Protecting Democracy From Fake News: The EU's Role in Countering Disinformation

Edited by Jorge Tuñón Navarro, Luis Bouza García, and Alvaro Oleart

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Academic Editors
Jorge Tuñón Navarro (Universidad Carlos III de Madrid)
Luis Bouza García (Universidad Autónoma de Madrid)
Alvaro Oleart (Université Libre de Bruxelles)

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EDITORIAL

How the EU Counters Disinformation: Journalistic and Regulatory Responses

Jorge Tuñón Navarro [1] , **Luis Bouza García** [2] , **and Alvaro Oleart** [3]

[1] Department of Communication, Universidad Carlos III de Madrid, Spain
[2] Department of Political Science and International Relations, Universidad Autónoma de Madrid, Spain
[3] Department of Political Science, Université Libre de Bruxelles, Belgium

Correspondence: Jorge Tuñón Navarro (jtunon@hum.uc3m.es)

Abstract

Social media companies have strengthened their power—both discursive and political—during the last decade, a process that has disrupted the public spheres, contributing to shaping the way in which public discourse unfolds. In this process, it has empowered anti-democratic domestic and foreign actors, and challenged the business model of traditional media companies, substantially changing journalistic practices. This process has led policy-makers across the world, but more specifically in the EU, to conceive of disinformation as a "problem" (sometimes even a "threat to democracy") that needs to be "solved." The thematic issue critically contributes to the increasing literature on the topic by opening avenues that reorient the debate towards the relationship between Big Tech regulation, disinformation, journalism, politics, and democracy in the EU context.

Keywords

Big Tech; democracy; disinformation; European Union; journalism; public policy; public sphere; social media; regulation

1. How Disinformation Has Become a Key Political Issue in the EU

Social media companies have strengthened their power—both discursive and political—during the last decade, a process that has disrupted the public spheres, contributing to shaping the way in which public discourse unfolds. In this process, social media has empowered anti-democratic domestic and foreign actors, and challenged the business model of traditional media companies, substantially changing journalistic

practices. Furthermore, it has also substantially affected processes of consensus-seeking in democracies (Bennett & Pfetsch, 2018). This has led policy-makers across the world, but more specifically in the EU, to conceive of disinformation as a "problem" (sometimes even a "threat to democracy") that needs to be "solved." Critical junctures, such as the 2014 illegal Russian annexation of Crimea and the ensuing disinformation about it, the 2016 Trump election, the Brexit referendum, the Cambridge Analytica scandal, or Covid-19, have contributed to enhancing the salience of disinformation, as well as the increasing relevance of these social media platforms in articulating the public sphere. In fact, countering disinformation has become a key component of the EU's own conception of democracy (Oleart & Theuns, 2023).

Accordingly, the EU has undertaken multiple initiatives. In response to the Russian invasion of Crimea, in March 2015 the EU created the EastStratCom Task Force, with the objective of detecting and responding to disinformation campaigns (mainly by the Russian government) using strategic communication (Kachelmann & Reiners, 2023; Ördén, 2019). In 2018, the Commission developed a more comprehensive series of ad hoc initiatives and policy documents. This work was formalised with the adoption of a High-Level Group on fake news and disinformation, and a voluntary Code of Practice on disinformation, organised on the grounds that the EU should prepare itself in the run-up to the 2019 European Parliament elections. After the 2019 EU elections, the von der Leyen Commission developed the European Democracy Action Plan which provided the backbone for policies on disinformation until 2024, a process whose importance grew due to the Covid-19 pandemic. The most influential initiative against disinformation has taken place within the Digital Services Act (DSA), an approach characterised as "co-regulatory," which breaks away from the EU's previously dominant approach of self-regulation to digital platforms by trying to regulate with these platforms rather than simply leaving these platforms to set their own policies. There have already been critical analyses of the EU regulatory action on disinformation (see Bouza García & Oleart, 2024; Bouza et al., 2024; Casero-Ripollés et al., 2023), but much work still remains to be done in making sense of the relationship between EU tech policy, disinformation, and democracy.

The question of disinformation is likely to continue to grow, as in 2025 it remains a central political issue, especially after the 2024 US presidential election victory of Donald Trump, who counts Elon Musk (owner of X, formerly Twitter) as one of his main allies. In fact, the EU is beginning to question X as the playing field for the future configuration of the European public debate, as it is very close to an increasingly geopolitical rival such as the US Trump administration. This concern is further compounded by the platform's capacity to channel disinformation strategies aimed at a dual purpose: (a) to erode the democratic models of geopolitical competitors; and (b) to monetize disinformation more effectively and rapidly. Furthermore, the EU is perceived as lagging behind technological advancements in comparison to the US and China, a geopolitical dimension that is likely to continue to grow when regulating tech platforms and companies that are not "European." This is visible by the increasing emphasis of the EU on building "tech sovereignty," framing EU tech policy and disinformation as primarily a geopolitical issue. Illustratively, Henna Virkkunen was confirmed within the second von der Leyen Commission as EU Commissioner for Tech Sovereignty, Security & Democracy until 2029. Unfortunately, the geopolitical framing of tech policy by the EU often sidelines addressing the business model of most tech companies, rooted in "surveillance capitalism" (Zuboff, 2019). Indeed, the support to European tech companies and a "EuroStack" (Bria et al., 2025) by the EU through private–public partnerships on the grounds of "competitiveness," "innovation," and "European strategic autonomy" will not fundamentally democratize technology and sideline disinformation if such approach does not entail a fundamental rethinking of the business model of tech companies or even the articulation of

public tech institutions. Perhaps the time has come for a European publicly owned and democratically governed version of X?

That said, not all action against disinformation has been regulatory, and there have been a myriad of initiatives to tackle it through innovative practices, such as fact-checking. This strategy to combat disinformation is straightforward: debunk the falsehoods that circulate in the public sphere. This strategy assumes that citizens, media, and political actors will prefer fact-based information over misleading narratives, and thus exposing true facts is a solution compatible with freedom of expression and liberal values. However, this assumption may clash with the very idea of post-truth politics: Does the election of Donald Trump for a second term and the usage of disinformation by tech oligarchs not confirm that we are living in a post-truth era, one where opposing narratives are impervious to verification? The effectiveness of fact-checking is therefore under dispute as part of a broader competition to define the best way to combat disinformation at the European level (Tuñón Navarro et al., 2019). Indeed, fact-checking, as part of a broader realignment of journalistic practices in order to respond to the challenge that disinformation poses, is being institutionalized as a new decisive stakeholder in the field as well (Tuñón et al., 2025).

The thematic issue critically contributes to these strands of literature by studying responses to disinformation in Europe by exploring regulatory and security responses and emerging journalistic practices—in particular fact-checking—and their complex interplay. Do media promote some practices over others according to dominant political discourses and emerging regulations? To what extent policies such as public diplomacy are enhanced or weakened by media literacy, fact-checking networks, or regulation of platforms? How do regulation and journalistic practices affect democratic performance? Overall, our thematic issue opens avenues that reorient the debate towards the relationship between Big Tech regulation, disinformation, journalism, politics, and democracy in the EU context. Furthermore, in terms of regulation, it will not only scrutinise and critique existing policy efforts but also imagine possible alternatives, a dimension that has received limited attention (Fuchs, 2021; Griffin, 2023; Muldoon, 2022).

2. European Policy Responses to Disinformation: Regulation, Political Communication, Fact-Checking, and Journalistic Initiatives

More concretely, the thematic issue covers two broad thematic blocks. First, the issue addresses the regulatory dimension of disinformation in the EU context, including the geopolitical turn of the EU and the tension between securitization and democracy when approaching disinformation. Ó Fathaigh et al. (2025) and Monaci and Persico (2025) address the EU's milestone regulation of digital services, the DSA. Both articles point out that despite the declared goal of fighting disinformation, the DSA does not have a proper definition of disinformation and its effect strongly depends upon complementary co-regulatory tools. The former article points out that the DSA may both limit freedom of expression in member states making disinformation illegal and also provide platforms a broad margin of appreciation regarding content removal, while the latter article highlights that the DSA has allowed platforms to adopt temporary measures of limited impact against disinformation entrepreneurs, rather than more effective actions such as deplatforming. Oleart and Rone (2025) take a broader view of EU regulatory responses by arguing that such actions have so far failed to address the root cause of the problem: the business model of social media companies. The article goes further in order to outline a set of priorities to imagine democratic alternatives to current social media and discuss what could be the EU's role in fostering them. Their main point is that combatting disinformation

is just one aspect of the broader task of democratizing technology and the public sphere. Proto et al. (2025), Durach et al. (2025), and Balčytienė et al. (2025) all explore responses to foreign campaigns and interference at the EU (Proto et al., 2025) and national level in Romania (Durach et al., 2025) and the Baltic countries (Balčytienė et al., 2025). The three articles point out that there have been processes of securitization of (dis)information that require a delicate balance between effective action to protect democracy without establishing state-sanctioned single narratives. The three articles address the evolution in policy responses—albeit, not always in the same direction—and potential trade-offs with other policy goals.

Second, the political communication, fact-checking, and journalism initiatives related to disinformation within the EU, including several national contexts. Another bunch of six articles explores the complexities of disinformation in Europe, offering critical insights into how media, public institutions, and democratic processes interact in an increasingly polarized and post-truth environment. A central theme running through these articles is the pivotal role of journalism and fact-checking in combating disinformation. Moland et al. (2025) argue for a reaffirmation of traditional journalistic values, highlighting public trust in unbiased news as a cornerstone for the future of journalism. This view aligns with García-Gordillo et al. (2025), who examine the role of EU-backed fact-checking initiatives in the EU. However, while Moland et al. (2025) emphasize adherence to traditional norms, García-Gordillo et al. (2025) point to the need for innovative strategies, including the integration of AI, to address the resource and technological gaps that hinder fact-checking efforts. Building on the theme of innovation, Cazzamatta's (2025) research highlights the importance of hyperlinking among European fact-checking organizations as a means to create transnational networks and strengthen collective responses to disinformation. Her findings reveal a stark contrast between the collaborative practices of independent organizations and the more insular approach of legacy media outlets.

This transnational perspective finds echoes in Rodríguez-Pérez et al. (2025) and Casero-Ripollés et al. (2025) analysis of Elections24Check, a European initiative that marked a shift from traditional fact-checking to debunking contextual disinformation during the 2024 European Parliament elections. Both articles underscore the value of cross-border cooperation, but Rodríguez-Pérez et al. (2025) also highlight the limitations of such initiatives, particularly their inability to focus sufficiently on election-specific disinformation. Casero-Ripollés et al. (2025) expand on these themes by examining the lifecycle of disinformation during electoral campaigns, revealing its persistence beyond polling day and its regional variations within Europe. Their findings emphasize how migration-related narratives, central to far-right agendas, dominate electoral disinformation. This focus on polarization and ideological exploitation ties closely to Haapala and Roch's (2025) exploration of how Spanish radical parties frame media elites in a post-truth context. Their study reveals the strategic use of media criticism by populist actors, both on the left and right, to legitimize their agendas and challenge democratic norms.

Taken together, these articles highlight both convergences and divergences in the fight against disinformation. While all agree on the urgency of transnational cooperation and the importance of fact-checking, they offer varied perspectives on the balance between tradition and innovation, national and regional dynamics, and reactive versus proactive approaches. This synthesis enriches our understanding of the European media landscape and provides actionable insights for policymakers, journalists, and academics seeking to protect democracy from disinformation.

Conflict of Interests

The authors declare no conflict of interests.

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About the Authors

Jorge Tuñón Navarro is full professor of journalism at the Universidad Carlos III de Madrid and a Jean Monnet ad personam chair of the European Commission. With over 100 publications and a dozen monographs, he has led seven research projects funded at the regional, national, and European levels. He has advised the European Parliament, the European Commission, and Spanish ministries, and collaborates regularly with the media. His work on disinformation and democratic resilience earned him the 2023 Excellence Award from UC3M.

Luis Bouza García is associate professor and vice dean for research at the Faculty of Law, Universidad Autónoma de Madrid, where he coordinates a research group on EU politics and governance. He leads the work package on regulatory aspects of the Horizon Europe project Reclaiming Liberal Democracy in the Postfactual Age (2022–2025). He is a visiting professor at the College of Europe.

Alvaro Oleart is a Fonds de la Recherche Scientifique (FNRS) postdoctoral researcher in the Department of Political Science and the Institute for European Studies of the Université libre de Bruxelles (ULB). He is the author of the books *Framing TTIP in the European Public Spheres: Towards an Empowering Dissensus for EU Integration* (Palgrave, 2021) and *Democracy Without Politics in EU Citizen Participation: From European Demoi to Decolonial Multitude* (Palgrave, 2023).

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ARTICLE

The Regulation of Disinformation Under the Digital Services Act

Ronan Ó Fathaigh [1] , **Doris Buijs** [2] , **and Joris van Hoboken** [3]

Institute for Information Law, University of Amsterdam, The Netherlands

Correspondence: Ronan Ó Fathaigh (r.f.fahy@uva.nl)

Abstract

This article critically examines the regulation of disinformation under the EU's Digital Services Act (DSA). It begins by analysing how the DSA applies to disinformation, discussing how the DSA facilitates the removal of illegal disinformation, and on the other hand, how it can protect users' freedom of expression against the removal of certain content classified as disinformation. The article then moves to the DSA's special risk-based rules, which apply to Very Large Online Platforms in relation to mitigation of systemic risks relating to disinformation, and are to be enforced by the European Commission. We analyse recent regulatory action by the Commission in tackling disinformation within its DSA competencies, and assess these actions from a fundamental rights perspective, focusing on freedom of expression guaranteed under the EU Charter of Fundamental Rights and the European Convention on Human Rights.

Keywords

Digital Services Act; disinformation; European Union; online platforms; freedom of expression; regulatory enforcement

1. Introduction

When announcing an investigation into X in late 2023, the European Commission heralded the EU's new Digital Services Act (hereafter DSA; Regulation of the European Parliament and of the Council of 19 October 2022, 2022) as setting out an "unprecedented new standard for the accountability of online platforms regarding disinformation" (European Commission, 2023c). Indeed, when opening proceedings against Meta in April 2024, the Commission explained how it "suspects" that Meta "does not comply with DSA obligations" related to "disinformation campaigns" (European Commission, 2024a). Curiously, however,

disinformation is nowhere mentioned in the DSA's actual provisions and is nowhere defined in the DSA; it is only mentioned in some recitals (Husovec, 2024). And yet, the DSA seems to be becoming the main EU legal instrument to, as the Commission's president stated, "protect European citizens from targeted disinformation" (European Commission, 2024a). This approach is further confirmed by recent enforcement activities by the Commission targeting disinformation on platforms. As such, the purpose of this article is to critically examine the regulation of disinformation under the DSA, including the recent high-profile enforcement activity by the Commission in this regard. Additionally, we aim to highlight the tensions between the DSA's approach to disinformation and the fundamental right to freedom of expression. The article begins by analysing: how the DSA applies to disinformation, including how its provisions relating to platforms' terms and conditions apply to disinformation; the role of trusted flaggers; the operation of the 2022 Strengthened Code of Practice on Disinformation within the DSA's framework (hereafter the 2022 Code); and the role of data access rules facilitating research on disinformation. The article then moves to the DSA's special risk-based rules which apply to so-called Very Large Online Platforms (VLOPs) in relation to the mitigation of systemic risks relating to disinformation, which are to be enforced by the Commission. The article continues by discussing recent regulatory actions by the Commission in tackling disinformation within its DSA competencies. Crucially, the article assesses these actions from a fundamental rights perspective, focusing on freedom of expression guaranteed under the Charter of Fundamental Rights of the EU (2012; hereafter EU Charter) and the European Convention on Human Rights (Convention for the Protection of Human Rights and Fundamental Freedoms, 1950; hereafter ECHR).

2. The DSA and Online Disinformation

The DSA, which became directly applicable in EU member states in February 2024, is a landmark piece of legislation that seeks to set out harmonised rules for online platforms to ensure a "safe, predictable and trusted" online environment, and where fundamental rights are "effectively protected" (DSA, Article 1(1)). Of note, and as mentioned previously, following its adoption, the DSA is being presented as the most important EU tool against disinformation by the European Commission and its president respectively, e.g., by describing the DSA as the main EU legal instrument to "protect European citizens from targeted disinformation" (European Commission, 2024a).

However, as already pointed out, what is nevertheless very important to emphasise again, is that when actually reading the DSA, it is apparent that disinformation is not mentioned in any of its actual provisions. Crucially, disinformation is also nowhere defined anywhere in the DSA and is only mentioned in recitals (Husovec, 2024). Indeed, Recital 9 DSA states that one of the purposes of the DSA is to address the "dissemination of illegal content online" and the "societal risks" that the "dissemination of disinformation" may generate (DSA, Recital 9). And, while disinformation is not mentioned in the provisions of the DSA, as will be explained below, many of the articles in the DSA can be directly applicable to disinformation.

Before continuing to discuss specific provisions of the DSA, let us first briefly set out the DSA's general operation and application to online platforms. The DSA targets a range of what are called online "intermediary services," and has a specific set of rules for "online platforms." Crucially, Article 3 DSA defines an online platform in short as a "hosting service that, at the request of a recipient of the service, stores and disseminates information to the public" (DSA, Article 3(i)). This definition captures many social media platforms, including Facebook, Instagram, TikTok, X, and YouTube. For example, the Commission considers

Instagram an online platform, because it is "a hosting service" that "stores and disseminates information to the public at the request of recipients of its service" (European Commission, 2023a).

2.1. Platform Obligations in Relation to Illegal Disinformation

A second major point is that in the run-up to the DSA proposal being published, it was considered EU policy that disinformation was a category of expression that is not illegal, but is harmful (and yet, lawful). This had crucial consequences for how the DSA sought to regulate disinformation. For example, the Commission's High Level Group on Fake News and online disinformation noted that disinformation is "not necessarily illegal," but may "nonetheless be harmful for citizens and society at large" (Directorate-General for Communications Networks, Content and Technology, 2018, p. 5). The Commission itself also describes disinformation as "harmful content," which is "not, *per se*, illegal" (European Commission, 2020a, p. 3). In the intervening period, there has been research on disinformation laws in the EU, and a growing realisation that the notion of disinformation is in fact illegal in many EU member states (European Regulators Group for Audiovisual Media Services, 2020). Indeed, research points to legislation in numerous EU member states which may capture the notion of disinformation. And most worryingly, it is criminalised in many of those EU member states. As Ó Fathaigh et al. (2021) note, for example, in Malta, the Criminal Code (Article 82) criminalises the spreading of "false news," and makes it an offence to "maliciously spread false news which is likely to alarm public opinion or disturb public good order or the public peace or to create a commotion among the public or among certain classes of the public" (Criminal Code of the Republic of Malta, 1854). While, under the Criminal Code of Cyprus (Article 50), it is an offence to disseminate "false news" or "news that can potentially harm civil order or the public's trust towards the State or its authorities or cause fear or worry among the public or harm in any way the civil peace and order" (The Criminal Code Law of Cyprus, 2025, Article 50). Importantly, these laws are not anachronistic and rarely invoked but are being actively enforced across member states (Espaliú-Berdud, 2022; Koltay, 2025; Radu, 2023). Indeed, as Ó Fathaigh et al. (2021) note, the European Commission itself has raised its alarm over member state laws of a "criminal nature" related to disinformation, and has warned that such laws that are "too broad" and "with disproportionate penalties" raise "particular concerns as regards freedom of expression" (European Commission, 2020b, p. 11).

In this regard, it is important to mention that the definition of "illegal content" is given an incredibly broad definition under the DSA (Ó Fathaigh et al., 2021) as it includes "any information that, in itself or in relation to an activity…is not in compliance with Union law or the law of…any Member State," and "irrespective of the precise subject matter or nature of that law" (DSA, Article 3(h)). As such, this definition of illegal content captures all of the national criminal legislation applicable to disinformation. This would mean that platforms' obligations in relation to illegal content under the DSA would apply to disinformation that has been made illegal in some EU member states. Further, these laws define disinformation differently, and this complicating factor also makes it more difficult for platforms to conform to such diverse disinformation laws across the EU (Ó Fathaigh et al., 2021, p. 15).

It is therefore important to closely look into three main provisions of the DSA which apply to illegal content, as they may cover disinformation in some of the EU's member states. The first of these is Article 9 DSA, where national judicial or administrative authorities may order online platforms to "act against" content considered "illegal content"; while online platforms must inform the national authorities "without undue

delay" of any effect given to the order (DSA, Article 9(1)). Very importantly, it is not only courts that can order content to be taken down, but this idea of "national administrative authorities" can also include "law enforcement authorities" (DSA, Recital 31). In other words, as noted by Ó Fathaigh et al. (2021), Article 9 creates an "explicit EU law mechanism to facilitate national judicial and administrative authorities" to issue orders for online platforms to "act against" specific user content that is deemed "illegal content" (Ó Fathaigh et al., 2021, p. 17). Notably, in recent transparency reports being published by platforms under the DSA, platforms such as Meta are reporting how Article 9 DSA orders are being made against its platforms under national laws applicable to misinformation (see, for example, Meta, 2024a, 2024b).

The second article to mention is Article 16 DSA, which requires platforms to implement notice-and-action mechanisms for (allegedly) illegal content. In particular, platforms are required to "put mechanisms in place to allow any individual or entity to notify them of the presence on their service of specific items of information that the individual or entity considers to be illegal content" (DSA, Article 16(1)). Platforms must process and make a decision on these notices in a "timely, diligent, non-arbitrary and objective manner," and notify their decision "without undue delay" (DSA, Article 16(5–6)). Again, due to the very broad definition of illegal content, this notice-and-action mechanism will also be applicable to all national criminal legislation on disinformation (Ó Fathaigh et al., 2021, p. 18). As such, Article 16 obliges platforms to put notice-and-action mechanisms in place for notices to be submitted of (allegedly) illegal content considered disinformation, with platforms being required to make a decision on this content without undue delay. However, it should be noted that currently, platforms may not be fully implementing these mechanisms in line with Article 16 (Holznagel, 2024a).

Further, Article 16(3) DSA provides that properly-submitted notices of (alleged) illegal content "shall be considered to give rise to actual knowledge or awareness" for the purposes of Article 6 DSA, which protects platforms from liability (DSA, Article 16(3)). In this regard, Article 6 DSA provides that platforms "shall not be liable" for any user content, even if it is illegal, provided the platform (a) does not have "actual knowledge" of the illegal content, or (b) "upon obtaining such knowledge or awareness, acts expeditiously to remove or to disable access to the illegal content" (DSA, Article 6(1)). What Article 16 DSA now means is that properly submitted notices of illegal content "shall be considered to give rise to actual knowledge" on the part of platforms for the purposes of Article 6 DSA. Thus, platforms are being put in a position to decide whether flagged content should be deemed illegal content under national law provisions applicable to disinformation. Platforms are also required to make this decision with a constant threat hanging over them that the submitted notice will mean they have actual knowledge of the illegal content, making them potentially liable for the content unless they "[act] expeditiously to remove or to disable access to the illegal content" (DSA, Article 6(1)). This may arguably incentivise removal.

A third important article in relation to illegal disinformation is Article 22 DSA on trusted flaggers, a flagging mechanism to inform platforms about illegal content—a practice which already existed before its inclusion in the DSA (Appelman & Leerssen, 2022). Article 22(1) requires platforms to "take the necessary technical and organisational measures" to ensure notices submitted by "trusted flaggers" through notice and action mechanisms under Article 16 DSA, are given "priority" and are processed and decided upon "without undue delay." Notably, the status of trusted flagger is to be awarded to entities by the newly-established national Digital Services Coordinators (DSCs), which are the national regulatory authorities established to enforce the DSA at a national level (DSA, Article 49). Crucially, Recital 61 DSA gives examples of such trusted flaggers, which can be "public" bodies, and "internet referral units of national law enforcement authorities"

or the "European Union Agency for Law Enforcement Cooperation" (Europol). Again, because of the broad definition of illegal content under the DSA, Article 22, too, will be applicable to national criminal legislation concerning disinformation and will facilitate internet referral units of national law enforcement authorities submitting notices of alleged disinformation, where such notices are to be decided upon with priority and without delay. It should be noted that trusted flaggers are quite important in relation to disinformation, with many public authorities having trusted flagger status before the DSA was enacted e.g., the Dutch Ministry of the Interior and Kingdom Relations has been a trusted flagger with numerous platforms (Ministry of the Interior and Kingdom Relations, 2023; see also van de Kerkhof, 2024). Thus far, trusted flagger status has been awarded to some entities with areas of expertise such as "negative effects on civic discourse and elections," including a Greece-based organisation which aims to systematically address disinformation (European Commission, 2025c). Scholars have discussed potential reasons for the lack of applications to be awarded the status of trusted flagger, such as resource constraints (Goldberger, 2024), but also in a broader sense of what the potential impact of the trusted flagger provision may be, which may not be "groundbreaking" (Rosati, 2024).

These are the main provisions that can be utilised to have disinformation removed where it comes within the definition of illegal content under the DSA and demonstrate how the DSA can be instrumentalised for the removal of illegal disinformation on platforms. However, an important point to make about the regulation of disinformation under the DSA is that not only does the DSA facilitate the removal of illegal disinformation, it also seeks to protect individuals whose content has been removed because it is considered disinformation by platforms. In this regard, the DSA has a double-edged-sword approach to the regulation of disinformation: where on the one hand it facilitates the removal of disinformation, on the other hand, it seeks to protect users' freedom of expression when content is removed for being qualified as disinformation by platforms. To this point, we now turn.

2.2. Disinformation Regulation and How the DSA Can Protect Freedom of Expression

The previous section examined how platforms can be instrumentalised to remove illegal disinformation. This section in turn details how the DSA also imposes obligations on platforms to protect users' freedom of expression where their content has been removed because it is allegedly disinformation. Platforms may remove "disinformation" because it may be illegal, but also if such content violates their terms and conditions. One of the most important DSA provisions in this regard is Article 14, which regulates platforms' terms and conditions. Preceding the enactment of the DSA, it was widely recognised that the systems used by platforms to moderate expression based on a platform's terms of service were "fundamentally broken" (Culliford & Paul, 2020; York & McSherry, 2019), and "undermine" freedom of expression online (Amnesty International, 2019). This was because of "overly vague rules of operation, inconsistent enforcement, and an overdependence on automation" (UN General Assembly, 2018).

As such, one of the purposes of Article 14 DSA was to, for the first time, impose statutory regulation on how platforms enforced their terms and conditions. The most important aspect of Article 14 is how it provides that platforms, when applying and enforcing restrictions on user content based on their terms and conditions, must have "due regard" to the "fundamental rights" of users "as enshrined" in the EU Charter (DSA, Article 14(4)). As authors such as Quintais et al. (2023), have explored, Article 14 essentially means that platforms should apply their terms and conditions with "due regard" to fundamental rights, explicitly including "freedom of

expression" under Article 11 EU Charter. This means platforms need to have due regard to fundamental rights in content moderation decisions based on a platform's rules in relation to disinformation, although it may be unclear what the practical effect is of this requirement (Galantino, 2023, p. 124).

As such, Article 14(4) DSA shifts the focus to some extent towards the fundamental rights framework concerning freedom of expression. The wording of the right to freedom of expression under Article 11 EU Charter is "broad and open-ended, and gives little concrete guidance to platforms" (Quintais et al., 2023, p. 897). As such, platforms may have regard to principles from the EU Court of Justice case law under Article 11 EU Charter, and from the European Court of Human Rights case law on freedom of expression, guaranteed under Article 10 ECHR. As Quintais et al. (2023) point out, the EU Court of Justice has confirmed that Article 11 EU Charter has the "same meaning and the same scope" as Article 10 ECHR, "as interpreted by the case-law of the European Court of Human Rights" (*Sergejs Buivids v. Datu valsts inspekcija* (2019), para. 65).

Further, Recital 47 DSA explicitly states that platforms should also have "due regard" to "relevant international standards for the protection of human rights" when applying restrictions based on their terms and conditions. Crucially, there are important and relevant freedom of expression principles that may be applicable to disinformation under both European and international human rights law. While other authors have examined in depth the application of freedom of expression principles to disinformation regulation (McGonagle, 2017; van Hoboken & Ó Fathaigh, 2021), for the purposes of this article, it is relevant to mention some of these principles that platforms may have due regard to under Article 14 DSA specifically. Ó Fathaigh et al. (2021) point towards certain specific principles. First, under international human rights law, regulations prohibiting dissemination of disinformation or "false news," which are "vague and ambiguous," are "incompatible" with human rights standards on freedom of expression "should be abolished" (UN, Organization for Security and Co-operation in Europe, Organization of American States, & African Commission on Human and People's Rights, 2017, p. 3). In particular, it has been emphasised by international human rights bodies that the concept of disinformation is an "extraordinarily elusive concept to define," and may provide executive authorities with "excessive discretion to determine what is disinformation, what is a mistake, what is truth" (UN General Assembly, 2020). As such, the penalisation of disinformation may be "disproportionate" under international human rights law. Of particular note, the European Court of Human Rights has held, in a landmark judgment, that legal proceedings over the "dissemination of false information" under national election legislation were a violation of the right to freedom of expression under Article 10 ECHR (*Salov v. Ukraine*, 2005). Crucially, the Court held as a matter of principle that Article 10 ECHR "as such does not prohibit discussion or dissemination of information received even if it is strongly suspected that this information might not be truthful" (*Salov v. Ukraine*, 2005, para. 113).

Thus, it is quite clear that under European and international human rights law, prohibiting disinformation raises fundamental questions under freedom of expression standards. Should platforms wish to indeed prohibit disinformation under their terms and conditions, Article 14 DSA may place those platforms under an obligation to take into account these fundamental rights aspects by assessing whether their own definitions of disinformation are sufficiently clear, and that certain restrictions placed on content classified as disinformation would be proportionate, and be the least restrictive measure (e.g., labelled or fact-checked, rather than removed). Further, the application of Article 14 DSA may materialise not only in the initial

decision taken by a platform applying its terms and conditions but also as users invoke the DSA's provisions to challenge decisions over content restricted under a platform's disinformation rules. So, Article 14 is the first of these DSA articles that addresses the issue of procedural fairness for users in the context of moderation of disinformation (Ó Fathaigh et al., 2021, p. 19), in contrast to the other articles discussed in the previous section which fit the perspective of the DSA as an instrument to remove disinformation.

A second article in this stream seeking to protect a user's freedom of expression in relation to disinformation is Article 17 DSA. Based on this provision, platforms shall give a statement of reasons following restrictions imposed on a user's content, due to it being considered illegal disinformation, or disinformation removed under a platform's terms and conditions. The types of considered restrictions include restrictions on the "visibility" of information, including content removal, disallowing access, or content demotion, which are all used by platforms to target disinformation (Leerssen, 2023). Crucially, the statement shall be "as precise and specific as reasonably possible" (DSA, Article 17(4)), and include "explanations as to why the information" is considered to be illegal content or incompatible with terms and conditions (DSA, Article 17(3.d–e)). Thus, under this provision platforms are required to actually explain their moderation decisions around disinformation. However, early analysis of the implementation of Article 17 would seem to suggest statements of reasons are generated automatedly and quite short, resulting in users not being able to specifically understand how certain content may have violated a platform's rules (Kaushal et al., 2024).

In addition to Article 17 DSA, the next question is what sort of redress can a user avail of if a user disagrees with the statement of reasons. In this regard, Article 20 DSA is crucial, which provides that platforms must provide users with access to "effective" internal complaint-handling systems to lodge complaints. Notably, platforms shall handle complaints in a "timely" and "diligent" manner (DSA, Article 20(4)) "under the supervision of appropriately qualified staff" (DSA, Article 20(6)), and be "free of charge" (DSA, Article 20(1)). This is beneficial from a user's procedural rights point of view; and again, it means that a platform's complaint-handling system may be required to issue decisions on disinformation having "due regard" to a user's freedom of expression under Article 14 DSA.

Further, where a user disagrees with a platform's internal complaint system's decision, users shall also "be entitled to select any out-of-court dispute settlement body" that has been certified "to resolve disputes" (DSA, Article 21(1)) relating to decisions made by platforms such as removal, disabling access, and suspension or termination of a user's account (DSA, Article 20(1.a–d)). This includes disputes that "could not be resolved in a satisfactory manner through the internal complaint-handling systems" (DSA, Recital 59) under Article 20. As such, these bodies may consider how a platform's decision related to disinformation sufficiently takes account of a user's right to freedom of expression. Platforms are required to "engage, in good faith" with the certified out-of-court dispute settlement body "with a view to resolving the dispute" (DSA, Article 21(2)). However, the same paragraph notes that this body does not have the power to "impose a binding settlement" on the platform nor the involved user. In terms of setting up these bodies, the national DSCs will certify these bodies, provided they satisfy a number of requirements, such as being "impartial and independent" and having the "necessary expertise" (DSA, Article 21(3)). Holznagel (2024b) has explored the first out-of-court dispute settlement bodies under the DSA and finds these first bodies "'serious,'" but also points towards potential questionable consequences around the financial side of this new type of alternative dispute resolution.

These are the main provisions that are applicable to disinformation on platforms from an user's procedural-rights perspective under the DSA, and demonstrate the second angle upon which the DSA regulates disinformation.

3. VLOPs and Disinformation

The rules discussed in the previous section generally apply to online platforms. However, a particularly landmark and important aspect of the DSA is that it also has very specific additional rules for what are called VLOPs. These rules adopt a risk-based approach to platform regulation (Nooren et al., 2018) and basically impose on VLOPs an obligation to manage any "systemic risks" stemming from their platforms. It is in this area of the DSA that the regulation of disinformation is most pronounced (Husovec, 2024).

Under Article 33 DSA, VLOPs are platforms which have a "number of average monthly active recipients of the service in the Union equal to or higher than 45 million." Recital 75 explains why VLOPs are targeted: given the "importance" of VLOPs in "facilitating public debate" and the "dissemination to the public of information, opinions and ideas," it is "necessary to impose specific obligations" on them. In April 2023, the European Commission designated the first tranche of 17 VLOPs under the DSA, which included all the major social media platforms, such as Facebook, Instagram, LinkedIn, Snapchat, TikTok, Twitter (now X), and YouTube (European Commission, 2023b).

This idea of targeting VLOPs through risk-based regulation is an innovative way of regulating platforms and imposing specific rules on them (which is part of a broader regulatory trend of adopting a risk-based approach to online platforms; Efroni, 2021). Once these platforms are designated as VLOPs, they are subject to inter alia what are called systemic-risk obligations. Thus, under Article 34 DSA, VLOPs are required to carry out "risk assessments" to identify and assess "any systemic risks in the Union stemming from the design or functioning of their service and its related systems, including algorithmic systems." This is where disinformation becomes crucial, as one of the explicit purposes of the DSA is to address the "societal risks that the dissemination of disinformation" may generate (DSA, Recital 9).

Article 34 lists a number of systemic risks that must be included in the risk assessment by VLOPs: (a) dissemination of illegal content through their services; (b) any actual or foreseeable negative effects for the "exercise of fundamental rights" enshrined in the EU Charter, including freedom of expression; (c) any actual or foreseeable negative effects on "civic discourse and electoral processes," and "public security"; and (d) any actual or foreseeable negative effects in relation to "gender-based violence, the protection of public health and minors and serious negative consequences to the person's physical and mental well-being" (DSA, Article 34(1.a–d)).

Crucially, disinformation is not explicitly mentioned as one of the four potential systemic risks. The question is therefore: How does disinformation fit within this provision? In this regard, it is important to look at the recitals of the DSA concerning systematic risks. Notably, Recital 83 states that risks of actual or foreseeable negative effects on the protection of "public health," "minors," "serious negative consequences to a person's physical and mental well-being," or "gender-based violence" can stem from "coordinated disinformation campaigns related to public health." Based on this recital, it seems disinformation is most readily identified with risk (d) under Article 34, namely negative effects on the protection of, in short, "public health." Further, Recital 84 states that

when assessing the systemic risks, VLOPs should focus on information "which is not illegal," and pay "particular attention" to how their services are used to disseminate or amplify "misleading or deceptive content, including disinformation," and how amplification of such information "contributes" to the systemic risks. Notably, the recitals concerning Article 34 and Article 35 do not state that disinformation is a systemic risk as such; only that systemic risks can *stem* from disinformation. Thus, on a strict reading of Article 34, the dissemination of disinformation may not be a systemic risk, in and of itself. For instance, Meta lists disinformation in multiple categories of "systemic risk areas," including "civic discourse & elections," "public health," and "public security" (Meta, 2024c, p. 17). LinkedIn includes mis- and/or disinformation in risk areas as "civic discourse and electoral processes," as well as under "public health" and "public security" (LinkedIn, 2024, pp. 63–64); and X, too, mentions disinformation in the context of "democratic processes, civic discourse and electoral processes," "public security," and "public health & physical and mental well-being" (X, 2023, pp. 59–68). However, as will be seen in Section 4.1, the systemic risk currently most associated with disinformation is risk (c) concerning negative effects on "civic discourse and electoral processes." Indeed, as Mündges and Park note, although Article 34 "does not explicitly mention disinformation, it implies comprehensive coverage of the phenomenon" through Article 34(1.c) DSA (Mündges & Park, 2024, p. 5). This is also where most regulatory action is currently occurring, which is discussed in Section 4.1. This is not to say that risk (c) on civic discourse and electoral processes will remain the systemic risk most closely linked to disinformation; this may change over time, and it could even be that the list of systemic risks in the DSA will be reevaluated and adapted at some point.

Once platforms have conducted their risk assessments and identified the risks, the next step is mitigating these risks. Crucially, if VLOPs identify these risks, under Article 35 DSA, VLOPs must "put in place reasonable, proportionate and effective mitigation measures, tailored to the specific systemic risks identified pursuant to Article 34" (DSA, Article 35(1)). Article 35 then sets out 11 measures which VLOPs can take. These are in short (a) "adapting the design, features or functioning of their services, including their online interfaces"; (b) "adapting their terms and conditions and their enforcement"; (c) "adapting content moderation processes," as well as "adapting any relevant decision-making processes and dedicated resources for content moderation"; (d) adapting "algorithmic systems," including "recommender systems"; (e) "adapting advertising systems"; (f) "reinforcing the internal processes, resources, testing, documentation, or supervision of any of their activities in particular as regards detection of systemic risk"; (g) "initiating or adjusting cooperation with trusted flaggers"; (h) "initiating or adjusting cooperation with other providers of online platforms" through "codes of conduct and the crisis protocols" as referred to in Articles 45 and 48 DSA respectively; (i) "taking awareness-raising measures" in order to give users "more information"; (j) "taking targeted measures to protect the rights of the child," and (k) ensuring that items of information that "appreciably resembles existing persons, objects, places or other entities or events and falsely appears to a person to be authentic or truthful is distinguishable through prominent markings when presented on their online interfaces" (DSA, Article 35(1)).

Notably, Article 34 and Article 35 are somewhat vague, e.g., "what makes a risk 'systemic'" (Sullivan & Pielemeier, 2023). As Griffin notes and what will be further discussed in Section 4.2, "The breadth and vagueness of Articles 34–35 gives the Commission significant discretion over their interpretation and enforcement" (Griffin, 2024, p. 176). The question is: What do Articles 34 and 35 mean in practice, especially in relation to disinformation? Helpfully, the Commission may, in cooperation with the DSCs, issue guidelines on the application of Article 35 in relation to specific risks (DSA, Article 35(3)). Indeed, just before the European Parliament elections in June 2024, the Commission adopted guidelines on the mitigation of systemic risks for electoral processes, to which we now turn.

3.1. Guidelines on the Mitigation of Systemic Risks for Electoral Processes

The guidelines on the mitigation of systemic risks for electoral processes were designed to provide "guidance" to support VLOPs to "comply with their obligation to mitigate specific risks linked to electoral processes" (Communication from the Commission, 2024, point 3). Notably, the guidelines contain specific measures for VLOPs to implement targeting disinformation, including the following: First, in order to "prevent the spread of" disinformation "on the electoral process itself," the best practice for VLOPs is to "facilitate access to official information concerning the electoral process," based on official information from the electoral authorities (Communication from the Commission, 2024, point 27(a)). A second example of best practices is for VLOPs to apply "inoculation measures that pre-emptively build resilience against possible and expected disinformation narratives" by "informing and preparing users," for example through the use of online games, videos, and other content on the generation of disinformation, which "encourages a critical reflection on the tactics" used for disinformation (Communication from the Commission, 2024, point 27(b.ii)). Third, VLOPs should use "fact-checking labels on identified disinformation" provided by "independent fact-checkers and fact-checking teams of independent media organisations" to "provide users with more contextual information" (Communication from the Commission, 2024, point 27(c–i)). The foregoing measures are very much in the vein of providing users with more information to recognise and be resilient against disinformation. However, there are particular measures which go much further and are framed in the sense of reducing the spread of disinformation. These include that VLOPs should consider to "reduce the prominence of disinformation in the context of elections," including "deceptive content that has been fact-checked as false," or "from accounts that have been repeatedly found to spread disinformation" (Communication from the Commission, 2024, point 27(d–ii)). Further, the Commission recommends VLOPs to put "systems in place to prevent the misuse of advertising systems" to disseminate inter alia "disinformation" (in the context of political advertising, point 27(e–iv)); to engage in the "demonetisation of disinformation content" (point 27(g)); to ensure the "enforcement" of terms and conditions to "significantly decrease the reach and impact of generative AI content" depicting "disinformation on the electoral process" (Communication from the Commission, 2024, point 40(a)). Thus, these measures are a mix of providing users with more information to be resilient against disinformation; and measures to reduce the reach and monetisation of disinformation.

Notably, the Commission was quite forthright in terms of VLOPs being required to implement these measures, although the guidelines contain "best practices" and recommendations (DSA, Article 35(3)). The Commission explicitly stated that VLOPs which "do not follow" these guidelines "must prove" to the Commission that the measures undertaken are "equally effective in mitigating the risks" (European Commission, 2024b). And "should the Commission receive information casting doubt on the suitability of such measures, it can request further information or start formal proceedings under the Digital Services Act" (European Commission, 2024b). So, this was very much a warning to VLOPs to follow these guidelines. Finally, and crucially, the guidelines also explicitly state that the mitigation measures "should draw" on the 2022 Code (European Commission, 2022), and it is to this code we now turn.

3.2. 2022 Code

When examining the DSA's regulation of disinformation, it is crucial to examine the 2022 Code as it is inextricably linked to the DSA (Brogi & De Gregorio, 2024). The Code was first put together in 2018 by the Commission and a number of online platforms starting as a self-regulatory instrument to which platforms

could voluntarily adhere (European Commission, 2018). The Code was updated in 2022, to become a mammoth 50-page document of co-regulation. This strengthened version of the Code explicitly stated already that it "aims to become" a recognised code of conduct under the DSA (2022 Code, p. 2). Indeed, the 2022 Code has been converted into an official code of conduct under the DSA, which will take effect from 1 July 2025 (European Commission, 2025b). Further, the DSA's recitals explicitly mention the 2022 Code (DSA, Recital 106), and that compliance with a given code of conduct by a VLOP can be considered as an "appropriate risk mitigating measure" in relation to systemic risks (DSA, Recital 104). This is now officially the case, as "full adherence" may indeed be considered an "appropriate risk mitigation measure" by the Commission and the 2022 Code will become a "significant and meaningful benchmark for determining DSA compliance" (European Commission, 2025b). The "refusal without proper explanations" by a VLOP to participate in the application of a code of conduct could be "taken into account" when determining whether a platform "has infringed the obligations" laid down by the DSA (DSA, Recital 104). Article 35(1.h) explicitly mentions cooperation through codes of conduct as a risk-mitigation measure. This shows how the Code has shifted from a self-regulatory instrument towards a crucial part of assessing VLOPs' compliance with the DSA in the context of disinformation.

The 2022 Code contains specific measures designed to target disinformation (the 2022 Code was renamed the Code of Conduct on Disinformation in February 2025, following its integration into the DSA framework; European Commission, 2025a). Notably, these measures include that platforms should: (a) put in place a functionality to allow users to flag "harmful false and/or misleading information," which should lead to "appropriate, proportionate and consistent follow-up actions" (Measure 23.1); (b) provide functionalities to allow users to assess the "authenticity or accuracy" of content (Commitment 20); (c) provides users with "factual accuracy of sources through fact-checks from fact-checking organisations that have flagged potential Disinformation," and "warning labels" from "authoritative sources" (Commitment 21); and (d) commit to "defund" the dissemination of disinformation (Commitment 1). A very important aspect of the 2022 Code is Measure 18.2, where platforms commit to "enforce" policies to "limit the spread" of false information, which can include prohibiting false information.

Crucially, although verification of reporting from platforms under the 2022 Code is difficult as Mündges and Park (2024, p. 1) note, "qualitative information provided by platforms often lack detail and/or relevance" and "quantitative data is, in several cases, missing, incomplete, or not robust"), these reports (at face value) reveal content considered disinformation is actually being taken down pursuant to Measure 18.2. So, when looking at reporting by TikTok in its latest report covering the period of the European Parliament elections, TikTok removed over a quarter of a million videos in the EU before the European Parliament elections (TikTok, 2024, p. 165). Similarly, YouTube reported removing almost 19,000 videos in the run-up to the EU elections based on its disinformation policy (Google, 2024, p. 146), while LinkedIn reported removing over 20,000 pieces of content under its disinformation policy in the EU in its March 2024 report (Microsoft, 2024, p. 119). This seems a considerable amount of content that is being removed under the 2022 Code, and only during a six-month period. Galantino also explicitly mentions how the 2022 Code "fails to tightly control the scope of content removals and account sanctions" and adds that "although content removal is not explicitly envisioned by the Code, it occurs in practice" (Galantino, 2023, p. 126).

As such, while the DSA does not prohibit disinformation, the 2022 Code is where disinformation can be prohibited, and where a large amount of removal is occurring. This is a crucial issue to highlight, as the 2022

Code is now seen as a co-regulatory measure under the DSA and one of the potential risk-mitigating measures under the DSA. Of note, Mündges and Park have analysed compliance by platforms with their reporting obligations under the 2022 Code, and note that "overall, platforms are only partly compliant with the Code" (Mündges & Park, 2024, p. 1).

3.3. Access to Data and Disinformation

A further crucial DSA provision relevant to disinformation, which is only applicable to VLOPs, is Article 40 on access to data. As Khan (2021) has noted, the lack of access to data continues to be a "major failing" of platforms regarding disinformation and makes independent scrutiny and accountability difficult. And a lack of access to data makes it "impossible" to actually assess the prevalence of disinformation on platforms, and assess the "effectiveness" of measures adopted by platforms to address disinformation (Khan, 2021, p. 17). Notably, Article 40 DSA is a ground-breaking provision on data access. There are two main angles. First, under Article 40(1), VLOPs are required to provide the European Commission, at its "reasoned request," access to data that are "necessary to monitor and assess compliance with this Regulation." This access to data is linked to the systemic risks provisions and may include data "necessary to assess the risks and possible harms" brought about by VLOPs' systems (DSA, Recital 96).

Second, not only does Article 40 allow access to data by the European Commission, but it also crucially allows in certain circumstances for researchers to access platform data. Thus, under Article 40(4), VLOPs "shall," in principle, provide access to data to "vetted researchers," upon a "reasoned request" from the national DSC of establishment, for the "sole purpose of conducting research that contributes to the detection, identification and understanding of systemic risks" under Article 34 DSA, and to the "assessment of the adequacy, efficiency and impacts of the risk mitigation measures" under Article 35 DSA. Notably, under Article 40(8), it is the national DSC that will grant the status of "vetted researchers," a contested notion as noted by Leerssen (2021). The provision lays down a number of criteria, including that a researcher is "independent from commercial interests," "capable of fulfilling the specific data security and confidentiality requirements," and "their application demonstrates that their access to the data and the time frames requested are necessary for, and proportionate to, the purposes of their research" (DSA, Article 40(8)). Thus, vetted researchers will be able to access data from VLOPs for the sole purpose of conducting research into the systemic risks and mitigation measures under Articles 34 and 35. Given how disinformation is considered a central contribution to systemic risks under Article 34, Article 40 DSA may allow independent scrutiny of the prevalence of, and engagement with, disinformation on VLOPs. Of note, the European Commission (2024c) published a draft delegated act on data access under Article 40 DSA in late October 2024 (Albert, 2024; Vermeulen, 2024).

4. Regulatory Action Under the DSA Against Disinformation and the Impact of Freedom of Expression

The foregoing section sought to set out how the DSA's specific rules for VLOPs apply to disinformation, in particular the systemic risk provisions. A major final question on the DSA and regulating disinformation on VLOPs is how it will be enforced, and to this we now turn. Notably, and as mentioned before, it is not the national DSCs (Jaursch, 2023) that have the power to regulate VLOPs, but the European Commission that has "exclusive powers" to supervise and enforce Articles 34 and 35 on systemic risks (DSA, Article 56).

In this regard, the Commission is granted extensive powers under the DSA, including the power to submit a request for information to demand information from VLOPs relating to a "suspected infringement," where VLOPs can be fined for providing "incorrect, incomplete or misleading information" (DSA, Article 67(1)–(2)). Further, the Commission can impose "interim measures" targeting VLOPs "where there is an urgency due to the risk of serious damage for the recipients of the service" (DSA, Article 70(1)). The Commission has stated that this can include measures such as "increased monitoring of specific keywords or hashtags" by VLOPs (European Commission, 2025d). Ultimately, the Commission can issue non-compliance decisions against VLOPs for violating the DSA, and issue fines up to 6% of a VLOP's total worldwide annual turnover (DSA, Articles 73–74). We will now first set out the enforcement actions undertaken by the Commission thus far, after which we will make an assessment of how the DSA is being utilised to regulate disinformation, including responses from civil society organisations (CSOs), in light of freedom of expression.

