limiting free speech and public debate. Finally, media representatives and public opinion at large are sensitive to attempts to regulate excessively, which might impinge upon the independence and plurality of the press. As a consequence, introducing further regulations needs to be accompanied by an investigation of public opinion and the opinion of experts. On the other hand, among Romanian journalists, professionalization, self-regulation, and the adoption of deontological codes are acceptable solutions. The protection of independent investigative journalism and the consolidation of fact-checking standards would add to the efforts to build a resilient society.

5. Discussion and Conclusions

The unique characteristics of Romania's domestic context need to be taken into consideration when designing good public policies to counter disinformation in Romania. Based on the insights we gathered both from the literature, and from the two project deliverables described in Section 4 of the article, we can conclude on Romania's vulnerabilities in the following areas: (a) features of the media and information ecosystem, media diet, and exposure to disinformation; (b) trust in the media, trust in social media, and political trust; and (c) public awareness and appetite for the adoption of countermeasures.

Regarding the features of the media and information ecosystem, media diet, and exposure to disinformation (a), the country finds itself in a social context of vulnerability to disinformation, marked by the permeability

of anti-EU and anti-Western narratives and, as of the second half of 2024, political instability. As the survey suggests, a high proportion of Romanians check the news daily. In this context, the specific vulnerabilities of the news media ecosystem, notably unclear media ownership and funding, as well as the presence of economic and political pressures that threaten editorial autonomy (see Section 1), may divert the members of the audience towards social media and the so-called "alternative media" for news and information. Online and social media merge as very popular sources of news despite their low credibility. Furthermore, social media is one of the important gateways to news, a factor linked in the literature to greater exposure and vulnerability to disinformation (Boulianne et al., 2022; Guess et al., 2019; Jamieson & Albarracin, 2020).

Concerning trust in the media, trust in social media, and political trust (b), in Romania, journalists rank second to lowest in the trust rankings, with politicians faring worst (Pricop, 2024). Distrust in both mainstream media and politicians, as well as deep distrust in the national institutions (European Commission, 2024), is linked to vulnerability to disinformation (Zimmermann & Kohring, 2020). The survey we analyzed adds to the discussion on the perceived trustworthiness of different sources of news and information while highlighting some paradoxes in this regard. More specifically, the perceived trustworthiness of information sources is inversely proportional to how frequently they are followed. Thus, the least-followed news source, radio, is considered the most credible. The highest level of distrust is directed toward information shared by influencers, bloggers, and social media content, the latter being one of the main sources of information (second after television), probably due to the convenience of use. In the respondents' view, the information channels considered most exposed to misinformation and the spread of fake news are social media (Facebook, Instagram, and TikTok), and even those who frequently get information from social media tend to believe this. High consumption of news through social media is one of the largely proven factors that decreases resilience to disinformation (Kont et al., 2024). This particular source of vulnerability for Romanian internet users justifies the need to focus on social media regulation to counter disinformation.

As for the public awareness of the problem and appetite for the adoption of countermeasures (c), the relationship between news consumption and perceptions of personal exposure to fake news and disinformation, as indicated in the survey, suggests a high level of awareness within the population. Despite this heightened awareness, an important source of vulnerability is rooted in the third-person effect. Romanians consider themselves less exposed to fake news and disinformation compared to close others and the general population. Individually, this perception may lead to vulnerabilities, such as decreasing vigilance in assessing the credibility of information and lower perceptions of personal threats coming from disinformation. There are also opportunities stemming from these results. The perception that the general population in Romania is exposed to fake news and disinformation creates opportunities for greater acceptance of public policies aimed at countering disinformation, ideally through measures aligned with international and regional best practices. Furthermore, this justifies the need for long-term investments in strengthening the media literacy framework in Romania.

Nevertheless, introducing legal provisions for countering disinformation is potentially more difficult in Romania than strengthening audience-centered solutions, such as media literacy or fact-checking. Freedom of expression is an essential value for the vast majority of the population, and the respondents hold a similar view regarding unrestricted internet access. These results suggest possible limitations to any measures aimed at countering misinformation, especially if such measures are not accompanied by convincing explanations to increase their public acceptance.

While the majority of respondents believe that key actors should protect people from disinformation, as opposed to leaving this task to the individuals themselves, only one-third of respondents (approximately) look for this type of protection from state institutions, a preference in line with the known distrust in state institutions. These responses provide additional arguments in favor of the "whole-of-society" approach to countering disinformation. By involving all institutional and social actors, as well as civil society, in designing strategies against disinformation, distrust could be mitigated to some extent, and countermeasures could receive less backlash from the public.

By corroborating public opinion insights with the recommendations developed in the project, various scenarios for Romania's fight against disinformation can be proposed, each with its set of challenges and consequences.