4.1. Regulatory Action Under the DSA Against Disinformation

The Commission has been undertaking regulatory action under the DSA, specifically targeting disinformation. The first regulatory action taken by the Commission under the DSA concerning disinformation occurred in October 2023, following the Hamas attacks on Israel. The Commission sent high-profile public correspondence to four VLOPs, namely TikTok, Meta, X, and YouTube, over disinformation related to the Hamas–Israel conflict. The Commission stated it had "indications" these platforms were being used to disseminate inter alia "disinformation in the EU" and sought to set out the "very precise obligations" under the DSA (Breton, 2023). The Commission noted that VLOPs must "diligently" enforce their terms and conditions, and must put in place "proportionate and effective mitigation measures to tackle the risks to public security and civic discourse stemming from disinformation" (Breton, 2023). The Commission noted there were many reports of fake and manipulated images and facts circulating on these platform(s) in the EU, "such as repurposed old images of unrelated armed conflicts or military footage," which the Commission considered appearing as "manifestly false or misleading information" (Breton, 2023). Certain VLOPs were invited to "urgently ensure" their systems were "effective," and report on measures taken to the Commission. Additionally, VLOPs were invited to "be in contact with relevant law enforcement and Europol" and "ensure that [they] respond promptly to their requests" (Breton, 2023). Of particular note, the Commission requested a response within 24 hours and warned that responses would be included in an "assessment file" on "compliance with the DSA," and that "following the opening of a potential investigation and a finding of non-compliance, penalties can be imposed" (Breton, 2023).

Following this, the Commission sent requests for information under Article 67 DSA to TikTok, Meta, and X over disinformation. Notably, the Commission stated it had "indications" of the "alleged spreading" of inter alia "disinformation," and noted X as a VLOP had an obligation under the DSA to mitigate risks related to the dissemination of disinformation (European Commission, 2023c, p. 1). Again, concerning its formal request to Meta, the Commission stated it required information specifically on measures taken to comply with obligations with regard to "mitigation measures" with regard to dissemination and amplification of disinformation (European Commission, 2023d). The Commission noted for both VLOPs that it could "impose fines for incorrect, incomplete or misleading information in response to a request for information" and "failure to reply by the deadline could lead to the imposition of periodic penalty payments" (European Commission, 2023c, p. 2, 2023d). And following the request for information, the Commission in December 2023 opened formal proceedings against X. This revolved inter alia around "the effectiveness of measures

taken to combat information manipulation on the platform," notably the effectiveness of related policies "mitigating risks to civic discourse and electoral processes" (European Commission, 2023e, p. 1).

Following the requests for information towards various VLOPs and opening of formal proceedings against X over disinformation, the Commission again engaged in further high-profile regulatory activity with X in August 2024 over disinformation. The correspondence was sent in relation to riots in the UK and a live-streamed interview on X between Elon Musk and US then-presidential candidate Donald Trump. The Commission stated that as a VLOP under the DSA, X was required to ensure:

> Proportionate and effective mitigation measures are put in place regarding the amplification of harmful content in connection with relevant events, including live streaming, which, if unaddressed, might increase the risk profile of X and generate detrimental effects on civic discourse and public security. (Breton, 2024, p. 1)

The Commission also mentioned examples of "public unrest brought about by the amplification" of content including "certain instances of disinformation" (Breton, 2024). Notably, the Commission also stated that:

> We are monitoring the potential risks in the EU associated with the dissemination of content that may incite violence, hate and racism in conjunction with major political—or societal—events around the world, including debates and interviews in the context of elections. (Breton, 2024, p. 1)

Finally, the Commission would be "extremely vigilant to any evidence that points to breaches of the DSA and will not hesitate to make full use of [its] toolbox, including by adopting interim measures, should it be warranted to protect EU citizens from serious harm" (Breton, 2024, p. 1).

Now that we have an overview of the enforcement activities from the Commission revolving around disinformation, we will analyse this from a critical, fundamental rights perspective focusing on freedom of expression, including responses by CSOs.

4.2. DSA Regulatory Measures in Light of Freedom of Expression

The Commission's regulatory activity as described in Section 4.1 has been quite controversial with considerable criticism from CSOs invoking freedom of expression principles. Indeed, 28 CSOs signed an open letter criticising the Commission's correspondence over disinformation related to the Hamas-Israel conflict. The organisations criticised the Commission over its "false equivalence between the DSA's treatment of illegal content and 'disinformation'", "the focus on the swift removal of content," and that "the DSA does not impose an obligation on service providers to 'consistently and diligently enforce [their] own policies'" (Access Now, ARTICLE 19, AlgorithmWatch et al., 2023, p. 2). Indeed, the organisations noted that "State pressure to remove content swiftly based on platforms' terms and conditions leads to more preventive over-blocking of entirely legal content" (Access Now, ARTICLE 19, AlgorithmWatch et al., 2023, p. 2). The criticism voiced by these organisations is reflected in the text of the DSA, which does not contain explicit deadlines on when content must be removed.

Further, following the Commission's regulatory correspondence over the UK riots and Trump's interview on X, civil society accused the Commission of using the DSA as a "pressure tool against online platforms during politically sensitive times and periods of high media attention" (Access Now, ARTICLE 19, & Electronic Frontier Foundation, 2024). CSOs also pointed towards the fact that both the interview and the riots took place outside the EU, and that while such events "may certainly lead to serious negative consequences" within the EU, they were concerned that the Commission's correspondence "does neither specify whether or how" the UK events "have reached the threshold of systemic risks within the EU nor explain why" the interview broadcast required "'effective mitigation measures' in the EU" (Access Now, ARTICLE 19, & Electronic Frontier Foundation, 2024). It was furthermore "entirely unclear what ex-ante measures a VLOP should take to address a future speech event" such as this single interview "without resorting to general monitoring and disproportionate content restrictions" (Access Now, ARTICLE 19, & Electronic Frontier Foundation, 2024). Finally, the CSOs called on the Commission to abstain from "generally demanding content-specific restrictions in the context of the systemic risk assessment and mitigation provisions," and "strongly" recommended that the Commission provide "more clarity" on its understanding of systemic risks under the DSA, including the "granularity of required evidence" VLOPs must follow when assessing if their systems and processes pose risks to "public discourse" (Access Now, ARTICLE 19, & Electronic Frontier Foundation, 2024). Indeed, the former UN Special Rapporteur on freedom of expression even went so far as to state that the conduct of the then-European Commissioner responsible for enforcement of the DSA had shown the DSA "can be abused" and "may have legitimized politicization of the DSA in ways that could be used to limit public debate" (Kaye, 2024). These critiques by civil society and international experts have also been reflected in the literature, where warnings about the dangers associated with the Commission as the enforcer of the DSA had been raised as the DSA was enacted, given how highly politicised content moderation can be in practice (Buri, 2023).

Finally, it should be recognised that the Commission's regulatory activity targeting VLOPs over disinformation may raise questions under Article 10 ECHR. In this regard, the ECHR has held that certain written warnings issued by public authorities may constitute an interference with freedom of expression, especially where it was mentioned that "a failure" to heed a warning "could result in liability" (*Karastelev and Others v. Russia*, 2020, para. 74). Crucially, the underlying legislation establishing the basis for the interference "must afford a measure of legal protection against arbitrary interferences by public authorities" with the right to freedom of expression in order for that legislation to meet the requirement of "prescribed by law" (*Karastelev and Others v. Russia*, 2020, para. 79; *Rid Novaya Gazeta and Zao Novaya Gazeta v. Russia*, 2021, para. 72). The Court has noted that, in the case of *Karastelev and Others v. Russia* (2020), "clear criteria" were absent, which lead to uncertainty. This uncertainty in turn "adversely affected the foreseeability of the regulatory framework" and led to the framework being "conducive to creating a negative chilling effect on freedom of expression," and leaving "too much discretion to the executive" (*Karastelev and Others v. Russia*, 2020, para. 90). Similarly, the Court found it "reasonable to assume" that "having recourse" to a "caution procedure" under legislation was "designed to have a non-negligible chilling effect directly affecting freedom of expression" (*Rid Novaya Gazeta and Zao Novaya Gazeta v. Russia*, 2021, para. 62). The Court found that a caution issued by a regulator "must have had a chilling effect" on the applicants' "freedom of expression because it warned them against covering certain matters (in a certain manner) or reproducing specific materials." (*Rid Novaya Gazeta v. Russia*, 2021, para. 62). Crucially, these Article 10 ECHR principles do raise a question mark over whether the DSA adequately sets boundaries on the European Commission's regulatory approach to disinformation under the systemic risks provisions.

5. Conclusion

This article has focused on the regulation of disinformation under the DSA, and some final points can be put forward. First, because of the DSA's notably broad definition of illegal content, the DSA's obligations placed on online platforms in relation to illegal content can be utilised to have disinformation removed when it comes within the definition of illegal content under national legislation. This demonstrates how the DSA can be instrumentalised in the removal of disinformation on platforms. Second, a crucial point about the regulation of disinformation under the DSA is that not only does the DSA facilitate the removal of disinformation, at the same time, it also seeks to protect individuals whose content has been removed because it is considered disinformation by platforms. In this regard, the DSA has a double-edged-sword approach to the regulation of disinformation: On the one hand, it facilitates the removal of disinformation, and on the other hand, it seeks to protect a user's freedom of expression when content is removed for being qualified as disinformation. Third, while disinformation is not mentioned in the DSA's provisions, the systemic risk provisions under Articles 34 and 35 are the most applicable to tackling disinformation. Notably, while these provisions do not mandate that platforms remove disinformation, most of the removal of disinformation is occurring under the 2022 Code, which is inextricably linked to the DSA and its risk-mitigation measures under Article 35. It is a crucial lesson to be learned that the DSA's regulation of disinformation cannot be read in isolation from the 2022 Code. Finally, the Commission has clearly opened a salvo against VLOPs based on tackling disinformation, but there are potential warning signs that need to be heeded to ensure that freedom of expression is adequately protected. In this regard, this article has sought to highlight how the Commission's regulatory action may need to better align with the right to freedom of expression, especially in providing sufficient guardrails for how the Commission conducts its regulatory approach to disinformation under the DSA's systemic risks provisions.

Conflict of Interests
The authors declare no conflicts of interest.

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About the Authors

Ronan Ó Fathaigh is an assistant professor at the Institute for Information Law (IViR), Faculty of Law, University of Amsterdam.

Doris Buijs is a former junior researcher at the Institute for Information Law (IViR), Faculty of Law, University of Amsterdam.

Joris van Hoboken is a full professor at the Institute for Information Law (IViR), Faculty of Law, University of Amsterdam. At IViR, he is appointed to the chair information law, with special emphasis on law and digital infrastructure.

ARTICLE

Regulating Disinformation and Ideological Entrepreneurs: An Exploratory Research on the Digital Services Act Implementation

Sara Monaci and **Simone Persico**

Inter-university Department of Regional and Urban Studies and Planning, Politecnico di Torino, Italy

Correspondence: Sara Monaci (sara.monaci@polito.it)

Abstract

The introduction of the Digital Services Act (DSA) by the EU marks a fundamental step in the governance of social media platforms, by outlining content-moderation guidelines aimed at preventing disinformation and the systemic risks related to the "business of polarization" for the digital public sphere (Geese, 2023). According to others (Husovec, 2023b), DSA is an ambitious legal framework that must be tamed in consideration of the priorities of different stakeholders: platforms, legislators at the European and national level, journalists responding to the challenges of fact-checking, and citizens entitled to participate in a safe and non-discriminatory public sphere. Thanks to a critical approach (Van Dijck, 2021; Zuboff, 2019), the article discusses how platforms manage controversial political influencers: the ideological entrepreneurs. From the point of view of the empirical analysis, the essay identifies ambiguities in the DSA text that neither clarify the role of ideological entrepreneurs nor explicitly outline the concept of disinformation. Furthermore, a longitudinal analysis (18 months) of the content moderation measures implemented in compliance with the DSA and accessible thanks to the DSA Transparency Database, shows that social media platforms tend to privilege temporary measures such as accounts suspension, rather than more effective actions such as deplatforming (Van Dijck et al., 2023). This reflects ongoing tensions in the regulation of digital services, especially when balancing innovation in governance with the protection of the democratic information environment. As a result, the article highlights a double-standard policy adopted by platforms towards the influencers: On one side they actively contribute to feeding the flow of disinformation and fake news, but on the other hand, they enable platforms to generate visibility and traffic, thus reinforcing the "business of polarization" typical of surveillance capitalism.

Keywords

content moderation; Digital Services Act; disinformation; ideological entrepreneurs; platform governance; social media

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1. Introduction

Various scholars have argued that Meta, X, and Google cannot be considered mere media infrastructure or platforms but, rather, moderators and gatekeepers of content, emphasizing their centrality in mitigating risks related to the spread of fake news, conspiracy theories, and extremist propaganda (Gillespie, 2018; Jeppesen et al., 2022). Others have identified the role of platforms in the context of an articulated digital ecosystem, where, in addition to Big Tech, different actors intervene: legacy media in their online assets, fringe platforms, prosumers, content creators, and influencers of various kinds (Zuckerman, 2021). These actors variously contribute to disinformation, which on one hand pollutes public debate and on the other hand can represent a stream of content that is easily disseminated and monetized (Braun & Eklund, 2019). By disinformation we mean "intentional falsehoods spread as news stories or simulated documentary formats to advance political goals" (Bennett & Livingston, 2018, p. 124). According to this definition, different actors play a crucial role, either through algorithmic means or deliberate actions, in fueling disinformation flows in the digital ecosystem. Thus, disinformation may result in a specific dimension of the platformization process as part of "the oxygen and carbon dioxide that feed the ecosystem of platforms" (Van Dijck, 2021, p. 2805). A more radical perspective is that of Shoshana Zuboff (2019), who identified the sovereignty of dominant platforms as essential to understanding power relations in the current digital ecosystem. The legitimacy of sovereignty lies in the instrumentalizing power and ability of platforms to exploit the accumulation of data as a knowledge base from which to extract predictive models of user behaviour. In relation to the governance of disinformation, the guiding principle of platform sovereignty is inspired by a radical indifference to the first text—social communication that also includes the business of viral disinformation—and tight control over the accumulation of data that represent the real capital to be defended in every way. According to Zuboff (2019), therefore, dominant platforms play an ambiguous role in the governance of disinformation: On the one hand, they transpose—eg., through their own term of service (ToS)—the regulations, codes of conduct, and procedures capable of contain the systemic risks of the digital public sphere; and on the other hand, they enable content moderation practices capable of balancing the risks of the dissemination of illegal or harmful content, with the profit goals given by the accumulation of data.

Also in response to Big Tech ambivalence in the governance of the digital public sphere, the European Commission introduced in October 2022, the Digital Services Act (DSA; Regulation of the European Parliament and Council of 19 October 2022, 2022): An ambitious and complex regulatory framework that aims to determine how platforms should intervene in the moderation of content deemed illegal or harmful to the digital public sphere (European Commission, n.d.-b). The DSA's guidance also affects the ToS of individual platforms, which should incorporate European regulatory guidelines. Two years after its entry into force, however, one finds in its implementation the basic ambiguity mentioned earlier, especially in relation to the management of problematic and influential profiles such as prominent public figures (eg., Donald Trump) or ideological entrepreneurs: political influencers and "deranged activists, rabid and paranoid haters, conspiracy theorists who operate refreshed by a self-segregated echo chamber of talk radio, television news and the Internet" (Avlon, 2010, p. 2). According to Van den Bulck and Hyzen (2020), ideological entrepreneurs on the margins of institutional political debate, play a key role in times of rapid change at the political and ideological levels, that is, times in which individuals become more amenable to alternative interpretations to make sense of an increasingly complex present. Controversial public figures, such as Alex Jones, Andrew Tate, and Laura Loomer have emerged in recent years as active spokespersons for conspiracy

theories in relation to, for example, Covid-19 or to new representations of patriarchy. They do not elaborate new value systems or prejudices; they are entrepreneurs of existing ideologies to the extent that they are able to actualize them, reframe them, and make them capable of explaining a complex social reality in a simple way. As ideological entrepreneurs, they compete in a market where attention and popularity are of strategic value, while the cost to be borne is a systematic and obsessive activity of interaction and reinforcement with respect to their followers through posts, live streaming, and a pervasive multi-platform presence. Such assiduity makes them ideological entrepreneurs of disinformation, capable of feeding streams, interactions, and ultimately valuable data for surveillance capitalism. What ideological entrepreneurs have in common is the dissemination of conspiracy theories, fake news, or hyper-partisan views, such as those in favour of the return of an ideology of "lost masculinity" (Haslop et al., 2024). They often position themselves at the conservative and populist alt-right side of the political spectrum, but in most cases, they are entrepreneurs of strategically crafted positions capable of intercepting niches of audiences not yet manned (Rogers, 2020; Siapera, 2023).

The next section explores how major platforms have handled influential and problematic profiles in the recent past and what critical issues and ambiguities can be inferred. Section 3 then focuses on the DSA guidelines related to content moderation, while the methodological Section 4 offers empirical evidence showing that both the text of the regulation and its practical implementation, present ambiguous aspects, especially regarding how platforms balance the costs and opportunities of disinformation.

2. The Governance of Controversial Profiles and Ideological Entrepreneurs

An exemplary case of platform ambivalence is that of Donald Trump. Some commentators believe that the success of his 2016 election campaign, characterized by aggressive tones and fake news, is intertwined with the success and expansion of X (previously Twitter), which established itself just then as the world's leading platform for political debate (Courty, 2024). Following the events on Capitol Hill on January 6, 2021, and based on charges of fomenting hatred and violence by the attackers, Trump's social profile was removed from X, Facebook, Instagram, YouTube, TikTok, and Twitch (Di Salvo, 2021). The censorship of the leader of the West's largest democracy was a global event that underscored the sovereign role of platforms in undertaking unprecedented measures: They were no longer conceived as mere moderators of content but as the new guardians of free expression (Macedo, 2022). Trump's social censorship, however, did not prevent thousands of other less popular profiles from feeding the streams of viral disinformation through QAnon conspiracy theories and misogynist and xenophobic stances. In fact, several studies have shown that deplatforming (the temporary or permanent suspension of a social profile from a platform) had a significant effect, for example, on Facebook and Instagram but a limited impact on X and YouTube, which remained privileged channels for alt-right conspiracists (La Gatta et al., 2023). As a paradigmatic outcome of the parable of censorship invoked by many, Donald Trump's profile was rehabilitated by X in 2023. In fact, its new owner Elon Musk declared that the X platform positioned itself too far to the left in political debate, thus justifying the reinstatement of the former president responsible for provoking a coup d'etat in which five people lost their lives (Campbell, 2022).

Alongside eminent figures, several ideological entrepreneurs have been the subject of moderation measures by platforms. One such figure is Alex Jones, an agitator of the American conspiratorial right who, with his news profile Infowars, has three million followers on X. Another controversial influencer is Andrew Tate (Cobratate

on X with 9.1 million followers), who promotes his personal University of Life based on avowedly misogynistic values and principles inspired by the unscrupulous pursuit of wealth (Sayogie et al., 2023). Also, Laura Loomer is worth noticing: a popular Covid-19 denier and former Republican congressional candidate. Following the campaign against the alt-right waged by major social platforms between 2018 and 2019 (Rogers, 2020), the social profiles of Alex Jones and Laura Loomer were removed (see "Deplatforming," 2024) from Facebook and X on charges of spreading extremist, misogynistic, discriminatory, and disinformative content about the Covid-19 pandemic. Andrew Tate's (https://x.com/Cobratate) profile did not overtly position himself in the alt-right camp but played on values related to self-manhood (Haslop et al., 2024) and an idea of masculinity to be preserved and defended at all costs. He escaped the first wave of moderation, but his social media profile was removed in 2022, following his arrest in Romania on charges of rape, human trafficking, and forming an organized criminal group for the sexual exploitation of women.

Despite the ban, the three profiles have established themselves as ideological entrepreneurs in just a few years: They cater to all kinds of niche political tastes at low cost, garnering potentially high rewards in terms of visibility and monetization from their audience of loyal and proactive followers. For example, between 2022 and 2023, Andrew Tate ran a number of paid platforms, first Hustler's University and then Real World Order, offering users instructions and manuals for earning money without working in the traditional sense, through means such as cryptocurrencies and networked trading platforms. The initiatives were promoted through multilevel marketing campaigns, later deemed illegal, which used major social platforms as a sounding board (Das, 2022). In January 2024, an analysis by the Center for Countering Digital Hate reported that Real World Order had generated 450 million views and that through this traffic, YouTube had earned up to £2.4 million from advertising through Tate's content ("YouTube rakes in millions," 2022). Another channel that shared content earned nearly 300 million views after circumventing social media bans by using affiliate marketing schemes (Oppenheim, 2024). In addition to the core platforms, the profiles analysed strategically articulated their presence in fringe environments, such as Rumble, Bitchute, and Roku, where a more tolerant governance of free expression allowed them to strengthen their hyper-partisan base of followers. Following the ban from the main platforms, marginal environments have become the more ideal context in which to maintain and strengthen ties with their audiences (Rogers, 2020). In the case of Andrew Tate, it was precisely because of his popularity that Rumble became the most widely used application in the Apple store in 2022 (Wilson, 2022).

Recently, as in the case of Trump, the profiles of Infowars (https://x.com/infowars) and Alex Jones (https://x.com/RealAlexJones), Andrew Tate (https://x.com/Cobratate), and Laura Loomer (https://x.com/LauraLoomer) were rehabilitated by X. Similarly, Facebook rehabilitated those of Alex Jones (https://www.facebook.com/profile.php?id=61558340987539) and Andrew Tate (https://www.facebook.com/OfficialHU4), who currently has a private profile. Currently, Alex Jones's X profile and his Infowars column are back in full operation, despite accusations of conspiracy and incitement to racial hatred levelled against the ideological entrepreneur from multiple parts.

In the parabola of deplatforming/replatforming profiles, hitherto entirely the preserve of the ToS of dominant platforms, the introduction of the DSA could mark a crucial step. This will depend a great deal on how the regulation is transposed into the practice of content moderation by platforms. The next section discusses the DSA and its possible implications.

3. The Tools of Governance: the DSA

After years of negotiation at the European level, the DSA was enacted in October 2022. It defines specific goals, procedures, and actions to curb the dissemination of illegal content that can pose systemic risks to the digital public sphere. Furthermore, it outlines a governance structure articulated at the European and national levels and it actively involves citizens and non-governmental organisations. According to Geese (2023), the DSA represents a fundamental regulatory breakthrough that challenges the inevitability of surveillance capitalism. If the size of platforms, their financial power, and their ability to influence public opinion seemed to make attempts at regulation impossible or ineffective, today, the DSA represents an end to this status quo: The time when platforms were "too big to be regulated" is over (Geese, 2023, pp. 66–67). The author has also argued that the DSA will end the influence of those "authoritarian regimes (e.g., Italy's) fuelled by the very business of polarization" on X, Facebook, and YouTube. Other researchers have expressed more cautious positions. According to Husovec (2023a), the DSA should be understood in an evolutionary sense; it is an ambitious regulation, with the potential to become an instrument that balances the economic interests of big technological players, the aims of member state regulators oriented towards the protection of a safe and reliable digital public sphere, and the priorities of citizens who must be guaranteed the rights to freely express their opinions and to act in a digital environment safe from violence, discrimination, and scams. In light of the aim of this legislation and the significant impacts it will have on the digital public sphere in the years to come, this essay questions its potential in managing disinformation and how its implementation can obviate ambiguities related to the governance of ideological entrepreneurs. The essay thus seeks to answer the following research questions:

RQ1: How and by what measures does the DSA address the issue of disinformation and the governance of ideological entrepreneurs?

RQ2: How are these measures implemented by the platforms in accordance with the DSA?

RQ3: Do the steps taken mark a change from the ambiguities of the platforms?

4. Methodology

Methodologically, the article uses a theoretical and empirical approach and is divided into two sections. Section 4.1 describes—through an analysis of the text of the regulation—the main measures intended for content and profile moderation by platforms, with the aim of understanding whether and how the issue of influential profiles is covered by the text of the law. Section 4.2 examines two distinct dashboards employed for extracting information, which will be analyzed in the context of the preceding discussion. These dashboards are as follows:

- The DSA Transparency Database (European Commission, n.d.-a): An institutional platform providing access to information regarding the content moderation measures implemented by platforms following the enactment of the DSA.
- CrowdTangle (CrowdTangle Team, 2022): A dashboard owned by Meta that facilitates the analysis of various popularity metrics, including the volume of comments associated with controversial profiles.

The final goal of this approach is to investigate whether and the extent to which the temporary deplatforming (Van Dijck, 2021) of ideological entrepreneurs has been an effective containment measure or whether this has contributed to their popularity.

4.1. The DSA and Risk Mitigation Measures: Profiles or Content?

Articles 34 and 35 of the DSA (Regulation of the European Parliament and Council of 19 October 2022, 2022) are the key references for understanding the kind of content around which platforms should take action and the corresponding measures in the governance of disinformation. The concept of "systemic risk" is the basis of Art. 34 and describes the dissemination of illegal content (Art. 34(1a)): any real or foreseeable adverse effects on the exercise of fundamental rights that affect the dignity of individuals, respect for private and family life, protection of personal data, freedom of expression and information, media pluralism, non-discrimination, and the rights of children and minors and consumers (Art. 34(1b)); any current or foreseeable negative impacts on civic debate and electoral processes as well as public safety (Art. 34(1c)); any current or foreseeable negative impacts in relation to gender-based violence, the protection of public health and minors, and serious adverse consequences for the physical and mental well-being of the person (Art. 34(1d)).

Nowhere in the articles is the concept of disinformation mentioned. The term is used in reference to risks related to "inauthentic coordinated behavior" (Giglietto et al., 2019, p. 13), that is, the use of automated systems to spread disinformation or illegal content (Article 34(2)). The DSA does not consider disinformation per se, considered by some to be a legally ambiguous concept (Husovec, 2023a) with respect to illegal content, but focuses on "systemic risk" as a relevant dimension. The Commission (European Commission, 2022, paras. 103–106 of the general provisions), therefore, encourages platforms to define the term from scratch or adhere to existing codes of conduct in line with the DSA—in particular, the strengthened version of the June 2022 Code of Practice on Disinformation. At the time of writing, almost all major social platforms were adherents to the 2022 code except for a few players, such as X. It is also noteworthy that the code of conduct, signed by platforms on a voluntary basis, unlike the DSA, does not provide for sanctions for non-compliance.

Regarding the risk mitigation measures that platforms should undertake in compliance with the DSA, the principle is one of "notice and action." The actions regulated by Article 35, include content removal, visibility restriction (demotion or shadow banning), demonetization, and more radical measures, such as permanent suspension or termination of services or profiles (deplatforming). In connection with the handling of controversial profiles, in addition to the text of Article 35, it is interesting to recall the text of Article 23, "Measures and Protection against Misuse": "Providers of online platforms shall suspend, for a reasonable period of time and after having issued a prior warning, the provision of their services to recipients of the service that frequently provide manifestly illegal content" (Regulation of the European Parliament and Council of 19 October 2022, 2022, p. x)

The article identifies profile suspension as the main action, if motivated by objective causes, to an extent and in a manner proportional to the quantity, systematicity, and seriousness of the illegal content posted by the profile after having verified the user's intentions. Such sanctions must be incorporated into the ToS of platforms through clear examples of illegal use, and the timing of the suspension must also be indicated. Thus, in reiterating the concept of temporary suspension or deplatforming, the DSA sanctions interim

measures towards profiles guilty of wrongdoing. Here the issue of influential profiles is not relevant: the ability to influence public opinion is referred to very large online platforms (such as X, TikTok, Facebook, etc.), recommender systems, or automated interfaces capable of autonomously generating content potentially risky; this prerogative is never referred to popular profiles or influencers active in the promotion of services and products. The regulations moderate profiles that objectively publish illicit content but it does not cover the dimension of influence. While this shields the DSA from accusations of interfering with and restricting citizens' rights of free expression, it leaves ample room for the dynamics and drifts of influence culture. Such effects have been highlighted, for example, in the role of marketing influencers in pretextually promoting products and brands. In this case, while the content is not illegal, it involves promotional messages reframed in the form of daily storytelling, with millions of followers (Duivenvoorde & Goanta, 2023). As Duivenvoorde and Goanta point out, however, there is a blurred distinction between an advertising message and a common post, and the DSA does not provide specific measures for profiles with a large following.

In the sphere of public debate, the difference between deliberate disinformation and personal opinion is even more problematic, as is the appropriateness of defining measures to limit its influence. So how do the DSA guidelines translate into objective implementation?

4.2. DSA Transparency Database and Crowdtangle

The DSA Transparency Database is a tool provided by Article 17 of the DSA, with the aim of making readable and transparent the moderation actions taken by social platforms in compliance with the DSA. The archive, freely accessible online, presents a detailed and systematically updated account of the actions provided for in Article 35 and the statements of reasons (SoRs; Art. 17) related to the measures initiated.

In view of the purposes of this research, the analysis looked at content moderation actions taken over a 26-month period (from February 20, 2022, the date of publication of the Transparency Database, to April 24, 2024) by major social platforms, specifically Facebook, Instagram, LinkedIn, Pinterest, Snapchat, TikTok, X, and YouTube. Here, an analysis is conducted of the SoRs of the DSA, the reasons for content moderation actions declared by platforms, with the aim of defining how and to what extent these practices have involved the profiles or content considered at risk. The total number of initiated actions and the related SoRs amounted to 966,442,879 (Figure 1).

Using the CrowdTangle dashboard, we processed references to three main individuals (Alex Jones, Andrew Tate, and Laura Loomer) using the profile names (and/or their podcasts) as search queries on CrowdTangle to identify mentions to them in public posts on Facebook. We considered a period of time that takes into account the previous 12 months and the following 12 months from the removal date of social profiles. The data processed with CrowdTangle thus represent the digital footprint that the public profiles had and continue to have before and after their accounts were removed (Innes & Innes, 2023).

The term digital footprint refers to the retrievable traces of online activity on a network, which can constitute information about a person or organization (Weaver & Gahegan, 2007). In line with Rogers (2018), this is a vanity metric, that is, a measure of popularity. In other words, CrowdTangle allowed us to analyse whether the volume of subject-related posts had increased or decreased as a result of deplatforming by Facebook and X. The digital footprint calculation considered the number of interactions, posts, and posts in
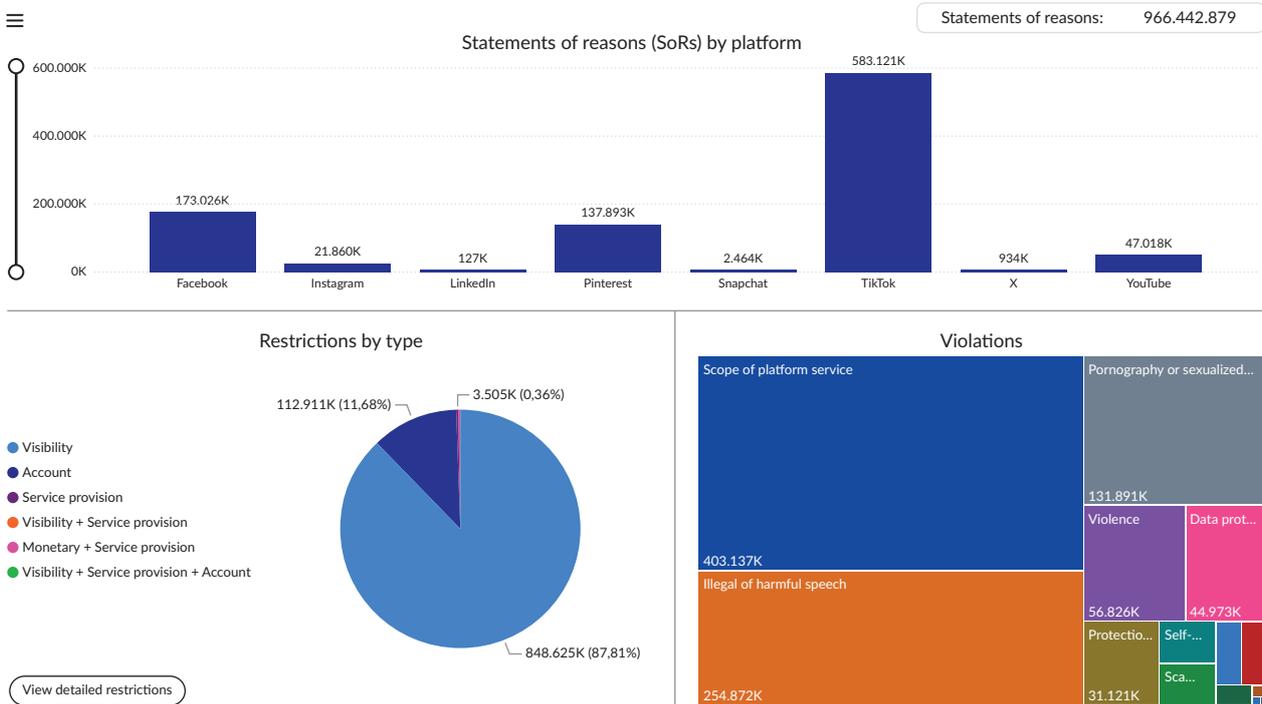
Figure 1. The total number of actions initiated and the related SoRs. Source: European Commission (n.d.-a).

overperforming; since the subjects had been removed from Facebook, none of the mentions following removal came from their social profiles. Interactions were calculated as the sum of comments, reactions, and shares. However, CrowdTangle does not consider reach (number of distinct users to have seen the post), impressions (total number of views of the post), and clicks (number of times users clicked on the post). The number of posts quantitatively indicates content that possesses references to the subjects under analysis and was used as a metric to further investigate the concept of overperformance. The overperformance index weighs the number of interactions with a particular post in relation to the average number of interactions with previous posts from the same page/group/profile. It indicates how well a post is exceeding expectations in terms of profile interaction.

The two dashboards were used synergistically to develop the discourse articulated in Section 5.

5. Results and Discussion

Here we discuss the actions taken by very large online platforms in moderating public debate and actions directed towards profiles, such as account suspension or permanent termination. We note the prevalence of actions towards TikTok (580 million), followed by Facebook (173 million), then Pinterest, YouTube, and X. Regarding the types of violations, those referring to the scope of platform service prevailed over others, with more than 400 million items indicating violations to the ToS of platforms, independent of the DSA guidelines. Violations represented by harmful or illegal content stood at 254 million, with abuses for disseminating pornographic or sexually oriented content coming in third, with more than 131 million items.

Illegal or harmful content occurred to varying degrees: on Facebook, for example, the volume of violations related to such content was only about 10% of all motivated violations, but it was significantly higher on TikTok, Instagram, and LinkedIn (Figure 2).
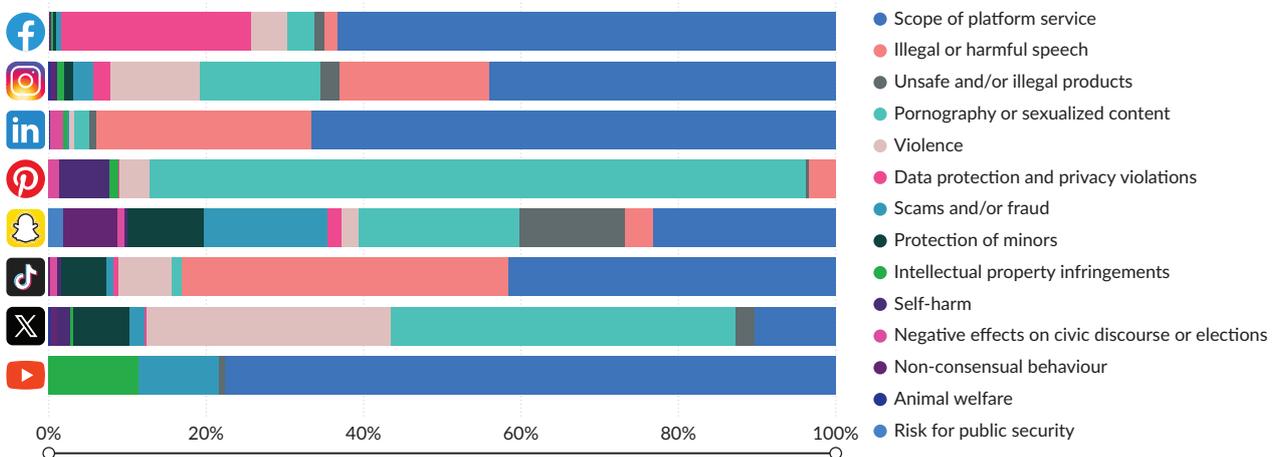
Figure 2. Violations sorted by platform and type. Source: European Commission (n.d.-a).

Note how this type of violation was irrelevant in relation to X, the most active platform from the perspective of political debate. In relation to violations related to pornographic content, Pinterest was the most represented social platform (Figure 3), with 83% of SoRs, followed by X (43%), Snapchat (20%), and Instagram (15%).
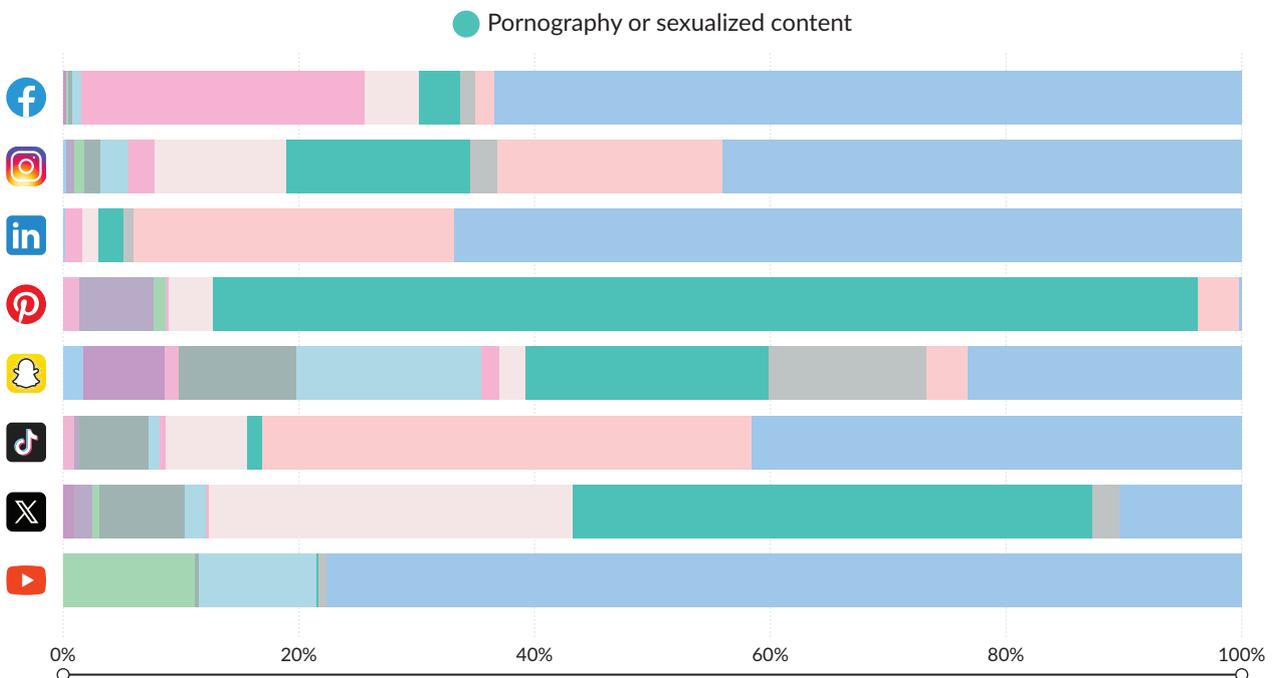
Figure 3. Focus on violations related to pornographic content. Source: European Commission (n.d.-a).

Figure 4 shows the sources of the reasons: i.e., based on what type of reporting the platforms moderated the content. Among those reported were as follows:

- Voluntary initiatives: platforms decide independently to adopt restrictive measures;
- Article 16 of the DSA, which provides for a process of immediate notification and action by platforms following a report by those specified in the statutory text;
- Other types of notifications could be initiated by parties outside the platforms (but acting as third parties on contract in content moderation), including third-party companies that performed moderation activities on behalf of the platforms;
- Trusted flaggers, that is, certified flaggers: figures provided by the DSA included these flaggers as competent in identifying and reporting illegal content (Art. 22 of the DSA).

In summary, the sources of the reasons for restrictions on illegal content refer minimally—in only 22% of cases—to Article 16 of the DSA (i.e., the notification and action process) and not to reports from trusted flaggers. Most of the actions were taken because of "other types of notifications" that may refer, albeit not explicitly, to the categories described above. Moreover, in many cases (see Figure 4, bottom right section), moderation actions were determined by the platforms' algorithms.

The graph in Figure 5 shows the type of measures taken and the considerations anticipated in the previous section. It shows that in most cases, the moderation measures taken were not aimed at profiles but at removing specific content or restricting visibility—more than 552 and 256 million cases, respectively. We note in third place "account suspension," which occurred 97 million times. This measure, involving ultimate deplatforming (that consists in disabling access to content plus the total termination of the account), was undertaken by social platforms 267 times (from more than 900 million actions) in more than two years of activity.
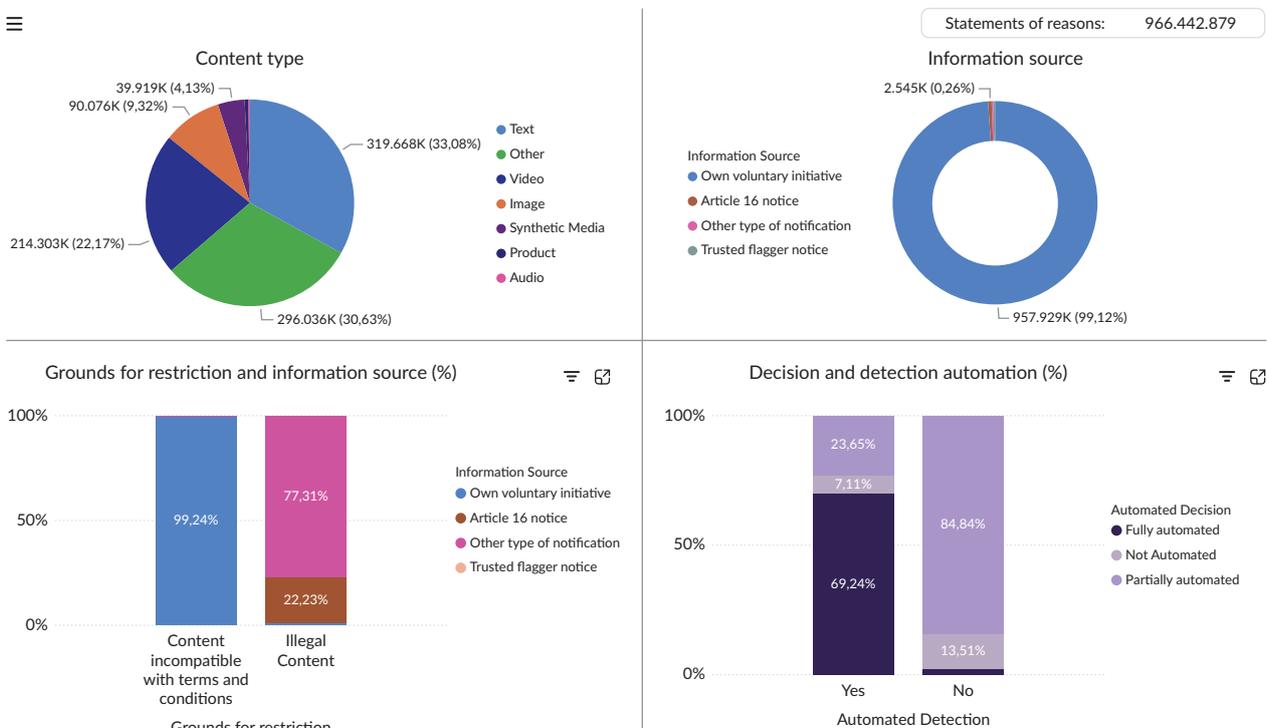
Figure 4. Dashboard which allows the exploration of information sources for the moderation measures taken. Source: European Commission (n.d.-a).

Statements of reasons by restrictions

Removal of content	552.015K
Other restriction visibility	256.303K
Suspension of the account	97.161K
Demotion of content	18.308K
Termination of the account	15.750K
Age restricted content	11.920K
Disabling access to content	8.926K

Other restriction visibility + Partial suspension of the pr...	228K
Other restriction visibility + Total suspension of the prov...	100K
Partial termination of the provision of the service	91K
Age restricted content + Other restriction visibility	39K
Age restricted content + Removal of content	5K
Other restriction visibility + Total termination of the provi...	5K
Disabling access to content + Total termination of the pr...	0

| Restrictions	Disabling access to content + Total termination of the provision of the service
Statements of Restrictions	267

0Mln   100Mln   200Mln   300Mln

Figure 5. Difference between the most frequently performed actions (green) and the least frequently performed actions (orange). Source: European Commission, (n.d.-a).

The analysis revealed that actions aimed at moderating profiles were concentrated in the area of temporary suspension. However, the expected duration or relationship regarding individual violations remained unknown. While the transparency database offers a detailed account of the actions taken by platforms, it does not report on the modalities of the measures. As described above, account suspension is an action under platforms' ToS aimed at mitigating the spread of disinformation by problematic profiles. The three profiles analysed (Alex Jones, Laura Loomer, and Andrew Tate) were subject to suspension for a significant period between 2018 and 2023.

What consequences has this suspension had on the popularity of ideological entrepreneurs? In view of these consequences, is it possible to say that the suspension measure was effective and could resolve the underlying ambiguity in the governance of disinformation?

With the aim of analyzing how and to what extent the suspension of influential accounts can contain the harmful effects of disinformation, the level of popularity of ideological entrepreneurs was taken into account to highlight whether their digital footprint had decreased or increased as a result of deplatforming.

In order to understand the effect of profile suspension on popularity, Table 1 shows the metrics calculated (using data from Crowdtangle) for the three ideological entrepreneurs in two separate periods, namely the year before and the year after their suspension from the main platforms.

The main evidence uncovered in this study was the high increase in the percentage changes on all the metrics considered for Andrew Tate (interactions +1,091.5%, posts +1,681.2%, and overperformance +1,430.5%). For Alex Jones, there was an increase in interactions (+62.2%) and a similar number of posts (−2.5%), which overperformed significantly better (+36.9%) in the post-ban period, suggesting that talking about Alex Jones following the ban "proved convenient" for the purpose of eliciting interactions. Finally, regarding Laura Loomer,

Table 1. Summary table of percentage variation (% VAR) in interactions (INT), posts, and the overperformance score (OvPer) of ideological entrepreneurs, before (<) and after (>) the ban date.

USER	BAN DATE	QUERY	INT <	INT >	% VAR	POST <	POST >	% VAR	OVPER <	OVPER >	% VAR
Andrew Tate (TateSpeech)	20 August 2022	Andrew Tate OR Tate Speech	1,189,105	14,168,380	1,091%	4,008	71,392	1,681%	619	9,474	1,430%
Alex Jones (Infowars)	6 August 2018	Infowars OR podcast Alex Jones	2,515,480	4,080,544	62.2%	25,157	24,538	−2.5%	4,092	5,600	36.9%
Laura Loomer	2 May 2019	Laura Loomer	1,168,200	252,359	−78.4%	6,324	4,130	−34.7%	1,214	884	−27.2%

there was a sharp decline in all metrics, with fewer interactions (−78.4%), fewer posts (−34.7%), and a negative change in overperformance (−27.2%).

The analysis shows that for at least two of the profiles (i.e., Alex Jones and Andrew Tate), there was a significant increase in posts. From this, we can infer an increase in the visibility and popularity of the subjects despite their period of censorship on Facebook, X, etc. This phenomenon is known in the literature as the "Streisand effect": on one hand, censorship can have the opposite effect, aggravating the ideological beliefs of the recipients. Rogers (2020), for example, examined some censored alt-right profiles and identified migrations to an alternative network of platforms used as a replacement for YouTube, Facebook, and X, one characterized by even more radical positions. On the other hand, the phenomenon also indicates, as Innes and Innes (2023) note, an increase in public posts on censored profiles because of the platforms' moderation efforts. This was observed in reaction to the deplatforming of two popular conspiracy theorists (David Icke and Kate Shemirani) during Covid-19 (Innes & Innes, 2023, pp. 1269–1275). In both cases, as with the ideological entrepreneurs Andrew Tate and Alex Jones, their popularity in public Facebook posts increased rather than decreased as a result of censorship.

6. Conclusions

In light of the effects of deplatforming ideological entrepreneurs, is it possible to say that such a measure is not only ineffective but may even contribute to increasing the popularity of the subjects involved?

The results of the CrowdTangle analysis, circumscribed to a limited number of profiles, are difficult to generalize to an overall assessment. However, there is evidence of an objective increase in the popularity of ideological entrepreneurs, and although it is not possible through a purely quantitative survey to identify the presence or absence of disinformation in the content related to them, it seems reasonable to infer that an increase in the visibility of hyper-shared profiles polarized on objectively controversial positions may also correspond to a greater dissemination of their ideas and opinions, that is, an increase in their influence in the informational disorder of the digital public sphere.

In response to RQ1 and RQ2, the DSA retains basic ambiguities: The text of the law focuses on content moderation but does not provide for specific actions towards influential and controversial actors who play a central role in the dissemination of uninformative or illegal content and can also benefit—in terms of popularity—from the temporary suspensions provided by the DSA.

There is clearly a paradox in content moderation (De Gregorio, 2020) between the generally stated objectives of the DSA to contain the systemic risks posed by the dissemination of illegal content on the one hand, and the pragmatic dimension of the law text on the other. While the objectives are clear and shareable, the actions in fact focus almost exclusively on content, circumventing some of the specific dynamics of social media that instead focus on profiles and influential individuals. As noted by the analysis of the text of the law, the concept of influence is not formally spelt out in any of the articles, nor are the related drifts such as virality phenomena with manipulative or propagandistic purposes: phenomena that are nevertheless at the heart of the communication dynamics of the platforms. The topic of influence is at most referred to the effects of inauthentic coordinated behaviour: that is, the outcomes of algorithmic manipulations or systems deliberately programmed to spread disinformation (bots, fake accounts, etc). There

is an obvious limitation here that circumvents serious problems that are inscribed in the context of influence culture (Arnesson, 2023; Banet-Weiser, 2012; Bennett & Segerberg, 2013) and its negative drifts related to political manipulation, ideological entrepreneurship, and propaganda: processes that refer to determined subjects and not algorithmic systems.

Finally, in response to RQ3—whether the measures taken contributed to a substantial change—the research highlighted several critical issues and advances the hypothesis (to be tested in future empirical investigations) that deplatforming is strategically used by platforms to respond to reports of wrongdoing in a timely manner, later reinstating the ideological entrepreneurs once their popularity has grown, also by virtue of the initial censorship. Once rehabilitated, they can continue to feed the social communication flows—and, ultimately, the data capitalism—on the strength of renewed popularity and a newly recognized public status. The latter point in particular highlights the present limits of the new regulatory environment inaugurated by the DSA: particularly the ambiguity of the concept of disinformation itself, which does not find a clear and agreed definition in the text of the law, the scope of the implementation of its measures, which proves to be a contested terrain between the text of the law and the priorities of the ToS of the individual platforms, and finally the overall opacity surrounding the ideological entrepreneurs' governance, whose role is, on the other side, at the core of the data capitalism pursued by dominant platforms.

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Conflict of Interests

The author declares no conflict of interests.

Data Availability

The data that support the findings of this study are available from the corresponding author, Sara Monaci, upon reasonable request.

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About the Authors

Sara Monaci, full professor in media and communication at Politecnico di Torino, researches the social impact of digital technologies, focusing on disinformation, extremism, and radicalization. She collaborates with the EU Knowledge Hub (2024–2028) and COST-Action DepolarisingEU. She is also the ICA GCSC Division international liaison officer.

Simone Persico, PhD candidate in urban and regional development at Politecnico di Torino, studies (dis)information and polarization on social media. With degrees in computer engineering and cinema and media engineering, his research combines computational social science and ethnographic methods using digital techniques.

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Reversing the Privatisation of the Public Sphere: Democratic Alternatives to the EU's Regulation of Disinformation

Alvaro Oleart [1] and Julia Rone [2]

[1] Department of Political Science, Université Libre de Bruxelles, Belgium
[2] Department of Political Science and Public Administration, Vrije Universiteit Amsterdam, The Netherlands

Correspondence: Julia Rone (j.e.rone@vu.nl)

Abstract

The emergence of social media companies, and the spread of disinformation as a result of their "surveillance capitalist" business model, has opened wide political and regulatory debates across the globe. The EU has often positioned itself as a normative leader and standard-setter, and has increasingly attempted to assert its sovereignty in relation to social media platforms. In the first part of this article, we argue that the EU has achieved neither sovereignty nor normative leadership: Existing regulations on disinformation in fact have missed the mark since they fail to challenge social media companies' business models and address the underlying causes of disinformation. This has been the result of the EU increasingly "outsourcing" regulation of disinformation to corporate platforms. If disinformation is not simply a "bug" in the system, but a feature of profit-driven platforms, public–private cooperation emerges as part of the problem rather than a solution. In the second part, we outline a set of priorities to imagine alternatives to current social media monopolies and discuss what could be the EU's role in fostering them. We argue that alternatives ought to be built decolonially and across the stack, and that the democratisation of technology cannot operate in isolation from a wider socialist political transformation of the EU and beyond.

Keywords

Big Tech; democracy; digital technology; disinformation; European Union; public sphere; social media

1. Introduction: Disinformation as a Feature (not a Bug) of Social Media Platforms

The emergence of social media platforms such as Facebook, Twitter (now X), or TikTok during the last decades has opened a wide political and regulatory debate about the role that these companies play in the

public sphere, and democracy more broadly. The internet and tech platforms are key mediators in the current circulation of ideas and provide the digital infrastructure of modern communication. As Bohman (2004, p. 133) predicted, the mediation of technology in public communication is "an essential condition for the existence of a public sphere in large and highly differentiated modern societies." However, Big Tech social media platforms are not "neutral" spaces through which communication flows circulate, but rather act as gatekeepers, making some actors and ideas more visible than others (Gillespie, 2018). This has become blatantly evident in Elon Musk's use of X, which he bought in 2022 and has since been used to boost Donald Trump's presidential campaign, becoming one of its most visible supporters. In 2024, we saw also open confrontations between X and the Brazilian government: After X refused to name legal representatives in Brazil and to remove profiles associated with disinformation and spreading hate speech, the Brazilian supreme court suspended the social media's service in the country. Brazil's president Lula da Silva famously argued that the world "isn't obliged to put up with [Elon] Musk's far-right free-for-all just because he is rich" (Phillips, 2024).

In the EU context, there have been major concerns around social media platforms' infringement on data privacy, microtargeting in the context of elections, and the spread of disinformation and misinformation. While there is a difference between disinformation (intentionally spreading false information meant to deceive) and misinformation (unintentionally spreading false information), in this article we stick to the concept of disinformation, often used as an umbrella term in EU documents. In fact, countering disinformation has become a central component of the EU's conception of democracy (Oleart & Theuns, 2023) and its strategy of "defending democracy." It is crucial to emphasize that both disinformation and misinformation are connected by being defining features of the business model behind social media platforms such as X or Meta's Facebook. Social media platforms nourish users with the information that is most likely to grab their attention (Benn & Lazar, 2022), regardless of its accuracy, which leads to a loss in the epistemic quality of public deliberation (Chambers, 2021). Scandalous untrue ideas are much better at attracting users' attention, prolonging their time on the platform, and extracting more data from them that can then be used to create profiles that are then sold to advertisers (Borgesius et al., 2018). Disinformation is thus not a bug but a central feature of the business model of tech companies. Indeed, we share Shoshana Zuboff's understanding of tech companies' business model as one rooted in "surveillance capitalism," a logic that is oriented towards mass data extractivism, claiming "human experience as free raw material for translation into behavioural data" (Zuboff, 2019, p. 8).

Rather than addressing Big Tech in general, in this article we focus primarily on social media platforms such as Meta (which encompasses Instagram, Facebook, and Whatsapp), X, Google (which owns Youtube), and TikTok, which have profound consequences for shaping the debates in the public sphere. Indeed, the rise of far-right parties and increasing polarization in contemporary politics are inherently linked to the "disruption" and transformation of the public spheres resulting from the business models of current social media monopolists (Bennett & Pfetsch, 2018; Hoffman & Rone, 2024). What is more, disinformation influences a wide range of other policies, such as health policy and climate change, and thus its regulation emerges as a meta-issue that has an impact on a wide variety of fields.

Considering the high stakes involved it is not a surprise that there has been a wide array of literature oriented to analysing the efforts by public authorities to regulate Big Tech companies (Moore & Tambini, 2021; Simons & Ghosh, 2020). However, most of this literature focuses on the US context and the

possibilities for regulation within its legal landscape—a logical trend considering that most leading social media platforms on a global scale, with the exception of the Chinese TikTok, are US corporations. At the same time, other countries also grapple with the problems of online surveillance and content moderation posed by the ascent of US tech giants. This article focuses more specifically on the agency of the EU in terms of regulating disinformation—a particularly interesting process given the entrepreneurship of the European Commission in this regard and the recent pivot to digital sovereignty (Bonnamy & Perarnaud, 2023; Rone, 2023; Seidl & Schmitz, 2023), but also the EU's broader ambitions to be a global normative leader when it comes to digital regulation (Bradford, 2020; Wagnsson & Hellman, 2018). While the notion of normative leadership has already been problematized in other fields (Staeger, 2016), even the most often quoted success in EU tech regulation and data protection—the General Data Protection Regulation (GDPR)—has so far yielded underwhelming results (Cobbe & Singh, 2022).

In the first part of this article, we argue that the EU has achieved neither digital sovereignty nor normative leadership in regulating disinformation since it has in fact increasingly "outsourced" the regulation of disinformation to corporate platforms. But if disinformation is not simply a "bug" in the system, but a feature of profit-driven platforms, public–private cooperation emerges as part of the problem rather than a solution. We show that the EU is not investing in fostering democratic social media alternatives as part of its new turn to industrial policy. In the second part of the article, we bridge our criticism of current EU policies with the booming field of imagining alternatives to current social media monopolies, outlining six conditions that alternatives to current social media monopolies should satisfy. Finally, we explore what could be the EU's role in fostering such alternatives and point towards hopeful avenues for academic research and political action.

2. The EU's Business-Friendly Regulatory Approach to Disinformation

2.1. Why is the EU Regulating Disinformation?

We could expect assertive action by the EU in the field of regulating disinformation due to the rise of a doctrine of digital sovereignty (Hoeffler & Mérand, 2024; Seidl & Schmitz, 2023), also as the result of concerns about mass surveillance (Bauman et al., 2014) and election interference, but also the increasingly tense geopolitical situation with wars in Ukraine and Palestine, and a rising far right. The concept of digital sovereignty has been applied to a variety of digital fields—including content regulation, AI policy, or semiconductor chips. At the content regulation level, this turn has been expressed in an increasing prioritisation of "public order" over "free access" in discourse (Flonk et al., 2024). And we have seen an assertion of sovereignty also in the ways in which sanctions against Russian media have been imposed throughout the EU, albeit in an uneven and often non-transparent way (ten Oever et al., 2024). The connection between disinformation and sovereignty (Kachelmann & Reiners, 2023) has paved the way for making sense of tech policy as a matter of geopolitics rather than corporate power.

Despite this growing prominence of sovereignty discourses, we argue that the EU's approach to regulating disinformation—both in terms of regulation and investment policy—has failed in challenging the power of aspiring Big Tech corporate sovereigns (Lehdonvirta, 2022; Srivastava, 2022). While the importance of business ideational power and the cooptation of EU institutions have been emphasized in other fields of digital sovereignty pursuit, including cloud policy (Obendiek & Seidl, 2023) or AI policy (Mügge, 2024), less

attention has been drawn to it in the field of disinformation (with important exceptions such as Bouza García & Oleart, 2024; Kausche & Weiss, 2024; Rone, 2021). This is precisely what we aim to do.

Furthermore, the EU has increasingly presented itself as a global normative leader when it comes to digital regulation. In the field of data protection, numerous authors have drawn attention to the de facto and de jure effects of the GDPR in setting global standards and positioning the EU as a normative leader. The regulatory power of the so-called "Brussels effect" (Bradford, 2020) also explains the extent to which lobbying efforts by tech companies have been oriented towards the EU level as a key political space in which we see unfolding the dispute to regulate disinformation, and social media platforms more broadly (Gorwa, 2021; Gorwa et al., 2024). Still, even when it comes to the GDPR as a most prominent success, critical legal scholars have raised doubts regarding the extent to which the regulation actually works and have cautioned against simply replicating more novel regulatory instruments rather than contextualizing them (Ilori, 2022).

An important caveat is needed here: Several authors have argued that the goals of digital sovereignty and normative power are not necessarily aligned and might be even contradictory (Broeders et al., 2023; Wagnsson & Hellman, 2018), due to tensions between discourses of geopolitical leadership and impartial universality. Furthermore, it is not necessarily desirable that the EU becomes a "leader" in the field of digital regulation, as this might reinforce colonial dynamics rather than challenge them. Instead, we focus on why the EU's regulations have missed the mark of addressing the structural causes of disinformation—the corporate-led business models of social media companies—and have simply focused on the symptoms.

2.2. Regulations That Miss the Mark: Tackling the Symptoms Rather Than the Causes

In the last decade, the EU has engaged in a flurry of legislative projects to regulate different aspects of social media companies' operations, including regulations and acts such as the GDPR, the Digital Markets Act (DMA), and the Digital Services Act (DSA). The DMA, applicable for most parts since May 2023, has established a set of clearly defined and objective criteria to qualify certain large online platforms as gatekeepers and to ensure that they behave in a fair way online and leave room for contestability. The DSA, directly applicable across the EU since February 2024, has obliged gatekeeper companies to adopt measures to counter the spreading of illegal goods, services, and content online, as well as to provide greater transparency on content moderation and options to appeal, and to give users more control over the personalization of content (European Commission, 2023).

While it is still unclear what the DMA and DSA's empirical effects or global repercussions will be, it seems they have raised doubts from the beginning. An excellent systematic analysis of the EU's regulatory efforts on disinformation more specifically (Nannini et al., 2024) has shown that problems that were already present in previous EU efforts at regulating tech companies (such as the 2000's E-Commerce Directive or the 2022 code of practice on disinformation), including the limited liability of social media platforms, have in many cases persisted in the novel DSA act. The authors provide a systematization of existing criticism, from a legal and technical perspective (concerns about conceptual ambiguities over what "systemic risk" amounts to), from a behavioural and psychological perspective (the excessive reliance on post-hoc take down measures despite evidence that preemptive friction nudges might be better in containing the spread of disinformation), and finally, from an ethical and philosophical perspective (drawing attention to the dangers of private governance and the outsourcing of truth judgements, the individualized understanding of harm from viral messages, and

the lack of direct journalistic protections). Furthermore, Leerssen (2023) has shown how the DSA aims to end shadow banning by making content moderation more transparent, but this regulation of "demotion" practices is unable to neutralise the structural ranking that social media algorithms undertake when curating content. Interestingly, Meta announced the abandonment of third-party fact-checking, at least in the US, in a gesture of political alignment with the second Trump administration. It remains to be seen whether this will impact its services in the EU (Graves, 2025) and whether other social media platforms will follow, but this would imply a violation of the EU's Code of Practice on Disinformation.

Taking stock of these detailed criticisms, we want to go further and argue that the underlying reason why the new DMA and DSA fail to reassert the EU's sovereignty over content and provide an example of good standard setting on disinformation is that the EU has failed to tackle the very business model of social media platforms, which is one of the root causes for the spreading of disinformation. Currently, the EU seems to see social media platforms as the location of a "marketplace of ideas," a perspective that is compatible with a continuation of reliance on already dominant private companies that "sell" access to "ideas" to their "clients" (users). Arguably, current digital infrastructures perform the "marketplace of ideas" rather successfully—albeit the ideas that are "sold" tend to be those that are most profitable or ideologically desirable for social media companies.

Indeed, the EU's approach has been cautious towards private companies such as Meta or X. A convincing legal and normative analysis of the EU's approach to social media governance by Griffin (2023, p. 58) has illustrated how the EU has deployed a combination of "multistakeholderism" and "rule of law" responses, reinforcing "the image of platforms as benevolent stewards of the public interest, rather than companies pursuing private gain" (Griffin, 2023, p. 60). Pickard (2020, p. 131) likens tech moguls such as Mark Zuckerberg to media barons such as Rupert Murdoch, arguing that a "new social contract for digital media must assert public control over communication systems and provide funding for the public infrastructure that sustains democratic society." In failing to recognise this, the EU's approach is marked by an epistemic and regulatory capture (Farrand, 2014; Obendiek & Seidl, 2023) that systematically sidelines policy demands that may challenge the "surveillance capitalist" business model of social media platforms. In some ways, the EU appears to make sense of Big Tech in a similar way as the big banks after the 2008 financial crash: they are "too big to fail," and policy-makers fail to see the possibility of democratic alternatives.

Regulators in the EU seem to assume that they cannot regulate "against" platforms but should do it "with" them. As a result, when it comes to disinformation, the EU has continuously externalized its regulatory role to platforms. In their endeavour to protect their business model, social media companies have played a crucial role in shaping how to define disinformation policies at the EU level, undermining any strong interpretation of European sovereignty in the field. Thus, EU regulation has ended up with technocratic regulatory changes, for instance, oriented towards algorithmic transparency in the case of the DSA but no substantive changes addressing the root causes of the problem. It is thus a form of detailed, well-intentioned but fundamentally misguided regulation that misses the mark and tackles the symptoms rather than the causes. Current discussions surrounding "disinformation" focus on the regulatory nitty-gritty, while missing the broader and deeper problem that the current infrastructure of the public sphere is reliant on private (global) companies. Furthermore, even if the DMA appears to be less friendly to Big Tech (Hoeffler & Mérand, 2024), competition policy does little to dismantle surveillance capitalism and the data extractivist practices that make targeted advertising and disinformation possible on a mass scale, and a key feature of current public spheres. Even such breaking up would be less than sufficient: Zuboff (2019, p. 23) has

convincingly argued that "calls to break up Google or Facebook on monopoly grounds could easily result in establishing multiple surveillance capitalist firms."

2.3. Why Has the EU Taken Such a Business-Friendly Stand in Regulating Disinformation?

First of all, several key aspects of the current disinformation legislation predate the rise of social media platforms. Limited platform liability was a key principle of legislation already since the late 1990s and early 2000s and it has been invoked multiple times also in progressive mobilizations against surveillance online as seen in the mobilizations against the Anti-Counterfeiting Trade Agreement, in which civil society often sided with Silicon Valley (Rone, 2020).

Secondly, social media companies cooperate closely with policy-makers to shape legislation, preempting public policies that question their business model, while also using their communicative power to challenge political actions that undermine their dominant position (Popiel, 2018). While their reputation has taken a hit, their revenues have continued to increase and social media platforms have emerged as powerful political players in the EU regulatory sphere thanks to their extensive resources. In fact, Big Tech has become "the biggest lobby sector in the EU by spending, ahead of pharma, fossil fuels, finance, and chemicals" (Corporate Europe Observatory, 2021, p. 6).

Third, a major reason for the EU's light-touch business-friendly approach to disinformation lies in the very essence of what is being regulated. Unlike data privacy regulation, which stems from fundamental human rights, regulating disinformation in the EU has a more problematic legal basis, since disinformation, even if harmful, is not illegal per se (Rone, 2021). To be sure, the argument about disinformation's specific legal status should be taken with a grain of salt, since it fails to explain why we have seen many similar developments and regulatory capture also in other digital policy fields such as data privacy, AI, or even cloud policy (Hladikova, 2024; Obendiek & Seidl, 2023). Indeed, a key effort put forward by Big Tech actors is to demonstrate to public authorities that they are indispensable for the regulation of the digital across the stack. For years these companies have dominated the networks of "expertise" at the EU level (Farrand, 2014), and policy-makers have largely relied on their "knowledge" to regulate them.

Finally, social media platforms have been skilful in navigating the series of international crises, managing to reframe a public policy issue such as the regulation of Big Tech as a "geopolitical" issue (Bradford, 2023) that is mostly looked through the lens of "security" (Mügge, 2023; see also Proto et al., 2025). The security-focused and geopolitical framing of disinformation places a great emphasis on the role of foreign actors in spreading disinformation while ignoring the key role of domestic, often far-right actors in creating and sharing disinformation (Rone, 2019). The right-wing framing of "security" and "foreign interference"—mostly referring to China, Russia, or Iran—when conceiving the interaction between tech platforms and democracy has also led EU public authorities to mostly invest human resources in the European External Action Service and the East Stratcom unit, oriented towards fighting disinformation and "foreign interference," while sidelining the role of social media platforms' business model in fostering disinformation (Tuñón Navarro et al., 2019). Given the lower amount of resources of the Directorate-General Connect and other relevant directorate-generals in the European Commission focused on regulating platforms, partially externalising the regulatory role to platforms (e.g., by allowing them to co-draft the code of practice on disinformation) appears also as a pragmatic decision from their perspective. It follows from

this thinking that EU policymakers tend to see social media companies not as part of the problem, but as the solution. However, what if the exact opposite is true: What if public–private cooperation with Big Tech is not part of the solution but instead part of the problem?

2.4. The EU's Lack of Investment in Alternatives

There is a notable lack of ambition by the EU to invest in and foster meaningful alternatives to current social media. When it comes to the cloud, the EU has increasingly combined regulation with targeted investment including through the so-called Important Projects of Common European Interest (Sheikh, 2022). To the contrary, there have been no comparable investment initiatives at the applications layer, relevant for the disinformation problem but also for data privacy, the integrity of elections, and democratic quality overall. Indeed, there have been only a few examples of venture projects to create alternatives to existing platforms such as Facebook, X, or TikTok. Among the few existing examples have been the platforms EU voice and EU video, launched by the European Data Protection Supervisor in 2022, which however have been used mainly by EU institutions so far. Still, (fostering) investment in social media alternatives accessible to the public has been negligible.

This became particularly clear during the first mass exodus from X (formerly Twitter) just after it was bought by Elon Musk in 2022. Back then, the European Commission launched its presence on the bottom-up alternative platform Mastodon, maintained by the German non-profit Mastodon. While Mastodon had received support through the Next Generation Internet programme by the European Commission (funding meant to foster the development of open-source software), in July 2024 it came out that the EU Commission is planning to close this line of funding without any explanation (Henning, 2024). In response, in August 2024, Mastodon's CEO and CTOs published an open letter to encourage the European Commission to continue funding open-source software (Rochko & Chaput, 2024). The fact that the Commission would discontinue its open-source software funding programme and replace it with a programme with less funds and more bureaucracy exactly when most of the world is looking for alternatives to Musk's X is puzzling, to say the least.

A potential reason for this lack of appetite to develop social media alternatives might be precisely the market orientation of EU institutions and its scepticism towards genuinely innovative open-source federated and more democratic alternatives. Indeed, from such a market perspective, the EU has felt that it has lost the competition for consumer data, where US and Chinese social media platforms are dominant, and has focused instead on developing cloud infrastructure for industrial data, where it still has potential (European Commission, 2020). Still, there are reasons to not simply regulate social media platforms but also to search for alternatives that go beyond the economic potential of such investments, including the protection of democracy and the promotion of an inclusive, democratic, and safe public sphere.

3. Towards an Emancipatory, Decolonial, and Democratic Digital Horizon: People's Power Through the Stack

We have so far described the EU's market-based approach to regulating disinformation and the lack of investment in alternatives to Big Tech social media platforms. Here, we bridge this analysis with the burgeoning literature on alternatives to corporate social media, which however has rarely focused on the EU as a policy space. We ask: How can we imagine and build an alternative public infrastructure in a way that is

more democratic and serves a collective purpose rather than the interests of private multinational corporations? This question has raised considerable attention over the last few years (Fuchs, 2021; Grohmann, 2023; Pickard, 2020; Rikap et al., 2024; Muldoon, 2022a, 2022b; Verdegem, 2022). Complementing this literature and applying it to the EU policy space, we argue that rather than a one-size-fits-all alternative to corporate social media monopolists such as Facebook and X, there should be multiple alternatives following six basic principles: (a) a commitment to secure a space for public communication oriented towards the public good rather than profit; (b) a democratic decision-making process surrounding the design and governance of alternatives; (c) plurality (c1) and interoperability (c2) across alternatives; (d) searching for alternatives across the technological stack; (e) non-exploitative and transparent content moderation; and (f) sustainable public funding that makes this possible and contributes to reversing structural inequalities.

Tech companies have managed to achieve an unprecedented feat—to enclose a large part of our communicative space and inter-subjective being on their own private platforms, extracting data for the purposes of their own private profit. Reclaiming "the space of our world" (Couldry, 2024) necessarily involves a rethinking and rebuilding of our common space in ways that cater for the public good rather than for the interests of a few corporations (a). If our digital public sphere can be currently compared to a shopping mall on whose premises we are allowed under the conditions of the owners and with the explicit purpose to be geared towards shops, a real alternative would constitute publicly owned or held-in-commons spaces that are also democratically managed and where we collectively decide what disinformation is and how algorithms should be used to shape conversations (if at all). Relatedly, alternatives should ideally be built on free and open-source code so that there is transparency regarding the software choices made, and the possibility of changing them. Public or community ownership of social media platforms is an even more reasonable suggestion once we acknowledge that a substantial share of the basic technology that makes possible their functioning was developed with public money, while the profit was subsequently privatized (Mazzucato, 2019).

Of course, the question is not simply about who has invested in the technologies that make social media possible and who is reaping the profits. Had this been the case, many of the current problems could have been addressed by redistributing the benefits of "surveillance capitalism," as suggested by Jason Lanier's (2014) proposal to pay consumers for the data collected by Big Tech companies. However, the problem is rather the non-democratic surveillance capitalist business model as such, and the current public spheres' reliance on private companies. Relatedly, the idea of building "European tech champions" has grown during the last few years to reduce the EU's dependence on US tech companies. However, a European version of US Big Tech companies is unlikely to make a meaningful difference if the ownership is in private hands, the business model remains the same, and there is no democratic governance.

Indeed, a democratic decision-making process (b) on what types of alternatives to current social media we would like to achieve would involve elected representatives at multiple levels. But it should also involve inputs from social movements and experimental tech collectives operating outside of the institutional sphere (Levi, 2022). Such actors should also be acknowledged by integrating expertise from below in debates about alternatives to current social media. The articulation of relations of transnational solidarities (Oleart, 2023) and collective action needs to be at the centre of any attempt to democratise alternative digital infrastructure. Widespread media coverage would also be crucial to keep citizens informed and ensure the quality of democratic participation in the design and governance of alternative social media.

Such a democratic approach to governance would be in stark contrast with the arbitrary, almost monarchical approach to governing social media that we see from Musk's X or from Zuckerberg's Meta, where an oversight board has been established with a restricted scope of action, providing no democratic legitimacy to platform governance (Haggart & Keller, 2021), and thus making a mockery of democracy. Considering that Big Tech companies are based in the Global North, a decolonial logic (Couldry & Mejias, 2023) of integrating and empowering collective actors and movements from the Global South should be central to any democratic attempt to develop alternatives.

When thinking of transforming the digital sphere, we need to think of ways in which this transformation could facilitate mass transnational collective action and participation at a local, national, and transnational scale (Oleart, 2021). The challenge is that the democratisation of the public sphere is both a normative goal as well as a necessary precondition for achieving it. This is because activists and political actors that organise against the existing capitalist model need digital spaces for both internal and external communication. On one hand, they need those spaces to effectively organise internally and transnationally, but they also need them to communicate beyond activist spaces (Castells, 2012). Insofar digital spaces are controlled by corporate actors, it is the latter that have the "sovereignty" to close those spaces. There are already several examples in which social media companies have cooperated with authoritarian governments to reinforce racism, violence, and restrict independent reporting (for the case of Myanmar, see Fink, 2018), thus complicating activists' capacity to organise.

Alternative social media platforms, following Muldoon's (2022a) ground-breaking work on platform socialism, could be conceived on different levels (c1)—local, national, and transnational depending on the types of publics they cater for and the types of goals they set themselves. A plurality of existing alternatives that operate simultaneously allows us to avoid thorny questions such as state censorship, for example. In some countries, a national social media, funded by taxpayers' money and democratically governed by its employees under oversight by parliament, for example, could work. In other contexts, where governments have shown authoritarian tendencies and might use social networking platforms for surveillance, bottom-up decentralized networks could be developed or solutions from abroad could be offered. Local social networking platforms could be very useful in terms of finding help for everyday tasks or maintaining neighbourhood life (Lomax-Reese & Wood-Lewis, 2021). But maintaining transnational connections is also crucial in some contexts such as transnational social movements' mobilization. Such connections could be made possible by the existence of transnational social networking platforms governed by bodies such as the UN, for example, where activists could debate and exchange information.

Crucially, using different alternatives to social media should not presuppose absolute loyalty by users to one social media only. It is thus important to create opportunities for users that are compatible and complementary (c2). Users should be able to bring their data from one platform to another, the so-called data portability. Interoperability between different platforms should be encouraged (Doctorow & Keller, 2021) to avoid a lock-in effect, whereby the cost of leaving a platform outweighs the benefits of joining an alternative. Mechanisms could also be developed so that content on one platform can "migrate" to other platforms and be discoverable across platforms. Thus, rather than thinking that the alternative to Instagram, TikTok, or X should be one global platform with equally ambitious goals of "connecting the world," a better pathway forward might be to connect multiple different but interoperable platforms across the globe, each with its own democratic governance bodies. On such a federated network of platforms, disinformation

would not scale up as quickly as on Facebook or X, but would have multiple barriers and thresholds to cross, ultimately receiving less attention.

Furthermore, a lot of existing proposals for alternatives can be enriched by a productive dialogue with critical media and environmental media studies, where the materiality of data has become increasingly emphasized and problematized. The functioning of current social media platforms such as Facebook, X, or TikTok is made possible by the constant work of vast amounts of servers hosted in gigantic data centres across the globe which have considerable energy and water demands (Hogan & Vonderau, 2019; Rone, 2023). Unlike previous public spheres which operated on the agora, on market squares, or in cafes, the digital public sphere is physically hosted on servers. And unlike built environments which require maintenance every now and then, the digital public sphere needs constant material maintenance and access to stable and trustworthy electricity grids.

Borrowing from Benjamin Bratton's speculative notion of the "stack," Haroon Sheikh (2022) outlines seven layers of digital sovereignty, including resources (raw minerals), chips, networks, cloud, intelligence, applications, and connected devices. Thus, any alternatives to the current social media platforms will have to consider power through the stack and to be thought through various layers (d). Conceiving viable alternatives to current social media platforms should not overlook thorny issues such as raw material extraction, network maintenance, and cloud governance—all layers of the stack that come with key trade-offs and challenges (Rikap et al., 2024). In locations where electricity supply is less trustworthy, more decentralized forms of networking and storing data on users' devices thus might be better options than national systems running on centralized servers. In the EU, there have been recent calls for developing a "EuroStack" (Bria et al., 2025), an interesting proposal that nonetheless prioritizes the "competitiveness" and "innovation" of European companies and the "strategic autonomy" of the EU, rather than the democratic and decolonial logic discussed earlier and continues to rely on private–public partnerships.

When thinking about national and transnational platforms, decisions on where and how data centres will be built should be open to democratic discussion, especially considering the heavy environmental consequences and energy demands of data storage. Another crucial question is what data should be stored in data centres and for how long. In the current ad-driven business model of social media companies, all user data is stored and used to improve targeted ads. But in a situation in which platforms are not profit-pursuing entities, collecting and storing all user data in a centralized way would not be necessary. An additional consideration is whether users' data should be used for training AI or not (the "intelligence layer"). Decisions on this matter would depend a lot on who manages the platforms, for what purposes, and what the purpose of training AI would be. In a world where multiple interoperable social media platforms exist, the decision of what data to store, for how long and how it would be used might differ per platform and context.

Fifth, while all previous principles are relevant for solving not only disinformation-related problems but also all kinds of other issues (data privacy, surveillance, expropriation of the commons…), an issue of great importance specifically for the topic of disinformation, is who will perform the content moderation labour on alternative social media platforms. Currently, this work is often externalized by the platforms and outsourced to workers under poor conditions—often in the Global South—who expose themselves to psychologically traumatizing content for small remuneration (Muldoon et al., 2024; Parks, 2019). Believing that a democratically designed and governed social media platform would not need moderation is naïve. The question emerges: Who will

do the moderation and under what labour conditions? Also, how will it be decided what content counts as disinformation? A non-exploitative and transparent moderation system should be pursued, in which securing transparent and democratically agreed criteria on content moderation and shielding moderators from harm (e) are the norm.

Finally and fundamentally, we must address the question of who would fund the initial prototyping and development of alternatives to current social media (f). This could happen through targeted public funding and investment—the sort of which is currently missing at the EU level when it comes to the applications layer. It could also happen through national government and municipal funding for smaller-scale projects. Not-for-profit charity funding could also be the basis of the initial development of alternative projects. Once built, social media platforms that are liked and adopted by users could be funded by taxpayers' money (see Crum, 2023, on the BBC as a reference case) or through membership and subscription fees. Indeed, the subscription model has been recently proposed by Facebook itself to users in Europe. The problem with Facebook's offer though is that users who pay for subscriptions, supposedly, would not have their data shared with advertisers. What this means in effect is that those who do not pay will have their data shared, introducing a crude distinction between those able to pay and those who are not. Data extractivism is something we have observed happening on a large scale when it comes to citizens' data in Africa (Kalema, 2023), and it has been a crucial element of digital or data colonialism (Couldry & Mejias, 2019; Kwet, 2019; Lehuedé, 2023).

Whatever alternative forms of funding social media platforms citizens, governments, and social movements come up with, these forms should not lead to a digital apartheid between those who can afford to not have their data collected and those whose data is mined and used for developing AI, reinforcing structural injustices in society. Rather than reproducing capitalist and colonial logics, new forms of funding should thus be based on innovative models that foster bonds of solidarity, meaning that (a) those who can afford could and should pay for access to the digital public sphere of those who cannot afford it, and (b) data extractivism should be eliminated rather than curtailed through pay-out options for those who can afford it. This requires a global approach that is sensitive to the structural inequalities and exploitation within and between the Global North, the Global South, and the Global East.

Our main point is that combatting disinformation is just one aspect of the broader task of democratizing technology and the public sphere. This is not simply a technical or legal question that can be solved by a policy tweak or a new regulation. It requires to rethink the way in which the private relates to the public, and the ways in which the public can democratically participate. In the same way, in which there cannot be socialism in one country only, we cannot have socialism in the digital only. Digital socialism, conceived as "the social (or common) ownership of organizations and productive assets in the digital economy for the purpose of curbing the domination of tech companies and enabling the popular control of digital services" (Muldoon, 2022b, p. 2), is unreachable without a broader transformative socialist agenda. It is precisely this wider conceptualisation of "digital socialism" that we are reclaiming.

4. Conclusions: How Can the EU Contribute to Reversing the Privatisation of the Public Sphere?

In this final section, we come to the central question of our intervention: What could the EU's role be in fostering democratic alternatives to current social media monopolies? With its strong embrace of a pro-market logic across a variety of fields and with the considerable strength of right-wing parties in the European Commission, Parliament (especially after the 2024 EU elections), and Council, the EU is currently not the most obvious and best-suited actor (to say the least) to pursue an alternative digital socialist agenda. What is more, as we have shown above, while the EU has a broad digital sovereign agenda, developing alternative social media platforms is definitely not a priority within it, and sovereignty is understood above all in geopolitical terms, rather than as democratic sovereignty (Roch & Oleart, 2024; Rone, 2023).

So why the EU? We argue that there are also favourable factors to target the EU as an actor who can support pursuing alternatives to current social media. First of all, even if the EU's current digital sovereignty efforts are not aiming to develop alternative social media platforms, the very existence of digital sovereignty strategies and discourses opens up space for pushing for an alternative and more democratic understanding of sovereignty by progressive groups and actors. Second, disinformation has been highly visible as an issue both in the media and on the policy agenda in both EU member states and Brussels. This creates a favourable discourse opportunity structure to argue for the need for alternative platforms. Third, it has been widely acknowledged that there is no common European public sphere beyond some episodes of contention (Conrad & Oleart, 2020)—therefore, and precisely in light of the rise of far-right nationalist actors, there might be interest in encouraging an alternative digital space where transnational conversations within the EU could unfold (as a complement to alternatives at the national, local, and regional level). This could be a good addition to the already existing but more media companies-oriented EU initiative from 2023—European Media Platforms, which aims to improve EU citizens' access to trusted information across the EU. Finally, in terms of funding, there has been a renewed focus on funding for innovation as part of the EU's broader digital sovereignty agenda. There is no compelling reason to exclude a priori funding also at the applications layer. Especially considering how quickly new platforms can rise to prominence (see TikTok's massive surge over the last few years), treating alternatives to current social media platforms as a lost battle is not justified.

Ultimately, the main problem with the EU's regulation of disinformation is not that there is too much regulation. Rather, the problem is that we have the wrong kind of regulation—a bureaucratically demanding but misguided regulation that focuses on tweaks in the system, while completely missing the big picture and a vision of how to reverse the privatisation of technology and the public sphere. Instead, we outlined here a set of principles to foster alternative social media where disinformation is not a feature of the digital platform itself. The EU and its member states are just one locus among many, where such a search for alternatives could take place. Democratic innovations from below in countries from the Global South have shown other unique pathways to reimagine digital technology (Grohmann, 2023; Medina, 2011).

A key avenue for future research is thus to what extent the EU's digital regulations and investment policies can move beyond extractivism (Kalema, 2023; Stuehlen & Anderl, 2024) and actually foster fair alliances towards inclusive, democratic, and safe digital public spheres. What is certain is that combating the rise of disinformation and establishing a truly public digital sphere cannot happen in the absence of a radical

rethinking of public authorities' relations with corporations. That is, the relation between supranational, state, and corporate sovereignty. Such a rethinking cannot come from narrowly technopolitical regulatory proposals. To democratise the digital public spheres, a collective transnational and decolonial movement is needed that problematizes data extractivism not only in the past, but also in the present, and dares to think of democratizing technology rather than simply adopting technosolutionist tweaks led by corporations.

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About the Authors

Alvaro Oleart is a Fonds de la Recherche Scientifique (FNRS) postdoctoral researcher in the Department of Political Science and the Institute for European Studies of the Université Libre de Bruxelles (ULB). He is the author of the books *Framing TTIP in the European Public Spheres: Towards an Empowering Dissensus for EU Integration* (Palgrave, 2021) and *Democracy Without Politics in EU Citizen Participation: From European Demoi to Decolonial Multitude* (Palgrave, 2023).

Julia Rone is an assistant professor in comparative politics at the Department of Political Science and Public Administration at the VU Amsterdam. Her current research focuses on democratizing digital governance and the distributive conflicts around the EU's notion of digital sovereignty. She is the author of the book *Contesting Austerity and Free Trade in the EU* (Routledge, 2021).

ARTICLE

The EU's FIMI Turn: How the European Union External Action Service Reframed the Disinformation Fight

Lucas Proto [1], Paula Lamoso-González [2], and Luis Bouza García [3]

[1] Department of Political Science and International Relations, Universidad Autónoma de Madrid, Spain
[2] Department of International Studies, Universidad Loyola Andalucía, Spain
[3] Department of Political Science and International Relations, Universidad Autónoma de Madrid, Spain

Correspondence: Paula Lamoso-González (aplamoso@uloyola.es)

Abstract

This article critically examines the strategic decision of the European Union External Action Service (EEAS) to reframe the concept of misinformation as Foreign Information Manipulation and Interference. The EEAS, particularly its Strategic Communications Division, has been at the forefront of combating disinformation within the EU. Initially mandated by the European Council in 2015 to counter Russian disinformation campaigns, the EEAS pioneered the framing of this complex phenomenon as an external threat, significantly shaping subsequent European perceptions and policies. While the Covid-19 pandemic and the surge of accompanying disinformation originally shifted the EU focus towards a more regulatory approach, culminating in the approval of the Digital Services Act and the Digital Markets Act, the large-scale Russian invasion of Ukraine soon after prompted a return to geopolitical considerations, reinstating both the disinformation-as-external-threat dimension and, therefore, the prominent role of the EEAS. This research argues that the EEAS, which recognizes the limitations of the EU in effectively countering the phenomenon of misinformation, adopted the framing of Foreign Information Manipulation and Interference to both make the problem more manageable and align it with its mandate. Through this reframing, the EEAS has addressed disinformation similarly to traditional security threats, such as cyberattacks, thereby aligning with existing security paradigms and the competencies and limitations granted by the EU.

Keywords

disinformation; European Union; foreign information manipulation and interference; public diplomacy; Russia

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1. Introduction

As early as 1998, General Vladimir Slipchenko then Vice President of the Russian Academy of Military Sciences, anticipated that in future conflicts great attention would be paid to information confrontation, because:

> Information is a weapon just like missiles, bombs, torpedoes, etc. It is now clear that the informational confrontation becomes a factor that will have a significant impact on the future of the war themselves, their origin, course and outcome. (De Spiegeleire et al., 2011, p. 108).

These words encapsulate the Russian leadership's long-standing belief that information is not merely a tool of communication but a potent form of non-kinetic or hybrid warfare (Splidsboel Hansen, 2017). In Russian military doctrine and government strategy, disinformation is systematically employed to destabilize adversaries, manipulate public opinion, and advance geopolitical objectives. This reality garnered widespread public and academic attention following Russia's interference in the 2016 US presidential election and has become even more pivotal since Vladimir Putin initiated the full-scale invasion of Ukraine in February 2022.

In contrast, the EU recognition of disinformation as part of a form of hybrid warfare is a relatively recent development. This delayed reaction was initially attributed to the significant challenge that the concept of information as a security threat poses to the EU's foundational principles of liberal democracy and freedom of expression (Wagnsson & Hellman, 2018). The notion of weaponizing information—using it to sow discord, manipulate public opinion, and undermine democratic institutions—directly conflicts with these core values (Szostek, 2020). Consequently, the EU is often described as being caught in a catch-22 (Van Raemdonck & Meyer, 2024), as it struggles to devise policies that effectively counter disinformation without undermining the very principles it seeks to uphold.

However, the EU's so-called fight against disinformation has been framed as an external security threat from the outset. Following the European Council meeting in March 2015, held a year after Russia's annexation of Crimea, EU leaders underscored "the need to challenge Russia's current disinformation campaigns" (European Council, 2015, p. 5) in their conclusions. They called upon the High Representative of the Union for Foreign Affairs and Security Policy/Vice President of the Commission (HR/VP), in collaboration with member states and EU institutions, to "prepare an action plan on strategic communication" (European Council, 2015, p. 5).

This initial framing of disinformation as primarily an external threat, particularly emanating from Russia, played a crucial role in shaping the EU's approach towards combating this challenge. By characterizing the multifaceted phenomenon as exclusively a foreign issue, the EU required the engagement of an institution with a dedicated focus on foreign affairs, thereby establishing the European Union External Action Service (EEAS) as the primary actor responsible for combating disinformation. This strategic choice led to EEAS concentrating its efforts almost exclusively on countering "foreign destabilization" while allowing other domestic aspects of disinformation—such as the role of internal political actors, the spread of false information within member states, or the need to strengthen citizens' media literacy—to receive less attention until 2018 (European Commission, 2018; European Commission & High Representative of the Union for Foreign Affairs and Security Policy, 2018) and not to truly foster regulatory responses until the Covid-19 pandemic in 2020 (Casero-Ripollés et al., 2023). This is the result of a policy debate about the security values at risk in the online ecosystem and a struggle between different policy communities (Ördén, 2019, p. 422).

In this process, the EU defined disinformation as "verifiably false or misleading information that is created, presented, and disseminated for financial gain or to intentionally mislead the public" (European Commission, 2018, p. 3), therefore distinguishing it from "misinformation" as potentially harmful misleading content produced without intent and other forms of errors, satire, and parody, or clearly identified partisan news and opinion. This definition, which we follow in this article, aims to balance the identification of individual behaviour responsible for spreading harmful content with the complex processes of truth-finding in open societies.

It has been theorized that the lack of established procedures for addressing emerging challenges, such as digital disinformation, positions the sui generis character of the EEAS as uniquely suited to developing transformative practices through active experimentation (Hedling, 2021). We contend that this process of compartmentalization—focusing primarily on the external dimension of disinformation while allowing other aspects of the issue to be handled by different actors within the EU (see Casero-Ripollés et al., 2023)—has been crucial to the EEAS's ongoing success in shaping the agenda. While other EU institutions and member states grappled with the complexities of digital and domestic post-truth dynamics, the EEAS consistently advanced, expanded, and refined its framework for countering the hybrid threat of foreign disinformation, thereby shaping both policy and public perception in a way that aligns with its mandate and expertise.

In this context, the EEAS's recent promotion of foreign information manipulation and interference (FIMI) is particularly significant. Introduced in 2021, FIMI has increasingly featured alongside—and in some cases outright replaced—"disinformation" in EEAS communications (EEAS, 2024a). This shift has enabled the EEAS to address challenges that have hindered other EU institutions and member states from combating disinformation (Hénin, 2023). By broadening the scope to encompass all forms of manipulative behaviour that threaten democratic processes and public trust while focusing exclusively on external actors, the EEAS has crafted a framework that not only appeals to a wide range of EU decision-makers but is also versatile enough to be applied to any narrative perceived as harmful, particularly those originating from Russia.

This article argues that while the EEAS's framing of disinformation as primarily an external threat and its strategic pivot to FIMI have effectively advanced its institutional power and shaped the EU's response, this raises significant questions about its alignment with the EU's self-perception as a normative or civil power. This is part of an ongoing process of a well-known securitisation of disinformation (Casero-Ripollés et al., 2023; Szostek, 2020; Szostek & Orlova, 2024; Wagnsson et al., 2024) that has sought to address malign information influence (Wagnsson, 2020). Through an analysis of the emergence of FIMI in EEAS communications and strategy, this article explores the underlying meaning of the concept and its implications for the EU's public diplomacy.

While recent scholarship has deepened our understanding of FIMI operational dynamics (Buvarp, 2023; Morača et al., 2023; Yuskiv & Karpchuk, 2024), these studies largely explore its practical application. However, the strategic implications of the term itself and what its adoption reveals about the EU's evolving stance on disinformation remain mostly underexplored. This article seeks to fill that gap. The purpose of this article is not to dispute the existence or relevance of FIMI or the fact that Russia and other state actors may weaponize information as part of hybrid warfare. Rather, it critically examines whether the EU's adoption of this framing, albeit in an initial phase, is consistent with its core objectives and whether this approach reinforces its strategic position or risks complicating its broader diplomatic and normative aspirations.

2. What is FIMI

The concept of FIMI is rooted in efforts by the EEAS to refine its approach to disinformation and related threats. In 2020, the EEAS commissioned James Pamment of the Partnership for Countering Influence Operations at the Carnegie Endowment for International Peace to produce Future Threats, Future Solutions. This three-part series of papers aimed to provide a structured framework to inform EU policy.

These papers established a hierarchy of terms—misinformation, disinformation, influence operations, and foreign interference—each representing an increasingly severe threat (Pamment, 2020b). At the peak of this hierarchy, foreign interference is characterized as a deliberate and often aggressive attempt by foreign actors to undermine the sovereignty of democratic institutions through covert, coercive, or deceptive tactics. Notably, the EEAS was designated here as the European entity responsible for addressing this highest-level threat:

> This terminology is escalatory. Foreign interference can involve several influence operations. Influence operations can include many examples of disinformation. Disinformation can cause or be derived from misinformation. Institutional ownership should be developed on this understanding; for example, the EEAS would be responsible for countering disinformation spread by pro-Kremlin sources on the grounds that such disinformation is part of influence operations and a tool of foreign interference. (Pamment, 2020a, p. 17)

It stands to reason that "foreign interference" linked to disinformation soon evolved into its later conceptualization as "FIMI," a term developed within the EEAS. A framework that simultaneously characterizes disinformation as predominantly a foreign threat and designates the EEAS as the principal authority for addressing and countering such activities.

2.1. A Recent Adoption

The adoption of the term "FIMI" began in 2021. Its first notable mention, albeit without the acronym FIMI, featured in the US–EU Summit Statement in June 2021. Leaders from both sides of the Atlantic have pledged to address hybrid threats, explicitly including "FIMI," as part of a renewed transatlantic partnership. This summit declaration positioned this concept as a critical component of joint efforts to safeguard democracy and uphold the rules-based international order amidst escalating challenges from state and non-state actors (The White House, 2021).

Later that year, the concept resurfaced—again without the use of the acronym—in the joint communication on the EU strategy for cooperation in the Indo-Pacific, published in September 2021 by the HR/VP. The document declared, "The EU will help combat FIMI by state and nonstate actors in the Indo-Pacific region through new tools aimed at identifying, analysing, assessing, countering and imposing costs on information manipulation" (European Commission & High Representative of the Union for Foreign Affairs and Security Policy, 2021, p. 15).

Building on its initial mentions in 2021, the term "FIMI," still without its acronym, was officially introduced in the EU's Strategic Compass for Security and Defence, a comprehensive policy document published in March

2022 that outlines the EU's strategic vision and priorities for security and defence. The document explicitly states, "We will substantially enhance our resilience and ability to counter hybrid threats, cyberattacks, and foreign information manipulation and interference" (EEAS, 2022, p. 34).

The term is prominently featured as a heading under the broader section SECURE, named "Hybrid Threats, Cyber Diplomacy, and Foreign Information Manipulation and Interference" (EEAS, 2022, p. 34). The Strategic Compass dedicates significant focus to combating this threat, including the development of a specialized FIMI Toolbox and its integration into initiatives such as the EU Hybrid Toolbox and Common Security and Defence Policy missions.

Since then, the EEAS has consistently incorporated the acronym FIMI into its communications, underscoring its key role in the institution's approach. In a joint analysis with the European Union Agency for Cybersecurity (ENISA) published at the end of 2022, the EEAS proposed the concept "as a response to the call of the European Democracy Action Plan for a further refinement of the definitions around disinformation" and defined it as:

> A mostly non-illegal pattern of behavior that threatens or has the potential to negatively impact values, procedures, and political processes. Such activity is manipulative in character, conducted in an intentional and coordinated manner. Actors of such activity can be state or non-state actors, including their proxies inside and outside their own territory. (ENISA & EEAS, 2022, p. 4).