A "do nothing" approach, where current procedures at the institutional level remain in place, would rely on the rationale that EU regulations and structures are sufficient for effective intervention to fight disinformation online and that state control can hinder freedom of information. There are several counterarguments against this scenario. First, disinformation monetization has real commercial implications. Algorithms can favor the viralization of information and the mobilization of key groups on social networks. Conspiracy theories will continue to use crowdfunding platforms. Fake accounts and the misuse of bots will continue to proliferate.

Another possible scenario would be hard regulation, which would translate into normative legislation, aiming to: deplatform actors who exploit digital services and demonetize websites that use disinformation; penalize digital platforms if they fail to comply with regulations (e.g., misuse or fail to protect data, distribute false information, etc.), including a ban on advertising on such platforms; penalize actors spreading false information, by suspending or closing down accounts, deleting offensive posts, and fining users; and put in place structural regulations in which political actors would intervene to prevent the concentration of technologies of power in the hands of a small number of companies or individuals.

With this hard stance, counterarguments reflect a concern that strict controls and harsh sanctions would limit freedom of expression and would alter public perceptions. The actors distributing content online are very diverse (mass media, political actors, companies, advertising agencies, civil society, etc.). Identifying the ones who produce and disseminate false information is a difficult and sensitive process, technically, politically, and legally, and would negatively impact online journalism.

A third scenario would be a "whole-of-society" approach. It would involve: training staff and creating a dedicated structure to oversee the process; extending partnerships with civil society and academia; extending inter-institutional collaboration; increasing the capacity to detect, monitor, and fight influence operations; drafting public policies; and drafting response strategies involving state authorities and stakeholders.

On the other hand, one needs to consider that such an approach requires sustained efforts from numerous state institutions and social actors, involves additional difficulties in creating specialized structures and regulatory bodies, and requires medium- and long-term strategies.

A coherent architecture for public policies needs to be tailored to the unique traits of the national context and be firmly grounded in the broader regional concerns. Local governance culture, the factors influencing societal resilience, the media ecosystem, citizens' media diets, their attitudes towards institutions, their attachment to

values, and an understanding of the challenges ahead all contribute to a coherent set of regulations, codes of practice, and collaborative approaches that work for a particular society in a specific historical moment.

The EU's strategies for combating disinformation are rooted in the protection of freedom of expression as a non-negotiable caveat. These fundamental principles need to be the building blocks of any regulatory framework. At the same time, designing and implementing such strategies is not without difficulties. "Two opposing logics that coexist and compete" (Casero-Ripollés et al., 2023, p. 9) drive the EU's policy: securitization (legitimizing exceptional decision-making from a hard power perspective) and the self-regulation and voluntarism of digital platforms (focusing towards soft law and minimal intervention). A duality of militant and defensive democracy feeds the EU's approach to disinformation: While the majority of regulations are inclusive/resilience-enhancing responses (e.g., the EU Code of Practice, Digital Services Act, High-Level Expert Group European Digital Media Observatory, etc.), restrictive approaches directed at broadcasters circulating Russian fake narratives can also be identified (Juhász, 2024, p. 12). Across European societies, this tension between hard and soft approaches is reflected in a unique combination of regulations and practices.

This inherent tension adds to the country-specific vulnerabilities and challenges. Political and information environments impact resilience and flexibility in accepting policies to fight disinformation.

The literature emphasizes that a regulatory framework for online activity should comprise a code of practice regarding disinformation and a collaborative approach among actors—expert groups, task forces, member states, companies that provide internet services, media organizations, and researchers (Durach et al., 2020, p. 9)—and sanctions against actors exploiting digital services. Difficulties derived from this attempt to strike the right balance between collaboration and sanctions are added to the overarching difficulties of understanding a country's needs and vulnerabilities and addressing such knowledge in the personalized design of public policies.

This study is not without limitations. As it represents a single-country case study reflecting Romania's experiences with countering disinformation, the findings and their subsequent discussion cannot be extrapolated to other countries, each with their own backgrounds to consider. Nevertheless, the present study can inform similar endeavors elsewhere by providing a list of key issues (or parameters) to consider at the intersection between international approaches and the domestic features of a given country. Another limitation comes from the data used for secondary analysis. As the data was collected to serve specific project objectives, its scope is relatively narrow. While the data do not allow us to conclude on the general principles for the implementation of localized approaches in countering disinformation, our article opens new avenues for research and discussion. Similarly to a number of articles from this thematic issue, it proposes an alternative view on the relationship between regulatory frameworks at the European and global levels and security responses that are grounded in local vulnerabilities and concerns.

Overall, the study contributes to a better understanding of the inherent tensions in designing systematic approaches that follow the relevant global and regional principles, while also addressing unique local contexts.

Conflict of Interests

The authors declare no conflict of interest.

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