2.2. Defining FIMI

In the *Foreign Information Manipulation and Interference (FIMI) and Cybersecurity Threat Landscape* document, ENISA and EEAS clarify that while disinformation is a significant component of FIMI, the emphasis of FIMI shifts away from the "truthfulness of the content being delivered" and instead concentrates on the "manipulative behaviour" underlying such actions (ENISA & EEAS, 2022, p. 4). According to the EEAS, the term disinformation "captures only part of the problem: the manipulation of the content that is being pushed to distort facts and reality, to foster fear and hatred and to sow division in societies" (ENISA & EEAS, 2022, p. 6). FIMI, on the other hand, is an activity that "constitutes an integral part of modern warfare" (ENISA & EEAS, 2022, p. 7).

FIMI essentially replaces the multifaceted phenomenon of disinformation with a term more closely aligned with hybrid warfare, transplanting a concept rooted in political–military discourse into the civilian realm (Fridman, 2024). The conceptualisation of FIMI in military terms is the substitution of communication concepts such as "sender and receiver" by "operation owner" and "target" (Buvarp, 2023, p. 39). Furthermore, FIMI assumes that communication between FIMI operators and their targets is unidirectional and episodic, thereby neglecting the importance of feedback, responses, and context. Emphasis is placed on the message, therefore neglecting the reception process, the ability of the receiver to decode the message and the uses it makes of them.

As a consequence, the "target"—European publics—is seen in a passive way, since harmful messages are received and are conceived as having direct and immediate effects. By framing the issue through the lens of warfare, the EEAS abandons any connection to the complex social and political dynamics that contribute to

the spread of false information, advancing a concept that is fundamentally based on circular reasoning. If we assume that Russia, as the EU's primary adversary, invariably intends to manipulate information, then any narrative or information emerging from Russian sources is, by definition, FIMI, regardless of its content, and is therefore a threat.

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 institution's mandate and strategic priorities (Hénin, 2023), aligning with the EU's broader 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 the FIMI ultimately signify? In practice, FIMI risks becoming synonymous with whatever narrative Russia and China put forward. 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 US or Israel. For instance, will the EU address Elon Musk's support to the AfD in Germany's 2025 snap election (Connolly, 2024) as a form of FIMI?

2.3. An Ongoing but Relevant Conceptual Innovation

Because this is a recent turn, only a few studies have focused on the implications of FIMI. Buvarp (2023) presented a methodological framework using general morphological analysis to dissect the inner workings of FIMI operations, offering a structured approach to understanding its mechanisms. Yuskiv and Karpchuk (2024) provide a detailed case study of Russia's deployment of the FIMI leading to its intervention in Ukraine, focusing on how state and nonstate actors manipulate information for strategic purposes. Morača et al. (2023) broadened the discussion by examining FIMI's effects in Africa and the Western Balkans, stressing how local and foreign narratives intertwine to challenge the EU's influence in these regions.

This article addresses a recent and ongoing, yet potentially decisive, innovation in the EEAS institutional discourse on disinformation. The EU awoke to the incorporation of disinformation into the aggressive toolbox of its systemic rivals in 2014, and from 2016, it deepened the reflection on the vulnerability of liberal societies to information manipulation.

This has led the EU to develop a response to disinformation founded upon a systemic view of democracy (García-Guitián et al., 2024) and a strong internal and external distinction (Casero-Ripollés et al., 2023). The EU has been well aware of the negative risks associated with "policing the truth" and "re-establishing centres of truth-making," as described by Farkas and Schou (2019), therefore adopting a combination of multilevel monitoring of external threats that are seen as potentially affecting security and democracy with a co-regulatory response consisting of collaboration between multiple stakeholders (social media, fact-checkers, and experts) in the identification and limitation of systemic risks to public speech. This creates a potential misfit between the ontological threat perceived from outside and the internal co-regulatory response where nonstate actors seek to redress attacks by improving the quality of available information, albeit without challenging the ability to dissent, for instance, by limiting the reach (but not eliminating) harmful content or tagging verification labels on contested information. In this sense, the banning of the Kremlin-backed channels RT and Sputnik in the EU came as a decision so misaligned with the existing frame that it has been explained as a decision taken outside of the existing disinformation policy

environment and in line with broader sanctions against Russia in the context of the Ukraine invasion (Datzer & Lonardo, 2023, p. 760).

This policy rests upon the identification of verifiably false information as the problem, and much of the work of the EU has been devoted to countering the politics of falsehood, in the terms of Farkas and Schou (2019), therefore discussing ways to empower truth sayers, provide the public with better information via improved fact-checking and increasing their ability to recognise false information through civic education. However, FIMI moves the EU's concern into a broader concern that can be termed malign information influence (Wagnsson, 2020; Wagnsson et al., 2024), where the focus is no longer placed on the detection and contention of wilfully forged information with a harmful intention and instead moves to the usage of information—either verifiable false or not—to manipulate public opinion. Whereas the disinformation agenda attempted to contain false information, FIMI increases concerns about the vulnerability of democracies by assuming that they can be manipulated by rivals using a combination of false information and malicious narratives. In other words, rivals can use factually correct information to articulate negative narratives that can be used to manipulate the preferences of citizens and political actors in decisive political decisions.

This subtle change is coherent with the EU's broader concern about narratives since the early 2010s (Manners & Murray, 2016) and with its position on the vulnerability of democracy to manipulation by foreign actors. However, it is potentially significant since the disinformation agenda assumes that the European public is vulnerable if it cannot identify falsehoods, but controversial opinions and narratives have a place for discussion in the public sphere. FIMI potentially moves all forms of communication arriving from foreign rivals into the space of potentially disruptive communication. It is the type of incremental change oriented with existing properties that may nevertheless evolve into a specific category and, therefore, merit particular discussion and analysis. We are also aware of the limited amount of evidence of change. FIMI is a very new addition to the EEAS toolbox and may expand or never be confirmed as a relevant contribution. However, its potential qualitative importance as a potentially significant transformation of the EU's strategy for democracy protection in the post-truth era justifies including it in conceptual debates and analyses beyond its still quantitatively minor importance.

This article intends to discuss the strategic implications that this conceptual pivot raises about the EU's identity as a global actor. Traditionally described and self-perceived as a civil, soft, or normative power (Manners, 2002), the EU's greatest asset has been its ability to shape global norms and values through diplomacy, dialogue, and peaceful engagement. However, the adoption of FIMI aligns with "information warfare" framing (Szostek, 2020), which risks reducing complex communicative processes to binary notions of attack and defence. As cautioned by Wagnsson and Hellman (2018), this shift could erode the EU's moral authority and credibility, diminishing its capacity to serve as a global advocate for peace and cooperation, even though citizens in EU member states (Wagnsson et al., 2024) and beyond (Szostek & Orlova, 2024) have also become more aware of the role of foreign interference. The Russian aggression on Ukraine has therefore largely contributed to moving decision-makers, scholars, and public opinion to positions more favourable to information control regarding foreign rivals than before, and we argue that along these lines, FIMI can have an effect on the EU's distinctive approach to international relations as a normative civilian power. At the moment of the emergence of the EU disinformation policy community, Ördén (2019, p. 427) highlighted a clear divide in policy preferences and risk attitudes: While the internet and security/defence communities shared a procedural approach focused on the continuous management of the digital space, the

media and education communities prioritized content pluralism and the diversity of viewpoints among citizens, viewing protection as empowering individuals to form their own judgements. The adoption of FIMI appears to be a move in the direction highlighted by the former.

3. Why FIMI Took Root in the EU

Because the EU has assumed since the beginning of its approach that disinformation is linked to foreign interference and has only recently addressed internal phenomena (Casero-Ripollés et al., 2023), member states tasked the EEAS to respond. In this context, the EEAS understood the necessity of increasing its strategic communication capacity, particularly focusing on digital disinformation and Russian media, as the new digitalization of diplomacy and social media represented a challenge to traditional diplomatic communication. The EEAS hired five communication experts from member states to create the East Strategic Communications Division (StratCom) task force, introducing new ways of doing diplomacy within the EEAS (Hedling, 2021) and reinforcing its role in front of member states.

To fully understand the emergence of FIMI, it is essential to consider several trends that have shaped the EU's approach to combating disinformation: the increased capabilities acquired by the EEAS, the conceptualization of narratives as a threat to the EU, and the polarizing effects of trying to regulate disinformation at both the EU level and the European national arenas.

3.1. The Incremental Acquisition of FIMI Capacities by the EEAS

Whereas, as we will discuss below, the adoption of FIMI is also de facto a call for new resources and capacities adapted to the new strategy, it is also expected that the strategy will incrementally build upon the structurally existing capacities and strategies against international disinformation campaigns. The FIMI toolbox addresses four interrelated priority dimensions: situational awareness, resilience, regulatory frameworks, and the EU's external action. Each of these areas encompasses various instruments aimed at either preventing or mitigating the impact of FIMI activities, deterring those who seek to engage in such actions, or effectively responding to them (EEAS, 2024b). Following the mandate of the European Council (2015), the first significant initiative launched by the EEAS was the creation of the StratCom together with the EUvsDisinfo platform.

This division leads efforts to combat foreign disinformation, manipulation, and interference by developing strategies to engage with key audiences, particularly in the EU's neighbourhood. Their proactive approach combines regional expertise, policy development, communication initiatives, and data analysis to amplify the EU's voice and support its strategic interests. This campaign-based communication strategy is complemented by strategic engagements, support for independent media and organized civil society, and training for EU delegations and public communicators (European Union External Action Service, 2021). The EUvsDisinfo was also created in 2015 to increase the ability to anticipate, address, and counter the Russian Federation's persistent disinformation campaigns targeting the EU, its member states, and neighbouring countries. Its primary objective is to raise public awareness and deepen the understanding of the Kremlin's disinformation tactics while empowering citizens in Europe and beyond to build resilience against the manipulation of digital information and media (EUvsDiSiNFO, n.d.). In December 2019, the General Affairs Council Conclusions regarding EEAS StratCom's efforts to combat foreign disinformation, information manipulation, and interference confirmed three key work strands: "(1) proactive communication

and raising awareness, (2) support for independent media, and (3) detection, analysis, and counteraction of such activities by threat actors" (EEAS, 2015, p. 1). This mandate was explicitly broadened to include new threat actors and geographic regions.

The next step was the Action Plan Against Disinformation launched in 2018 by the HR/VP in collaboration with the Commission to coordinate efforts to address the growing threat of disinformation. In particular, to ensure that the relevant EEAS strategic communication teams were equipped with the necessary mandates and resources, considering the 2019 European Parliament elections (European Council, 2018, p. 6). The action plan aims to enhance EU institutions' disinformation capabilities, strengthen coordinated responses with member states, mobilize the private sector, and improve societal resilience (Butcher & Neidhardt, 2021). The next EEAS step was to implement the Rapid Alert System, which focused on facilitating the sharing of insights related to disinformation campaigns and coordinating responses among EU institutions and member states. It relies on open-source information and incorporates insights from academia, fact-checkers, online platforms, and international partners (EEAS, 2019a). Its primary objective is to address disinformation campaigns that interfere with or undermine European democratic processes, focusing on two categories: (a) campaigns originating from or disseminated with the support or involvement of foreign actors; and (b) campaigns aiming to influence national or European elections. The last initiative supported by the EEAS was the creation of the FIMI-Information Sharing and Analysis Centre in 2023. It enhances its members' capacity to detect, analyse, and respond swiftly and efficiently to FIMI while adhering to the core principle of protecting freedom of expression (Information Sharing and Analysis Centre, n.d.).

3.2. Narratives as a Threat

As the first Von der Leyen commission took office in 2019, the concept of "geopolitics" gained renewed prominence within EU policy circles and the media. Faced with escalating external threats—from intensifying competition between the US and China to growing instability in its own neighbourhood—the new administration committed to reasserting the EU's global role by integrating geopolitics into its strategic framework. This "geopolitical Commission" placed strategic communication at the forefront of its agenda, as reflected in the Commission's 2020 Work Programme, which explicitly aimed to counter "multiple challenges, both from outside and from within," confronting the democratic systems of EU member states and enhancing their long-term resilience (European Commission, 2020, p. 8).

As Valenza (2021) observes, this emphasis on strategic communication gained further momentum amidst the Covid-19 pandemic. In February 2020, Josep Borrell (HR/VP) argued that the EU must "relearn the language of power" and strategically align its resources to maximize its geopolitical impact (Borrell, 2019). Borrell underscored the critical role of narratives, asserting that "whoever is best at organizing the response, quickly drawing on lessons learned from around the world, and communicating successfully to citizens and the wider world, will emerge strongest" (Borrell, 2020). He depicted a global landscape marked by "a struggle of influence through spinning" and urged EU institutions and member states to be "armed with facts" to defend Europe against its detractors (Borrell, 2020).

To fully grasp this strategic shift, it is essential to consider the "narrative turn," a concept introduced in the early 2010s to explain the EU's legitimacy challenges (Bouza García, 2017). This turn marked the first time

the EU recognized its lack of control over popular narratives about Europe as a significant risk to the Union. The realization that the EU needed to establish a new narrative to win back the hearts and minds of Europeans became central to the continuation of the EU integration project.

This renewed focus on narratives and strategic communication—aimed at promoting "beneficial" internal narratives while countering "dangerous" external narratives—was built on the foundations laid by the EEAS, which includes a dedicated StratCom. This division includes the East Stratcom Task Force, the Western Balkans Task Force, and the Task Force South, each tasked with addressing disinformation in key regions critical to the EU's strategic interests. Both the division and its regional task forces are specifically charged with "narrative positioning" (EEAS, 2021). For example, when the East Stratcom Task Force was established in 2015 as the first unit deployed by the EEAS following the Council's mandate, its explicit goal was to develop a positive narrative about the Union's actions in the Eastern neighbourhood while simultaneously deconstructing conspiracy theories and debunking disinformation (Missiroli et al., 2016).

3.3. Polarization Challenges

In the lead-up to the 2019 European elections that ushered in the Von der Leyen commission and amidst the fallout from the Cambridge Analytica scandal and Russia's interference in the 2016 US presidential election, the EU significantly bolstered its disinformation countermeasures through the Action Plan against Disinformation. This initiative included the establishment of the Rapid Alert System, which was designed to facilitate swift data exchange on disinformation campaigns between member states, the European Commission, and the EEAS, thereby enhancing the EU's capacity for a coordinated response. The plan also underscored the importance of member states' involvement, urging them to "complement and support the actions of the Union institutions" by expanding their national capacities and contributing additional resources to the collective effort (European Commission & High Representative of the Union for Foreign Affairs and Security Policy, 2018, p. 6).

However, as Dragomir et al. (2024) recently noted, despite the comprehensive plans and various EU measures implemented to address disinformation over the past decade, these strategies have not uniformly fortified member states against the phenomenon. A closer examination of the divergent responses from EU capitals highlights the significant limitations that national governments face in combating disinformation. One of the most glaring issues is that "politicians and government officials remain a major source of disinformation accross Europe" (Dragomir et al., 2024, p. 7). Additionally, legislation intended to penalize the spread of fake news can be vulnerable to misuse and can exacerbate polarization by fostering mistrust and perceptions of manipulation by authorities.

The recent clash between the former EU Commissioner Thierry Breton and Elon Musk, CEO of X (formerly Twitter), over the Digital Services Act highlights the challenges of regulating disinformation in a politically charged environment. Before an August 2024 interview between Musk and Donald Trump, Breton urged Musk to ensure that X complied with the Digital Services Act, which mandated that platforms limit harmful content and address disinformation. Musk dismissed this as an attack on free speech, igniting a broader debate, with Trump's supporters accusing the EU of electoral meddling and right-wing European parties calling the Digital Services Act politically biased ("Abascal critica que la UE," 2024; Starcevic, 2024).

At the national level, Spain provides another relevant example. In April 2018, under a Partido Popular government, a working group was formed in Congress to study disinformation, which was proposed by the defence minister. Unidas Podemos rejected it. A year later, now under socialist administration, the Coordination Network for Security in Electoral Processes was created, including the Permanent Commission Against Disinformation. This time, the Partido Popular condemned it as a "Ministry of Truth," sparking a heated debate amplified by Vox and opposition media (Correyero-Ruiz & Baladrón-Pazos, 2023).

The clash across the political spectrum underscores the reality that in highly polarized environments, such as those prevalent in many member states, any initiative by the ruling party to combat disinformation risks being perceived as a partisan tool, potentially weaponized by the opposition.

3.4. Logical Conclusions

As previously noted, the recent pivot towards FIMI within the EU's disinformation strategy can be attributed to three key factors. First, the incremental capacities acquired by the EEAS have significantly expanded the institution's influence, allowing it to take the lead in shaping disinformation frameworks. Second, the EU's growing perception that external narratives pose an existential threat to the European project has placed a renewed emphasis on strategic communication, driving a focus on "defending" and "responding" to these perceived threats. Finally, the difficulty of legislating disinformation at both the EU and national levels has created an imbalance, as the EEAS has been able to advance its external disinformation agenda far more rapidly than other EU institutions and member state parliaments, which struggle with fragmented and polarized domestic contexts.

These converging trends have both capitalized on and strengthened the EEAS's exclusive focus on the external dimension of disinformation. By positioning foreign actors as the primary culprits, the EEAS has navigated the politically fraught environments within member states. Simultaneously, it has emerged as the greatest beneficiary of the European Commission's broader geopolitical pivot and its strategic emphasis on narrative building and strategic communication as tools of defence. These shifts have not only validated but also amplified the role of this institution in shaping the EU's response to disinformation.

There is no better example of this dynamic than the recent promotion by the EEAS of the concept of FIMI. As stated by Nicolas Hénin, the clinical approach of FIMI, almost completely detached from the content or from other actors other than the most obvious geopolitical rivals of the EU, "responds to strong political pressures and limitations of consensus demanded by the different perspectives of the Member States" (Hénin, 2023, p. 4).

In defining FIMI, the EEAS avoids the pitfalls of the debate about disinformation (value pluralism and democracy, balance between values and rights, polarization and populism) or about ways to respond (regulatory complexities, national diversity, and differing capacities) and focuses exclusively on the external dimension. However, it also provides a politically neutral understanding of the threat. By not addressing the nature of disinformation or the best tools to respond but instead objectifying information—even factually correct information—as an asset that can be manipulated against democracies, FIMI provides a bureaucratic tool that allows EEAS to define its contribution to the EU response on the grounds closer to its interests and expertise.

4. Public Diplomacy in a World of Narrative Rivals?

The EU has traditionally perceived itself as an international power closely associated with the concept of normative power that uses public diplomacy as a tool of international influence. Public diplomacy is an international diplomatic and political communication activity aimed at creating a positive image and/or political influence to support the achievement of foreign policy objectives, which is close to a less intrusive and less malign-minded form of propaganda (Cull, 2009, pp. 22–23). It functions as a tool to enhance soft power—a form of power based on the capacity for attraction, influence, and persuasion that occurs indirectly through the mobilization of resources such as culture, principles, foreign policy strategies, and institutions (Nye, 1990).

Public diplomacy aims to promote EU interests by understanding, informing, and influencing. This involves clearly explaining the EU's goals, policies, and activities and fostering understanding through dialogue with individual citizens, groups, institutions, and the media. This broad definition encapsulates the essence of the EU's internal and external public diplomacy. Essentially, it concerns self-image, or the image that a given actor intends to project to a third party. The complex linkage between the internal and external dimensions of EU public diplomacy can be best understood as a self-reaffirming process, wherein messages communicated internally are also directed externally as part of the EU's ongoing internal identity construction. The attraction of the EU is based on the will of its partners to emulate the peace, stability, and prosperity characteristic of EU members. The legitimacy of internal identity construction, the acceptance of norms, and the consensus around the narrative significantly influence the legitimacy of external public diplomacy for both EU citizens (who wish to see reflections of themselves) and third parties (who wish to see the virtues of the European example reflected towards themselves).

With the adoption of the Lisbon Treaty, public diplomacy is no longer conducted exclusively by the Council Secretariat and the Commission but also by the EEAS. The advent of the EEAS held the promise of integrating strategic communication, public diplomacy, and stakeholder engagements in ways that had previously eluded the EU, intending to create a comprehensive communication culture across the EU institutions involved in external actions (Song & Fanoulis, 2023). The EEAS plays a crucial role in shaping the EU's positive image globally. The primary requirement is to ensure that its foreign policy actions align coherently with the EU's self-representation and professed values (Chaban & Lucarelli, 2021).

What made public diplomacy an acceptable and successful form of diplomacy rather than an aggressive form of propaganda was the liberal understanding of a rules-based international order where partners did not harm each other with hostile actions and instead competed under generally accepted rules of behaviour. This is in stark contrast with a geopolitical understanding of international relations where information can be weaponized (Valenza, 2021). Defining FIMI as a mostly nonillegal yet hostile behaviour establishes self-interest on the side of the sender despite the civilian nature of action as the primary rule of thumb for acceptable informational exchanges. Even though the aggressive form of communication, the use of disinformation and the combination of other warfare techniques clearly situate FIMI outside the consensus on public diplomacy, conceptual clarity between liberal public diplomacy and manipulative behaviour is difficult to achieve (Szostek, 2020, pp. 2740–2741).

The process of securitization of the object is therefore fully in line with decisions adopted since 2018 (Casero-Ripollés et al., 2023) and implies not only a bureaucratic specialization logic but also a much broader

definition of the threat. Given that concerns with disinformation emphasize that geopolitical rivals could attempt to manipulate EU political processes using false information, FIMI focuses on manipulative behaviour against EU values, procedures, and political processes. In summary, exercising soft power via diplomacy is a form of using information in the form of publicly articulated narratives to shape (therefore manipulate) preferences, values, or political processes into positions more favourable to the EU.

An example of how the EU has tried to promote its soft power is the usage of strategic communication. The EU adopted an action plan on strategic communication in the decisive mid-2010s, effectively the interregnum between liberal narratives and the advent of new geopoliticised understandings (Manners & Murray, 2016), whose objectives are:

> Effective communication and the promotion of EU policies and values towards the Eastern neighbourhood, strengthening the media environment. (East Stratcom Task Force, 2015, p. 2)

In 2014, former HR/VP Federica Mogherini stated that the EU was working on making X one of its fundamental diplomatic tools (Mann, 2015). Additionally, the EU Global Strategy (EEAS, 2016, p. 23) declared that the EU would "enhance its strategic communications, investing in and joining up public diplomacy across different fields, in order to connect EU foreign policy with citizens and better communicate it to our partners." In a 2019 report on the implementation of the EU Global Strategy, the EEAS emphasized that "public diplomacy and communication are critical" and suggested that the EU could invest more in "positively communicating who we are and what we seek to achieve in the world" (EEAS, 2019b, p. 26).

Therefore, we argue that by adopting the FIMI strategy, which considers all types of information exchanges, albeit from certain actors only, as potentially dangerous, the EU is severely endangering its ability to use public diplomacy and strategic communication (Szostek, 2020, makes this point for other responses to information warfare). Whereas it may be reasonably assumed that these channels are effectively locked in relation to geopolitical rivals, who control information channels in an authoritarian fashion, a key issue to consider is the reception of this message by other international partners. This is a further step in the direction of adoption since the geopolitical turn:

> From building policy on mutuality and reciprocity and attempting to co-create between equals, the EU has moved towards a communication approach that considers cultural relations as a tool in the above-mentioned EU StratCom's box, and local actors as rather passive recipients of a message that has already been drafted in Brussels. (Valenza, 2021, p. 4)

However, as Valenza anticipates, public diplomacy assumes reciprocity. Therefore, despite the EU's designation of Russia and China as its primary narrative rivals, the concept potentially undermines the ability of the EU to carry out public diplomacy successfully since any international actor attempting to manipulate the preferences of EU political actors in its favour could be targeted as an object of anti-FIMI measures and would therefore likely retort: "Problematically, however, this messaging approach disregards the fact that successful people-to-people contacts take place only when the principles of mutuality and reciprocity are fully reflected in the implementation of external action" (Valenza, 2021, p. 4).

Furthermore, the FIMI can also impact the polyphonic nature of EU public diplomacy narratives: Since the FIMI considers information a dangerous element to be channelled, it can endanger the organic ability to cast

a positive narrative of the EU. This is particularly important since the EU's public diplomacy is intermestic, as messages are sent to both the EU member states and the third states.

The EU turning to FIMI does not mean that it has renounced public diplomacy, as it still sees it as a fundamental tool of the EEAS and that the fight against disinformation can actually be reinforced. However, based on a case study by NATO, Olsson et al. (2019) state that information warfare strategies risk undermining public diplomacy efforts, as they foster adversarial behaviour instead of being open to genuine dialogue. Of course, EU FIMI efforts are not a form of aggressive information warfare against its rival, but they adopt an adversarial language that conceives of all information from some rivals as a potential bit of information, therefore fostering defensive information warfare and enhancing the already mentioned conceptual lack of clarity between information warfare and public diplomacy. As a result, it has been argued that, at least in relation to Eurasia, the EU can no longer be conceived as a normative but a defensive power (Zwolski, 2024, p. 134). The remaining questions are whether this turn is fully reflective and whether the EU has the means, tools, and will to achieve such a transformation.

5. Conclusions

The FIMI pivot is a logical evolution for an institution seeking to recalibrate and redefine its role within an increasingly hostile and multifaceted global environment. In this process, the actor responsible for driving the EU's external policy—the EEAS—has found ways to replicate the narrative strategies of its geopolitical rivals, adopting a more assertive posture in response to foreign threats. This is coherent with ongoing securitization and geopoliticisation in other fields but contributes to transforming the way in which the EU sees itself (Manners & Murray, 2016).

The shift towards viewing disinformation as a form of hybrid warfare may reflect an accurate reading of a global reality that the EU finds unfavourable but cannot fundamentally change. However, this article challenges more than just the adoption of FIMI or the reframing of disinformation as a broader issue requiring new regulatory frameworks. Returning to a question addressed by Szostek (2020), the issue is whether democracies can win information and at what cost. In terms of Wagnsson et al. (2024), the EU's approach has decidedly opted for confronting rival narratives, whereas the jury is still out as to its ability to do so while still promoting its own narratives abroad (Valenza, 2021) or assume a greater role in blocking, as evidenced in the exceptionality (both as a single case and as an application of an extraordinary measure) of the RT and Sputnik ban. Does this shift and its effects truly enhance the Union's standing, or does it risk eroding its main strengths, ultimately causing it to lose more than it gains?

As discussed in Section 4, the EU is still fundamentally an international actor with civilian capacities who can turn its market power into political influence by diplomatic means, including public diplomacy. Even though it is trying to accommodate itself to a diagnosis of an international environment where liberal norms weaken, the EU is only incorporating the information control rationale into its external policy toolbox incrementally, whereas it is still expected to be able to follow a rules-based normative logic in the fight against disinformation in the internal market (Casero-Ripollés et al., 2023). The dilemma is whether the EU has sufficient time and resources to develop new capacities and strategies in line with its new world vision.

The new world vision defining the world as a hostile environment for what the EU has traditionally been may become a consensual venue both for reformists and more radical critics of traditional EU policies. This

consensus works since rival visions are not there to be represented and, as noted in Section 3, it avoids some of the more polarising issues about the role of domestic politics, media, and platforms in the origin and circulation of disinformation. This has implications for the consolidation of a postcolonial worldview opposing an internal sphere where rules and norms can be applied and an external sphere dominated by securitised power politics, including information wars, and can potentially affect political pluralism internally (Wagnsson et al., 2024).

This article contributes to the emerging policy turn that FIMI represents in the EU policy toolbox on disinformation. This line of work will require further research in different directions. First, the EEAS is not a monolithic actor but is composed of different internal actors maintaining internal balance. The critical relationship between the interception of harmful foreign narratives and the ability to exert public diplomacy is likely to become an issue of internal contention. Additionally, research will be required if and when the case emerges of applying FIMI to actors who are internally more divisive than China and Russia, such as Israel or the Trump-led US. Finally, even though the EU regulatory response still maintains a clear distinction between foreign threats (to be addressed with FIMI) and internal phenomena (related to the EU market or national politics) where distinctions between legal and illegal and factually based or unverifiable contents apply, the RT/Sputnik sanctions demonstrate that geopolitical thinking can rapidly challenge this internal/external distinction and take decision-making down a slippery slope affecting internal freedom.

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About the Authors

Lucas Proto is a journalist in *El Confidencial* and a part-time lecturer in political science at the Universidad Autónoma de Madrid, where he is undertaking a PhD.

Paula Lamoso-González is an assistant professor at Universidad Loyola Andalucía. She holds a PhD in Law, government, and public policies from the Universidad Autónoma de Madrid.

Luis Bouza García is associate professor of political science at the Universidad Autónoma de Madrid.

ARTICLE

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

Flavia Durach [ID], Mălina Ciocea [ID], and Cătălina Nastasiu [ID]

College of Communication and Public Relations, National University of Political Studies and Public Administration, Romania

Correspondence: Flavia Durach (flavia.durach@comunicare.ro)

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 $\pm 3\%$ 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.

Where do you get your information from most often?	What sources of information do you think are most prone to disinformation?				
	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.

How often do you follow the news on topics of interest?	To what extent do you believe you have personally been exposed to fake news or disinformation in recent months?	
	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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About the Authors

Flavia Durach (PhD) is associate professor at the National University of Political Studies and Public Administration, Bucharest. Her research interests include the study of digital platforms and online disinformation. In recent years, she has been involved in a number of international projects dedicated to media literacy and countering disinformation.

Mălina Ciocea (PhD) is associate professor at the National University of Political Studies and Public Administration, Bucharest. She is interested in the topics of the Romanian diaspora in media and political discourse, public problems, and media debates in the Romanian public sphere.

Cătălina Nastasiu (PhD) is assistant lecturer at the National University of Political Studies and Public Administration, Bucharest, where she is currently teaching courses on media and digital literacy. Her areas of academic interest include the study of disinformation, the analysis of media frames, and strategic narratives.

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ARTICLE

What a Human-Centred Approach Reveals About Disinformation Policies: The Baltic Case

Auksė Balčytienė [1,2], **Agnese Dāvidsone** [3], and **Andra Siibak** [4]

[1] Department of Public Communications, Vytautas Magnus University, Lithuania
[2] Vytautas Kavolis Transdisciplinary Research Institute, Vytautas Magnus University, Lithuania
[3] Institute of Humanities, Economics and Social Sciences Research, Vidzeme University of Applied Sciences, Latvia
[4] Institute of Social Studies, University of Tartu, Estonia

Correspondence: Andra Siibak (andra.siibak@ut.ee)

Abstract

The Baltic countries' responses to disinformation are widely recognized for their effectiveness in balancing "hard" and "soft" approaches while upholding democratic values (Bleyer-Simon et al., 2024). This article argues for additional efforts and more focused approaches to sustain societal resilience amid increasing geopolitical uncertainties and national political and economic risks, resulting in challenges of a more "epistemic character," such as growing information-related vulnerabilities, informational inequalities, and polarization. To expose inconsistencies and gaps in the current strategies and agendas for countering disinformation, the article proposes a human-centred approach based on the critical realist framework elaborated by Margareth Archer (1995, 2020). While Estonia, Latvia, and Lithuania have advanced beyond mere risk awareness in their national policies, this article argues that a more targeted approach is necessary—one that goes beyond the protective logic of securitization and toward evidence-informed awareness of the divergences and information-related inequalities among people.

Keywords

agency; Baltic countries; countering disinformation; disinformation; governance; informational inequality; media literacy; risk awareness; vulnerability

1. Introduction

Significant variations exist in how European-wide frameworks for societal resilience development are integrated into national policies and communication governance models (Casero-Ripollés et al., 2023). When addressing digital disruptions, such as the rise of disinformation, misinformation, and the dominance of other forms of dysfunctional content, including hate speech and radicalization in digital discourses, two opposing yet coexisting logics, and the necessary tools to mitigate them, emerge. On the one hand, there are apparent attempts to impose measures associated with "hard power," based on ideas of protectionism, and "exceptional decision-making," in specific circumstances, indicating a willingness to respond with more substantial (regulatory) positions when faced with particular challenges and crises (Casero-Ripollés et al., 2023). On the other hand, advocating for measures for platform accountability, strengthening fact-checking in the media, and providing media literacy programs for citizens are essential "soft" strategies (Sádaba & Salaverría, 2023).

Although a wide range of policy approaches (cf. Tuñón Navarro et al., 2025) are found across Europe, there is no clear understanding of which efforts might yield explicit and desirable outcomes. As European-wide strategies for information resilience are not uniformly integrated into national resilience strategies, different national policy steps deserve to be identified and specifically discussed (Balčytienė & Horowitz, 2023; Dragomir & Túñez López, 2024).

Our analysis uses exemplary cases from Estonia, Latvia, and Lithuania to study the adaptations of the EU policies as well as specific national measures elaborated to combat disinformation in the Baltic region. We examine how the policy approach, influenced by awareness of disinformation risks, is implemented at the structural level, and which characteristics—those starting with the individual and expanding to various sectors (Truusa, 2021)—are involved in addressing information threats. We also examine how these approaches integrate with more "soft" perspectives on media literacy and media education, which have been developed for democratic expression and active citizenship.

Since we are examining the outcomes of the decision-making process reflected in structural reforms, the primary focus of the analysis is consistency in communications policy framing and the actual experiences of citizens.

For this task, the perspective of critical realism (Archer, 1995) appears of exceptional significance. While acknowledging the presence of dominant objective social structures, the critical realist approach stresses the human-centred view, namely, it aims to examine people's understandings and perceptions of the studied reality. It is our hypothesis that policy formation and the development of strategic responses to counter disinformation can be a good focus for analysis when examined from the perspective of decision-making by engaged agents (social actors and stakeholders). Hence, our study focuses on the complex interplay and balance among structural, agentic, and communicative (cultural) powers and their manifestations in complex social relations.

The study's main questions follow the societal resilience development goal, explicitly analysing the actors' (stakeholders') participatory roles and their effectiveness in policy making. While adhering to the whole-of-society ideals, which run on inclusion and universalist values, the analysis seeks to reveal

characteristics of current policies and models of information exchanges and their related strengths and weaknesses in a specific geographic, political, and cultural context.

As an important contextual factor, it needs to be noted that the above-mentioned Baltic countries, after the collapse of the Soviet Union, implemented economic and political transformations based on strict neoliberal principles. These countries, once described as the "paragons of neoliberalism" (Salyga, 2023, p. 2), embraced market-oriented reforms; prioritizing free-market capitalism, privatization, and limited government intervention coupled with the promotion of individualism (Bohle & Greskovits, 2007; Norkus, 2023). Unfortunately, this has happened at the expense of social welfare programs and public services, leading to diminishing social bonds and a reduction of safety nets for the population (Bērziņš et al., 2024; Ķešāne, 2023). Hence, it is worth studying what expectations are posited on people by the neoliberal policy agendas in the midst of the disinformation crisis.

The discussion begins with the argument that evidence-informed policy formation and resilient civics do not simply result from a linear process or aggregation of actions. Instead, such aims manifest as the result of an ongoing process of policy framing and negotiations between ideals and the visions sustained by various actors.

2. Background: Informational Vulnerability and Risk Awareness

To begin with, the global spread of online disinformation should be addressed as a "wicked problem" following the definition by Peters (2017), who states that a wicked problem is "complex, involving multiple possible causes and internal dynamics that could not be assumed to be linear, and have very negative consequences for society if not addressed properly" (p. 385). A wicked problem cannot ever be solved: At best, it can be managed if proper strategies are in place, which draws on co-regulation performed by governments and platforms with, more importantly, the involvement of civil society and citizens (Montgomery, 2020).

Wicked problems typically emerge from inter-dependent socio-cultural contexts, adding complexity and ambiguity for policymakers and researchers. Drafting policies to address wicked problems requires a holistic understanding of the entire context, which, in the case of online disinformation, is determined by the specificities of the national information ecosystem on one hand and a wide range of stakeholders seeking different solutions on the other. If addressed this way, disinformation pressures us to examine the broader struggle with implications for institutions, media systems, audience media consumption patterns, and many other issues. Similarly, it invites various approaches for scholarly analysis, including those encompassing digital, technological, and socio-political outcomes. So, addressing online disinformation as a wicked problem cannot yield a single definitive approach leading to a successful solution.

Despite numerous scholarly attempts to clarify the fuzziness of the disinformation phenomenon and the responses to combat it—ranging from structural and legal protection systems at the governmental level to fact-checking and media literacy efforts by various organizations—there are still quite a few uncertainties. In most cases, the emphasis is on promoting societal resilience as a favourable outcome around which all solutions to mitigate disinformation should revolve (Humprecht et al., 2020). On the other hand, societal resilience is not a fixed point that can be reached; instead, it needs to be defined as a complex state characterized by multilayered features, some of which can be determined from structural (macro and mezzo) or agentive (micro) perspectives (Balčytienė & Horowitz, 2023).

In the last decade, numerous steps have been taken to counter disinformation at the level of the EU. The main lines of action include: (a) developing policies to strengthen European democracies, making it more difficult for disinformation actors to misuse online platforms, and pushing towards the increased responsibility of online platforms; (b) countering foreign interference and cyberattacks through awareness-raising projects, advanced technological solutions, and improved coordination; (c) building societal resilience against disinformation through media literacy and awareness raising; (d) cooperating with institutions, national authorities, civil society, and other organizations (Borz et al., 2024; Datzer & Lonardo, 2022; European Commission, n.d.).

All these action lines are well-prepared and thoughtfully expressed; however, we argue that gaps still exist in this approach, which can be referred to as "unresolved issues." These issues are context-dependent and thus require more effective and coordinated responses that would not suffer from terminological unclarity, unclear and untested legal foundations, a weak evidence base, and a lack of political mandate (Pamment, 2020; Peukert, 2024). Indeed, numerous steps at the EU level have been framed towards countering disinformation, including the creation of special government agencies like the East StratCom Task Force (2015), the adoption of the High-Level Group on fake news and online disinformation (2018), the development and supervision of two Codes of Practice on Disinformation (2018 and 2022), and the adoption of the Digital Services Act in 2022, which obliges the largest online platforms and online search engines to assess and mitigate systemic disinformation risks stemming from their services (Peukert, 2024). Still, the contextually determined challenges posed by various approaches to the disinformation problem applied by the member states weaken the coordination of efforts advanced by the EU institutions.

With this in mind, we contend that national countries' responses to the influx of disinformation should be examined to better understand how the European strategies to protect democratic communication processes manifest in national policies and what the national and regional solutions are that countries choose to work on. Our main argument is that there must be a balance between the structural measures (macro level), most explicitly evident in policy initiatives and governance decisions, and the micro-level features, such as the level of information and communication rights and media use preferences manifested by ordinary citizens (Ala-Fossi et al., 2019; Horowitz et al., 2024).

Therefore, following this line of analysis, countering disinformation must be seen not only as a technologically geared politico-economic challenge and a services-relating issue on the side of global technological infrastructures and platforms' policies but also as a sociopolitical and sociocultural process at both national and regional levels, involving various actors (stakeholders) and requiring their response, awareness, and engagement. When analysed from a processual and human-centred perspective, each actor's (or group of actors') understanding and performed role count, and thus, the conceptual definition of risk awareness (Bleyer-Simon et al., 2024) appears well-suited for highlighting specificities of strategic thinking to establish communicative practice among those partners. In broad terms, risk awareness concerning disinformation represents a comprehensive strategy covering various dimensions. The dominant approach applied in different analyses relies on examining the system-level characteristics (see, for example, Humprecht et al., 2020, 2021) and individual capacities (Jolls, 2022) required to minimize disinformation's detrimental effects.

In our analysis, we argue that a country's level of risk perception is indicated by strategic policymaking and the development of long-term strategies to address emerging informational inequalities and information-related vulnerabilities. Our argument is framed according to such a line of thinking: Since decision-making and information processing are socio-cultural processes sensitive to values and communication traditions relevant to a national context, as well as a country's geopolitical location and memory politics (Hallin & Mancini, 2004, 2012), we want to suggest that such cultural variations in information-related thinking across countries will also manifest in strategic policymaking.

By advocating for this approach, however, we endorse that information-related risks and crises are not solely linked to physical phenomena, such as digitally accelerated communication leading to an overabundance of information. Instead, these risks represent connections to people's evolving media awareness and self-efficacy assessments, which are influenced by social, cultural, and psychological factors, and lead to informational vulnerabilities (Balčytienė & Iarovyi, 2023). Thus, we argue that by taking a broader view of people's skills and life experiences, a human-centred approach could provide invaluable insights, considering people's ability to react to rapidly changing digital media environments (Balčytienė & Horowitz, 2023).

Following such a line of thought, the policy-thinking and conceptualization of (dis)information vulnerability and responses to it, via risk-awareness strategies and other measures, must be extended to incorporate new aspects—not only those understood in classical terms, such as socio-economic disparities like age, education, and income, but also to address people's worldviews and epistemic variations. In this context, informational vulnerability is defined by additional factors, namely individual information accessibility and responsible media use (for an accountable practice and communication rights perspective, consult, for example, Horowitz et al., 2024), as well as individual self-efficacy assessments.

To conclude, all societies selectively identify vulnerabilities, and it is unlikely any polity could free itself of them. In the era of digital communication, individuals and groups are likely to become sensitive and vulnerable to disinformation due to their limited knowledge, understanding, and control of macro-level situations, media representations, and micro-level communication rights.

3. Cultures of Resilience: Human-Centred Analytical Framework

In the prevalent mindset, the Baltic countries are often praised for their coordinated efforts and resilience against disinformation (Balčytienė et al., 2024; Keršanskas, 2021). Though this might be a valid result, more explanation is needed about what specific institutional or cultural arrangements (or a combination of both) in these countries play the most decisive role in contributing to such assessments. In other words, insights are needed regarding governance arrangements focused on countering disinformation and key contextual factors that define their specifics.

To address these questions, we intend to follow the critical realist tradition using Margaret Archer's morphogenetic/morphostatic analysis approach (Archer, 1995, 2020). Drawing on the work of Roy Bhaskar (2008), in morphogenetic/morphostatic analysis, Archer proposes the idea that every structural arrangement in a studied social domain must be viewed within the historical context of implemented patterns of change. This approach is primarily actor-oriented and, therefore, human-centred, highlighting the role of agential responses in shaping social actions and outcomes. In other words, it strongly emphasizes individual

decision-making, specifically the relationships and interactions between different agents and the reflectivity of consequences.

By keeping a human-centred focus, critical realists generally review social dynamics by identifying distinctive causal powers and the actors' responses to these, exercised at a given time. In this way, the analysis does not ignore temporality or the structural contextualization of actors' interactions, interests, and commitments. As argued by Archer (2020, p. 138):.

> What is distinctive about social reality—or any section of it—is it's being intrinsically, inherently, and ineluctably 'peopled.' Its ontological constitution is utterly activity-dependent, even though people's thoughts and actions give rise to factors that are 'not people'—the most important being culture and structure..

Furthermore:.

> For any process to merit consideration as a generator of social change, it must necessarily incorporate (i) structured human relations (context-dependence), because there is no such thing as 'context-less action' and calling it 'situated' makes no difference; (ii) human actions (activity-dependence), because even the most distant outcomes, such as GDP or climate change in the Anthropocene, would not exist without the continuous actions of people, and (iii) human ideas (concept-dependence), because activities like 'voting,' 'paying rent,' or 'opening a bank account' require that actors have some notion of what they are doing, however vague or misguided. (Archer, 2020, p. 138).

As briefly mentioned in previous sections, a "human-centred" (also referred to as "people-focused" by Margaret Archer) view becomes highly significant when uncovering the actions and ideas of different agents involved in creating specific responses, such as drafting strategies for media literacy programs in our case. The decentralizing nature of the internet attracts many participants to the information space, with a considerable number who also harbour malicious intentions. If not adequately addressed, unlimited digital expressions risk leading to the acceptance and "normalization" of dysfunctional forms of communication, such as spreading false information, promoting hate speech, and increasing radicalization. In response to such harms, various analysts (Cammaerts, 2024; Siapera, 2023) suggest defending democracy through new governance frameworks prioritizing public and democratic interests over private and commercial ones sustained by the politico-economic functioning of platforms. Calls like these are inspired by human-centred views that advocate universalist values..

However, until now, as conventional solutions, the applied disinformation countering efforts have been typically focused on developing digital resilience against disruptive communication, including regulatory measures, media fact-checking, and media literacy initiatives aimed at individuals and groups (Brogi & De Gregorio, 2024). Despite implementing these various policy measures to address disinformation, the detrimental effects on the population remain evident throughout Europe. As the Flash Eurobarometer 522 study reveals, citizens in different EU states admit to needing assistance to respond effectively to manipulative content: 39% of the respondents believed that people using online platforms should get better at distinguishing false and misleading information, whereas only 12% of the respondents thought that people are sufficiently equipped, on their own, to identify what is true and what is false (European Commission, 2023, p. 46).

Our human-centred perspective suggests that structural–institutional and organizational–cultural aspects are significant for sustainable democratic ways of life. Quite naturally, since disinformation distorts traditional routines and methods of knowing and trusting institutions (Neuberger et al., 2023), the functions of conventional news media are crucial in this context. Comparative studies show that in countries where public service media are highly used, people express more trust in both media and political institutions (Balčytienė & Horowitz, 2023; Humprecht et al., 2021; Kõuts et al., 2013; Newton, 2016). Public service media are sustained by ideals of inclusion, accountability, service, care, and social solidarity; hence, functioning information structures act as viable frameworks to maintain these social norms in people's daily practices. Fact-checking journalism also acts as a mediator in assisting citizens in navigating the informational space. In many countries, a firm reliance on fact-checking, aimed at verifying the accuracy of publicly disseminated claims, is recognized as one of the critical activities to mitigate the harms of disinformation (Miller & Vaccari, 2020) or even considered a "democracy-building tool" (Amazeen, 2020, p. 90). In fact, according to Bateman and Jackson (2024), the current scientific evidence supports fact-checking as a generally helpful instrument; however, at the same time, studies demonstrate that the effects of fact-checking vary substantially and are related to a myriad of contextual factors, the influences of which are not yet fully known (see Arcos et al., 2022, for systematic review). One central problem is related to the fact that manipulated information can be produced extremely quickly, but fact-checking and disseminating a response need considerable time and resources; hence, nothing prevents false information from reaching large audiences before it gets debunked (see, e.g., Vilmer, 2021). The conclusion is that while fact-checking is beneficial, focused efforts are needed, more than mere fact-checking, to solve epistemically grounded problems. Changing a person's worldview is nearly impossible just by bringing more facts (cf. Nyhan et al., 2020; Walter & Tukachinsky, 2020); thus, other, more informed efforts are required.

To assist in such argumentation, our focus employs the concept of "locus of control," which enhances the analytical lens provided by the human-centred view. In his framework for media literacy, Potter (2004) used this concept to emphasize that media literacy depends not only on people's skills for handling different sources of information but also on their assessments, feelings, and self-perceptions. James W. Potter famously wrote that media literacy is "the set of perspectives from which we expose ourselves to the media and interpret the meaning of the messages we encounter" (Potter, 2004, pp. 58–59). Hence, individuals who feel confident in their ability to find and consume high-quality information, and are responsible for proactively doing so, are less likely to fall for disinformation. Passive information users, on the other hand, are more vulnerable to disinformation threats (Bateman & Jackson, 2024). Similarly, Maksl et al. (2015) found that individuals with a "high locus of control" score higher in news consumption and resilience against false information. However, a "high locus of control" in the media consumption process might trigger unwanted effects, as argued by Mihailidis (2009, p. 9): "Critical thought can quickly become cynical thought."

In conclusion, although individual capacities matter greatly, they are interrelated with the perceived role and quality of the external environment, formed via information cultures and historical traditions (Balčytienė et al., 2024; Hallin & Mancini, 2004, 2012). This last observation also sums up that people's views and "locus of control" must be considered central in policy design, paying attention to structural, institutional, and organizational-cultural matters.

4. Policy Responses and Examples From the Baltic Countries

In the following section, examples from the three Baltic countries highlight how notions similar to those used in Europe-wide frameworks for societal resilience development are integrated into national policies and communication governance models. The analysis outlines the coexistence of two opposing perspectives: the notion of "hard power" and securitization seen in institutional efforts and the "softer" approach related to citizen empowerment (Casero-Ripollés et al., 2023).

4.1. Institutional Restructuring as a Component of a Comprehensive Defence System

According to the human-centred approach, which flexibly incorporates contextual, agentive, and ideational aspects, truly understanding resilience to disinformation requires focusing on multiple environments—cultural, economic, legislative, technological, political, and educational—and collaborative actions (Liu et al., 2017, 2020). Regarding such contextual factors and their interdependency, the Baltic States have been united in the mission to develop societal resilience and collaborate on information warfare and strategic communication for more than a decade (cf. Baltic Assembly, 2009). In 2014, the Baltic Assembly issued a resolution calling on the parliaments and governments of Estonia, Latvia, and Lithuania, as well as the Baltic Council of Ministers, "to develop strategic communication capabilities that can help protect against information attacks and hostile propaganda, also information tools and channels used in civil emergencies" (Baltic Assembly, 2014, p. 4). Since then, the topic has been a priority, and the Baltic Assembly has issued different calls for joint strategic actions. In particular, it has been advised that joint measures need to be implemented in the region for "counter-acting Russian propaganda and increasing public awareness of disinformation campaigns launched by external forces," both of which are seen as measures for decreasing the vulnerability of societies (Baltic Assembly, 2015, p. 2). Furthermore, the Baltic States have not only declared to be united in this mission, but have also supported similar efforts in Eastern partnership countries, e.g., Moldova, Georgia, and Ukraine (cf. Baltic Assembly, 2015) years before the Russian military invasion of Ukraine; and emphasized the need for continuous cooperation and strengthening of strategic communication capabilities amongst the whole EU and NATO alliance (Baltic Assembly, 2015).

Moreover, since 2015, the promotion of strategic communication, "including the provision of quality, unbiased information within the region, protection of European values, increasing public awareness about democratic values, supporting independent media," has been a shared priority for the Baltic states (Baltic Council, 2015, p. 4). To reach this goal, the Baltic Centre of Media Excellence, a hub for "smart journalism," was established to facilitate professional dialogue in the region. In addition, the Baltic Assembly (Baltic Assembly, 2017, p. 2) has emphasized the need to "develop joint educational programs and projects on strategic communication," as well as to "develop joint bilateral and trilateral programs and projects amongst state-funded mass media" (Baltic Assembly, 2018, p. 2).

At the individual country level, we see a strong leaning towards securitization as a driver in institutional reforms. For example, in Estonia, the National Defence Development Plan 2017–2026 emphasizes the need for developing strategic communication and psychological defence to combat disinformation. To achieve this goal, a dedicated strategic communication team was founded under the Government Communication Unit of the Government Office in 2018; and the Estonian Defence Forces have established their own Strategic Communications Centre and a Cyber and Information Operations Centre. The latter is crucial as the Internal

Security Strategy 2020–2030, issued by the Ministry of the Interior (2020, p. 13), states that Estonia must be equipped to counter cyber-attacks and address hybrid threats. The topic of informational resilience or similar terminology is in fact present in different strategy documents e.g., the Estonian Foreign Policy Strategy 2030 (Ministry of Foreign Affairs, 2020) compiled by the Ministry of Foreign Affairs, the Estonian Digital Agenda 2030 (Ministry of Economic Affairs and Communications, 2021) prepared under the leadership of the Ministry of Economic Affairs and Communications, the National Defence Development Plan 2031 prepared by the Ministry of Defence (2021), and the foundations of the National Security Concept of Estonia (Republic of Estonia Government, 2023).

In Latvia, the State Chancellery issued a conceptual report (Latvian State Chancellery, 2023) regarding the security of the state's strategic communication and information environment for the years 2023–2027. It states that the informational space and its security are equally dependent on three pillars: (a) effective communication by state and municipal institutions with their target audiences; (b) a strong and high-quality media environment and journalism offering; (c) a skilled, educated, and engaged society that can recognize and resist manipulations in the informational space (Latvian State Chancellery, 2023, p. 2). The authors of the report envision that by 2027, at least 75% of Latvia's population (aged 18 and older) will possess basic media and information literacy skills. The authors of the report state that:

> Achieving this goal will require resources, recognizing that investments in people and their resilience strengthen national security and defence against hybrid threats. It is also necessary to enhance the psychological resilience of the population against information manipulation operations and foreign interference in the information space to promote successful and effective crisis management in the future. (Latvian State Chancellery, 2023, p. 19)

In 2023, the National Crisis Management Centre was established as a structural unit of the Government Chancellery in Lithuania to coordinate the activities of national authorities in preventing and counteracting information threats. This Centre manages and coordinates the state's strategic communication in national security. In 2024, it consolidated and developed a unified model for monitoring and analysing information incidents, utilizing a standardized data format methodology and advanced technological solutions.

In addition to these institutionalized efforts, legal norms exist in all three countries that address hooliganism or public order disturbances, which can be applied to those who spread false information. For instance, in 2024, Lithuania amended its criminal code to outlaw manipulated social media accounts that disseminate information to harm the constitutional order, territorial integrity, defence, or other state interests; and explicitly forbids the dissemination of disinformation (Buholcs et al., 2024). In Latvia, however, amendments to the Latvian Criminal Law, from 2024, made the use of deepfakes to manipulate elections illegal (Buholcs et al., 2024); while Estonia has taken steps to fight against health disinformation by adding a subsection to the Public Health Act (6 §12; Riigikogu, 1995), and a special subsection of the Penal Code (1 §278; Riigikogu, 2001) describes the misdemeanour offence of making false emergency calls. Among other "hard" power measures against disinformation, the three Baltic countries have accepted legal norms that allow blocking content that violates public interests (Buholcs et al., 2024).

Overall, aspects of securitization in the fight against disinformation emerge, echoing the processes currently occurring in the EU (Casero-Ripollés et al., 2023). The above-identified examples mainly highlight the work

done on a macro level, which outlines reliance on strategic communication, institutional and structural changes, and more substantial restrictions in national laws. However, these measures seem to represent just "one side of the coin"; alongside those efforts, we see a strong dependence of institutions on media literacy skills within society. As Tessa Jolls argued, the changing security landscape and disruptions require citizens to serve as the first line of defence (Jolls, 2022). Hence, in this context, "media literacy is a way to help ensure resiliency and problem-solving skills, providing people with the agency they need as active participants in the online and offline worlds" (Jolls, 2022, p. 6).

The following section outlines the responses taken by Baltic countries to strengthen societal resilience through media literacy activities.

4.2. Media Literacy for Empowerment and Active Citizenship

On the policy level, resilience building within the media sector is generally seen as strongly related to sufficient media literacy in Estonia, Latvia, and Lithuania, combined with trust in media (see, e.g., Balčytienė et al., 2024; Kõuts-Klemm et al., 2022). Policymakers in all three countries are actively devising strategies to enhance public awareness, and this approach appears beneficial when, internationally, we see decreasing interest in news, declining trust in journalism, and scepticism of media literacy (Newman et al., 2024; OECD, 2024). The measures include media literacy in school curricula, providing up-to-date teaching materials, and developing mentorship and supervision programs for various groups (news media, teachers, librarians, and creative artists). Hence, in general, even though the media literacy policymaking has been filled with conceptual confusion (cf. Teperik et al., 2022), steps in the direction of media literacy and media education have been undertaken since the Baltic states regained their independence in 1990 (Kine & Davidsone, 2021). This effort has intensified in the last decade, with some differences between the three countries.

In Estonia, following the broad security ideas, the components of media literacy have been touched upon in state documents related to national defence (e.g., Ministry of Defence, n.d.; Republic of Estonia Government, 2017). These documents do not use the term "media literacy" but instead tackle the steps needed for promoting "psychological defence" i.e., "informing society and raising awareness about information-related activities aimed at harming Estonia's constitutional order, society's values and virtues" (Republic of Estonia Government, 2017, p. 20). The documents highlight the need to inform the public about information-related dangers while ensuring that everyone has access to diverse information sources to build a more resilient society (Voltri, 2021). In addition, the Education Strategy 2021–2035 developed by the Ministry of Education and Research has included "raising the learner's awareness of the opportunities and risks of the information society" (Ministry of Education and Research, 2021, p. 21) as one of the goals for the future. However, diving deeper into the actions, it is more difficult to pinpoint what, exactly, is planned or the budget being directed to it.

In Latvia, in a similar vein, after the annexation of large parts of Ukraine by Russia in 2014 and the immense increase of Kremlin-supported propaganda campaigns, a gradual shift has happened from notions of media literacy as mainly connected to digitization and digital skills education to increasingly seeing media literacy as a crucial element for national security and the country's ability to build societal resilience against Kremlin propaganda (Denisa-Liepniece, 2022). The highest planning document in force, the National Development Plan for 2021–2027, states that media literacy and critical thinking can be seen as the best defence of Latvia

against hybrid threats (Cross-Sectoral Coordination Center, 2020). Also, the Guidelines for National Security in Latvia (Republic of Latvia, 2023) highlight media literacy as one of the most crucial elements for ensuring national security. In the guidelines, it is said that the Latvian state must promote the strengthening of people's media literacy in formal and informal education, as well as support the efforts of public and commercial media to promote media literacy in all age groups. In the educational sector, The National General Secondary Education Standard (Cabinet of Ministers, 2019) underlines the necessity for media literacy skills improvement, albeit under the label of digital literacy, probably more than any other policy document, highlighting that it is essential to improve people's ability to assess media effects, take individual responsibility critically, act to prevent the impact of low-quality media content, and create media content following ethical and legal principles.

In Lithuania, media literacy, civic preparedness, and societal resilience-related issues have gained much more attention in recent decades. Different policies and strategies (The Law on Public Information Provision, Lithuanian Culture Policy Strategy, National Development Plan 2021–2030, Public Information Policy Strategic Directions 2019–2022, Library Development Policy Strategic Directions 2016–2022, and the strategic directions of the media and information literacy of the National Martynas Mažvydas Library) are stressing the significance of media and information literacy in enabling the various publics to assess publicly available information on its own and resist undesirable information threats, stimulating civic activity, participation, and creativity. Since 2016, the objectives of raising digital and information literacy have recently been high in the Lithuanian Government's agendas, coupled with societal resilience. The shift is linked to external challenges, such as the pandemic and other health-related risks, Russian aggression and war in Ukraine, geo-political turbulence, and growing regional national security threats. The role of media and quality information is receiving heightened significance in providing verified information. Hence, the Ministry of Culture is leading media literacy policy proposals and implementation. Several programs and policy documents have been initiated in response to technological developments, social implications, and changed media situations.

In short, over the years, the Baltic States have committed to promoting and developing media literacy within society and have taken steps to reach out to members who have been hard to reach due to language barriers or different media consumption habits. In addition, Baltic countries have taken various steps to strengthen high-quality, responsible, and reliable journalism within the region. However, recent analysis concludes with some problematic aspects: few long-term projects in the media literacy field, competition (rather than cooperation) among media literacy project creators in the fight for funding and insufficient collaboration among various stakeholders overall, which leads to media literacy projects being sporadic and fragmented and largely dependent on international donor funding (Locmele & Buholcs, 2024).

5. Discussion

From the policy steps reviewed above, we can conclude that all three countries acknowledge the necessity of individuals' heightened responsibility in the form of media literacy when speaking about societal resilience. This outcome is evident in how the role of state interventions, strategic communication, and media literacy is perceived in all three countries.

In the case of the Baltic countries, it is not just the current geopolitical context, the influx of disinformation, and cyber threats—namely "external" causes—that call for individuals to be media literate and to adopt a responsible and vigilant approach to the information environment. Our analysis of policy steps reveals an "internal" gap. We define it as a firm reliance on individual responsibility in addressing information-related matters. Addressing individual needs is crucially important, yet, we argue, that this focus is counterproductive in the case of media literacy policies.

Since the early 1990s, the three Baltic countries have undergone a steadfast politico-economic restructuring. Furthermore, the three countries are characterized as winners of transformations. However, regarding policies, a much larger metanarrative has been evident in all countries; namely the rhetoric of goal orientation, which also translates as thinking that aligns with neoliberalist approaches emphasizing competitiveness and innovativeness but generally neglecting broader social values. Because of such "persistence" and goal orientation, the Baltic countries have succeeded and have even been described as the "paragons of neoliberalism" among European countries in many aspects of life (Salyga, 2023, p. 2). Only the most recent analyses outlined the need to examine the implications of policies on individual life cases and people's worldviews while also exploring discontent, various inequalities, and transformational traumas at a much deeper level. As a matter of fact, social discontent and inequalities also echo in how people approach the media and the broader information environment—whether they feel represented, or if their concerns are seen by a wider public. And if not, these unaddressed issues might turn into informational vulnerabilities exploited by disinformation campaigns.

Therefore, we argue against embracing media literacy as a panacea for societal resilience without addressing the broader structural forces at play on an equal level.

All of the above relates closely to what was identified by Joseph (2013) who argued that resilience, encouraged via securitization and protectionist views, "encourages the idea of active citizenship, whereby people, rather than relying on the state, take responsibility for their own social and economic well-being" (p. 42). Here, we also want to acknowledge Druick (2016), who expressed concerns about media literacy discourses becoming too closely tied to the logic of neoliberalism. She argued that positioning media literacy as a tool for "inoculation" against a degraded culture, and, in Foucauldian terms, the promotion of the emergence of "homo economicus," might be a dangerous path. In other words, it is wrong to believe that a "[media] educated subject will be protected against a destructive system thanks to guidance that will make him or her aware of the connections between knowledge and power" (Druick, 2016, p. 1138). This approach, as she warns, aims to frame media institutions generally as a democratic counterforce—which seems to be scaringly overlapping with current populist and conspiracy reasonings (Hameleers, 2020) and adds to societal insecurity (Wojczewski, 2020).

In general, a balanced approach is required—one that promotes media literacy and continues to elaborate on the socio-political conditions under which media literacy is exercised, ensuring that societal resilience efforts do not reinforce the very neoliberal logics that contribute to societal insecurity, informational vulnerability, and information-related inequalities in the first place.

6. Conclusion

As demonstrated, there is no single answer to what makes some societies more resilient than others and which strategies in countering disinformation work best in which geographic and cultural context. The Baltic countries' policies on combating disinformation, on the one hand, align with the EU's broader strategies but also display some distinct features rooted in their specific geopolitical context. The Baltic approach differs in urgency and scope, driven by a more acute perception of geopolitical threats, especially from Russia. The geographic closeness to Russia, as well as historical memories, also explain why the Baltic states often adopt more robust measures than the EU-wide approaches. Their regulatory environment can be assessed as more restrictive, with laws explicitly addressing the manipulation of information during times of crisis or heightened tensions.

Moreover, the Baltic states are working on state-sponsored strategic communication as a defence mechanism, which complements the EU's emphasis on co-regulation and media literacy. They have established specialized institutions and initiatives that contribute to national resilience and serve as models for EU cooperation in countering disinformation. These efforts illustrate a more proactive stance in promoting media literacy campaigns tailored to counteract Russian influence, reflecting their front-line status in the EU's broader fight against external information threats.

We argue that building resilience to disinformation by promoting institutional transparency and accountability and strengthening people's political and media literacy capacities are essential to mitigating its impact on societal trust. Democracies with lower institutional and interpersonal degrees of trust appear vulnerable to heightened uncertainty and prone to populist manipulations. Also, even in more mature democracies with high levels of institutional trust, press freedom, and media literacy, online disinformation poses challenges to national security and societal coherence.

The public's perception of risk and its response are subjective. Therefore, it is essential to adopt a research approach that allows an integrated view of the development of coordinated institutional and individual strategies and integrated social and communication policies to guide against the implications of disruptive communication, including informational vulnerabilities.

We began our discussion by exploring the complex nature of disinformation, which is both structural and discursive, along with the informational vulnerabilities that must be addressed to tackle the social and cultural causes leading to manipulations and insecurities effectively. Our analysis reveals that in the Baltic countries, in their efforts to combat disinformation, different institutions, such as those on the governmental level, operate with varying institutionally framed logic and routines and pursue diverse goals. The foundations of Baltic resilience seem to rely on interconnected networks of grassroots movements, including NGOs, libraries, schools, and media outlets.

Critical Realism's perspective allowed us to uncover general agentive groups when addressing the crucial question of fostering collective reflexivity and agency in contexts of heightened uncertainty and social change. It allowed us to simultaneously approach structural solutions, such as legal regulations and the empowerment of individuals. As a "peopled" approach, critical realism also involves recognizing potential limitations, such as the risk of overemphasizing individual responsibility (aligning with neoliberal narratives)

without adequately addressing structural inequalities. Thus, while enhancing citizens' media literacy skills and fostering critical thinking, policy reforms must address the root causes of disinformation, which are not solely linked to individual citizens' information choices or actions but arise from persistent inequalities.

Conflict of Interests

The authors declare no conflict of interests.

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About the Authors

Aukse Balčytienė is a professor of journalism and communications and a core founding person of the Journalism and Communications School at Vytautas Magnus University. She is also co-leader of the UNESCO chair on Media and Information Literacy for Inclusive Knowledge Societies. Her scholarly interests include digital agency and citizenship, communication rights and media policy, media literacy, media cultures, and the European public sphere. She is passionate about digital media-infused social changes, and her most recent object of research and public speaking is democratic forms of public resilience against information disorders.

Agnese Dāvidsone (PhD) is an associate professor and lead researcher in the field of media and communication at Vidzeme University of Applied Sciences (ViA), Latvia. Her scholarly interests are related to media and information literacy development, scientific literacy, and civic participation. She is the co-leader of the UNESCO chair of Media and Information Literacy and Scientific Literacy at ViA.

Andra Siibak is a professor of media studies, a deputy head of research and development, and program leader for the media and communication doctoral studies, at the Institute of Social Studies, University of Tartu, Estonia. Her research focuses on opportunities and risks surrounding digital technology use, cyber risks and harms (e.g., fake news, deepfakes, social engineering scams, phishing, surveillance, privacy issues), and inter-generational family life and communication practices in the era of datafication and platformisation.

Cogitatio

ARTICLE

Reinforcing or Rethinking? What Do News Consumers Want From Journalism in the Post-Truth Era?

Martin Moland [1], Jacopo Custodi [2] and Hans-Jörg Trenz [2]

[1] ARENA—Centre for European Studies, University of Oslo, Norway
[2] Department of Political and Social Sciences, Scuola Normale Superiore, Italy

Correspondence: Martin Moland (martin.moland@arena.uio.no)

Abstract

Policymakers and news producers have long grappled with the challenges that fake news and misinformation pose to quality journalism. This has given rise to an extensive body of literature, covering various aspects from the characteristics of fake news to strategies for addressing it. However, the preferences of news consumers regarding the future of journalism and their views on how journalistic commitment to truth can best be maintained remain relatively overlooked in scholarly research. This article utilizes primary data from a survey ($N = 4,521$) fielded in Norway, Italy, and Poland in 2023 to show that, even in contemporary media environments, people continue to regard traditional journalistic ideals as the normative goals for future journalism. This suggests that journalists in an age of post-truth should focus less on rethinking journalism and more on adhering to its traditional goals of unbiased dissemination of facts.

Keywords

disinformation; fake news; journalism; journalistic quality; post-truth politics; public opinion

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1. Introduction

The issue of fake news and misinformation has sparked extensive debate among academics and policymakers (European Commission, 2018; Swire et al., 2017; Valenzuela et al., 2019). While much of the discussion has centered on the dual challenges of targeted fake news and unintentional misinformation, as well as potential strategies to address them, two critical aspects remain underexplored. First, in the face of uncertainty about the future role of journalism and divergent expectations regarding how journalism should be rethought in the

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era of post-truth (Michailidou & Trenz, 2021), we ask what qualities news consumers expect from professional journalism. Second, considering the alleged importance of fact-checking services in combating fake news and misinformation (e.g., Brandtzaeg et al., 2018), we examine how news consumers think these services should be organized.

This article addresses these questions through a survey fielded in 2023 in Norway, Italy, and Poland. The survey asks both what people believe makes journalism trustworthy, and whether fact-checking is best organized through independent organizations or legacy media bound to traditional norms of professional journalism. We thus move beyond an existing literature dealing with the effectiveness of fact-checking (e.g., Walter et al., 2020) to also investigate news consumers' expectations of fact-checking services.

Our data reveals that readers remain committed to traditional values of professional journalism, such as unbiased coverage, even as the broader media landscape around them is changing. Furthermore, they place less importance on features like the ability to comment on news stories and show only limited support for the notion that journalism should have immediate relevance to their daily lives. Lastly, our findings indicate that most people favor fact-checking services provided by independent organizations rather than legacy media, a preference especially evident among those on the political right and those distrustful of journalism. This is important because media industry initiatives that relate directly to the quality of the media product rather than the surrounding media infrastructure (as the Digital Services Act and the European Media Freedom Act do) can be an important complement to existing regulatory efforts to strengthen trust in traditional media. Moreover, a strong understanding of how news consumers want fact-checking to be structured can also help the media industry and the EU to tailor support for future initiatives in a way that enhances journalistic quality and aligns with consumer expectations.

To investigate news consumers' expectations of journalism and fact-checking, we first outline four qualities of journalism in democracy and formulate hypotheses about how these are embraced by different types of publics. We then introduce our survey design and explain the methods used to test our hypotheses. These survey data are then used to assess which journalism role models and approaches to fact-checking the public perceives as most important and credible, and how these perceptions are influenced by political ideology. We conclude by arguing that trust in journalism remains strongly grounded in shared expectations about professional standards of truth and unbiased news coverage. Complementing other contributions in this thematic issue—such as those examining the use of new AI tools in journalistic practice—our findings suggest that the most effective way for journalists to strengthen trust in traditional journalism is to reinforce their commitment to ideals that have long been at the core of both the journalistic profession and the public expectations of journalism. Our findings thus have wider implications for how journalism can consolidate by responding to public demands for quality news and reclaiming legitimacy in the age of post-truth politics (Ott, 2017; Waisbord, 2018).

2. News Consumers' Expectations in Journalism and Fact-Checking

Questions about trust in journalism have animated a large body of literature within media studies and related fields. Scholars who have investigated people's expectations in journalism found that news readers prefer journalists "to consider society's best interests: reporting in a socially responsible manner, alerting the public of threats and opportunities, accurately portraying the world, and contributing to society's well-being"

(Abdenour et al., 2021, p. 329). These expectations nevertheless vary by ideology: For instance, fiscal and social conservatives are more likely to believe that journalists should be detached observers, and not actors providing opinion and potentially biased analysis (Vos et al., 2019). This suggests broad support for the idea that journalists should serve as "watchdogs," not only reporting events but also investigating critical issues and providing context for daily occurrences. However, as Kalogeropoulos et al. (2024) point out, this watchdog function is typically seen as much less important for readers than whether journalists report news quickly and accurately.

On the other hand, journalists also express divergent ideas about which of their multiple roles are most important, and their normative preferences and role ascriptions do not necessarily align with the perceptions held by readers (Custodi & Trenz, 2025; Hanitzsch et al., 2011; Weaver et al., 2019). Data from the US suggests that journalists are more likely to believe that interpretation and contextualization are the key functions of journalism (Weaver et al., 2019). American news consumers, on the other hand, believe that quick dissemination of news should be the main priority of journalism. Similarly, we find that journalism students were more likely to see the contextualizing and investigatory dimensions of journalism as more important after completing their studies than they were when they entered a journalism program (Hanna & Sanders, 2012). Lastly, we find that journalists are more likely to see their roles as altruistic and public-service oriented than what news consumers do (Gil de Zúñiga & Hinsley, 2013).

2.1. News Consumers' Expectations of Journalism

Readers' preferences for unbiased and truth-oriented journalism are shaped by their experiences as news consumers in high-choice news environments. The challenges journalism faces in the post-truth era (Michailidou & Trenz, 2021) and the proliferation of debates about fake news and disinformation (Al-Rawi, 2019) create a context in which ideals like trustworthiness and objectivity are perceived to be under threat. Disinformation, in particular, presents a specific challenge to journalistic values, as it erodes perceptions of journalism's credibility and raises questions about the profession's ability to fulfill its democratic role. Consequently, these perceptions may prompt news consumers to reaffirm traditional ideals such as accuracy, objectivity, and relevance, while critically evaluating journalism's performance.

This article contributes to our understanding of news consumers' role expectations and evaluations of journalistic quality in a media context increasingly characterized by post-truth challenges. While existing research has highlighted the importance of accuracy, contextualization, critique, and relevance as key features of journalistic quality (Loosen et al., 2020), it remains unclear how declining trust in journalism and different media systems cause people to reevaluate their expectations of what journalism is and should deliver. The empirical question, therefore, is whether disinformation and related threats encourage people to hold onto traditional journalistic ideals or lead them to adjust their expectations.

Depending on their ideological beliefs, news consumers will have different expectations of journalism. For instance, those who self-identify as belonging to the political right are more likely to believe that journalists should use a detached reporting style, focusing less on advocacy and interpretation than on the mere reporting of facts (Vos et al., 2019). We thus expect that the same people will have similar views of journalistic quality. However, we move beyond the existing literature in accounting for how this relationship is more likely to be curvilinear. In other words, much like populist actors on the left and right are more likely

to engage in post-truth discourses (Waisbord, 2018), non-mainstream voters are likely to adopt different views of what journalism is desirable from those who are in the political center. This is evident in how people with anti-establishment attitudes tend to have very different preferences for media consumption than more mainstream voters, preferring media sources that are lighter on contextualizing journalism (Hameleers et al., 2017b). The implication of this is that both left- and right-wing voters outside of the mainstream might be more likely than others to see contextualization as a less important feature of journalism. Accordingly, we hypothesize that:

> H1a: News consumers with voting preferences outside of the political mainstream are less likely to prioritize contextualization as an important feature of quality journalism.

A possible reason for this is that contextualization forces journalists to somewhat depart from their roles as impartial observers, making more explicit choices about how to frame issues. Such choices are likely to be more controversial to voters outside of the political mainstream, who already tend to be skeptical of journalists and their ability to do their jobs in an unbiased way. This skepticism of mainstream journalism also translates to a greater propensity to expose oneself to and believe misinformation narratives (Hameleers et al., 2022).

It is possible that the other quality features of journalism that we survey would not be subject to the same dynamics. At the core of the populist critique of modern journalism (Van Dalen, 2021) is the idea that journalists are not acting as unbiased disseminators of facts, but rather as proper political actors. Journalism that is unbiased, accurate, and relevant might thus be considered a positive expectation. This yields the following testable hypothesis:

> H1b: Relevance, objectivity, and truthfulness are likely to be equally important to both mainstream and non-mainstream partisan identifiers.

We do, however, expect there to be a difference between different groups that identify as being outside the political mainstream. As the literature suggests, cues regarding the low quality of journalism tend to predominantly come from right-wing populist leaders (Hameleers et al., 2017a) and populist right voters tends to have lower levels of education compared to the general electorate (Cordero et al., 2022). Given that education levels tend to correlate with trust in institutions more broadly, there is reason to suggest that right-wing non-centrists are more likely to be critical of contextualizing journalism than left-wing non-centrists. This leads to the following testable hypothesis:

> H1c: Far right-wingers will be more critical of contextualization than both far leftists and centrist ideological identifiers.

It is also possible that there will be an effect of nationality, independently of ideology. This effect is likely to vary along with the media systems in place in each country and the extent to which it is characterized by parallelization. Such parallelization describes a situation where media messages are to some extent filtered through a partisan lens (Brüggemann et al., 2014). In contrast, other countries with lower levels of parallelization are characterized by media systems that enjoy high levels of journalistic professionalization, where unbiasedness plays an important role. It is reasonable to assume that in countries where parallelization is high, such as in the Mediterranean countries and Poland (Dobek-Ostrowska, 2012), readers

might have a greater desire for objective journalism. In these countries, contextualization might more easily be seen as a way for journalists to advance a partisan agenda. This leads to the following hypothesis:

> H2: News consumers in media systems with high levels of media parallelization are more likely than others to prioritize objectivity as a desired ideal of journalism.

Overall, understanding how news consumers evaluate journalistic qualities in the present day provides important insights into the contemporary challenges of the post-truth era. In fact, this perspective allows for a more nuanced understanding of the current media landscape not only in terms of restraints but also in terms of new demands for quality journalism. Such a discussion is needed to contextualize the evidence of post-truth phenomena with counter-evidence of democratic resilience. First, it contributes to the development of an audience perspective of journalism. This is important because the quality of journalistic practice depends not only on media professionals but also on how well their practice is aligned with news consumers' views and expectations (Loosen et al., 2020). Second, there are large gaps in how news consumers and producers evaluate the performance of journalists (Gil de Zúñiga & Hinsley, 2013). Having an understanding of what people actually want from journalism is thus important because it can help media institutions and media regulators support the kind of journalism that is in demand and more likely seen as trustworthy.

2.2. Preferences for Institutionalized Fact-Checking

While we expect balanced information and truthfulness to be key characteristics that people expect from journalism, there are still remaining questions about people's expectations of fact-checking services. Past literature has extensively probed when and how people will find certain fact-checking messages more or less credible. However, there is much less attention paid to the infrastructure surrounding fact-checking and what people want from it. This makes it an open question whether people prefer fact-checking to be done by professional journalists working within legacy media, or by independent organizations working outside legacy media institutions. Understanding whether people actually want fact-checking that is done by professional journalists, as is most common today (Graves et al., 2016), rather than independent organizations is crucial for assessing the policy proposals and regulations for combating disinformation and fake news as contained in the European Media Freedom Act and Digital Services Act. To fully unleash the potential of fact-checking, it is important that it happens within a framework that bolsters the credibility of the responsible fact-checking institutions to the greatest extent possible.

In contrast to the knowledge gap related to how people think about the organization of fact-checking, journalists' understanding of and support for it has been extensively studied. Many journalists believe that the role of such fact-checkers is to uphold traditional journalistic values, even if these are sometimes ill-defined and potentially on a collision course with each other (Mena, 2019). Appeals to such values are nonetheless likely to encourage more journalists to engage in fact-checking than if they are simply told that audiences demand such practices (Graves et al., 2016). This shows that journalists have become socialized to the logic of fact-checking as part of their working ethos, and that it is seen as a valuable tool by news producers. However, its effectiveness in actually correcting people's erroneous beliefs about news is open to question: For instance, telling people that a meme has been fact-checked by a third-party fact-checker has no statistically significant effect on whether people are more likely to believe the correction (Oeldorf-Hirsch et al., 2020).

Regarding how people perceive the credibility of fact-checking messages, both ideology and media trust are important in shaping people's trust in fact-checking (Primig, 2024; Walter et al., 2020). We assume that those who express greater distrust of journalism will be less likely to view fact-checking conducted by journalists as preferable to that carried out by independent organizations. An important reason for this is that news media trust relates to ideas about how well media professionals fulfill their core functions, whether it relates to their unbiasedness, their willingness to tell the full story, or any of the other roles that consumers expect journalists to adopt. A belief that journalists are not doing all they can to fulfill these functions, should logically also correspond to a belief that the same people should not be tasked with fact-checking the output of media more broadly. We thus hypothesize:

> H3: News consumers who are most likely to distrust journalism are also more likely to favor fact-checking by independent organizations than legacy media institutions.

Beyond media trust, political attitudes are likely to have an impact on people's views about the organization of fact-checking. Those on the right are more likely to distrust professional fact-checking than those on the left (Lyons et al., 2020). Similarly, correlations have been found between ideology and trust in legacy media (Lee, 2010) and susceptibility to misinformation (Hameleers et al., 2022). These general views are, however, much more pronounced on the political extremes. Right-leaning news consumers may perceive fact-checking done at an arms-length distance from professional newsrooms as more credible because it reduces the influence of professional journalists. This leads to the following hypothesis:

> H4: Right-leaning news consumers are more likely to trust fact-checking by independent organizations than by legacy media institutions.

Understanding how people want fact-checking to be organized is not only a key question for media professionals interested in strengthening institutional fact-checking in a way that also strengthens the public perceptions of the legitimacy of media. It is also crucial for academics studying fact-checking, as it can shed light on how media industry choices impact the esteem in which the outcomes of fact-checking are held. This is a question that has gained relevance as fact-checking has become more strongly institutionalized than before (Lowrey, 2017).

3. Data and Methods

We investigate the hypotheses presented through a survey fielded in 2023 to 4,521 respondents in Norway, Italy, and Poland. These three countries are highly interesting for investigating people's beliefs about the journalistic response to post-truth discourses for a variety of reasons: First, they capture the beliefs of news consumers across a wide range of media systems (Brüggemann et al., 2014). Second, the three countries are also characterized by very different levels of trust in democratic institutions, with Norway standing out as a country with a particularly high level of trust in government (Stein et al., 2023). Lastly, we have observed over the last years an increasing politicization of critical journalism, especially in Poland, where the former populist-right government actively criticized independent media (Kelemen, 2017). Our data thus allow us to investigate attitudes towards journalism and fact-checking in contexts that feature very different levels of trust in legacy media, relations between the state and media, and politicization of journalists' role.

Our data are designed to be representative of the populations of the three countries with respect to age, gender, and regions of the country. The survey was conducted by the company YouGov and fielded through an online panel.

3.1. Dependent Variables

Our first set of dependent variables surveys people's views on the role of journalism by asking them what functions they believe journalism should fulfill. We ask about the perceived importance of journalists providing news that are (a) relevant to their lives, (b) accurately describing the events they report on, and providing reporting that is (c) objective and (d) contextualized. These four aspects of quality journalism align with the functions identified by scholars such as Weaver et al. (2019) and capture the diverse objectives of journalism. The English original of the question is phrased "journalism has a lot of functions to fulfill. How important for journalists' work do you believe each of the following is?" To operationalize preferences for the relevance criterion, we use the phrase "to provide news that is relevant to my life"; for factuality and accuracy "to accurately describe events as they happened"; for unbiasedness "to provide news that is objective"; and for contextualization "to give enough information that I can understand what is happening."

A preference for journalism that is mainly concerned with accuracy, is thus measured by asking whether people want journalism to only describe accurately what happened, while a preference for contextualization is measured by asking how highly people rate the importance of journalism that lets one comfortably understand the *why* of an event, and not only the *what*. Overall, our question is also less abstract than asking about "journalistic quality," as it points to features of the journalistic product and asks people to rate how important they find this in the news output they consume. The four variables are all Likert-scaled, with the response categories going from "very important" to "very unimportant." In all cases, we treat "don't know" as missing data.

One challenge is that people may hold journalism to a different standard of unbiasedness than the objectivity standard suggested by our closed questions. Previous literature has, for instance, found that academics and journalists think differently about what objectivity actually means (Post, 2015). It is reasonable to expect that the average news consumer would bring different understandings to bear when relating to such a contested concept. However, we expect that underneath all conceptions of objectivity, there rests a central concept of unbiasedness, even if there are disagreements about the rigor of that unbiasedness and how to measure it.

To investigate people's attitudes towards the question of how fact-checking should be structured, we ask: "Some fact-checking services are provided by people working for professional news media while others are independent organizations working outside of professional news media. Which do you believe will lead to the best results?" Once again, this question goes beyond asking about mere preferences for different forms of fact-checking. Instead, it asks people what model is best suited to fulfill the key function of fact-checking: preserving trust in journalism. The response categories for this dependent variable are "Fact-checking done by professional news media," the predominant model for fact-checking today (Graves, 2018), and "Fact-checking done by independent organizations." We treat this as a categorical variable, where a value of 0 indicates a preference for fact-checking done by professional journalists and a value of 1 expresses a preference for fact-checking done by independent organizations.

3.2. Independent Variables

Our first independent variable, relevant to both H2 and H4, is the respondents' ideology. Our original measure of ideology is Likert-scaled, where 1 corresponds to *strongly on the left* and 7 *strongly on the right*. Here we treat "don't know" as a missing value. To capture the effect of having an ideological leaning that is outside of the mainstream, we give those who responded *strongly on the left* and *strongly on the right* a value of 1, and everyone else a 0. We treat all those who responded "don't know" as having missing values, and remove them via listwise deletion.

Second, we create a multidimensional scale of trust in journalism. This index deviates from the pre-registration for this survey (Michailidou et al., 2023), as a confirmatory factor analysis (Brown, 2015) shows that only measures of the perceptions that news are accurate, relevant, and provide a full context for relevant events have sufficiently large factor loadings (> 0.4) to warrant inclusion in the journalism trust index. Figure A1 in the Supplementary File shows the results of this measurement model. The benefit of including a multidimensional scale of trust in journalism is that it allows us to capture views of more than one of the relevant dimensions of the very multifaceted concept that is trust in journalism.

3.3. Control Variables

In the second step, we introduce a comprehensive set of control variables, drawn from the literature on media and fact-checking trust, which are known to influence beliefs about both phenomena (Kohring & Matthes, 2007; Koliska, 2022; Lyons et al., 2020; Walter et al., 2020).

We start with a measure of media use which asks "how many minutes a day do you spend reading or watching news?" Consumption of news is well-known to impact beliefs about journalism (Lee, 2010). Our measure has the benefit of specifying news consumption as the relevant phenomenon. We thus avoid conflating a range of possible media consumption patterns that may be theoretically unrelated to trust in journalism.

We also control for previous use of fact-checking services. Accordingly, after presenting an example of fact-checking from the respondent's own country, we ask: "Have you ever used any such services?" Response categories range from "yes, often" to "I have never used any of these services, but I am aware of them." For similar reasons, we include age, gender, and education—which correlate with trust in both media (Kohring & Matthes, 2007) and institutions more broadly (Armingeon & Ceka, 2014)—as control variables.

Finally, because the media systems of the three countries vary in terms of the level of state involvement, politicization of journalism, and journalistic norms (Brüggemann et al., 2014), we introduce fixed effects to control for this unmodelled variation. While such fixed effects make it challenging to estimate the effects of contextual factors like media systems and overall levels of political polarization regarding journalism, they do allow us to come closer to an accurate estimate of the individual-level covariates of theoretical interest.

Descriptive statistics, including the percentage of missing values and the number of unique categories, can be found in Table A1 of the Supplementary File.

3.4. Model Estimation

To model the preference for fact-checking alternatives and how ideology and trust in journalism impact beliefs about different roles of journalism we use fixed effects models. This means, for instance, that the preference for different forms of fact-checking Y stated by individual i in country j becomes a function of a theoretically interesting variable X_1, a vector of control variables X_2, and a country fixed effect λ_j. As the dependent variable measuring perceptions of fact-checking is a dichotomous indicator, we estimate the regression using logistic regressions. This is formalized as:

$$Y_{ij} + X_1 + X_2 + \lambda_j \tag{1}$$

Given that we are also interested in testing how ideology trust in journalism relates to both contextualization and objectivity, we also fit a regression model with identical vectors. This model takes advantage of the Likert-scaled nature of the dependent variable, is fitted using ordinary least squares with country-clustered standard errors, and is formalized as follows:

$$Y_{ij} = X_1 + X_2 + \lambda_j + \varepsilon_{ij} \tag{2}$$

In summary, our analytical approach allows us to test whether there is in fact a relationship between ideology or trust in journalism that impacts not only broad evaluations of quality, but also the specific role of contextualization.

4. Results and Discussion

We begin by showing how our respondents evaluate each of the four traditional roles of journalism featured in our survey. This allows us to assess which roles the public perceive as most important and how these perceptions are influenced by political ideology. We then analyze the factors that shape preferences for different approaches to fact-checking.

4.1. What Do News Consumers Want From Journalism in an Age of Post-Truth?

When first examining the descriptive statistics, as outlined in Figure 1, what stands out is the primacy given to traditional virtues of journalism. Objectivity, accuracy and contextualization have long been seen as core professional principles for most journalists (Weaver et al., 2019). We find that respondents tend to report a similar affinity for these criteria, evaluating them as being of very similar importance. These results are noteworthy because they suggest that people do not automatically favor the most detached form of journalism. In fact, they place a comparable value on contextualization, which often requires journalists to adopt a more engaged and less distant stance.

Interestingly, there is somewhat less emphasis placed on the relevance criterion. Readers appear to see journalists reporting information accurately and providing contextualization as more important than the personal relevance of a news story. This finding suggests a potential disconnect between contemporary news media practices and the demands of news consumers. While news personalization and targeting have become widespread (Bodó et al., 2019), in part due to the assumption that relevance is a key factor in shaping consumers' preference for news, our data complicate this commonly held belief, indicating that accuracy and contextualization may be more important to audiences than previously assumed.
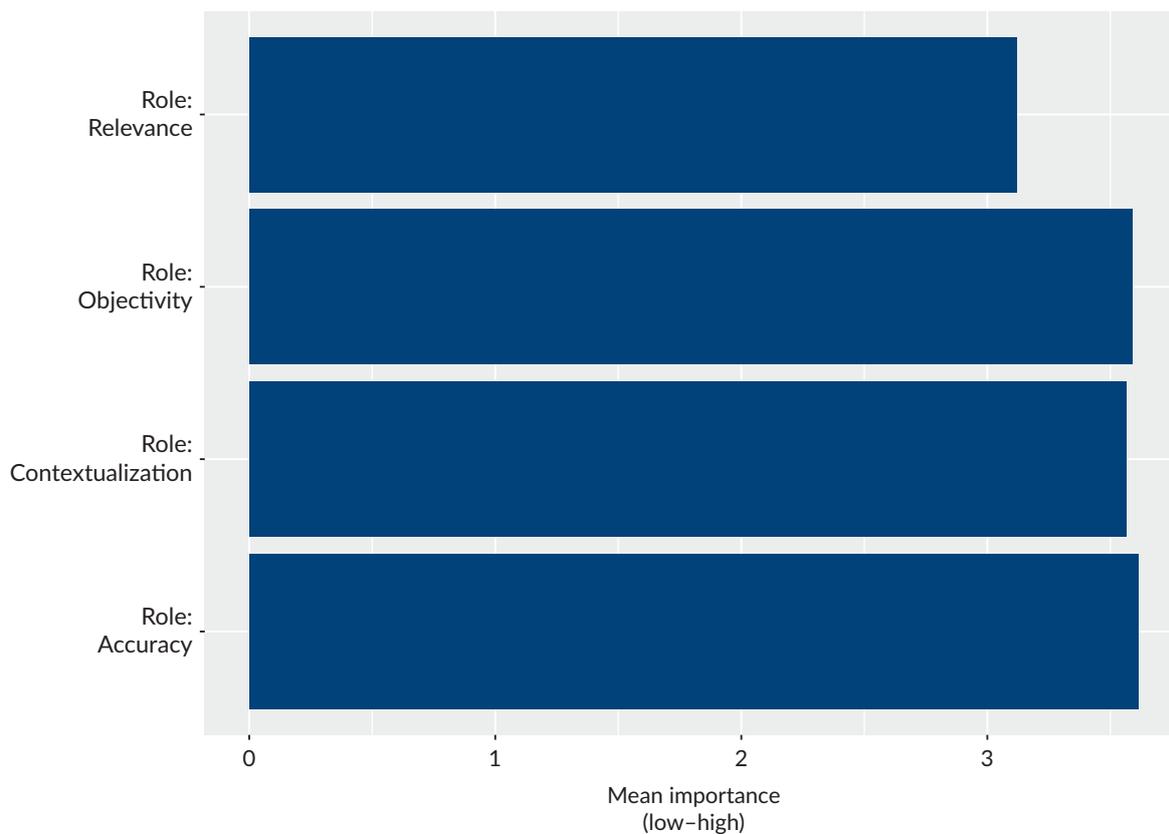
Figure 1. Perceived importance of journalism functions across all individuals.

The great emphasis placed on contextualization and objectivity is also important for another reason: It suggests that the "truth mediating" role that journalists play—where they are not seen as keepers of truth but rather as professionals explicitly tasked with seeking it through a set of tools that together constitute a journalistic method (Michailidou & Trenz, 2021)—also resonates with news consumers. However, it is important to note that there is a strong convergence of opinion around all four criteria.

Figure A2 of the Supplementary File illustrates that these criteria hold similar importance across the three countries. However, contextualization appears to be more important for Norwegian respondents compared to their Italian and Polish counterparts. An important reason for this may have to do with the variations in the structure of the media systems within each country. As Brüggemann et al. (2014) point out, the Norwegian media system is characterized by a high level of professionalization. Under these conditions, readers may come to take values like accuracy and objectivity for granted. In contrast, questions about the ability of journalists to deliver contextual news may be less taken for granted. People also appear similarly inclined to apply these criteria when evaluating the trustworthiness of specific news content (see Figure A4 of the Supplementary File). For instance, the presence of multiple viewpoints in a story is nearly as important to respondents as their trust in the journalist or the medium. Because such viewpoints are intimately connected with the ideals of objective and contextualizing journalism, we find a clear connection between what news consumers want journalism to be and the criteria they use to establish the credibility of specific news content.

However, a core feature of online media, namely the ability to debate news content through comment sections, appears to be far less important to respondents than factors such as the source of the news story,

as shown in Figure A3 of the Supplementary File. This is not particularly surprising, as motivated reasoning may lead people to place greater trust in news content from sources they already know (Taber & Lodge, 2006). This highlights a potential disconnect between journalists and news consumers regarding the characteristics they consider most important for building trust: While many journalists view their engagement with readers through comment sections as crucial to their work (Hanusch & Tandoc, 2019), readers do not seem to perceive it as similarly important. This pattern is especially pronounced in Norway, where the perceived importance of comment sections by readers is even lower than in Italy and Poland (see Figure A3 of the Supplementary File).

As Table 1 shows, we find little evidence for the connection between non-mainstream ideological leanings and support for contextualization. Instead, we find that readers who are inside or outside the political mainstream evaluate the different qualities of journalism rather similarly. We thus reject H1a, which posits that readers from the far left and far right are equally less likely to prefer contextualizing journalism than those identifying as centrists, as the hypothesized pattern is not observed. We also reject H1c, as we find no evidence that far-right readers are less likely to believe that contextualization is important than centrists and far-leftists. Indeed, the only significant difference we find goes in the other direction: Readers identifying with a far-left ideology are *more* rather than less likely to see contextualization as a core feature of journalism.

However, we confirm H1b, which states that objectivity, relevance, and truthfulness will be equally important to people regardless of whether they belong to the political mainstream or adopt more non-centrist positions. This is illustrated by the fact that there are no significant differences between political centrists and far-left- or right-wingers in how they rate these particular features of journalism.

Table 1. Test of connection between ideology and preferences for journalism.

	Accuracy	Contextualization	Objectivity	Relevance
Far left	0.07	0.13*	0.02	−0.01
	(0.02)	(0.02)	(0.05)	(0.04)
Far right	−0.00	−0.07	0.09	0.03
	(0.09)	(0.10)	(0.10)	(0.04)
Age	−0.08	−0.09	−0.09	−0.12**
	(0.03)	(0.02)	(0.02)	(0.01)
Gender	−0.03	−0.02	−0.03	0.02
	(0.03)	(0.03)	(0.01)	(0.01)
Education	0.13*	0.11*	0.14*	0.08*
	(0.03)	(0.02)	(0.02)	(0.01)
Trust in journalism	−0.03	−0.08	−0.03	−0.04
	(0.02)	(0.02)	(0.03)	(0.06)
Media use	0.02	0.03**	0.05**	0.01
	(0.01)	(0)	(0)	(0.01)
Fixed country effects	Yes	Yes	Yes	Yes
Clustered SEs	Country	Country	Country	Country
N	4,013	3,997	3,992	3,939

Notes: *** $p < 0.001$, ** $p < 0.01$, * $p < 0.05$; country fixed effects; country-clustered *SE*s.

One core difference, as the panels of Figure 2 illustrate, is that there seems to be a much greater convergence of opinion regarding the role of objectivity among political non-centrists than centrists. The predicted values of panel D also show that the demand for objectivity seems to be more pronounced among those belonging to the far right, even if the differences are not large enough to be statistically significant at conventional levels. The same predicted values also show much lower support for contextualization among far right-wingers compared to both their left-wing counterparts and more centrist ideological identifiers (panel C).

However, we reject H2 (coefficients shown in Table A2 of the Supplementary File), which states that people living in media systems with a higher degree of parallelization are more likely to want objectivity to be a guiding principle of journalism. As Figure 3 suggests, both the mean assessment of objectivity as a desired ideal of journalism and the measure of uncertainty suggest that the baseline support for independent organizations doing fact-checking is identical across all countries. People who live in countries whose media feature a great deal of political parallelization thus seem just as likely to prioritize objectivity as a guiding ideal of journalism as those whose national media are more heavily professionalized.
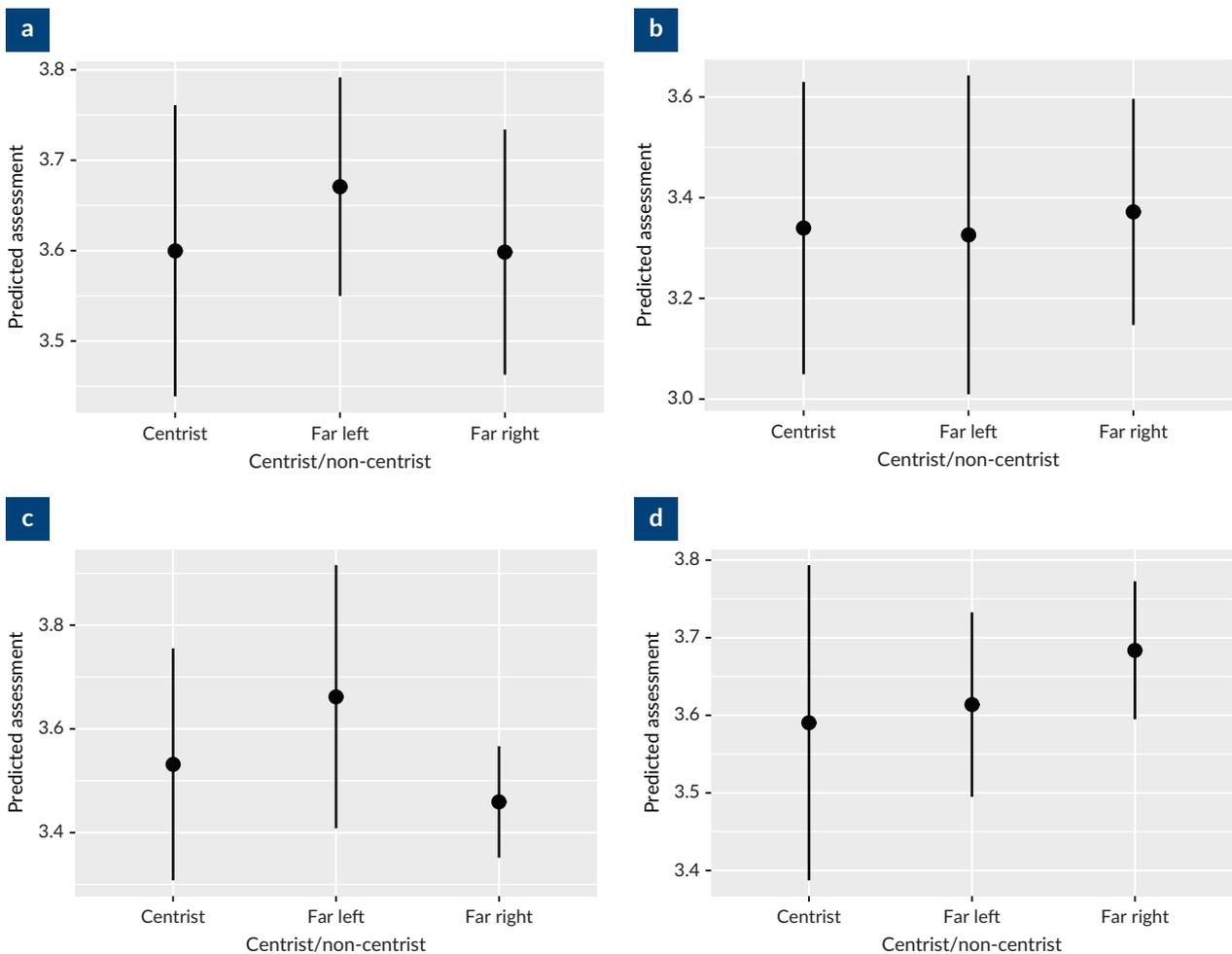

Figure 2. Impact of ideology on perceived importance of roles of journalism: (a) Accuracy, (b) relevance, (c) contextualization, (d) objectivity. Note: 95% prediction intervals shown.
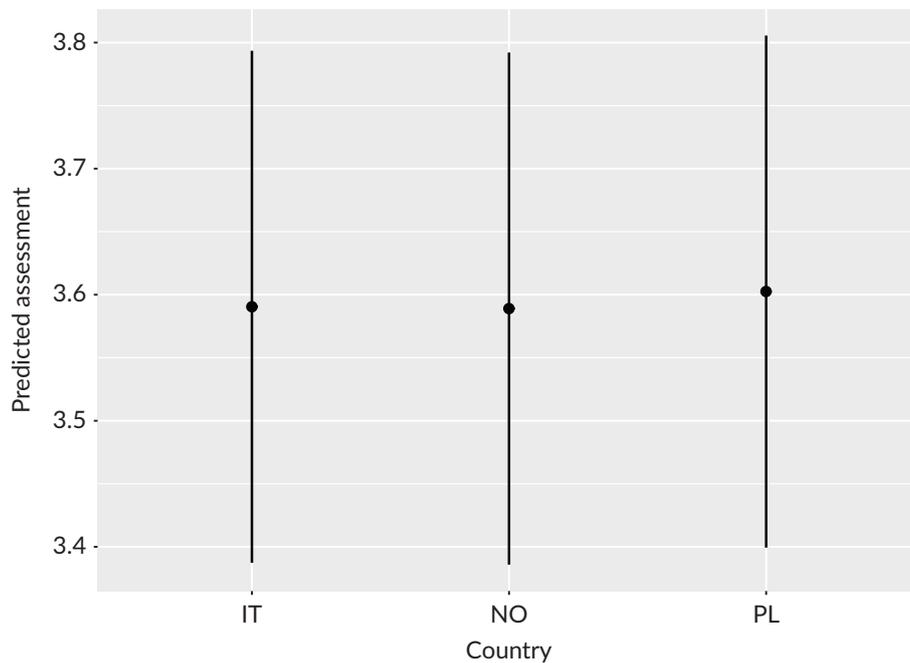
Figure 3. Predicted assessment of the importance of objectivity for news consumers of Italy (IT), Norway (NO), and Poland (PL). Note: 95% prediction intervals shown.

The evidence presented thus far portrays a news-consuming public that places significant value on the journalist's role as both contextualizers and disseminators of timely and accurate information (Weaver et al., 2019). Importantly, news consumers of all ideological stripes seem to have largely overlapping views on the importance of these criteria. Our results also suggest that these views are somewhat independent of the structural features of the media systems of a respondent's country of residence.

4.2. Understanding Individual-Level Preferences for Fact-Checking

We now proceed to a more formal investigation of the specific factors influencing preferences for various organizational modes of fact-checking. This analysis begins by first testing the base correlation between each variable, before expanding to include interactions.

As Table 2 shows, the relationship between ideology and support for fact-checking by independent organizations does not align with H3 and H4. Both the base and interaction models indicate that left-leaning respondents tend to favor more fact-checking conducted by independent organizations rather than fact-checking performed by institutionalized media to a greater extent than those on the right.

Two things stand out from the analysis reported in Table 2. The first is that there does not seem to be a strong correlation between holding views of politics that are outside of the political mainstream and views on how fact-checking should be organized. While we see that left-wingers outside of the political mainstream are, on average, more likely to believe that fact-checking should be done by professional organizations, the corresponding measure for right-wing individuals is associated with much uncertainty. The other thing that clearly stands out is that trust in journalism moderates the lower propensity of right-wingers to prefer fact-checking conducted by independent organizations. We find no similar pattern

Table 2. Preferences for fact-checking organizations.

	Base model	Interaction model
Far left	0.40* (0.19)	−0.02 (0.84)
Far right	−0.07 (0.46)	−1.47* (0.74)
Age	0.22** (0.07)	0.22** (0.07)
Gender	0.22*** (0.03)	0.23*** (0.03)
Education	0.05 (0.03)	0.05 (0.03)
Trust in journalism	0.10*** (0.02)	0.08*** (0.02)
Media use	−0.04 (0.04)	−0.04 (0.04)
Far left X Trust in journalism		0.09 (0.17)
Far right X Trust in journalism		0.28*** (0.08)
Fixed country effects	Yes	Yes
Clustered SEs	Country	Country
N	2,860	2,860

Notes: *** $p < 0.001$; ** $p < 0.01$; * $p < 0.05$; coefficients are shown as log-odds, with country-clustered SEs and country-fixed effects.

for those belonging to the non-mainstream left. The fact that the hypothesized effect of non-mainstream beliefs is only found on the left means that we reject H4.

In contrast to the inconsistent effect of ideology, we find that there is a robust and statistically significant effect of trust in journalism. However, this seems to go in the opposite direction than what we hypothesized. As panel A of Figure 6 of the Supplementary File shows, going from the highest to the lowest levels of trust in journalism is associated with an increase in the predicted probability of supporting fact-checking by independent organizations that is slightly higher than 10%. Importantly, however, this effect is not moderated in any substantial way by people's political ideology. This is clear from panel B, which shows that there is a strong overlap between centrists and non-centrists with identical levels of trust in journalism. The difference, as Table 2 suggests, is that strong trust in journalism seems to have a stronger moderating impact on far right-wingers than on the other groups.

We thus reject both H3 and H4. This suggests that beliefs about how fact-checking should best be organized are not shaped along a U-shaped dimension where antipathy towards fact-checking done by professional journalists is equally strong on both sides of the political spectrum. Instead, this antipathy is more pronounced, in contrast to what we hypothesized, on the far left. However, a higher confidence in the ability of journalism to fulfill its core functions seems to be an important moderator of these beliefs. This aligns with how trust

in journalism on its own similarly influences news consumers' views on who should actually be in charge of fact-checking the news.

What stands out, despite trust in journalism acting as a differentiator, is the very large support that professional fact-checking done by journalists nevertheless enjoys among news consumers. This is evident from the predicted probabilities shown in Figure 4. Even among those who are the most distrustful of journalism, there is still a 70% probability that they will believe fact-checking should mainly be done by journalists working within traditional news organizations. Thus, despite there being a plethora of different ways of organizing fact-checking, there is still robust support for a professional model that sees journalists working within traditional media outlets to conduct fact-checks as opposed to "out-sourcing" it to external organizations.
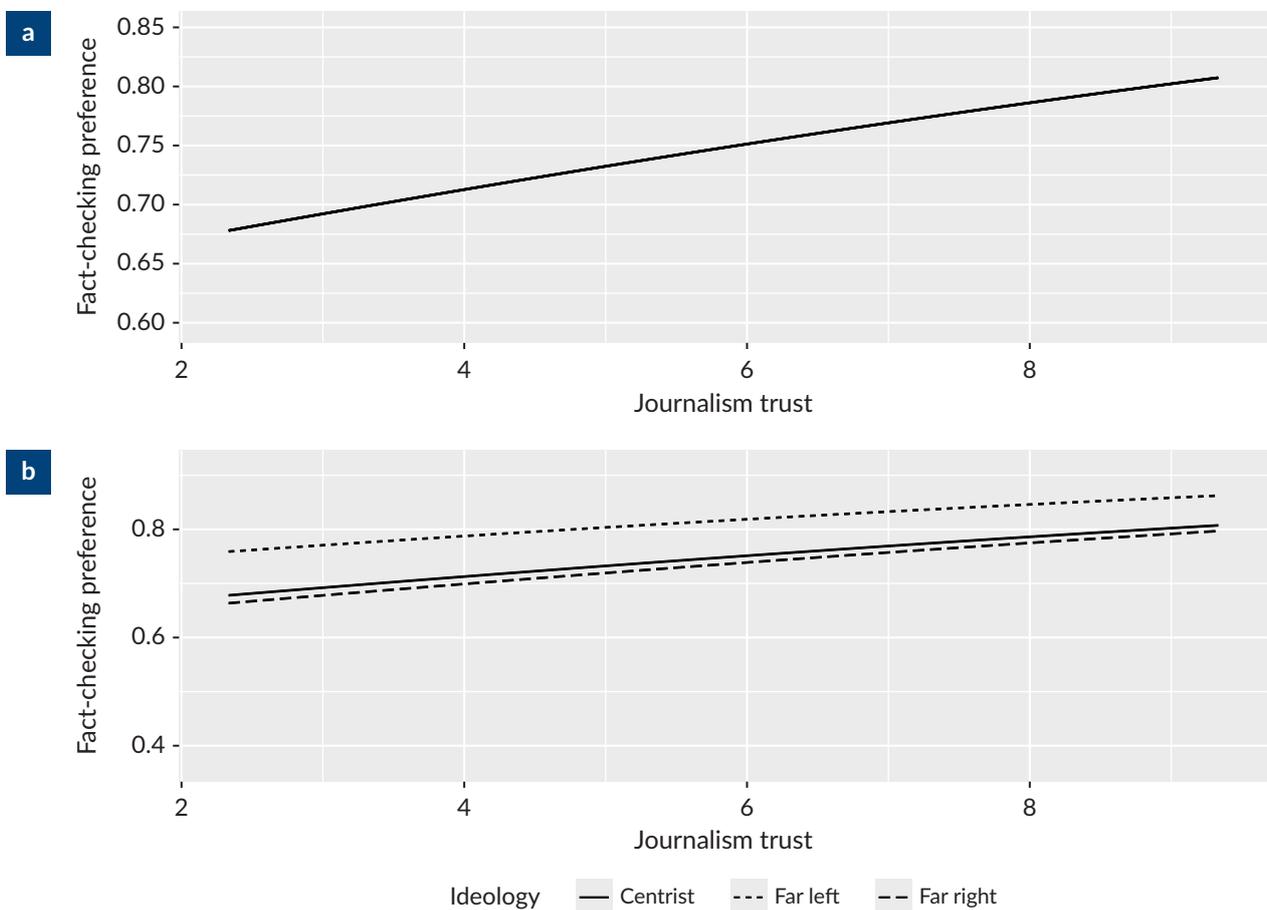
Figure 4. Base model (a) effect of journalism trust and its interaction with political ideology (b). Note: 95% prediction intervals shown.

5. Conclusion

This article explores the under-researched question of what kind of journalism the public wants and what kind of fact-checking infrastructure they are most likely to trust. In doing so, we contribute to the extensive literature on post-truth practices and principles (e.g., Bryanov et al. 2021; Iyengar & Massey, 2019; McIntyre, 2018), shedding light on what readers specifically seek from journalism. While our data provides only a

snapshot in time—meaning we cannot assess the changing importance of these criteria within the same countries over time—it nonetheless reveals important insights into the demands placed on journalism. These insights are particularly important as they come at a time when the media landscape has been transformed by technological and regulatory changes, as well as the growing challenge posed by the spread of fake news and elites questioning the legitimacy of traditional journalism. Our findings suggest that news consumers, despite technological advances such as artificial intelligence that are currently reshaping journalism, remain committed to very traditional ideas about what journalism should do. They want journalism to be unbiased, factual, and committed to contextualizing events. These expectations are largely consistent between readers across the political spectrum. It is only when it comes to the role of independent organizations in fact-checking that ideology plays a role, with those identifying as far right expressing significantly different views of this question than those belonging to the ideological center.

The question of how we operationalize "objectivity" also presents an important avenue of future research. Leveraging recent advances in the analysis of open-ended text questions (Roberts et al., 2014), future studies should examine the extent to which different conceptions of objectivity correlate with determinants of media trust such as age, education, and political ideology. The same applies to other core values of journalism, such as contextualization and accuracy.

Our results have two important implications: First, we show that readers are not ambivalent towards the question of how fact-checking should be organized to inspire the greatest confidence, and that this opinion varies by ideology. There is, in other words, no general deficit of media literacy that turns news readers into victims of falsehood. Instead, people make explicit decisions to trust or distrust particular news formats based on shared beliefs about what makes journalism trustworthy in a democracy. We thus show that upholding traditional journalistic values, such as impartiality and accurate news coverage, may be more beneficial in fostering high-quality journalism and trust in it, than relying on algorithms or other technologies to personalize news content for individual consumers.

We also note that individual preferences regarding how fact-checking services should be organized correlate with levels of media trust. Future research should therefore extend its focus from news content to the practices of news production and news reception. The question is not simply how a particular news content can be effectively identified as true or false, but how different forms of falsehood labeling by fact-checking organizations vary in terms of trust. To address this latter question, the study of falsehood in journalism needs to shift focus from news production to audience and reception analysis. Through our surveys of news consumers, we provide first insights into these variations in news readers' preferences for the organization of fact-checking services. Our results also have implications for media practitioners who must consider how the infrastructure of fact-checking influences readers' trust and how it can be effectively improved. Ultimately, understanding these dynamics will be essential for building a media ecosystem that fosters greater public trust and accountability.

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Conflict of Interests

The authors declare no conflict of interest.

Supplementary Material

Supplementary material for this article is available online in the format provided by the author (unedited).

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About the Authors

Martin Moland is a postdoctoral fellow at ARENA, Centre for European Studies. His work centers on public opinion, and has been published in *West European Politics*, *JCMS: Journal of Common Market Studies*, and *Publius: The Journal of Federalism*, among others.

Jacopo Custodi is a postdoctoral research fellow in political science at Scuola Normale Superiore (Italy).

Hans-Jörg Trenz is a full professor of sociology of culture and communication at Scuola Normale Superiore (Italy).

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ARTICLE

The Fact-Checking Initiatives in the EU: A Diverse Ecosystem Against Disinformation

Mar García-Gordillo [1] , **Rubén Rivas-de-Roca** [2,3] ,
and **Mathias-Felipe de-Lima-Santos** [4,5,6]

[1] Department of Journalism II, University of Seville, Spain
[2] Department of Communication Sciences, University of Santiago de Compostela, Spain
[3] Department of Communication, Carlos III University of Madrid, Spain
[4] School of Communication, Society and Culture, Macquarie University, Australia
[5] Department of Communication, Pompeu Fabra University, Spain
[6] Digital Media and Society Observatory, Federal University of São Paulo (Unifesp), Brazil

Correspondence: Rubén Rivas-de-Roca (rubenrafael.rivasderoca@usc.es)

Abstract

Disinformation in Europe is a significant challenge to democracy. The pan-European conversation faces a landscape dominated by misleading or false information targeting the EU. In response, various public institutions have been promoting fact-checking initiatives. Our research analyzes the fact-checking initiatives developed by these institutions at national and regional levels. This study identifies and describes organizations ranging from dedicated initiatives, such as VerificaRTVE in Spain and ARD-Faktenfinder in Germany, to news media and fact-checking platforms funded by public money. Our analysis is based on nine semi-structured interviews with professionals conducting fact-checking across the EU. We explored topics such as content selection criteria, audience involvement, collaboration with stakeholders, dissemination practices, and the evolving role of AI in supporting these activities. Results highlight a growing number of fact-checking initiatives, particularly those associated with public service media, with AI increasingly integrated into their operations. However, our findings also reveal concerns related to the pace of digital transformation and limited resources. This research provides insights into the future of fact-checking in Europe, where public fact-checking efforts and media literacy initiatives remain underdeveloped. Our study contributes to ongoing discussions about the creation of a robust European Public Sphere, arguing that public institutions can play a pivotal role in mitigating disinformation within a shared space for democratic deliberation.

1. Introduction

The rise of digital disinformation is a massive problem that threatens Western democracies, shaping a fragmented and disrupted public sphere (Bennett & Pfetsch, 2018). Terms such as "information disorder" (Wardle & Derakhshan, 2017) or "fake news" (Tandoc et al., 2018) have become frequent when analyzing the media landscape. "Misinformation" and "disinformation" are often used interchangeably, but they refer to distinct phenomena. While the first involves the unintentional sharing of false or inaccurate information, disinformation refers to the deliberate creation and dissemination of false information with the explicit goal of deceiving the audience. While both forms of deceitful content can cause harm by distorting public understanding, disinformation is particularly concerning due to its strategic nature in influencing public opinion and undermining trust. In this study, we will focus on "disinformation" to highlight the intentionality and coordinated efforts behind false information campaigns, which are central to our investigation (de-Lima-Santos & Ceron, 2023). The proliferation of these false messages goes beyond social media and has to do with a technological universe in which algorithms and users are prompted to create fake news (Baptista & Gradim, 2021). As stated by the literature, the economic and technological structures of social media platforms led to the emergence of digital communication that prioritizes false media messages (Anderson, 2021).

The proliferation of disinformation has contributed to widespread distrust in the news media (Lewis, 2019). Further, on a regulatory approach, this challenge has also catalyzed the emergence of specialized fact-checking initiatives as an attempt to combat disinformation (Graves, 2016). These organizations have been developing newer relationships with their audiences through, for example, media literacy programs and more transparent verification processes (Chaparro-Domínguez et al., 2024). Europe has become a pioneer in fact-checking, with numerous initiatives emerging to verify political claims and online social media content (Graves & Cherubini, 2016). The democratic significance of these projects is evident in their role in countering disinformation disseminated by right-wing populist parties across Europe (Rivas-de-Roca et al., 2024).

The EU has become a primary target for disinformation campaigns, a phenomenon that coincides with rising Euroscepticism stemming from tensions between cosmopolitan and national values (Caiani & Guerra, 2017). While EU-related discourse has reached unprecedented levels of politicization (Justel-Vázquez et al., 2023; Schmidt, 2019), the spread of disinformation threatens the development of a European Public Sphere (EPS)—conceived as an interconnected network for transnational debate (Rivas-de-Roca & García-Gordillo, 2022). Research has demonstrated both the role of reliable information in fostering trust in EU institutions (Brosius et al., 2019) and the crucial function of professional journalism in combating false content (Lecheler et al., 2024).

In this context, fact-checking platforms have increasingly been established by both independent organizations and public institutions, employing professional journalists dedicated to verification work. This study aims to map fact-checking initiatives across EU member states, with particular attention to public

service media (PSM) organizations due to their commitment to social values (Horowitz et al., 2022), while also encompassing other publicly funded fact-checking operations. The research pursues two main objectives: (a) identify and examine these fact-checking projects (O1); and (b) investigate their operational strategies and practices, including audience engagement mechanisms and AI implementation (O2).

This exploratory analysis focuses specifically on publicly funded fact-checkers within the broader landscape of European fact-checking organizations that have emerged in recent years. Thus, we pose the following research questions:

RQ1: Which fact-checkers are promoted by public institutions within the EU?

RQ2: How is the working of these fact-checking organizations in terms of practices and routines?

2. Literature Review

2.1. Actions Against Disinformation in National and Supranational Entities

The growth of disinformation has caused concern among public institutions, news media, and journalists since it poses a risk to democratic systems (Ferreras Rodríguez, 2020; Tuñón, 2021). In this sense, some initiatives have been launched. At the institutional level, the International Program for the Development of Communication of UNESCO approved the Media Development Indicator as a framework to evaluate the media landscape and its impact on society (UNESCO, 2008). In Europe, the EU Media Freedom Law came into force in 2024. This document preserves the media independence to safeguard democratic values (Regulation of the European Parliament and of the Council of 11 April 2024, 2024). To this end, the European Commission has carried out several projects to protect citizens from mis- and disinformation, including a code of good practices (European Commission, 2022).

The emergence of fact-checking represents a return to journalism's foundational principles of verification (Graves, 2016). In this context, fact-checking networks have assumed a role in promoting fact-checking efforts. The International Fact-Checking Network (IFCN), established by the Poynter Institute (Florida, USA) in 2015, now encompasses more than 170 fact-checking organizations worldwide, providing support through networking, training, and collaborative initiatives. Similarly, the European Fact-Checking Standards Network (EFCSN) works to advance and maintain rigorous verification standards and media literacy across Europe. This networked approach to fact-checking has contributed to the observed convergence of verification practices and content across national boundaries (Cazzamatta, 2024).

Similarly, the EU has implemented various initiatives to combat disinformation, with the European Commission and European Parliament taking leading roles through targeted funding programs. Among them, the Media Pluralism Monitor serves as a comprehensive assessment tool for evaluating threats to media pluralism. The European Digital Media Observatory (EDMO) has also established regional hubs that foster collaborative approaches to countering online disinformation. These hubs function as interdisciplinary networks, connecting fact-checkers, media literacy specialists, and academic researchers to analyze and address disinformation challenges through coordinated efforts.

PSM play a vital role in combating disinformation (Fieiras Ceide et al., 2022; Rodríguez-Martelo et al., 2023), leveraging both their higher levels of public trust and established reputation to enhance the effectiveness of their initiatives. The strong presence of public media across Europe further amplifies their potential impact (Rivera Otero et al., 2021). According to Rodríguez Castro and Pérez Seijo (2024, pp. 42–48), PSM organizations focus their efforts on five key areas: (a) strengthening their information mission, (b) developing verification initiatives, (c) promoting media literacy, (d) creating content for young audiences, and (e) addressing national security concerns. A notable example of cross-border collaboration is the Journalism Trust Initiative, spearheaded by Reporters Without Borders and supported by various public media organizations, including VerificaRTVE (Spain), BBC Verify (UK), and NRK (Norway).

For its part, the EU's role in countering disinformation also covers legal measures. With the adoption of the Digital Services Act (DSA), these measures were taken for the first time at the EU level (Eskens, 2024). This author points out how the DSA was completed by the Political Advertising Regulation and the European Media Freedom Act, both shaped by a vision of disinformation as a changing and external threat. Beyond that, the DSA, issued in December 2020, marked a turning point since it proposes a digital services market based on digital sovereignty (Turillazzi et al., 2023), in which protection from disinformation is critical. Even though not all the actors agree to this legislation, the DSA establishes a new relationship between audiences and platforms fueled by the principles of content moderation and freedom of expression (Cauffman & Goanta, 2021).

Taken together, the convergence of institutional initiatives, fact-checking networks, and PSM efforts represents a comprehensive European approach to tackling disinformation. Furthermore, the multi-stakeholder strategy, combining regulatory frameworks, collaborative verification networks, and trusted public media organizations, demonstrates the EU's commitment to preserving information integrity and democratic discourse. As disinformation continues to evolve, the coordination between these various actors and initiatives becomes increasingly crucial for ensuring informed citizens.

2.2. The Role of Fact-Checking

Fact-checking journalism has established itself as a distinctive form of verification, employing systematic and replicable methodologies to assess the veracity of potentially false information (Lotero-Echeverri et al., 2018). While fact-checking methods have shown a tendency toward standardization, European fact-checking platforms must navigate the diverse journalistic traditions and practices that exist across EU member states (Picard & Salgado, 2015). This challenge is particularly significant as disinformation campaigns consistently portray the EU as a failed project (Kermer & Nijmeijer, 2020), potentially undermining the development of a shared European identity. These challenges are further complicated by the persistent structural crisis affecting Europe's media sector, such as media concentration and language barriers (Trappel et al., 2015).

In this complex media landscape, fact-checking initiatives may offer an innovative pathway against disinformation. Andersen and Søe (2020) argue that fact-checking should transcend mere technical verification to foster democratic dialogue about the validity of arguments. These initiatives are part of a realignment of journalistic practices to respond to disinformation, including activities that adapt to emerging technologies like AI. Nevertheless, the fact-checking industry presents some limits, as is determined by the disinformation landscape.

Fact-checking assumes that society prefers fact-based information over misleading narratives. On this matter, some authors reflect on the extent to which these actions could be effective in a digital context in which individual reality is prioritized over consensus (Vinhas & Bastos, 2021). One of the problems of fact-checking is its ephemeral character, but at the same time, it contributes to clearing up the validity of specific messages. As the effectiveness of fact-checkers is not completely evidenced, the literature also discusses the importance of educational activities (Dumitru et al., 2022). Indeed, media literacy training is a key strategy for some fact-checkers to reach different generational publics, to make them aware of disinformation processes.

Although verifying information means returning to the origins of journalism, there is a huge debate at the EU level to define the way to fight disinformation (Tuñón Navarro et al., 2019). Additionally, traditional fact-checking processes, while thorough, often struggle to keep pace with the volume and velocity of information dissemination in the digital age (Graham et al., 2020). On this backdrop, the potential of PSM to mitigate the impact of disinformation in Europe has already been tackled (Horowitz et al., 2022), but there is a lack of empirical research that unravels the working of fact-checkers across the EU, singularly regarding initiatives fostered by public institutions. Most academic studies focus on the performance of independent civic fact-checking platforms, whose business model is unlike conventional journalism (Ufarte-Ruiz et al., 2020). As fact-checking may enhance the quality of European digital conversation, our study sheds light on the weight of public initiatives within the lists of fact-checkers in the EU, exploring their practices in comparison.

3. Methodology

Our study of the fact-checking initiatives is based on a triangulation of research techniques, combining website content analysis (Herring, 2010) with in-depth interviews. First, we triggered a list of fact-checkers through the following databases: Code of Principles of the IFCN, belonging to the Poynter Institute; EFCSN; and EDMO. Projects that are signatories of at least one of these networks were included, but we also expanded the number of research items with a snowball sampling (Noy, 2008) aimed at professionals working on fact-checking across Europe. Specifically, we contacted journalists from fact-checkers that we knew in person or through their public activity and asked them to mention prominent colleagues and fact-checking organizations. This allows us to retrieve an overview of the fact-checkers placed in the EU.

Our data collection happened between 2023 and 2024. On average, each interview lasted 45 minutes. They were conducted in Portuguese, Spanish, and English, the languages spoken by the authors.

Then, we applied a website content analysis on the available information of each fact-checking initiative. The analysis was conducted over three months: July, August, and September 2024. To this purpose, we developed an analysis template, considering the country of origin, type of company, international networks in which they are registered, and the weight of public fact-checkers within the country. Additional items such as the scope (European, national, or regional) and the implementation of media literacy actions were considered. The study of fact-checking platforms through a template has already been carried out in Southern Europe (Ufarte-Ruiz et al., 2020), providing a detailed description of its characteristics.

The country of origin of each initiative is relevant because it determines the audience's expectations of journalistic verification, which could be explained in the context of media systems and political cultures

(Cushion et al., 2021). Besides that, we take all the fact-checkers into account to assess how important public initiatives are in frequency comparison, although only these public ones are content-analyzed exhaustively. The strong social value of these entities, especially remarkable in PSM to enhance an inclusive public sphere even in disrupted times (Iosifidis, 2011), and their need for accountability to citizens make them a convenient object of study for delving into the mitigation of disinformation in Europe.

Regarding the goal of analyzing the internal workings of fact-checkers, we conducted in-depth interviews. This method is appropriate for exploratory research since it gives knowledge of the reasons that grounded particular practices (Valles, 2014). Our fieldwork was carried out between February 2023 and May 2024 through online interviews. Nine interviews were held (four from public organizations and five from private ones), at which we found a possible saturation point as the informants did not bring new data.

Even though the article's focus is on public fact-checking initiatives and singularly PSM, our purpose is also to compare the practices of these organizations and private ones in Europe that receive public funding. There may be differences between the logic of these media, but at the same time, it is relevant to know how the public's money is used. Hence, the second phase of research includes both entities.

The participants were selected based on their positions as people in charge of the fact-checking platforms. We include different types of companies to check potential divergences between public and private, as well as different EU countries. These organizations were selected because our mapping of fact-checkers reveals that they could be implementing interesting actions in terms of verification, considering other factors such as the number of organizations. For instance, Germany was reported three times due to its great presence of fact-checkers.

Besides that, the non-probabilistic and snowball sampling allowed us to reach additional respondents who were assessed as relevant by the participants. This strategy was useful to address the most important people and organizations according to professionals involved in the sector. Table 1 shows the list of interviewees and their details.

A thematic analysis was used to identify common patterns (Braun & Clarke, 2006), following the phases suggested by these authors: familiarization with qualitative data, production of initial codes, search and

Table 1. Respondents and their organizations.

Code	Organization	Name	Type	Country
R1	ARD-Faktenfinder	Patrick Gensing	Public	Germany
R2	CORRECTIV	Caroline Lindekamp	Private	Germany
R3	Demagog	Aleksy Szymkiewicz	Private	Poland
R4	Deutsche Welle	Julie Bayer	Public	Germany
R5	*Jornal Polígrafo*	Filipe Pardal	Private	Portugal
R6	Maldita.es	Ximena Villagrán	Private	Spain
R7	Pagella Politica	Tommaso Canetta	Private	Italy
R8	VerificaRTVE	Borja Díez-Merry	Public	Spain
R9	VRT NWS	Chaja Libot	Public	Belgium

review of themes, and drafting the report. The interviews were structured into three sections that tackle several items: content selection criteria, audience involvement, collaboration with stakeholders, dissemination practices, and the increasing role of AI in addressing fact-checking tasks. All the qualitative information was managed through Atlas.ti software version 9, following our interview guide (Table 2).

Table 2. Interview guide.

Sections	Questions
1. Fact-checking practices	1. How do you choose the content that you verify?
	2. Are the audiences involved in the fact-checking task? How do you engage them?
	3. Do you collaborate with other stakeholders in the fight against disinformation?
	4. Is there a dissemination strategy to spread the fact-checked content and, therefore, avoid the spread of disinformation? If so, how does it work? What role do social media platforms play in dissemination practices?
2. The role of technology	5. Has your company developed new professional roles, derived from changes in the type of disinformation, such as deepfakes?
	6. Is there some kind of bot or automatic tool that you use to identify or verify content? Is it developed in-house or is it a third-party tool?
	7. In your opinion, which phases of the verification process can be replaced by AI tools? What role do you think AI will play for fact-checking?
	8. Are you concerned with ethical principles in implementing technological solutions? Do you know how to address them?
3. Future developments	9. Do you participate in any activity of media literacy to prevent disinformation?
	10. What do you think might be the future challenges to mitigating disinformation?

4. Results

4.1. Mapping of Fact-Checking Initiatives in the EU

According to our research design on projects featured in the IFCN, EFCSN, and EDMO databases, 74 fact-checkers were found in the EU. Of all of them, only 18 (24.3% of the total) were public initiatives. In this sense, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, Greece, Ireland, Italy, Latvia, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, and Sweden do not have this kind of projects. Therefore, most EU countries (19) only have private fact-checkers.

However, these private organizations are usually non-profit entities that resort to public funding. For instance, Faktiv (attached to *Profil* magazine) in Austria counts on funds from a local body (Wiener Medieninitiative der Wiener Wirtschaftsagentur). At the EU level, many fact-checking projects have some funding from EU institutions, particularly the European Commission. Concretely, 20 Minutos Fake off is linked to the DE FACTO observatory, which is the EDMO hub in France. Another example is the Baltic Center for Investigative Journalism Re: Baltica (Latvia and the Baltic countries), which mixes investigative journalism and fact-checking thanks to competitive grants for cross-border journalism such as those funded by the European Commission.

Moreover, other platforms operate in several countries and collaborate with different media outlets against disinformation. dpa Deutsche Presse-Agentur (private) verifies false media content from Austria, Belgium, Germany, Luxembourg, the Netherlands, and Switzerland (non-EU country); meanwhile, AFP Fact Checking (public) is a French unique initiative that puts the new agency's efforts together to check fake news all over the world.

Regarding the public field, Table 3 presents key characteristics of the public fact-checking projects across the EU. Most of them are fostered by PSM, with a few initiatives from radio (Piloting Radio-FACT-Checks in Bulgaria and franceinfo.fr in France) and TV (Les Révélateurs de FranceTv in France). It should be noted that some PSM fact-checkers collaborate within the framework of European Perspective, which is a shared project coordinated by the European Broadcasting Union between 17 PSM outlets (Rodríguez-Castro & Arriaza-Ibarra, 2023). A look at the VerificaRTVE website reveals a section of European Perspective, with news content verified by franceinfo.fr or BR24 #Faktenfuchs.

Beyond PSM, there are three projects developed by news agencies funded by public money: APA—Austria Presse Agentur, AFP Fact Check, and EFE Verifica. It is noteworthy how several initiatives have not signed their membership to any of the main international fact-checking networks. In the same vein, in most countries,

Table 3. Public fact-checking projects by EU countries (available data in September 2024).

Country	Name	Type	IFCN	EFCSN	EDMO	% of public initiatives within the country
Austria	APA—Austria Presse Agentur	Agency	Yes	Yes	Yes	50%
	Fakten mit profil (faktiv and ORF III)	PSM	No	No	No	
Belgium	VRT NWS (Flanders)	PSM	No	Yes	No	50%
	Faky (Wallonia)	PSM	No	No	No	
Bulgaria	Piloting Radio-FACT-Checks	PSM (radio)	No	No	No	50%
France	AFP Fact Check	Agency	Yes	Yes	Yes	50%
	franceinfo.fr	PSM (radio)	Yes	No	No	
	Les Révélateurs de FranceTv	PSM (TV)	No	No	Yes	
Germany	Bayerischer Rund.—BR24 #Faktenfuchs	PSM	Yes	No	No	50%
	Deutsche Welle	PSM	Yes	No	Yes	
	ARD-Faktenfinder	PSM	No	No	No	
	HART ABER FAIR faktencheck	PSM	No	No	No	
	SWR3 Faktencheck	PSM	No	No	No	
	ZDF heuteCheck	PSM	No	No	No	
Hungary	Lakmusz	EC project	Yes	Yes	Yes	50%
Lithuania	LRT Faktai	PSM	Yes	No	No	25%
Spain	VerificaRTVE	PSM	No	No	Yes	33%
	EFE Verifica	Agency	Yes	Yes	Yes	

public initiatives represent half of the initiatives in the country. These figures are lower in Lithuania (25%) and Spain (33%). This evidence shows that public projects have an important weight in the nations in which they are present.

Considering the scope, a national dimension is prioritized, but four fact-checkers follow a regional approach: VRT NWS (Flanders), Faky (Wallonia), #Faktenfuchs from Bayerischer Rundfunk BR24 (Bavaria), and SWR3 Faktencheck (southwest of Germany). VRT NWS is developed by VRT as the public broadcaster for the Flemish Community in Belgium, covering the region of Flanders. Its counterpart in the French Community (Wallonia) is RTBF, which produces Faky. In Germany, two national broadcasters coexist: ARD and ZDF. Likewise, ARD is a consortium of regional public broadcasters, such as BR in Bavaria or WDR in North Rhine-Westphalia. This peculiar composition explains why Germany is the European country with the largest number of aforementioned fact-checkers.

Following the above, the presence of regional public initiatives seems linked to the political organization of the country since both Belgium and Germany are highly decentralized states. In the private sector, we only found one regional initiative (Verificat in Catalonia), which also belongs to a decentralized country like Spain. According to its website, Verificat receives public and private funding without further details. In terms of funding, it was detected that AFP Fact Check (France) and Lakmusz (Hungary) are doing fact-checks co-funded by the European Commission. In any case, Lakmusz was first created as an EC project to fight disinformation in the illiberal Hungarian context (Toomey, 2018).

Finally, the analysis of media literacy reveals that these actions are scant present in the public fact-checking initiatives (see Table 4), at least on their websites. Based on available information, we observe that media literacy ranges from self-verification tools (Faky or VerificaRTVE) to recommendations (Deutsche Welle) or courses to ameliorate the knowledge of fake news. Media literacy is key because it contains a double dimension of training journalists and citizens, empowering the audience. This is the reason why the EU assesses media literacy as a necessary measure against disinformation (Sádaba & Salaverría, 2023).

Even though EU institutions recognize the importance of media literacy, the public fact-checkers did not seem so committed to making citizens part of the management of disinformation. The four media literacy actions detected are in Belgium, France, Germany, and Spain, whose PSM are big organizations, with many employees and a huge budget. In the cases of AFP Fact Check and Deutsche Welle, the media literacy

Table 4. Media literacy actions in the public fact-checkers (available data in September 2024).

Name	Description	Website
Faky	Self-verification tool of keywords, articles, and images	https://faky.be/fr
AFP Fact Check	Digital courses on fact-checking training supported by Google News Initiative	https://digitalcourses.afp.com
Deutsche Welle	Tips from the Deutsche Welle fact-check to recognize and verify fake news	https://www.dw.com/en/dossier-how-to-spot-fake-content-online/a-67738458
VerificaRTVE	Availability of a self-verification toolbox with many free instruments	https://www.rtve.es/noticias/verificartve/herramientas-de-verificacion/avanzadas

materials are accessible in English to reach a wider public. This overlaps with the public value of those news media, contributing to developing a multilevel solution to combat disinformation in European territory.

4.2. European Fact-Checking Initiatives in the Digital Age: Strategies, Technology, and Collaboration

4.2.1. Approaches and Practices to Fact-Checking

European fact-checking organizations employ diverse strategies, blending manual, automated, and collaborative approaches to combat disinformation. These strategies are often tailored to their contexts and resources. For example, R4 from Deutsche Welle has "a fact-checking unit. However, it's not focused on fact-checking [verifying] internal reports. Instead, it's more about finding content to fact-check and then reporting on that."

These initiatives have developed sophisticated approaches to combat disinformation in the digital era, prioritizing content based on its potential impact, virality, and public interest. As explained by one representative from ARD-Faktenfinder (R1), this prioritization involves carefully assessing "how widespread the misleading content has become, what immediate harm the messages in question could cause, whether multipliers are involved in spreading misleading content, and the risk of making the misleading content more known."

Some of these initiatives have very structured routines to deal with the contents that come from the public. The process of identifying and verifying potentially false information has become increasingly collaborative and technologically driven. Social media platforms like Facebook, X (formerly Twitter), Telegram, and TikTok play a crucial role in content monitoring. Some organizations confine their monitoring to tools from these companies. For R2 from CORRECTIV, being "part of Facebook's partnership program, allows us to automatically detect potential misinformation through their tool. Apart from that, we search manually across social media platforms, such as Twitter, Telegram, and TikTok."

Many organizations have begun to leverage user participation as a key strategy, with Demagog reporting that "20–30% of the content [they] verify" (R3) comes directly from user submissions through their website and social media channels. Innovative approaches have emerged, such as CORRECTIV's "Check It" tool and Maldita.es' automated WhatsApp chatbot, which allow users to submit potential disinformation. R7 from Pagella Politica mentioned that they "focus mainly on political statements," but they launched "another project, 'The Facta,' which deals with non-political disinformation." This project relies heavily on user-generated content submitted via WhatsApp or other social media platforms.

Organizational structures have evolved to meet these challenges, drawing parallels to Fordist principles of efficiency and specialization. Demagog, for instance, has divided its editorial team into "two distinct sections"—one focused on "political claims" and another on general "fake news" (R3). This compartmentalization mirrors the industrial approach of streamlining tasks to increase output and maintain control, optimizing fact-checking efforts through specialized processes.

4.2.2. Technological Innovation and the Role of AI in Fact-Checking

Technology, particularly AI, has become an increasingly important tool in this landscape. R9 from VRT has an "innovation department that has been working on AI-related projects for a long time." They established an AI team across VRT that collaborates "with different departments, primarily news-related, but also with technical teams working on other software and media tools" (R9).

Maldita.es has implemented an "AI-powered system to identify content for fact-checking via WhatsApp" (R6), representing a new paradigm in information verification. This approach echoes the evolution from traditional labour models, with AI functioning as an extension of human capacity. However, crucially, human oversight remains essential. As R1 from ARD-Faktenfinder emphasized, "Human intelligence is always needed to fully understand and explain the ambiguity of statements and their context."

Similarly, Maldita.es uses an AI-powered system to "identify content for fact-checking via its chatbot-automated WhatsApp" (R6), which aligns with the evolving relationship between humans and machines. In the same way that Fordism relied on the mechanization of labour to boost production (Hudson, 2021), AI now functions as an extension of human capacity, automating the detection of such information at a massive scale (Guzman & Lewis, 2020). Yet, just as Fordist assembly lines still required human oversight and intervention, Maldita.es' system still relies on human fact-checkers to verify the AI's findings. This collaboration between AI and human fact-checkers mirrors the blend of automation and human labour that characterized Fordism's industrial processes, where machines increased efficiency, but human workers maintained quality control. The transition from purely human-driven fact-checking to a hybrid AI–human model reflects the broader shift from Fordist to post-Fordist modes of production, where labour divisions are integrated to manage the complexities of modern information ecosystems.

Besides developing their tools, some organizations use "simple publicly available tools such as Google Images, Yandex and TinEye for reverse searches" (R8). There also was mention of other third-party tools like "Trint to transcribe interviews and testimonies" (R8). As the digital landscape continues to evolve at a rapid pace, these organizations face a growing need to adopt technologies that can keep up with the rapid changes in the AI age. While out-of-the-box tools offer quick solutions, their long-term viability can often be a cause for concern. These tools, designed with broad usability in mind, may initially seem like the perfect fit for small to medium-scale projects. However, as the needs of the project evolve, the limitations of these solutions often become apparent. Customization options may be restricted, preventing the tool from adapting to more specialized requirements. This can be particularly problematic for projects that experience growth or require the integration of more complex systems (de-Lima-Santos et al., 2021).

Moreover, this scalability issue is compounded by the fact that many of these tools are not designed with long-term sustainability in mind. Their reliance on external vendors means that any changes in pricing, product offerings, or service support could have a direct impact on the success of the project. This includes the risk of shifts in the vendor's business model, which may lead to unexpected cost increases, changes in subscription plans, or the introduction of new pricing structures. These changes can put a significant financial strain on the use of these tools that were initially budgeted for stable, predictable costs (de-Lima-Santos et al., 2021). Ultimately, the security and privacy features of such tools may not always align with the evolving regulatory landscape, leaving projects vulnerable to compliance issues.

4.2.3. Collaboration and Networks in Combating Disinformation

Collaboration with other institutions has also emerged as a fundamental strategy in combating disinformation. These organizations are increasingly working together, sharing resources, best practices, and verified information across domestic and international networks. This includes partnerships with academic institutions, such as Maldita.es' collaboration with the University of Granada, and international projects like AI4Media and AI4Trust, which aim to develop advanced tools for media practitioners. "NoFake" project is a project from CORRECTIV that "involves collaboration with three university partners, and we aim to explore new ways of fact-checking, including finding ways to make the process more efficient, and combining fact-checking with media literacy training" (R2).

In the same vein, Deutsche Welle and VRT were partners in a large European project called AI4Media, and Demagog highlighted their participation in AI4Trust, both projects aim to develop AI tools to help fact-checkers and media practitioners. As R6 from Maldita.es stated, "the fight against disinformation is a team effort" and that collaboration is necessary for success. R1 "collaborates with different stakeholders to get substantial information and understand complex contexts, including fact-checkers and experts from the scientific community." For example, R1 "collaborates with other fact-checkers and experts from the scientific community. We also work with different stakeholders to get substantial information and understand complex contexts," but there is no way to verify that this collaboration is helpful to the public.

Commonly outlined by the respondents, international networks like the IFCN and the EFCSN also play a critical role in facilitating this collaborative approach. As R6 from Maldita.es noted, "the fight against disinformation is a team effort," highlighting the collective nature of modern fact-checking initiatives. The comprehensive European approach involves a convergence of institutional initiatives, networks, and governmental efforts to mitigate the impact of disinformation.

5. Conclusions and Discussion

Rooted in the theoretical framework that connects disinformation with democratic disruption (Bennett & Pfetsch, 2018; Wardle & Derakhshan, 2017), fact-checking emerges as a crucial mechanism for addressing the intentional spread of falsehoods and restoring public trust in media. Fact-checking, particularly through publicly funded and institutionalized initiatives, not only reaffirms journalism's foundational principles of verification (Graves, 2016) but also aligns with the democratic goals of the EU, ensuring a shared, factual basis for transnational discourse. To examine the fact-checking initiatives boosted by public institutions in the EU, this study identifies these fact-checkers and describes their characteristics, analyzing their internal working comparatively. Our study contributes to the current literature on fact-checking, providing two conclusions that follow the objectives and research questions defined.

First, regarding RQ1 on which fact-checkers are promoted by public institutions within the EU, our evidence points out that public fact-checkers mean only almost a quarter of all fact-checking initiatives in the EU, but they have a certain importance in the countries where they are present. These public fact-checking projects mostly belong to PSM and are not always signatories of international fact-checking networks. In addition to that, public fact-checkers tend to focus on a national scope, with some exceptions in highly decentralized states such as Belgium and Germany. In these countries, media literacy actions appear, along with France and Spain. This finding illustrates how media literacy is limited to big PSM within the European public field.

Considering RQ2 on how the working of these fact-checking organizations in terms of practices and routines is, our second contribution offers qualitative information on the practices of fact-checking, showing how the systematic and replicable methodologies used by fact-checking initiatives—combined with their collaboration with public institutions—enable these initiatives to address the pervasive challenge of disinformation targeting the EU. This is particularly significant in light of the rising levels of Euroscepticism and populist narratives that portray the EU as a failed project (Kermer & Nijmeijer, 2020). Disinformation threatens not only to undermine trust in EU institutions but also to weaken the shared identity and collective consciousness required to sustain an EPS (Nieminen, 2009).

PSM fact-checkers, such as VerificaRTVE in Spain or Deutsche Welle in Germany, have demonstrated that collaboration with other stakeholders—academics, independent media, and even international organizations—can amplify their efforts to combat disinformation. These partnerships foster a networked approach to verification, which is increasingly necessary in a media landscape characterized by the rapid and transnational spread of disinformation. Moreover, the convergence of various institutional efforts, such as EFCSN and EDMO, alongside national and regional fact-checking initiatives, underscores the comprehensive approach the EU has taken to tackle disinformation. However, while countries like Germany, France, and Spain have strong public and private fact-checking initiatives, many other EU countries lack sufficient public fact-checking mechanisms. This uneven landscape can hinder the development of a pan-European fact-checking network capable of addressing disinformation at the transnational level. Furthermore, the slow pace of digital transformation and limited financial resources faced by many of these initiatives pose an ongoing risk to their sustainability and scalability.

Nevertheless, the integration of AI into fact-checking processes offers a potential solution to some of these challenges. As highlighted in our interviews, AI tools are increasingly used by fact-checking platforms to streamline content verification, allowing them to process large amounts of data and detect disinformation more efficiently. Platforms like Maldita.es in Spain, which uses an AI-powered chatbot to identify false claims, demonstrate the potential of technology to enhance fact-checking efforts. However, it is essential to recognize that while AI can ameliorate the speed and scale of fact-checking, it cannot replace the nuanced judgment of human fact-checkers. The collaboration between AI systems and human fact-checkers (Guzman & Lewis, 2020), therefore, represents a hybrid approach that leverages the strengths of both to achieve more accurate and timely verification.

In short, the data reveals a strong commitment of the journalists involved in fact-checking. PSM are the main origin of public fact-checkers initiatives, but news agencies also play a role. Some of these initiatives (public or private) have the particularity of applying an international approach that reaches several countries, which may be useful in shaping a common social conversation. The existence of a well-informed citizenry in Europe depends on these measures against disinformation, as the EU institutions acknowledge (European Commission, 2022).

Taking these insights, this study contributes to the scholarly debate on the consolidation of fact-checking, pointing to the need for innovative strategies for achieving better results against disinformation. Prior qualitative scholarship outlines the rise of fact-checking projects in European areas such as the Mediterranean countries but with difficulties in connecting with the audience (Rodríguez-Martelo, 2021). Similarly, our analysis is aligned with early research on the verification carried out by PSM (Fieiras Ceide

et al., 2022) but also considers the role of the country in which fact-checking is produced (Cushion et al., 2021).

Some limitations should be acknowledged, such as the collection method. Some fact-checking initiatives could be missed as we only focused on well-known databases (IFCN, EFCSN, and EDMO), together with snowball sampling. For instance, if we had examined the organizations listed in the Duke Reporters' Lab database, we might have located additional public initiatives in other countries such as the Netherlands, where Checkt has been developed within a program from the Dutch public broadcasting company KRO-NCRV. Besides that, fact-checking supposes a changing sector in which projects are constantly transforming.

We seek to provide an overview of the public fact-checkers in the EU, putting the work about private non-profit organizations on this matter. Nonetheless, another limitation is that our classification derives into a mix of different entities (platforms, PSM departments for verification with a website, self-checking tools developed by a PSM, TV content, etc.), making it difficult to compare them.

Addressing disinformation from a public perspective means a strong responsibility, with an impact on the health of European democracy. Our results reveal that eight EU countries have public fact-checking initiatives, with special support from PSM. In this regard, the fake news targeting the EU can be mitigated (Caiani & Guerra, 2017), but public funding has effects on fact-checking organizations, particularly regarding press freedom and potential risks to democracy. Our study has implications for future research, which may expand this work by comparing the contents of public and private fact-checkers and connecting these findings with the internal strategies disclosed by the interviewees. While these organizations are likely to have good intentions, the scholarship should address the balance between public support and independence to avoid potential conflicts with freedom of the press, as the relevance of fact-checking is increasing.

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About the Authors

Mar García-Gordillo (PhD) is an associate professor of journalism at the University of Seville and coordinator of the research group Communication & Social Sciences. She is the director of the RTVE-US chair. Previously, she served as director general of communication at the University of Seville. Her main lines of research focus on communication and political journalism, with special attention to international politics and the European Union, information quality, and gender studies.

Rubén Rivas-de-Roca (PhD) is an assistant professor of journalism at the University of Santiago de Compostela and a member of the research group Novos Medios. He worked before at King Juan Carlos University and the University of Seville. He has been a visiting scholar at universities in Germany, the United Kingdom, and Portugal, and also at Carlos III University of Madrid (Spain). His research focuses on the study of political communication, local and new digital media, as well as on the European public sphere.

Mathias-Felipe de-Lima-Santos (PhD) is a researcher, journalist, and technologist. He has worked with institutions across Oceania, Europe, and Latin America. Previously, he contributed to major European research projects, including Human(e) AI, AI4Media, and JOLT, a Marie Skłodowska-Curie European Training Network project. Mathias-Felipe co-edited *Journalism, Data and Technology in Latin America* and the forthcoming *Fact-Checking in the Global South* (Palgrave Macmillan). His research explores how technological innovations are transforming journalism, media, and online social networks.

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ARTICLE

Building a Cross-Border European Information Network: Hyperlink Connections Among Fact-Checking Organizations

Regina Cazzamatta

Department of Media and Communication, University of Erfurt, Germany

Correspondence: Regina Cazzamatta (regina.cazzamatta@uni-erfurt.de)

Abstract

This article examines the hyperlinking practices of European fact-checking organizations as one of many indicators of efforts to establish a transnational community and identify organizations perceived as "opinion leaders" in combating disinformation. Through a content analysis of 1,976 fact-checking articles from 12 organizations (independent, in-house, and global news agencies) in Germany, Portugal, Spain, and the UK, the study reveals significant variations in hyperlink practices. We measured internal and outbound hyperlinks to fact-checking units used as verification sources or further reading material. The article also evaluates the transnational character of disinformation by analyzing the scope of verified falsehoods. Among the core findings, independent organizations are more likely to establish cross-border connections through outbound links to peer organizations, primarily linking to global news agencies like Reuters and AFP or to other independent fact-checking units from former colonies. In contrast, legacy media units rarely hyperlink to other fact-checkers as evidence sources or for reading suggestions. The study identifies European global news agencies as key opinion leaders, frequently linked for their reliability, particularly amid the heightened disinformation landscape following the Russia–Ukraine war. US fact-checking units, such as PolitiFact and Snopes, also maintain significant influence. This research enhances fact-checking studies by extending beyond liberal systems and emphasizing the strategic importance of hyperlinks in creating a global network of organizations. It offers new insights into linking practices within this domain, complementing existing literature on journalism and political communication. Additionally, the findings advance disinformation research by demonstrating the transnational nature of the issue.

Keywords

disinformation; fact-checking; hyperlinking; information flows; media systems; opinion leadership

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1. Introduction

Concerns about disinformation have led to the development of a digital fact-checking infrastructure aimed at circulating verified information and establishing shared epistemologies. This article analyses the extent to which European fact-checking units—whether independent, in-house, or linked to global news agencies (Graves & Cherubini, 2016)—are interconnected online both transnationally and within individual countries. It also identifies organizations that serve as transnational reference points in journalistic co-orientation processes within this news landscape, i.e., as opinion leaders (Hanusch & Nölleke, 2019; Mathes & Pfetsch, 1991). To measure this online interconnectedness, we examine citational hyperlinks (Ryfe et al., 2016) that are manually embedded by fact-checkers from four European democracies—Germany, the UK, Portugal, and Spain—encompassing three types of media systems (Hallin & Mancini, 2004) and 12 organizations. Hyperlinks can coordinate actions, enhance collective viewpoints, foster a sense of community, and build a unified group identity (Heft et al., 2021).

Hyperlinks are only one of several indicators used to observe interconnectedness and a sense of community, which may foster a European public sphere, as encouraged by EU-promoted fact-checkers (see Moland et al., 2025). Studies have traced the global fact-checking movement's evolution since 2014, shaped by the Global Fact conferences, where fact-checkers built a community, adopted shared practices, and organized under the International Fact-Checking Network (IFCN). Since then, they have collaborated to define their work, engage with stakeholders, and establish governance mechanisms (Graves & Lauer, 2020; Lauer & Graves, 2024). Despite this, hyperlinking practices as a measure of interconnectedness remain unexamined. While hyperlinks have been studied as strategic tools in journalism, politics, and social movements (Ackland & Gibson, 2013; Heft et al., 2021; Karlsson et al., 2015; Shumate & Lipp, 2008), no research has explored their role in the fact-checking community, which spans both journalistic and NGO-based organizations.

Hence, this article aims to explore the existence of a fact-checking network across Europe, with a specific focus on connections established through hyperlinking practices, while acknowledging the existence of other forms of interconnectedness and community-building. By examining how European fact-checkers collaborate and reference one another, the research identifies key national and transnational organizations that hold influential positions within this network. Additionally, the study analyzes the geographical scope of information verified by European fact-checkers, highlighting their regional and international focus on combating misinformation. Although several studies have examined hyperlinking patterns in journalism (Coddington, 2012; Karlsson et al., 2015; Ryfe et al., 2016; Stroobant, 2019), social movements and political parties (Ackland & Gibson, 2013; Shumate & Lipp, 2008), or right-wing regressive online media (Heft et al., 2021), to the best of our knowledge, no analyses have specifically addressed hyperlinking practices among fact-checkers. Given the hybrid nature of fact-checking organizations, which are linked to media outlets or NGOs, this study contributes to journalism and fact-checking literature, as well as disinformation studies.

The article begins with a theoretical framework from which the research questions are derived, focusing on the following: First, the extent to which European fact-checkers lay the foundation for a national and transnational fact-checking landscape through hyperlinking; second, the identification of fact-checking organizations that can be deemed the most influential or "opinion leaders" for European fact-checkers; and third, the geographical scope of verified information. Initially, we discuss the development of the European fact-checking movement and explain why hyperlinks serve as an indicator of a transnational information ecology. Next, we define

opinion leadership as the role of influential outlets that journalists rely on for information and as a benchmark for shaping their reporting, and briefly address the global circulation of disinformation. Before presenting the findings and concluding discussion, the article outlines the research design and the rationale for selecting countries and organizations in Section 3.

2. Theoretical Background

2.1. The European Fact-Checking Landscape

The breakdown of the 20th-century mass media system and the emergence of fragmented digital media environments have paved the way for the expansion of populist communication strategies (Waisbord, 2018), intensifying epistemic challenges and information disorder (Wardle, 2019), including the unintentional spread of falsehoods (misinformation) and the deliberate use of propaganda tactics (disinformation). In Europe, post-truth politics has had a significant impact, most notably seen in the Brexit referendum. The problem was further aggravated by the mishandling of the Covid-19 pandemic by right-wing governments (della Porta et al., 2024) and the invasion of Ukraine, both of which were accompanied by a surge in misinformation and disinformation, which were amplified through social media. In response to this broad structural and cultural epistemic crisis, fact-checking initiatives have emerged as a new journalistic mediation tool, establishing themselves in numerous countries:

> By mediation, it is generally meant that a third element stands between (at least) two other actors and provides services [in this case verification of third-party content] for one or both sides (or is at least expected to do so). (Neuberger, 2022, p. 161)

While these sites may vary in aspects like reach or funding models (Graves, 2018), their emergence can be viewed as a transnational phenomenon (Lauer & Graves, 2024) due to their shared values and the similar information niches they occupy across different countries.

Fact-checking organizations typically fall into two categories: independent or in-house teams within media outlets. Independent fact-checkers, often found in regions like Eastern Europe and Latin America, operate as non-profits free from corporate or editorial influence (Graves & Cherubini, 2016). These organizations rely on grants from foundations committed to supporting democratic institutions (Usher, 2019), though they often face difficulties in securing long-term funding and expanding their audience base. Their work is typically more community-focused, pushing the boundaries of conventional journalism to engage the public (Baack, 2018). As hybrid organizations, they encourage civic activism by promoting informed decision-making grounded in public-oriented values while balancing financial sustainability challenges (Kim & Buzzelli, 2024).

In contrast, in-house fact-checking teams function within established media outlets, primarily in the US and Western Europe (Graves & Cherubini, 2016). These teams benefit from the extensive infrastructure and reach of their parent organizations but are constrained by the editorial guidelines of those media entities. Due to the daily demands of news production, these media outlets generally produce fewer fact-checking pieces (Cazzamatta, 2025; Graves & Cherubini, 2016; Luengo & García-Marín, 2020; Palau-Sampio, 2018). However, some global news agencies, such as AFP, EFE, Deutsche Presse-Agentur (DPA), and Reuters, have fully integrated fact-checking practices into their newsrooms. AFP and DPA have even developed

AI-assisted verification tools, including those created through the Vera.ai and WeVerify projects (AFP, 2024). These agencies have the resources to employ specialized technologists and programmers alongside journalists (Lewis & Usher, 2014). Although fact-checking shares similarities with journalism, scholars consider it a "transnational field adjacent to, but distinct from, professional journalism" (Lauer & Graves, 2024, p. 13).

Fact-checking aims to identify, verify, correct, and curb misinformation, often working with government agencies and platform operators (Bélair-Gagnon et al., 2022). Since 2016, in response to rising disinformation and post-truth politics, fact-checking organizations have shifted focus. Their work has expanded from evaluating statements by politicians and officials to actively tracking and countering viral misinformation on social media (Bélair-Gagnon et al., 2022; Cazzamatta & Santos, 2024; Graves et al., 2023). The verification process begins by reaching out to sources of misinformation, such as political figures, and tracing false claims. Fact-checkers then gather evidence from authoritative records and independent institutions to ensure transparency. To address conflicting and often politicized expert opinions, they use truth triangulation, comparing perspectives from diverse experts or organizations. Finally, they assess contextual accuracy, consistency, and the broader implications of misleading claims within ongoing debates (Graves, 2016, 2017; Moreno-Gil et al., 2022). Some fact-checking coalitions, such as Elections24Check—as demonstrated in this issue by Rodríguez-Pérez et al. (2025)—are adopting a more contextual approach to disinformation.

Cross-referencing data from the Duke Reporters' Lab, the IFCN, the European Fact-Checking Standards Network (EFCSN), and the Facebook Third-Party Fact-Checking Project (3PFC) reveals 137 fact-checking organizations operating in Europe. Of these, 77 are affiliated with media outlets, while 60 operate independently within academic institutions, NGOs, CSOs, or other non-profits. In terms of collaboration, 56 are signatories to Meta's program, 44 to the EFCSN, and 67 to the IFCN. Much like social movements (della Porta, 2022; Diani, 1992; Moss & Snow, 2016), fact-checking networks have emerged through collective efforts, facilitated by events focused on community-building, the establishment of dedicated institutions, and strategic partnerships with key stakeholders to secure institutional support and legitimacy (Lauer & Graves, 2024, p. 13). The inaugural Global Fact conference in 2014, organized by the IFCN, is widely regarded as the pivotal moment that unified the global fact-checking community. Prior to this, although the number of fact-checking organizations had grown since 2009, there was minimal interaction between them (Lauer & Graves, 2024, p. 13). The IFCN sets rigorous standards for fact-checkers, requiring a commitment to non-partisanship, transparency of methods and sources, fairness, and accurate corrections. Through the IFCN, fact-checkers have partnered with major platforms, such as Meta's Third-Party Fact-Checking Program, which operates across Facebook, Instagram, and WhatsApp in 119 countries. IFCN also oversees the Global Fact Fund—an initiative supported by funding from Google and YouTube—designed to support fact-checking efforts worldwide and mitigate the impact of misinformation (Poynter, 2024).

In 2022, the EFCSN was founded to foster collaboration among European fact-checkers and strengthen their fight against disinformation. This initiative aligns with the EU's broader disinformation strategy, which includes the European Digital Media Observatory (EDMO), launched by the European Commission in 2020. EDMO operates 14 hubs across 28 EU and EEA countries, while EFCSN concentrates on upholding high standards for fact-checking, promoting accountability, and ensuring transparency in the battle against misinformation: "The EFCSN exists to uphold and promote the highest standards of fact-checking, as well as

build professional, long-lasting links among the community of independent European fact-checkers" (EFCSN, 2024). These networks facilitate collaboration to counter disinformation. Faced with challenges such as debunking war-related misinformation (Dierickx & Lindén, 2024), fact-checkers coordinate efforts to improve effectiveness, expand reach, and minimize redundancy (Linares, 2022). Beyond training and events, European institution-building organizations like EDMO and EFCSN provide a searchable database of fact-checks in multiple EU languages, maintain an updated list of active organizations, analyze disinformation trends, and support joint investigations (EDMO, 2024).

The EU's updated Code of Practice on Disinformation, introduced in 2022, aims to expand fact-checking efforts across all EU member states and languages, ensuring platforms consistently integrate fact-checking into their services. It also seeks to provide fair financial compensation for fact-checkers and improve access to critical information needed for their work (European Commission, 2022). Within this context, we aim to examine the extent to which these collaborative efforts are reflected in their transnational hyperlinking practices, which amplify their initiatives and foster cross-border connections.

2.2. Hyperlinks as an Indicator of a Transnational Fact-Checking Information Ecology

The described rise of a global fact-checking movement integrated into the information ecology provides some opportunities to establish transnational networks focused on mutual attention, recognition, and support in the fight against disinformation. Hyperlinks constitute the core structural component of the internet. It is defined as a technological function that permits one webpage or website to connect to another (Park, 2003). Depending on their context, hyperlinks can guide attention, credit information sources, offer interactivity, and facilitate the creation of personalized content (Coddington, 2012). Some studies reinforce the notion that linking behavior is deliberate rather than random, suggesting that hyperlinks hold a certain degree of social significance (De Maeyer, 2013) and are a tactically planned communicative act (Heft et al., 2021; Park, 2003). In a literature review of link studies, De Maeyer (2013) shows that hyperlinks can act as a barometer of authority, measured by the frequency with which content is linked. In political science, they can serve as a technical measure, offering insight into the ideological landscape of the blogosphere under study. The list of functions is extensive, including tracking societal debates, establishing connections between blogs and media outlets, and observing international flows of information (De Maeyer, 2013).

Links can also be understood as a journalistic strategy (Coddington, 2012; De Maeyer & Holton, 2016; Karlsson et al., 2015; Ryfe et al., 2016). While links are praised for enhancing context, transparency, and connectivity in the news, such optimism is balanced by a degree of skepticism within metajournalistic discussions due to financial considerations (De Maeyer & Holton, 2016). News organizations aim to retain users on their sites for extended periods to maximize advertising revenue and reinforce their brand. Consequently, directing readers to external websites—particularly those of rival media—seems unlikely in this context. In the realm of news media, external links, when included, are more likely to direct users to the original sources and materials of the reported content (Heft et al., 2021). Ryfe et al. (2016) subsume the significance of news links to a limited set of objectives: navigation, commercial, social, and citation. Navigational purposes help users find relevant content. In fact, all links are navigational, as they guide readers from one page to another. Commercial links are utilized to generate revenue through connections to other sites, such as advertisements or classified sections. Social links facilitate content sharing through social media platform buttons and provide users with opportunities to disseminate content. Citation links,

manually embedded by journalists—the focus of this article—guide users to sources of information, aiming to enhance the credibility of news reports (Ryfe et al., 2016).

Fact-checkers extensively use hyperlinks to cite the sources of evidence used in the verification process, thereby enhancing transparency (Humprecht, 2020; Seet & Tandoc, 2024). The fact-checking community is encouraged to present research comprehensively and in a near-scientific manner. By sharing sources via hyperlinks—such as statements, documents, infographics, images, and forensic tools—fact-checkers enable audiences to replicate their conclusions, akin to scientific reproducibility (Graves, 2016; Humprecht, 2020; Kumar, 2024). Studies on fact-checking transparency show that independent fact-checkers in Europe (Humprecht, 2020), Asia (Seet & Tandoc, 2024), and globally, including the US, UK, India, South Africa, Brazil, and Australia (Ye, 2023), tend to be more transparent than newsroom-based counterparts. These organizations also provide readers with additional relevant content, such as links to prior verifications on the same topic, either produced by the reporting organization or other fact-checking entities. This facilitates navigation to related materials through outbound hyperlinks, which are links that an organization embeds in its website which forward to the website of another fact-checking organization.

Beyond journalism, hyperlinks can also be employed as a political or social movement strategy (Ackland & Gibson, 2013; Shumate & Lipp, 2008). In their comparative study of hyperlinks across around 100 political parties in six countries, Ackland and Gibson (2013) identified three networked communication objectives: reinforcing identity, multiplying forces, and dismissing the opposition. In the case of identity reinforcement, hyperlinks are used to show approval for a specific political cause or issue, thereby strengthening the party's policy stance and key objectives. Transposing this to the fact-checking community, it refers to their shared objective of combating disinformation and enhancing the quality and accuracy of public debate. When used to enhance impact, hyperlinks are employed to amplify the online visibility of political parties or organizations. This strategy is also crucial for fact-checkers to reach a wider readership and strengthen the impact of their corrective messages. In this sense, hyperlinks are assets that "enable members and nonmembers to reach like-minded organizations in order to enhance the visibility of the network's goals" (Shumate & Lipp, 2008, p. 178). Some scholars conceptualize hyperlink networks as a form of connective good, i.e., the collection of inter-organizational links that facilitate members' and non-members' access to similar organizations, thus increasing the visibility of the network's primary objectives. Organizations benefit from this connective good since individuals can navigate among various websites on the same topic or with similar objectives, and the number of hyperlinks directed to a website can impact the ranking of search engines. Based on this background, we ask:

RQ1: To what extent are European fact-checkers interconnected both nationally and transnationally through hyperlinks?

Considering that established online news media primarily use internal links (Heft et al., 2021) and that independent fact-checkers tend to be more transparent, we hypothesize:

H1: Independent organizations are more likely to provide outbound links to their peers.

2.3. Media Opinion Leadership

Media outlets or fact-checking organizations are integrated into their respective media systems. Within this informational landscape, a process of reciprocal co-orientation occurs. This means that journalists—and fact-checkers in our case—base their perspectives not solely on their own outlets but also on coverage [or corrective messages] from other media sources (Mathes & Pfetsch, 1991). Journalists observe and adapt their colleagues' investigative methods, news selection, and event coverage (Harder et al., 2017). These professional co-orientations are influenced by homophily—the tendency for similar individuals to form social connections—a concept established over 60 years ago (Hanusch & Nölleke, 2019). In journalism, Donsbach (2004) identified three key orientations: personal relationships with colleagues, professional engagement where peers shape reporting, and news decisions informed by observing others to validate choices and reduce uncertainty. Homophily in social networks is driven by geographic proximity, organizational ties, and shared interests (Hanusch & Nölleke, 2019). Since fact-checkers share a common identity, operate within institution-building frameworks like the IFCN, EFCSN, and EDMO, and collaborate on verification and governance (Lauer & Graves, 2024; Linares, 2022), similar co-orientation likely occurs within their community, reinforcing collective efforts against misinformation.

For instance, on the websites of many fact-checking organizations, they acknowledge following or being inspired by methodologies of flagship organizations such as the US-American PolitiFact, the British Full Fact, or even the Argentinian Chequeado (Nafría, 2018). Previous studies focusing on legacy outlets during the mass media era also identified several factors contributing to inter-media coordination. First, due to the commercial nature of the press, they are in a competitive situation that requires them to monitor their competitors. Moreover, the co-orientation of other media outlets reduces uncertainties related to topic selection and evaluation. Finally, the orientation toward colleagues also represents a replacement for the lack of contact with imagined audiences (Mathes & Pfetsch, 1991). Because of structural conditions and resources, prestigious quality media have always been considered "opinion leaders." The concept was first developed within audience research (Katz et al., 2017) and has been defined as individuals who enhance, validate, or modify the information their followers hold by sharing media content through personal interactions (Podschuweit & Geise, 2024). The concept has then been transposed to opinion formation within the mass media: "Media opinion leaders are certain prestigious media that other journalists use as a source for information and as a frame of reference" (Mathes & Pfetsch, 1991, p. 36). In the same vein, we are interested in examining, through hyperlinks, European fact-checking organizations that hold prestigious status and serve as references for their peers.

This reciprocal observation of media and their content takes place across various levels: within the media system, within individual editorial teams, and among journalists (Jarren & Donges, 2011). An indicator of intra-media opinion leadership is the frequency at which media outlets are cited by their peers on specific topics (Media Tenor, 2019). Current research observes the co-orientation—or homophily—phenomenon by examining how media professionals predominantly mention other media actors on social networks, such as Twitter (Hanusch & Nölleke, 2019; Wu et al., 2011). In a review of link studies, De Maeyer (2013) further demonstrates that hyperlinks can serve as an indicator of authority, based on the frequency with which content from a specific organization is cited. Hence, we ask:

> RQ2: Which national/transnational fact-checking organizations can be deemed as an "opinion leader" for fact-checkers from different European nations?

2.4. International Flows of (Dis)Information

As previously mentioned, fact-checking units generally provide links to their national or international peers when using material as evidence or recalling previous debunked materials related to the same topic, usually at the end of the article. Nonetheless, the type of link provided can be related to the scope of verified information. While previous studies did not observe an established linking culture (Quandt, 2008; Turow & Tsui, 2008), the use of hyperlinks has grown over the years, especially to make the reporting process more transparent (Coddington, 2012). Transparency and the reproducibility of verdicts are fundamental to fact-checking practices. However, the selection of links provided, whether to national or international peers, may reflect the geographic focus of the falsehoods being addressed. In this context, hyperlink analysis can be used to observe the international flow of falsehoods. To determine whether a claim merits correction, fact-checkers consider two key criteria: first, whether the claim is verifiable ("checkability") and not simply an opinion; and second, whether it has achieved viral status, in order to prevent the amplification of rumors (Amazeen, 2015). Once these criteria are met, additional factors such as relevance (or "check-worthiness"), timeliness, and the prominence of sources and targets of misinformation are evaluated (Graves, 2016; Moreno-Gil et al., 2022). Misinformation, understood in this context as a broad category irrespective of intent, is intrinsically a transnational issue. Falsehoods can easily cross borders and languages via digital platforms (Cazzamatta, 2024; EDMO, 2022; Tardáguila, 2021). Global events, such as the Covid-19 pandemic, the death of Queen Elizabeth II, or conflicts in Ukraine and the Middle East, frequently trigger cross-border falsehoods. It is plausible to assume that the traditional structure of news geography can be applied to fact-checking verification practices, wherein falsehoods circulating within global superpowers, neighboring countries, and regions affected by conflict and war receive heightened scrutiny. Hence, we ask:

RQ3: What is the geographical scope of the verified information by European fact-checkers?

3. Methods

3.1. Sampling of Countries and Organizations

To address our three primary research questions, we conducted a quantitative content analysis of 1,976 verification articles produced by European fact-checkers in 2022. We selected only articles that provided some form of verdict, either in a narrative form or based on labels. Explanatory articles, investigative pieces, meta-analyses, and promotional material were excluded from the sample. Our selection included countries representing the three media systems outlined by Hallin and Mancini (2004): Portugal and Spain exemplify the polarized pluralist model, the UK represents the liberal one, and Germany corresponds to the democratic corporatist. Language constraints also influenced our choices within each typology, leading us to exclude France, Italy, and the Nordic countries. Additionally, we included Spain as a second country from the Mediterranean model, considering studies that, based on Hallin and Mancini's operationalization, later classified Portugal within the liberal cluster (Brüggemann et al., 2014). Although studies have observed a convergence path within independent organizations influenced by transnational structures like platform partnerships or IFCN/EFCSN memberships, the media system approach continues to impact legacy media organizations, reflecting a path of continuity (Cazzamatta, 2025). Considering other indicators, these four selected countries exhibit differing levels of disinformation resilience (Humprecht et al., 2020) and epistemic vulnerability (Labarre, 2025).

Considering varied organizational structures—as well as potential variations in their practices regarding internal and outbound linking to fact-checking peers—we selected different types of organizations when available during the data collection period. This includes editorial units operating within legacy media and global news agencies, as well as independent organizations, as illustrated in Table 1.

Table 1. Selected European organizations.

Countries	Legacy Media	Independent Fact-Checking Organizations	News Agencies
Germany	Faktenfinder (Tagesschau)	Correctiv!	DPA Faktenchecks
UK	BBC Reality Check	Full Fact	Reuters Fact Check
Portugal	Fact Checks (Observador); Prova dos Factos (Publico)	Polígrafo	—
Spain	—	Maldita.es; Newtral	EFE Verifica

We collected links published between January and December 2022 using the Feeder extension ($n = 8{,}153$). While misinformation about Covid-19's aftermath remained widespread, it was no longer the dominant issue throughout the year. Key events included regional elections in Portugal, Spain, and Germany; Brazil's presidential election (which was particularly verified by Portuguese organizations); and the onset of the Russia–Ukraine war. Other significant events included the Qatar World Cup, the death of Queen Elizabeth II, and the resignation of two UK prime ministers, culminating in Rishi Sunak's succession. For the manual content analysis, we drew a stratified representative sample of 25% by following the order of publication and selecting every fourth article ($n = 2{,}038$). After excluding duplicates and articles unrelated to fact-checking practices (such as explanatory texts, meta-analyses, and investigative reports), our final sample consisted of 1,976 articles, reflecting the overall population.

3.2. Coding Training and Reliability

Six research assistants, all native speakers with substantial knowledge of the countries under analysis, manually coded the articles over a period of six months after completing 40 hours of training and reaching acceptable levels of reliability. Krippendorff coefficients are provided below for each category of analysis. Reliability was measured across language groups to ensure that any misunderstandings were attributed to flaws in the coding instructions rather than differences in language proficiency. Furthermore, it was not feasible to train everyone in English, as the assistants needed to be familiar with the organizations they would be coding.

3.3. Operationalization and Categories of Analysis

Here, we briefly describe the categories presented in the findings section. For more detailed instructions and definitions, please refer to the Supplementary Material. To address RQ1 and RQ2, we measured whether a verification article provided links to fact-checking organizations either as a source of information within the verification process or as suggested further reading for similar corrections on the same issue:

- Fact-checking link as evidence source: Are links to fact-checking organizations included in the adjudication process during the verification analysis? Four coding possibilities were available: 0 (no

links); 1 (yes—self-production); 2 (yes—outbound links); and 3 (both; Krippendorff's alpha ranged from 0.72 to 0.88).
- Verification provided by other organizations: Does the article provide links to the same verification conducted by other fact-checkers? For a list of 140 global organizations, please refer to the codebook (Krippendorff's alpha ranged from 0.88 to 1.00).

To address RQ3, we combined two additional categories—the geographical scope of the verified information and the countries involved in the content of the false information:

- Scope of verified information (Krippendorff's alpha ranged from 0.77 to 0.95):
  — "Regional–national" refers to verifications entirely related to the reporting country.
  — "International" verifications describe situations in other countries that are not directly related to the reporting state, such as Portuguese fact-checkers verifying issues related to the Brazilian elections.
  — "National–international" linkages encompass the involvement of national actors, either as targets or sources of false information abroad.
  — "Global–transnational–deterritorialized" issues address falsehoods with no clear borders, related to supranational organizations, global companies, or spanning more than two countries.
- Countries involved in the content of false information: Refers to states, other than the reporting country, that are involved in the false content being verified. A mere mention of the nationality of sources or the location of institutions was not sufficient for coding; the country had to be directly involved as either a target or a source of falsehood (Krippendorff's alpha ranged from 0.77 to 0.94).

4. Results

4.1. Linking Patterns Among Fact-Checkers (RQ1 and RQ2)

Fact-checking organizations hyperlink to one another in two contexts. They either reference materials from other fact-checking units during the verification process as supporting evidence or background information, or they link at the conclusion of articles to indicate that the same falsehood has already been debunked by multiple other organizations. In the case of links to other organizations as part of the evidence provided, as shown in Figure 1, fact-checking units within established legacy media—such as the Portuguese newspapers *Público* (91% of instances with no links whatsoever) and *Observador* (72.8%), the public service broadcasters Faktenfinder from Tagesschau-ARD (66.7%) and the BBC (60%), and two global news agencies, the German DPA (63.9%) and Reuters (57.1%)—do not employ hyperlinks to fact-checking organizations, either internal or external (for a tabular visualization, see the Supplementary Material). This result aligns with previous studies of journalistic patterns of hyperlinking, showing that reporters usually don't employ citational links (Karlsson et al., 2015; Turow & Tsui, 2008). If links are available at all, they are primarily internal to their own website. It is interesting that all these legacy media's in-house fact-checking units—except for DPA—are not members of the EFCSN and are probably less involved in community-building practices, which is reflected in their lower levels of homophilic hyperlinking. In this case, similar to the findings of Hanusch and Nölleke (2019), organizational contexts appear to play a significant role in shaping homophilic hyperlinking networks.
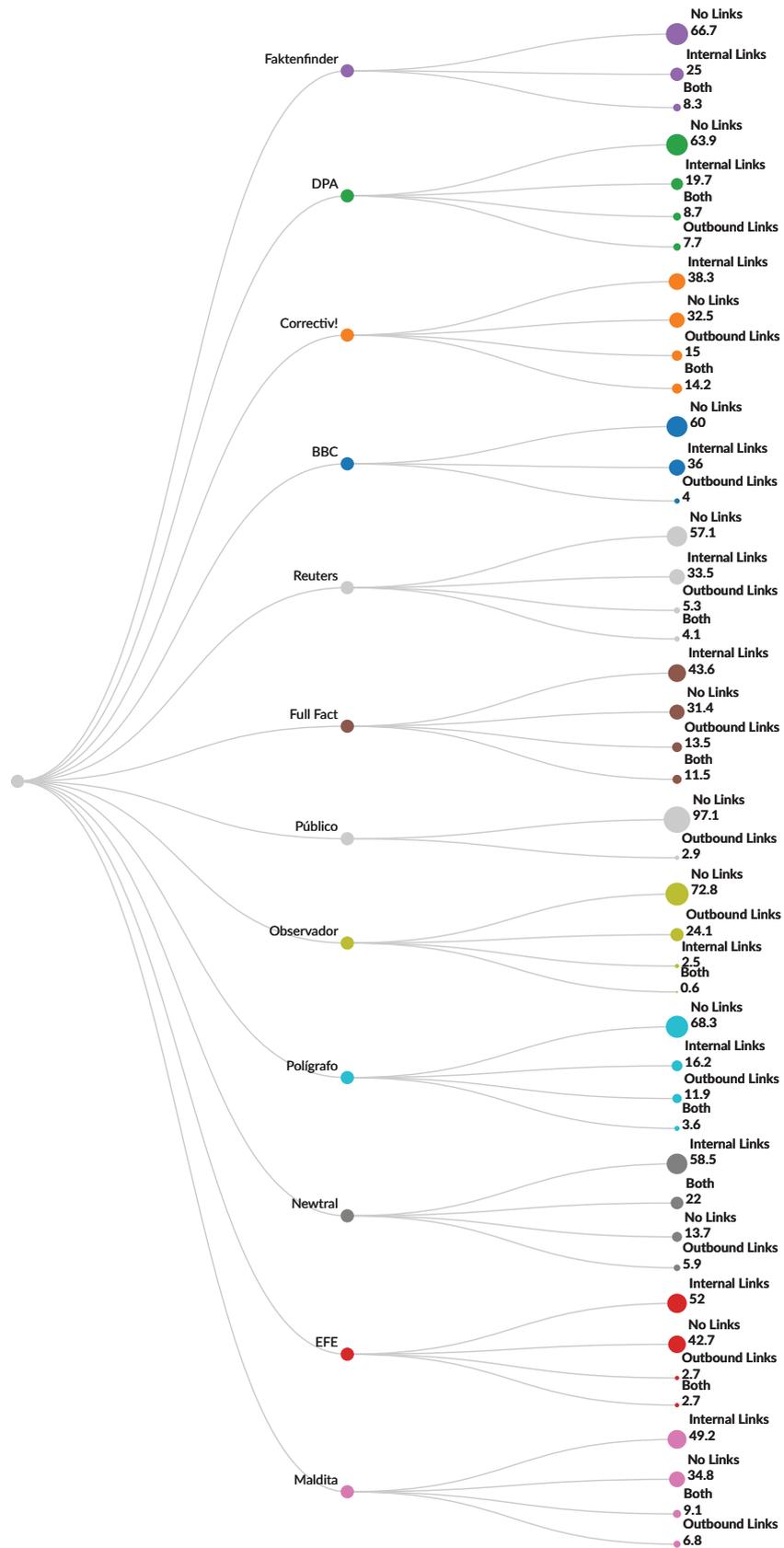
Figure 1. Percentage of links to fact-checking organizations used as evidence sources.

In contrast, and in support of H1, independent fact-checking organizations demonstrate a stronger sense of community by providing significantly more outbound hyperlinks to their peers, further demonstrating that organizational structure plays a role (Hanusch & Nölleke, 2019). Considering citations of outbound links and cases where both internal and external links are present, we observe that Maldita (15%), Full Fact (25%), Newtral (28%), and Correctiv! (29%) are the organizations most frequently referencing others in their verification process. The online Portuguese newspaper *Observador* (25%) also offers a comparatively higher number of outbound links. Previous studies have shown that media brands with a print legacy exhibit different hyperlinking patterns compared to native online organizations (Stroobant, 2019). Because these independent organizations—all part of the EFCSN—are smaller compared to European legacy media, even though their fact-checking specialized units are generally larger, they may employ hyperlinks more strategically to foster a cross-border sense of community and enhance collective viewpoints.

Focusing on links that direct readers to other fact-checking organizations that have already conducted the same or similar verifications on the same topic, it is evident that independent organizations are the primary contributors to establishing connections among like-minded media both domestically and internationally. Figure 2 illustrates the frequency with which the analyzed organizations provide outbound links to their peers. The thickness of the arcs on the circumference indicates the organizations that provide the most outbound links, while the direction of the arrows represents the cited organizations. Independent organizations—Polígrafo (69), Maldita (60), Full Fact (55), Newtral (55), and Correctiv (30)—are the most frequent providers of outbound links to further verifications conducted by other fact-checkers. Additionally, the Portuguese online newspaper *Observador* (50) and the global news agencies DPA (23) and Reuters (36) also provide outbound links to related verifications.

Interestingly, AFP—also an EFCSN member—does not provide any outbound links to similar verifications conducted by other fact-checkers, while Reuters is cited much more frequently (60 times) by several organizations than it cites others (36 times). Both Reuters and AFP are the most cited organizations, likely due to their roles as global news agencies, receiving significant citations even from the German DPA (8.7% and 30.4%, respectively). Within Germany, there are notable connections and citations between DPA and Correctiv, as well as with the Austrian organization Mimikama. The fact that DPA, as a global news agency, and Correctiv, as an independent fact-checking and investigative journalism venture, are not in direct competition may enable higher levels of interconnectivity through hyperlinks. In the UK, stronger cross-border connections are evident, with Full Fact and Reuters citing prominent US organizations such as Snopes, PolitiFact, and the Associated Press (AP). The French AFP is also highly cited.

In Spain, Newtral and Maldita, both independent units, do not cite each other, although they occasionally reference EFE (around 3%). Spanish independent organizations connect through hyperlinks with leading global news agencies—Reuters and AFP—and, to a lesser extent, with independent organizations in Latin America, such as Chequeado, Animal Politico, and Colombia Check. Finally, Portuguese organizations, two of which operate within legacy and competing newspapers, also do not cite each other. Instead, they opt to link to global news agencies—AFP and Reuters—and leading US organizations such as PolitiFact, Lead Stories, and Snopes. However, they also provide links to Brazilian organizations such as Lupa, Aos Fatos, and UOL Confere. Here, it is evident that despite shared values, organizations operating within the same borders—especially in Spain and Portugal—remain competitors.

Figure 2. Similar verifications carried out by other organizations.

4.2. Opinion Leaders

Some findings from the previous section have already identified certain "opinion leaders" within the European fact-checking landscape—namely, prestigious national and international fact-checking outlets that serve as sources of information and frames of reference for their peers. Similar to media analysis organizations (Media Tenor, 2019) and further studies on journalistic homophily in social networks (Hanusch & Nölleke, 2019), we assess opinion leadership through mentions of fact-checking organizations within verification articles.

Analyzing the data without further differentiation among countries or organizations, the European global news agencies emerge as the most cited outlets—AFP (20%) and Reuters Fact-Check (15.50%)—followed by

US organizations such as PolitiFact (10%), Snopes (8%), and AP (6%). When mapping the fact-checking field through the presence and connections within the Global Fact annual meetings, Lauer and Graves (2024, p. 9) show that AFP and PolitiFact, among others, hold a prominent position in this mapping, which partially explains our results. The role of Reuters and AP as opinion leaders may be associated with their journalistic profile and reach as global news agencies, even though they are not as deeply involved in the fact-checking community. In this case, it is clear how hyperlinks can also be seen as a barometer of journalistic authority in the field, even if attention is not mutual, as demonstrated by the case of global news agencies.

Nonetheless, country-specific differences and profiles must also be considered (Figure 3). The prominence of US organizations is significantly more pronounced within the UK, where Snopes (20%) and PolitiFact (17%) are the most frequently cited, followed by AFP (13%) and AP (12%). Portugal and Spain exhibit similar patterns,
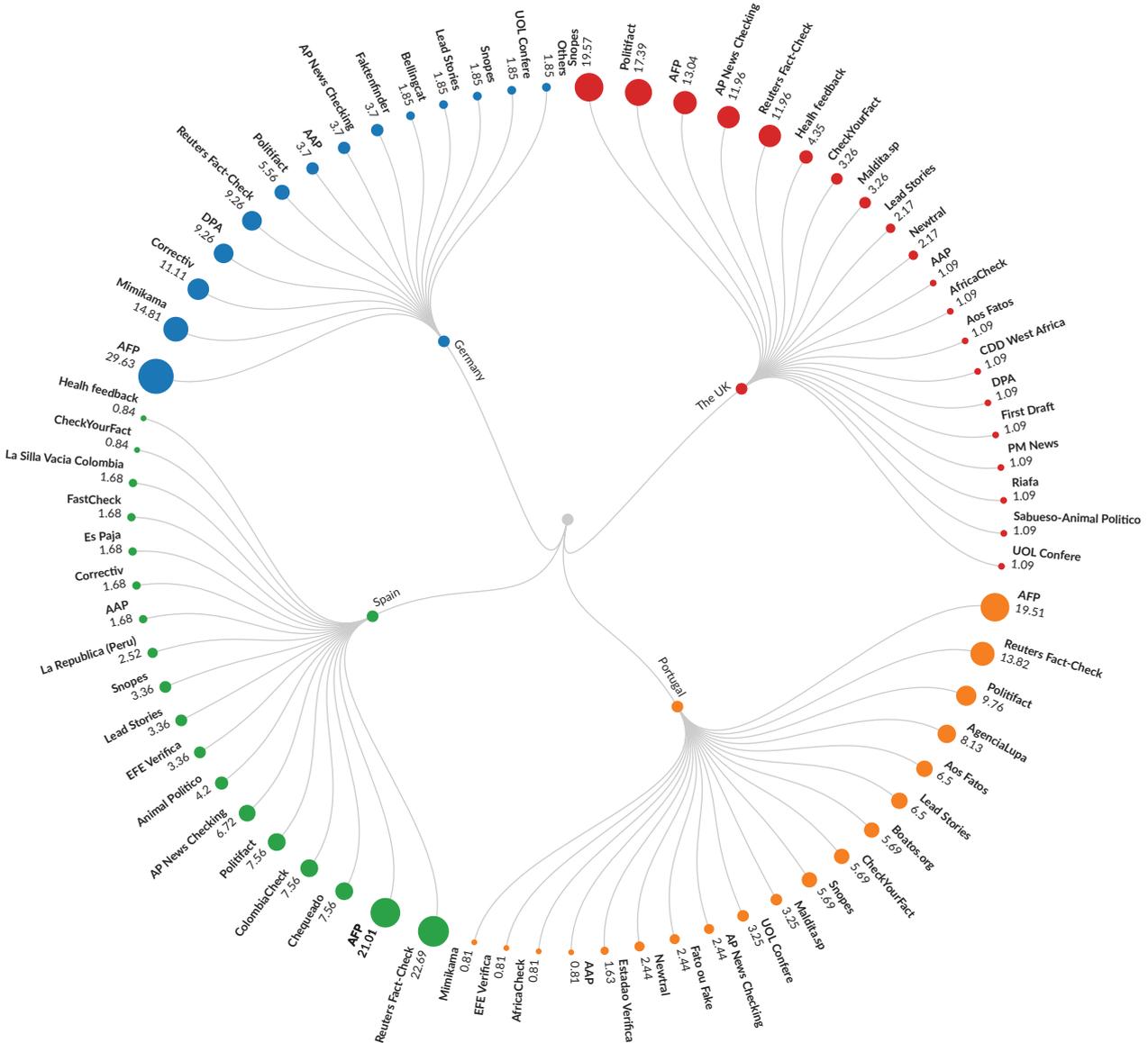

Figure 3. Outbound hyperlinks across countries in percentage. Note: The percentage of mentioned organizations is calculated within each country, meaning 100% is based on the data for each individual country.

placing substantial importance on Reuters (14% and 23%, respectively) and AFP (19.5% and 21%, respectively). They also demonstrate, albeit to a lesser extent, a focus on independent organizations from Latin American countries with shared language and historical ties, such as Lupa (8%), Aos Fatos (6.5%), and Boatos (5.6%) in Brazil, Chequeado (7.5%) in Argentina, or Colombia Check (7.5%). In Germany, Reuters holds the same significance as the German DPA (both at 9%), followed by local organizations such as Correctiv (11%) and the Austrian Mimikama (14%; refer to the Supplementary Material for cross-table). In general terms, despite regional variations, we note that some organizations—such as PolitiFact, Aos Fatos, Lupa, and Chequeado, which are considered the core of the fact-checking network with different leadership roles as discussed by Lauer and Graves (2024)—are also regarded as opinion leaders by their international peers in Europe.

4.3. Scope of Verified Falsehoods

Although some connections among like-minded fact-checking outlets, both domestically and internationally, can be inferred through their hyperlink strategies, patterns of citation and connection may also reflect the scope of verified information, as shown in Figure 4. In terms of geographic focus, Germany (43%), Portugal (46%), and Spain (46%) exhibit similar patterns, with nearly half of their verifications addressing regional or national issues, as indicated by the data. The UK stands out as an outlier, with only about 20% of debunked falsehoods being related to national concerns. This variation is largely due to Reuters, where just 6.3% of verifications focus on national topics. In contrast, the proportion is higher for Full Fact (45%) and BBC (32%), aligning more closely with other countries. Outbound hyperlinks are more common in verifications of international disinformation, global issues, or cases with national–international linkages, which justifies the higher frequency of cross-border connections. Fact-checkers operating abroad are not direct competitors in the national market for attention, and organizations can also establish cross-country connections.

International verifications—those addressing falsehoods related to other countries—show similar proportions in Germany (33%), Portugal (35%), and Spain (31%), while the UK leads with 55%, as shown in Figure 4. Global issues involving transnational organizations, multinational companies, or deterritorialized concerns
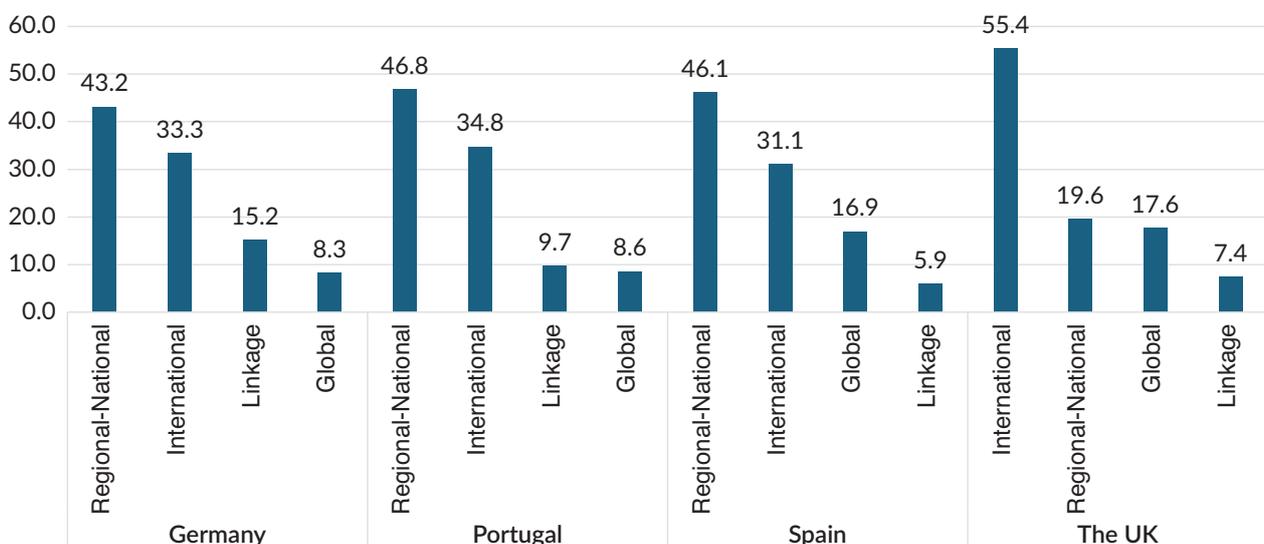

Figure 4. Scope of verified information within countries.

without a specific country focus, such as climate change or the pandemic, were found at comparable levels in Germany (8.3%) and Portugal (8.6%), and at higher rates in Spain and the UK (both around 17%).

These findings underscore the transnational nature of disinformation. When examining the countries involved in falsehoods verified by European fact-checking organizations, Ukraine and Russia dominate, primarily due to the outbreak of war in 2022. This "information war" and the complexities of verifying war-related claims (Dierickx & Lindén, 2024) likely account for the increased reliance on verification services from global news agencies like Reuters and AFP. In the UK and Portugal, Ukraine (16% and 17%, respectively) and Russia (14% and 13%) are prominent but rank second and third respectively (Figure 5). In the UK, most verified information concerns the US (31%), while in Portugal, Brazil leads (18%), likely due to its 2022 presidential election. These findings explain the UK's frequent outbound hyperlinks to US organizations and Portugal's links to Brazilian outlets. The US also plays a significant role in falsehoods verified by German fact-checkers. These patterns reveal that, consistent with earlier studies of news

Figure 5. Top 10 countries involved in falsehoods verified by fact-checking organizations in Europe (in percentage).

geography, fact-checking organizations prioritize falsehoods related to countries at war, global powers like the US, nations with shared colonial histories, and neighboring states, such as Austria, Italy, and Switzerland in Germany's case. Nonetheless, regardless of scope, independent organizations such as Maldita, Polígrafo, Full Fact, Newtral, and Correctiv (see Figure 1) are more likely to provide outbound links, assisting readers in locating relevant content.

5. Discussion and Conclusion

Hyperlinks can improve the effectiveness of online news by enhancing transparency in the newsgathering process (Coddington, 2012). This statement holds particularly true in the case of fact-checking organizations in their fight against disinformation. Fact-checkers transparently provide all referenced sources and materials used in the verification process, allowing readers to reproduce the verdict themselves, thereby strengthening the validity and trust in their verification practices. Nonetheless, beyond enhancing transparency and establishing credibility by providing the foundation for fact-checkers' assertions, hyperlinks are also coordinated actions to amplify mutual perspectives, encourage a spirit of togetherness in the fight against disinformation, and form communities of like-minded outlets across and within countries. Thus, this article explores how European fact-checkers hyperlink themselves either as a source of information or as further suggested readings on similar debunked disinformation. Within this context, the article also examines which fact-checking organizations are regarded as opinion leaders, i.e., prestigious outlets that serve as central nodes within the transnational fact-checking network. In the US context, Graves (2016) observed that fact-checkers are less concerned than their traditional media counterparts about being scooped or uncovering a novel angle on a previously challenged issue. Within the most prominent US organizations, a significant overlap in claims was identified among units, and they frequently reference each other's work in their published articles. To assess this relationship within Europe and expand the scope of the research on fact-checking practices, we manually content-analyzed 1,976 publications from January to December 2022 among 12 organizations operating in Portugal, Spain, Germany, and the UK.

In addressing RQ1, this study provides evidence that primarily independent European outlets are better positioned to establish a transnational fact-checking landscape through their hyperlinking practices. With regard to links to fact-checking organizations as sources of evidence used during adjudication, it is noted that fact-checking units within established legacy media rarely utilize hyperlinks to other fact-checking organizations. When they do, they predominantly link to pages within their own fact-checking desks' websites. This observation aligns with previous studies highlighting the infrequent use of citational outbound links by journalists (Karlsson et al., 2015; Ryfe et al., 2016; Stroobant, 2019). In contrast, independent fact-checking organizations exhibit a stronger sense of community by providing significantly more outbound hyperlinks to their peers, which supports our H1. Maldita, Full Fact, Newtral, and Correctiv are identified as the most active in referencing other organizations during their verification processes. It is clear that hyperlinking practices—in line with current studies (Hanusch & Nölleke, 2019)—may vary depending on the type of organization.

In a similar vein, independent organizations—particularly Polígrafo, Maldita, Full Fact, Newtral, and Correctiv—are more inclined to establish both national and international connections by providing outbound hyperlinks to similar verifications conducted by other fact-checkers. But to whom are they linking precisely? Reuters and AFP emerge as the most frequently hyperlinked organizations for further reading, likely due to their status

as global news agencies. They even receive substantial citations from the German DPA, highlighting how hyperlinking practices can serve as an indicator of journalistic authority recognition. Within Germany, notable connections exist between the DPA and Correctiv, as well as with the Austrian organization Mimikama. In the UK, stronger cross-border links are evident, with Full Fact and Reuters citing prominent US organizations such as Snopes, PolitiFact, and AP. In Spain, although Newtral and Maldita do not cite one another, they occasionally reference EFE. Spanish independent organizations also hyperlink to leading global news agencies, such as Reuters and AFP, and, to a lesser extent, to independent organizations in Latin America, like Chequeado, Animal Politico, and Colombia Check. Similarly, Portuguese organizations do not cite each other, opting instead to link to global news agencies—AFP and Reuters—and leading US organizations like PolitiFact, Lead Stories, and Snopes, while also linking to Brazilian organizations such as Lupa, Aos Fatos, and UOL Confere. Due to their distinct nature, European global news agencies, along with independent organizations outside of Europe, are not typically considered direct competitors in their national markets. As a result, they are more likely to be hyperlinked, further demonstrating that organizational differences influence linking behaviors (Hanusch & Nölleke, 2019).

Regarding opinion leadership (RQ2)—defined as the role of influential fact-checking units that others rely on for information and as a reference for their own verification practices (Mathes & Pfetsch, 1991)—our analysis reveals that European global news agencies, particularly the French AFP and the British Reuters Fact-Check, are the most frequently cited outlets overall. They are followed by US organizations such as PolitiFact (10%), Snopes (8%), and AP (6%). The reasons for the strong reliance on European news agencies are twofold. First, these agencies have long been regarded as established and reliable media sources without being in direct competition with their clients (Rantanen et al., 2019). Second, the disinformation landscape in 2022 was heavily shaped by the information war sparked by the Russian invasion of Ukraine, where some claims were exceedingly difficult to verify due to distance from the battlefield or language barriers (Dierickx & Lindén, 2024). This likely increased attention to these global news agencies, which are better equipped to cover global conflicts and have also made significant investments in fact-checking units and AI-assisted verification tools for detecting and verifying online disinformation (AFP, 2024). Nonetheless, opinion leadership patterns and journalistic co-orientation vary across countries. In the UK, for example, US organizations are particularly prominent. In contrast, Portugal and Spain place greater emphasis on Reuters and AFP, while offering relatively less focus on independent organizations from Latin American countries. In Germany, Reuters and DPA are equally significant, followed by local organizations such as Correctiv (11%) and the Austrian Mimikama (14%).

Finally, in examining the geographical scope of verified falsehoods by European organizations (RQ3), Germany, Portugal, and Spain show similar trends, with nearly half of their verifications focusing on regional or national issues. In contrast, the UK stands out as an outlier, with only about 20% of debunked claims relating to national matters. Outbound hyperlinks are more prevalent in verifications addressing international disinformation, global issues, or cases with both national and international dimensions, which explains the higher frequency of cross-border references. When dealing with international or deterritorialized falsehoods, hyperlinked organizations tend to be based abroad and are not in direct competition with the verifying organizations in their home countries. Additionally, these hyperlinks establish cross-border connections. When analyzing the countries most frequently involved in verified falsehoods, Ukraine and Russia dominate, largely due to the ongoing war that began in 2022. In the UK, most verified information pertains to the US, while in Portugal, Brazil emerges as the leading source, likely reflecting the

country's 2022 presidential election. These trends clarify the UK's tendency to link to US organizations and Portugal's connections to Brazilian fact-checking outlets.

These findings contribute to the literature on fact-checking by expanding the scope of research beyond overstudied countries within liberal systems, focusing on a relatively under-analyzed aspect of their verification practices—namely, hyperlinking practices as a strategy to create a transnational community based on shared values. Independent fact-checking organizations play a crucial role in establishing such a transnational fact-checking network through hyperlinking practices; however, linking to national competitors remains relatively rare, a phenomenon that warrants further investigation. Additionally, this study contributes to link studies by providing new evidence from the fact-checking domain, complementing prior research on linking patterns in journalism (Coddington, 2012; Karlsson et al., 2015; Ryfe et al., 2016), political parties (Ackland & Gibson, 2013), right-wing outlets (Heft et al., 2021), and NGOs (Shumate & Lipp, 2008). Lastly, it advances disinformation studies by empirically demonstrating the transnational character of the disinformation problem and how fact-checking organizations align and connect to address it.

Despite its contributions, this article has several limitations. First, it defines opinion leaders solely through peer recognition, overlooking audience perceptions of these organizations' prestige. Future research should incorporate audience perspectives. Additionally, further studies should assess whether the hyperlinking practices identified here apply to other fact-checking formats, such as investigative or explanatory articles, or if they vary by verification topic. Expanding the analysis to include additional European countries would also enhance the findings. Moreover, Meta's withdrawal of support for third-party fact-checking introduces uncertainty into the EU and global fact-checking landscape, necessitating further analysis. The EU's response will be pivotal in shaping fact-checking efforts within and beyond Europe (for insights on EU regulation, see Ó Fathaigh et al., 2025, and Monaci & Persico, 2025). This disruption of partnerships contradicts the Digital Service Act and the reinforced Code of Practice on Disinformation, which require collaboration between researchers, platforms, and fact-checkers, alongside fair financial contributions to verification efforts. Researchers should now examine the impact of this politically motivated decision on the EU's informational environment.

Conflict of Interests
The author declares no conflict of interests.

Supplementary Material
Supplementary material available here: https://osf.io/vwsxt/?view_only=81b5c51bb9884381ba3d894caba7ff69

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About the Author

Regina Cazzamatta is a postdoctoral researcher at the University of Erfurt. She is the principal investigator of a comparative research project on fact-checking practices, funded by the German Research Council (DFG). Her current research investigates the evolving roles of fact-checking initiatives across diverse media landscapes.

ARTICLE

From Fact-Checking to Debunking: The Case of Elections24Check During the 2024 European Elections

Carlos Rodríguez-Pérez [1] [iD], **Rocío Sánchez-del-Vas** [2] [iD]**, and Jorge Tuñón-Navarro** [2] [iD]

[1] Department of Communication Management, Universidad de La Sabana, Colombia
[2] Department of Communication, Universidad Carlos III de Madrid, Spain

Correspondence: Carlos Rodríguez-Pérez (carlosrope@unisabana.edu.co)

Abstract

Misleading and false information is an issue in the European public sphere. This article analyzes the verified disinformation by fact-checkers during the 2024 European Parliament elections. From the lens of fact-checking, as a journalism practice to fight against disinformation, this research explores the European initiative Elections24Check, a collaborative fact-checking project associated with the European Fact-Checking Standards Network. The research aims: on the one hand, to demonstrate the prevalence of debunking over fact-checking; and on the other, to dissect the thematic nature, format, typology, and deceitful technique of the hoaxes verified during the last European elections. Using content analysis, the sample comprised 487 publications verified by 32 different fact-checkers across a total of 28 countries for one month related to the 2024 European elections. The results present implications regarding the collaborative fact-checking project that made a greater effort to verify other contextual disinformation issues rather than checking disinformation directly involved in the elections and EU politics. Also, this case study revealed the shift in the European fact-checking movement with the prevalence of debunking activity over scrutinizing public statements. Finally, the verified disinformation underscored the continued dominance of text as the primary format for spreading false information and the predominance of content decontextualization. The results of this study aim to deepen the understanding of fact-checking in the European media landscape.

Keywords

debunking; fact-checking; disinformation; Elections24Check; European Union; European Parliament elections

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1. Disinformation in the European Public Sphere

In the "information disorder" era (Bennett & Livingston, 2018), the media system turns towards a hybrid nature. In this sense, social media has decentralized information, becoming a primary platform for self-distributed content. Audiences now determine their media consumption, creating an environment of information overabundance and disinformation. In this article, the term "disinformation" will be used to refer to "information that is false and deliberately created to harm a person, social group, organization or country" (Wardle & Derakshan, 2017, p. 20). Similarly, "hoaxes" will be used to refer specifically to disinformative content.

In this informative scenario, social media is also the main space for the spread of hoaxes, conspiracy theories, and manipulated content, with polarized audiences receiving a daily flood of misleading or erroneous information (Novotná et al., 2023). This ecosystem amplifies disinformation's impact (Lelo & Fígaro, 2021), with platforms exploiting cognitive biases through algorithms that shape public opinion, increasing social media's relevance as a key source of information, especially amid rising public polarization (Lewandowsky et al., 2017).

At the EU level, Casero-Ripollés et al. (2023) suggest that reforming the pan-European journalistic model is pertinent, given that we live in a reality marked by disinformation, fake news, and other hybrid threats. In this sense, Duch-Guillot (2016, p. 140) emphasizes that "quality information, rigor, and transparency are the best antidotes against simplification, half-truths, or lies."

Disinformation is as alarming as the lack of information, for it is in ignorance that falsehoods find fertile ground to proliferate. Both have been major challenges for EU communication since the 1980s (Grill & Boomgaarden, 2017). Numerous initiatives and legislative tools at the European level aim to ensure that people can participate in a truly democratic system through free and informed decision-making, without interference and illegal manipulation, such as conspiratorial currents (Bennett & Kneuer, 2024).

The Brexit referendum was the result of decades of media coverage with an exclusionary and sensationalist focus, portraying the Brussels elite as a threat to the sovereignty and economic prosperity of the United Kingdom (Tuñón, 2021). This anti-European disinformation campaign could only be countered with responsible journalism. As Duch-Guillot (2016, p. 142) highlights, "ensuring that Europeans have accurate data at their fingertips will undoubtedly help them confront those who distort reality to suit their destructive tactics".

Faced with the growing problem of disinformation, European public authorities have adopted a dual approach. On the one hand, they have introduced legal measures to strengthen the regulatory framework for tackling the intentional spread of disinformative content. Through this more defined and stringent legal framework, the goal is to create a safe environment where digital platforms assume their corresponding responsibilities (Higgins, 2019).

Since 2018, the EU, aware of the vulnerability of democratic societies to propaganda and disinformation, has promoted a series of targeted initiatives and policy documents to combat these challenges (Tuñón et al., 2025). As part of this action plan, the EU has begun to assign fact-checking organisations a pivotal role.

In this line, the European Commission promoted the creation of an independent high-level group, composed of 40 professionals representing social networks and technology companies, fact-checkers, media, academics, and civil society members, tasked with drafting a report on fake news and online disinformation titled *A Multi-Dimensional Approach to Disinformation*. From a European institutional perspective, this group was charged with "defining and quantifying disinformation, as well as studying possible legal mechanisms and countermeasures to combat it" (Tuñón Navarro et al., 2019, p. 247). Concurrently with these efforts, in late 2018 and at the suggestion of the European Council, the high representative and the European Commission introduced the EU Action Plan Against Disinformation. This systemic proposal brings together the efforts of competent authorities in the member states, civil society organisations, fact-checkers, and digital platforms.

Following the aforementioned report, the European Commission welcomed the self-regulatory agreement that established the first European Code of Practice on Disinformation in 2018. This was the world's first voluntary self-regulatory instrument for online platforms, founded on 21 commitments. After a review process, the EU strengthened Code of Practice on Disinformation was introduced in 2022. The updated code encompasses 44 commitments and 128 specific measures (European Commission, 2022). Unlike its predecessor, the strengthened Code of Practice functions as a co-regulatory instrument for very large online platforms and search engines, developed within the framework of the Digital Services Act, which has been in force since 2022 (Tuñón Navarro et al., 2023). On 13 February 2025, the Commission and the European Board for Digital Services endorsed the integration of the 2022 Code of Practice on Disinformation as a Code of Conduct on Disinformation into the framework of the Digital Services Act (European Commission, 2025).

In recent years, two major crises—the pandemic and the war in Ukraine—have jeopardized the so-called "EU fragmented approach towards disinformation" (Casero-Ripollés et al., 2023, p. 5). Specifically, the latest EU regulatory responses have been the European Media Freedom Act, in 2023, and the EU Artificial Intelligence Act, in 2024. In a context marked by increasing polarization, the rise of populism is largely due to the significant representation that extreme right-wing parties have recently gained in some European states (Carral et al., 2023; Tuñón-Navarro & Bouzas-Blanco, 2023), and the impact of disinformation strategies, both internal and external to the EU, which have resurged during crises such as the pandemic and the war in Ukraine (Gullo & Tuñón, 2009; Jiménez-Alcarria & Tuñón-Navarro, 2023). The EU seeks to become a bastion of free and independent media to safeguard the European public sphere. This commitment to protecting the rule of law had already led the EU to develop initiatives, including a recommendation on journalist safety and measures to address strategic lawsuits against public participation.

Ultimately, as noted by Casero-Ripollés et al. (2023, p. 8), the increase in the intentional and harmful use of disinformative content during Covid-19 and the invasion of Ukraine has amplified the strategic relevance of this issue, and European policies on this matter are being redefined in the post-pandemic scenario, facing significant internal contradictions. Disinformation has gained prominence on the European policymakers' agenda. However, due to the lack of real involvement by major private digital platforms, the actions to be taken will remain subject to co-regulation through the pre-existing rationale of codes of practice mentioned earlier. Additionally, a geopolitical shift is occurring in EU policy against disinformation. A securitization process, applying security tools and discourse to an issue previously not identified as such, is being promoted. As a result, two opposing (and possibly contradictory) logics—securitization and self-regulation—

coexist and compete when determining the EU's focus and political actions against disinformation. This contrast between a hard-power approach, treating it as a cardinal threat, and a soft-law approach, relying on voluntarism and minimal intervention in the digital media industry, creates dissonance (Casero-Ripollés et al., 2023, p. 8).

This study examines Elections24Check, a fact-checking initiative implemented during the 2024 European Parliament elections, as a journalistic project to safeguard democratic communication processes from disinformation in the European public sphere. By analysing its role in debunking misinformation circulating on social media and verifying public statements, this research contributes to the broader discussion on the capacity of fact-checking in countering information disorders and reinforcing the European project.

2. Fact-Checking Journalism in Electoral Contexts

Fact-checking journalism emerged at the end of the 20th century as a practice to check political discourse during electoral context and to revitalize journalism practice to escape declarative journalism and claim essential attributes of journalism such as rigour or impartiality (Amazeen, 2019). Fact-checking journalism has become a global movement that is joined by both traditional media and new niche digital media, which makes verification their journalistic mission. Koliska and Roberts (2024) explain fact-checking organizations share a normative value system whose epistemology enhances confidence in factually verifiable truth, and this journalistic practice is oriented towards a public service promoting education and training the citizenry to make the public both sensitive to misleading content and able to think more critically about informative content. As of December 2024, the Duke Reporter's Lab at Duke University's Sanford School of Public Policy recorded 446 fact-checking organisations worldwide (Duke Reporter's Lab, n.d.). In this context, the International Fact-Checking Network reported 143 verified signatories internationally (International Fact-Checking Network, n.d.), while the European Fact-Checking Standards Network (EFCSN) identified 55 verified member organisations at the European level (EFCSN, n.d.).

Rodríguez Pérez (2020) highlights that fact-checking journalism aims to "ensure the accuracy of information shared on social networks and platforms, scrutinize political figures, and transform this information into knowledge that citizens can trust" (p. 244). Media organizations support this latter goal through literacy programs. While fact-checking journalism played a crucial role during crises like the Covid-19 pandemic and in addressing social issues such as migration and environmental challenges, it is during electoral contexts and referendums that this practice is enhanced. Cazzamatta and Santos (2023) describe fact-checkers as "gatewatchers or gatebouncers," as their work involves curating information that has already been published.

In electoral contexts, such as the European Parliament elections, when polarization is accentuated, fact-checking organizations often choose to collaborate and form consortiums as a strategy to combat disinformation, aiming to increase efficiency and effectiveness in light of limited resources. As noted by Bélair-Gagnon et al. (2023, p. 1170), "fact-checking is thus a productive arena for examining truth-seeking knowledge practices in partnership contexts."

Although fact-checking alone will not eliminate the phenomenon of disinformation at all, it remains an invaluable tool for mitigating its immediate consequences (Tuñón et al., 2024). In this sense, several studies have confirmed the effectiveness of fact-checking in correcting misinformation and reducing false or

inaccurate beliefs as well as improving accuracy in issue perceptions (Carnahan & Bergan, 2021; Walter et al., 2019). However, factors such as political knowledge, whether the fact-check is counter-attitudinal or pro-attitudinal, the association with campaign statements, and the perceived credibility of fact-checkers, among others, influence their effectiveness.

2.1. Research Questions

The tradition of collaboration is inherent in the DNA of fact-checking. Several initiatives emerged in European countries, such as CrossCheck (the 2017 French presidential election), Comprobado in the 2019 general election in Spain, and Crosscheck Europe in the context of the 2019 European Parliament election. These collaborative projects aim to be more efficient and effective in curbing misinformation produced by polarized and populist political discourses and a fragmented, interconnected, and digitized information system that embeds social network sites. Palau-Sampio and Carratalá (2021) state this socio-political context "has transformed elections into a breeding ground for disinformation" (p. 110). In this sense, we worded the following research question:

RQ1: How much of the verified content was directly related to the 2024 European Parliament elections?

The practice of fact-checking increasingly tends to verify viral content rather than to focus on the scrutiny of political discourse because misinformation is growing on the internet and social network sites, which is called the debunking function of fact-checkers (Cazzamatta, 2025; Graves et al., 2023; Verhoeven et al., 2024). Both functions are equally prioritized by fact-checkers across the globe as the main purposes of this journalistic practice (Rodríguez-Pérez et al., 2023). Also, two additional reasons can help explain this shift: their dependence on big tech financial resources (International Fact-Checking Network, 2023) and because debunking online disinformation tends to be less time-consuming than checking political claims (Cazzamatta & Santos, 2023; Graves & Mantzarlis, 2020), favouring then the debunk task over the fact-checking performance. For instance, in the three initiatives under study by Palau-Sampio and Carratalá (2021), only half of the verified content was related to actions or statements made by politicians. According to this, we phrased the following research question:

RQ2: To what extent did fact-checkers prioritize checking viral content over scrutinizing political discourse during the 2024 European Parliament elections?

The expected research contributions aim to analyze if the shift of fact-checking organizations that initially prioritized producing fact-checking claims moved towards debunking viral hoaxes. With this purpose, we analyze, as a case study, the context of the 2024 European Parliament elections that included 32 organizations from 28 countries. This particularity is relevant due to the performance of activities embedded with the journalistic culture of fact-checking organizations. Traditionally, fact-checking initiatives assumed a watchdog role to scrutinize political and public discourse from prominent personalities. That means that the watchdog journalistic culture involves the practice of monitoring and holding those in power accountable through journalism. Hence, the prioritized disinformation to be monitored by fact-checkers is that which goes from elites to citizens (top–bottom).

On the other hand, a performance focused more on debunking prioritizes bottom-up content, referring to information shared by social media users that is deemed false or misleading. These activities are more closely tied to the role of intermediaries, assisting platforms with content moderation, flagging harmful content, and identifying problematic information.

Additionally to the electoral context, topics regarding migration, health, science and climate change, and gender emerge as topics affected by misinformation content. We worded a research question as follows:

RQ3: In which topics were the fact-checkers focused on verifying mis/disinformation? Are these topics directly related to the 2024 European Parliament elections?

Fact-checkers perform this journalistic practice to curb mis/disinformation; journalists assess the content disseminated in the electoral context as false, misleading, or true, among other categories. Wardle and Derakshan (2017) categorized the types of mis/disinformation from the intention to deceive using different formats. These categories (satire, misleading content, fabricated content, false context, etc.) have been widely used to code misleading and fake content according to the type of disinformation and the misleading technique (Gutiérrez-Coba et al., 2020; Gutiérrez-Coba & Rodríguez-Pérez, 2023; Salaverría et al., 2020; Sánchez del Vas et al., 2025). During electoral contexts, misleading content tends to generate deceitful narratives with inaccuracies, exaggerations, or false contextualization, as one of the main misinformation techniques that makes it more difficult to separate facts from false (Cazzamatta & Santos, 2023; Gutiérrez-Coba & Rodríguez-Pérez, 2023). As a global misinformation trend, decontextualization stands out as the primary deception strategy identified by fact-checkers (Cazzamatta, 2024). The verification of imposter and manipulated content is also on the fact-checking agenda.

Additionally, previous studies identified the prevalence of using the text format to disseminate disinformation narratives both in the electoral context (Gutiérrez-Coba & Rodríguez-Pérez, 2023; Rodríguez-Pérez et al., 2022) and in other issues, such as the Covid-19 pandemic (Gutiérrez-Coba et al., 2020; Sánchez del Vas & Tuñón Navarro, 2024), migration (Narváez Llinares & Pérez-Rufí, 2022), or gender (Herrero-Diz et al., 2020). According to scholars, disinformation often adopts the text format because it is the simplest to produce and disseminate, requiring less skill and time than manipulating images. Additionally, text is easily accessible, can be tailored to fit the context of different countries, and can be seamlessly combined with other formats, making it an effective tool for widespread distribution. Based on this, we worded the following research question:

RQ4: What type of disinformation was verified? What techniques of misleading were used by the agents of disinformation? What formats were used to create disinformation content?

3. Method

The research aims to explore the predominance of debunking over fact-checking, while also analyzing the thematic elements, formats, typologies, and deceptive techniques of the disinformation verified during the most recent European elections. To achieve this, content analysis was used as the primary methodology, which is widely regarded as a core research technique in communication studies. This methodology has also been previously used in recent studies on fact-checking and disinformation, such as Salaverría et al.

(2020), Ruiz Incertis et al. (2024), Sánchez del Vas and Tuñón Navarro (2024), and Sánchez-del-Vas and Tuñón-Navarro (2024).

3.1. Sample

The sample of verifications is derived from the collaborative initiative Elections24Check. As indicated on the project's website, which is associated with the EFCSN:

> The project aims to increase cross-country collaboration in detecting and debunking European electoral disinformation across the EU while promoting access for European citizens to verified information so they can make informed decisions in the lead-up to the European Elections in June 2024. (Elections24Check, 2024)

As described in the internal guidebook of the EFCSN, to which the authors have gained access as researchers, the Elections24Check project has a threefold objective. Firstly, it aims to identify and fact-check disinformation and misinformation narratives relating to the 2024 European elections within their respective national contexts. Secondly, it provides a frontend website for free and open access to citizens. Lastly, it offers a comprehensive dataset on disinformation about the 2024 European elections, enabling researchers and institutions to make evidence-based interventions and policy recommendations.

In this context, the European verifiers affiliated with the EFCSN have contributed to the joint database. We requested full access to the complete database from the EFCSN in our capacity as researchers. This repository has enabled us to explore a substantial number of articles, data downloads, and insights into the statistics and narratives essential for understanding electoral disinformation throughout Europe.

To select the research sample, we downloaded all verifications published on the website during the period from 24 May to 24 June 2024 in Excel format via the researchers' platform. This timeframe encompasses two weeks before and after the European elections of 2024 (6–9 June 2024). We consider this period particularly significant given the volume of disinformation regarding the elections, which presents an intriguing area for study. The relevance of studying one month for the analysis of disinformation during electoral cycles is supported by recent research on disinformation in electoral contexts, such as the study by Baptista et al. (2022).

In this regard, we selected all content classified as fact-checks or debunks, excluding explanatory narratives ($n = 5$), publications that fact-checkers themselves classified as "not verifiable" ($n = 4$), or publications rated as true ($n = 40$). Accordingly, once these items were removed from the sample, the resulting sample comprised 487 publications to be studied ($N = 487$), verified by 32 different fact-checkers across a total of 28 countries.

3.2. Variables

We used some variables directly coded by the original dataset such as the type of content verified ("debunk" and "fact-check") and the relation with the EU politics ("direct" and "indirect"). Likewise, in the aforementioned internal guidebook of the EFCSN, the organisation established criteria to unify the standards regarding the direct relationship with the EU, stating that "a claim, political fact-check, debunking article, pre-bunking article,

or narrative report about EU politics or national politics that is affected by European politics." It is worth noting that, although these two variables were based on the coding previously carried out by the fact-checkers, they have been thoroughly reviewed by the authors, and discrepancies have been corrected as necessary. The additional variables, which will be presented below, were coded by two researchers. A pre-test with an $n = 52$ was developed to assure reliability.

In regards to the topic, considering existing research (García-Marín et al., 2023; Verhoeven et al., 2024), we coded this variable into several categories: "economy/finance," "politicians (national context of countries)," "European institutions (regulations, standards, EU leaders...)," "conflict (Ukraine/Gaza...)," "health/healthcare," "society, justice, and gender," "education," "immigration/race," "environment, energy, science, and technology," and "others" (agreement = 78.8%; Cohen's $\kappa = 0.761$; Krippendorff's $\alpha = 0.763$).

As for the format, we coded as "text," "photo/images," "audio," and "video" (agreement = 94.2%; Cohen's $\kappa = 0.912$; Krippendorff's $\alpha = 0.913$). When there was a combination of formats, we selected as the main format the one that the fact-checker prioritized, for instance, with references in the title or in the lead.

Concerning the type of disinformation, based on Gutiérrez-Coba and Rodríguez-Pérez (2023), three possibilities were coded: "satire/parody," "misleading content," and "imposter content" (agreement = 94.2%; Cohen's $\kappa = 0.704$; Krippendorff's $\alpha = 0.707$). This variable categorizes disinformation based on the nature or intent behind the falsehood.

As for the deceitful technique, based on Gutiérrez-Coba and Rodríguez-Pérez (2023), three possible options were coded: "false context," "manipulated content," and "fabricated content" (agreement = 88.5%; Cohen's $\kappa = 0.799$; Krippendorff's $\alpha = 0.800$). It refers to the specific method used to deceive or mislead through disinformation.

4. Results

Firstly, in addressing RQ1, as can be observed in Table 1, of the 487 verifications analyzed, 62.63% ($n = 305$) are indirectly related to Europe, indicating that the content covers themes beyond specific European interests. For instance, these pieces talked about public figures such as the player Mbappé or Scarlett Johansson, conspiracy theories about Covid-19 vaccines and climate change, and international conflicts, among other topics. In contrast, 37.37% ($n = 182$) demonstrate a direct connection to European matters, encompassing topics such as European elections. This distribution highlights the varying degrees of relevance to European contexts within the body of verifications, with a significant majority focusing on broader themes, while a notable portion specifically addresses issues pertinent to Europe.

About RQ2, of the 487 verifications analyzed, 83.98% are classified as "debunks" ($n = 409$), while 16.02% pertain to fact-checking political statements or claims ($n = 78$). These results point out that during the 2024 European Parliament elections, content verified by fact-checkers tended to be associated with the debunking function rather than fact-checking political statements. This distinction underscores the primary focus of the verification efforts of the project Elections24Check, with the majority directed toward addressing general online disinformation. A smaller yet significant proportion is dedicated to scrutinizing political discourse and ensuring the accountability of public figures. This division reflects broader priorities in

combating disinformation in electoral contexts, such as those about the European Parliament, balancing general content verification with the critical task of fact-checking within the political sphere.

Table 1. Distribution of type of verified content and EU relation.

Type of verified content	Direct	Indirect	Total
Debunk	133	276	409
Fact-check	49	29	78
Total	182	305	487

We also performed both the Fisher exact test and the Chi-squared test to find out if there was an association between the EU relation to the verified content and the type of content verified. The tests ($\chi^2 = 25.70$; $p < 0.001$; Fisher's exact test = $p < 0.001$) revealed that the proportion of "debunks" directly associated with the EU is significantly lower than expected and considerably higher with its indirect relationship to the EU. At the same time, the proportion of "fact-check" type content with a direct relationship is higher than expected. In brief, we can assert that "fact-checks" tended to be more associated with the European elections than content classified as "debunk."

In regard to the RQ3, the main verified topic was about "European institutions (regulations, standards, EU leaders…)" (20.94%; $n = 102$), followed by content associated with the "conflict (Gaza, Ukraine…)" (19.92%; $n = 97$), "environment, energy, science, and technology" (12.32%; $n = 60$), and "immigration/race" (11.70%; $n = 57$). The other topics obtained less than 10%. These other minority topics were "economy/finance," "health/healthcare," "society, justice, and gender," and "education," among others.

When crossing the topic with the (in)direct relation with the EU politics (Figure 1), we noted that half of the verified content related directly to the elections is associated with the topic "European institutions (regulations, standards, EU leaders…)" (50%, $n = 91$; e.g., "Misinformation about the salary of MEPs"), followed by "environment, energy, science, and technology" (10.99%; $n = 20$) (e.g., EU-funded study finds food grown in home gardens poses environmental threat?"), and "politicians (national context of countries)" (10.44%; $n = 19$; e.g., "Why do the PP and PSOE usually vote the same in the European Parliament?"). The more frequent topics indirectly related to the elections were "conflict (Ukraine/Gaza…)" (28.85%; $n = 88$; e.g., "This video shows a Russian warship off Cuba in 2019, not 2024"), "environment, energy, science, and technology" (13.11%; $n = 40$; e.g., "Photos of Rio de Janeiro from 1880 to 2020 do not disprove the rise in sea level," and "immigration/race" (12.79%; $n = 39$; e.g., "This video does not show 'menas' who assault several stores in Las Palmas de Gran Canaria").

Results also indicate a remarkable difference in terms of observed and expected frequency in several topics from the lens of the (in)direct relation to the EU elections. Verified disinformation about "conflict (Ukraine/Gaza…)" was rarely directly associated with the elections (4.95%; $n = 9$); this topic has a higher indirect relation to the EU than expected. The same pattern also occurred regarding the topic "health/healthcare" (direct: 1.65%, $n = 3$; indirect: 11.48%; $n = 35$). On the other hand, the topic "European institutions (regulations, standards, EU leaders…)" tends to have a higher relation to the EU than expected. The Chi-squared test disclosed a statistical association between the two variables ($\chi^2 = 173.04$, $p < 0.001$; Cramer's $V = 0.596$, $p < 0.001$; coefficient of contingency = 0.512, $p < 0.001$).

	Direct	Indirect	Debunk	Fact-check
Conflict (Ukraine, Gaza...)	4.95%	28.85%	22.49%	6.41%
Economy / Finance	3.3%	2.62%	1.22%	11.54%
Education	0.55%	0.66%	0.49%	1.28%
Immigration / Race	9.89%	12.79%	11.74%	11.54%
European Institutions (regulations, standards, leaders...)	50%	3.61%	19.8%	26.92%
Environment, Energy, Science, and Technology	10.99%	13.11%	11.98%	14.1%
Others	3.3%	9.51%	7.09%	7.69%
Health / Healthcare	1.65%	11.48%	9.29%	0%
Politicians (national context of countries)	10.44%	9.51%	8.8%	15.38%
Society, Justice, Gender	4.95%	7.87%	7.09%	5.13%
Total	100%	100%	100%	100%

Direct   Indirect   Debunk   Fact-check

Figure 1. Relation of the topic with the EU.

When crossing the topic with the type of content verified, the topic "conflict (Ukraine/Gaza...)" represented 22.49% ($n = 92$) of the "debunk" content, followed by "European institutions (regulations, standards, EU leaders...)" (19.80%, $n = 81$), and "environment, energy, science, and technology" (11.98%, $n = 49$). Regarding "fact-check," the top three topics were "European institutions (regulations, standards, EU leaders...)" (26.92%, $n = 21$; e.g., "#LegalCheck. PCF program for the European elections: 'We must challenge the principle of primacy of European law over national law, a primacy that is not enshrined in the treaties'"), "politicians (national context of countries)" (15.38%, $n = 12$; e.g., "What Alberto Núñez Feijóo has said and what he has not said about a motion of censure against Pedro Sánchez and the support of Junts"), and "environment, energy, science, and technology" (14.10%, $n = 11$; e.g., "Poland has less water resources than Egypt? False"). In detail, the Chi-squared test disclosed a statistical association between the two variables ($\chi^2 = 45.79$, $p < 0.001$; Cramer's $V = 0,307$, $p < 0.001$; coefficient of contingency = 0.293; $p < 0.001$). Topics such as "conflict (Ukraine/Gaza...)" and "health/healthcare" were more linked to "debunk" than expected; on the other hand, "economy/finance," "European institutions (regulations, standards, EU leaders...)," and "politicians (national context of countries)" were more associated with "fact-checks" than expected.

Focusing on RQ4, the type of disinformation, the category "misleading content" was the majority (88.09%; e.g., "Germany has not decriminalized possession and sharing of child pornography"), followed by "imposter content" (11.09%; e.g., "No, Marina Sáenz has not said that 'couples should sleep in separate beds' because double beds encourage 'the rape of the male over the female'"), and satire/parody (0.82%; e.g., "A quote attributed to Gabriel Attal by a parody site"). Regarding the technique of deceit, "false context" (decontextualization) became the primary deception strategy identified by fact-checkers during the 2024

European Parliament elections. (59.34%; e.g., "Posting from 2012 about former politician Korun in circulation"), followed by "fabricated content" (32.85%; e.g., "Did Pope Francis congratulate Putin on his victory after the election and agree to visit Moscow?"), and "manipulated content" (7.80%; e.g., "What do we know about the image of Netanyahu's arrest?"). We carried out a Chi-squared test to check whether a relation between "type of disinformation" and "deceitful technique" occurred. We removed the category "satire/parody" ($n = 4$) to ensure the validity of the test. The test revealed a statistical association between the two variables ($\chi^2 = 70.79$, $p < 0.001$; Cramer's $V = 0.383$, $p < 0.001$; coefficient of contingency = 0.358, $p < 0.001$).

The most prevalent format of verified disinformation content was "text" (53.59%), followed by "video" (30.80%), "photo/images" (14.17%), and "audio" (1.44%). We executed a Chi-square test to test the association between the format and the deceitful technique—for this test, we removed the category "audio" to ensure the validity of the test. The result revealed a statistical association between the two variables ($\chi^2 = 61.02$, $p < 0.001$; Cramer's $V = 0.252$, $p < 0.001$; coefficient of contingency = 0.336, $p < 0.001$).

5. Discussion and Conclusions

As demonstrated by the initiatives and regulatory actions introduced by the EU to combat disinformation, fact-checkers play a pivotal role in the European strategy to address this issue. Notably, the establishment of the EFCSN network, which encompasses the Elections24Check project, was facilitated through funding provided by the European Commission. Additionally, the strengthened Code of Practice on Disinformation of 2022 seeks to foster a framework of collaboration between signatories and the EU fact-checking community, embedding the contributions of fact-checkers into the platforms of participating signatories (European Commission, 2022). All of this highlights that, with the endorsement of European institutions, fact-checkers are increasingly solidifying their role as key stakeholders in regulatory efforts to combat disinformation.

This article aims to analyze the verified disinformation by fact-checkers in the context of the 2024 European Parliament elections, using as a case study, the European initiative Elections24Check, a collaborative fact-checking project associated with the EFCSN. The main objective is to explore in which way fact-checking faced disinformation narratives and which characteristics of disinformation narratives to mislead were disseminated related to the 2024 European Parliament elections.

The first implication of this research lies in the verified content provided by the collaborative project formed by 32 different fact-checking media outlets from 28 European countries, which manifest a great effort to collaborate in curbing disinformation. Although this consortium, as a political fact-checking initiative, clearly had the purpose of combating political disinformation, the majority of verified content flagged as disinformation is indirectly related to EU politics and the elections. Elections are a significant concern in the practice of fact-checking, but the results show this initiative made a greater effort to verify other contextual issues rather than checking disinformation directly involved in the EU Parliament elections. Nevertheless, the viral disinformation issues indirectly related to EU institutions demonstrate how disinformation agents aim to destabilize supranational elections by fostering manipulation through collateral false narratives. In these cases, although the EU is not the primary focus, European institutions maintain an official discourse that is contradicted by such pieces of disinformation. For example, falsehoods about wars, climate change, or immigration serve as illustrative examples.

The second implication of this research is about the prevalence of the debunking activity over scrutinizing public statements (fact-checking function), the original function of the fact-checkers. Although both tasks are in the core purposes of these organizations (Rodríguez-Pérez et al., 2023), this research, developed from the collaborative project Elections24Check, adds a new piece of evidence of this shift that tends to be focused on curbing online disinformation. Some researchers have suggested reasons that may drive this shift, including technology partnerships to receive financial support from tech platforms (Graves & Mantzarlis, 2020), news consumption in social media networks (Newman et al., 2022), and the more demanding task of checking claims compared to debunk social media content (Graves & Mantzarlis, 2020).

Although the new European Code of Practice on Disinformation encourages signatories to collaborate with fact-checkers, Meta has been doing so since 2016. Under the policies of Meta's third-party fact-checking programme, political speeches are not eligible for verification within this framework. In this context, a significant number of European fact-checkers collaborate with Meta, particularly since the big tech company began recognizing verified membership of the EFCSN as a prerequisite for joining the programme. This helps to explain why a substantial portion of the verification sample in this study involves debunking rather than traditional fact-checks and why much of it pertains to indirect EU topics. This is attributed to the prolific nature of disinformation on social media, which encompasses a wide variety of themes.

Particularly, the actions of Elections24Check follow a common pattern observed in consortia created for electoral coverage (Palau-Sampio, 2024): A greater effort is needed to focus on verifying the claims and actions of politicians and public figures. This role performance diverges from the traditional watchdog role performance of fact-checking journalism. Therefore, this shift highlights the importance of considering whether fact-checking will continue to play a watchdog or monitoring role, or if it will take on an intermediary or even subsidiary role for tech platforms, focusing on cleaning up problematic information. Moreover, reaching large audiences has always been a challenge for fact-checking organizations, and fact-checkers acknowledge that platforms play a crucial role in distributing their fact-checks to the appropriate audiences (Bélair-Gagnon et al., 2023). However, recent evidence determined that debunking posts about health misinformation (related to Covid-19) obtained lower levels of user engagement on Facebook than fact-checking claims from politicians and public figures (Riedlinger et al., 2024).

Third, more frequently verified topics by Elections24Check were "European institutions (regulations, standards, EU leaders...)," "conflict (Ukraine/Gaza...)," "environment, energy, science, and technology," and "immigration/race." These topics enhance, first, disinformation affected the EU Parliament elections mislead regarding its leaders, policies, and institutions, but also the prevalence of contextual topics such as the war between Israel and Hamas and the Russian invasion of Ukraine. Other topics emerge as a source of verification during the time of the electoral campaign such as immigration and the environment as societal issues. Misleading and fake content related to migration tends to promote negative attitudes and racial prejudices against them, often in the form of hate and xenophobic speech. Complementary, climate change and the environment are affected by disinformation through conspiracy theories that deny the greenhouse effect and contribute to scepticism about the incidence of human beings in climate change. Furthermore, and encompassing the purpose of Elections24Check, these topics were related to the elections less than expected and, often, more related to the debunking function rather than the fact-checking activity.

In this context, disinformation is closely linked to topics that dominate the contemporary media, political, and public agenda within the European public sphere. Consequently, it is crucial for fact-checkers to

effectively verify information on sensitive issues that resonate with public opinion. However, an alternative interpretation might suggest that this consortium of journalists prioritized other viral topics from the public agenda shared on social media, potentially due to: (a) the absence of a European public sphere engaging in debates with a pan-European focus on the electoral campaign, which aligns with the second implication, highlighting the prevalence of debunking activities over scrutinizing public statements; (b) a campaign primarily centered on national issues rather than fostering European-wide debate; or (c) journalists' still-developing understanding of the structures, proposals, and political stances of parties and leaders during the electoral campaign. Similarly, and in alignment with the first implication of this study, the thematic diversity of disinformation content highlights how the manipulation of elections through narratives extends beyond strategies directly linked to the European elections. Instead, it involves the use of alternative narratives designed to polarize the population and erode trust in official or institutional discourses.

Fourth, although numerous alarms have been raised about the proliferation of high-tech disinformation, such as deepfakes, the results of this case study underscore the continued dominance of text as the primary format for spreading false information. Precisely, the majority of the verified content corresponded to what has been referred to as bottom-up disinformation (Luengo & García-Marín, 2020); that is, disinformation generated by users or groups to be shared via social media, which may explain why it is the predominant format. Text-based disinformation, characterized as a low-tech method of disinformation production, is notable not only for the speed of their creation and dissemination but also for the relative ease with which they can be fact-checked, owing to their typically lower level of complexity. With the advancement of technology, verifying increasingly complex content necessitates continuous training and the acquisition of new skills by fact-checkers, as well as additional time for effective debunking. Consequently, given that the sample in this study is based on falsehoods previously selected by fact-checking organizations, it cannot be assumed that professionalized disinformation created using AI techniques is absent from the digital sphere. Nonetheless, the prioritization of simpler falsehoods for debunking suggests that their virality exerts a substantial impact on audiences. Prior research has consistently confirmed the prevalence of this format in fact-checking efforts, as demonstrated by Salaverría et al. (2020) and Sánchez-del-Vas and Tuñón-Navarro (2024).

Fifth, another key implication highlighted in this article is the predominance of content decontextualization. The practice of extracting information from its original context to mislead is a widely employed disinformation technique by those who produce hoaxes, as noted by scholars such as Hameleers (2023) and Sánchez del Vas and Tuñón Navarro (2024). This is closely tied to the fourth implication, as the predominance of textual formats—due to their simplicity for virality and verification—parallels the technique of decontextualization, which likewise does not require significant resources, as it relies on the utilization of genuine content or information. Consequently, when such information is incorporated into a different scenario, it loses its original meaning and is reinterpreted to serve the disinformation objectives of those who employ it to deceive audiences. This technique is also closely linked to the type of disinformation being propagated; in this study, misleading content emerged as the most prevalent category among the fact-checks examined. Misleading content is characterized by the distortion or omission of factual information from its original context, making it increasingly challenging to differentiate between truth and falsehood (Gutiérrez-Coba & Rodríguez-Pérez, 2023). In fact, this form of disinformation is particularly detrimental, as highlighted by Allen et al. (2024), who reported the negative impact of factually accurate yet deceptive content on audiences.

In conclusion, this article sheds light on how European fact-checking organizations oriented towards curbing disinformation tend to prioritize the debunking function over the fact-checking activity, aligning with previous findings on how this journalism practice is shifting. Also, the findings associate the prevalence of debunking online disinformation with the indirect relation of the verified content to the EU. This point is crucial because it can represent an inadequate alienation from the mission of this cross-national initiative to fight European electoral disinformation. Moreover, disinformation narratives regarding issues such as conflicts (Russian invasion in Ukraine or the war between Israel and Hamas) were less than expected related to the European elections. Additionally, this article discloses new evidence regarding decontextualization as the principal deception technique used in disinformation narratives and the text as the preferred format to disseminate disinformation narratives verified by fact-checkers.

The limitations of this article primarily arise from the study's reliance on fact-checks sourced from a closed database associated with the Elections24Check project. Consequently, only publications submitted and produced by members of the EFCSN, with which the project is affiliated, were included in the analysis. Furthermore, due to the extensive scope of the selected database and the temporal constraints of the study, geographical factors related to the fact-checkers, as well as other significant variables—such as the sources employed in the verification process, the actors behind the disinformation, and the channels through which verified hoaxes were disseminated—were not considered. On the other hand, due to logistical and time constraints, in-depth interviews with specialized agents could not be incorporated, which would have further enriched the research.

These limitations highlight potential avenues for future research, aiming to broaden the study through the examination of these variables and methodological techniques, among others. Furthermore, applying the methodology to other studies on fact-checking and disinformation during electoral periods, such as the 2024 American elections, could yield valuable insights that would enhance our understanding of the work of fact-checkers and their essential public service role in combating disinformation.

Conflict of Interests

The authors declare no conflict of interests. In this article, editorial decisions were undertaken by Luis Bouza García (Universidad Autónoma de Madrid) and Álvaro Oleart (Université Libre de Bruxelles).

Data Availability

The authors are continuing to work on the data to produce new research. Researchers or readers interested in the dataset used in this study are encouraged to contact the corresponding author.

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About the Authors

Carlos Rodríguez-Pérez is a professor at the Department of Communication Management at the Universidad de La Sabana (Colombia). He holds a PhD in communication from the Complutense University of Madrid (Spain). His research interests include misinformation, intangible resources in the public sector, and fact-checking journalism.

Rocío Sánchez-del-Vas is PhD candidate in media research and communication at Universidad Carlos III de Madrid, funded by a University teacher training (FPU). She holds a BA in journalism and an MA in research applied to the media. She is a member of the Jean Monnet Chair FUTEUDISPAN.

Jorge Tuñón-Navarro is full professor at the Carlos III University of Madrid and a Jean Monnet *ad personam* chair of the European Commission. With over a hundred publications and a dozen monographs, he has led seven research projects funded at the regional, national, and European levels.

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Spreading False Content in Political Campaigns: Disinformation in the 2024 European Parliament Elections

Andreu Casero-Ripollés , **Laura Alonso-Muñoz** , **and Diana Moret-Soler**

Department of Communication Sciences, Universitat Jaume I, Spain

Correspondence: Andreu Casero-Ripollés (casero@uji.es)

Abstract

Electoral campaigns are one of the key moments of democracy. In recent times, the circulation of disinformation has increased during these periods. This phenomenon has serious consequences for democratic health since it can alter the behaviour and decisions of voters. This research aims to analyse the features of this phenomenon during the 2024 European Parliament elections in a comparative way. The applied methodology is based on quantitative content analysis. The sample ($N = 278$) comprises false information verified by 52 European fact-checking agencies about the campaign for the European elections in 20 EU countries. The analysis model includes variables such as time-period, country, propagator platform, topic, and the type of disinformation. The results show that the life cycle of electoral disinformation goes beyond the closing of the polls assuming a permanent nature. In addition, national environments condition the profiles of this question, which is more intense in Southern and Eastern Europe. Furthermore, although multiple channels are involved, digital platforms with weak ties are predominant in disseminating hoaxes. Finally, migration and electoral integrity are the predominant topics. This favours the circulation of an issue central to the far-right agenda and aims to discredit elections and their mechanisms to undermine democracy. These findings establish the profiles of this problem and generate knowledge to design public policies that combat electoral false content more effectively.

Keywords

disinformation; elections; electoral integrity; European Union; fact-checking; political campaign; social media

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1. Introduction

Disinformation has become a crucial issue for modern societies due to its potential to endanger democracy (Bennett & Livingston, 2018). In this context, institutions such as the EU have been striving for years to curb this expanding phenomenon by implementing various initiatives (Casero-Ripollés et al., 2023). One of their main areas of action is elections. Based on the report of the Special Committee on Foreign Interference in all Democratic Processes in the EU, in particular disinformation, the European Parliament adopted a resolution in June 2023 for the creation of a coordinated strategy to increase the EU's resilience to foreign interference and information manipulation to protect European elections. In addition, at the start of the European Parliament election campaign in 2024, EU authorities investigated Meta, owner of Instagram and Facebook, due to concerns that it was not doing enough to control the circulation of false content ("La UE contra," 2024). These actions prove the importance given to the fight against disinformation, which EU institutions consider a threat to democracy that needs to be solved.

Electoral campaigns are fundamental to a healthy democracy as they provide citizens with the necessary information to make voting decisions. However, in recent years, the spread of disinformation has intensified during these periods, posing a serious threat (Bennett & Livingston, 2018). The increasing presence of false information can influence public opinion, alter voter behaviour, and ultimately undermine the legitimacy of electoral results. This phenomenon is particularly concerning in the context of the EU, where the diversity among countries allows narratives to be adapted to exploit local tensions and social divisions (Mudde, 2024). Its implications threaten the cohesion and stability of the EU by eroding public trust in its institutions and the democratic process itself (Cinelli et al., 2020).

The main objective of this research is to characterize the content of electoral disinformation circulated during the campaign for the 2024 European Parliament elections, aiming to identify when the peak of false content occurred, its origin, types, main topics, and the platforms from which these hoaxes were disseminated.

2. Literature Review: Characteristics of Electoral Disinformation Content

The use of disinformation in the context of electoral campaigns has been spreading in recent years across various parts of the world (Keller et al., 2020; López et al., 2023). Numerous countries have witnessed an increase in the circulation of this type of content in recent times. Although quantitatively fewer, false information disseminated during electoral periods tends to be more widely shared and, therefore, has a greater impact on the public (Baptista & Gradim, 2020; Canavilhas et al., 2019).

The consequences of electoral disinformation are diverse, although most are associated with negative effects on democracy. For instance, in previous campaigns, such as the 2019 European Parliament elections, disinformation was used to destabilize the EU (Bendiek & Schulze, 2019). During the 2017 Kenyan elections (Mutahi & Kimari, 2020), it was used to undermine public credibility in the political and electoral system, as well as to increase polarization. In this context, disinformation aims to delegitimize and reduce trust in democratic institutions and processes (Bennett et al., 2010). Furthermore, it can also artificially and deliberately alter public perceptions, thereby influencing voting decisions (Kofi Annan Foundation, 2020). As a result, the EU has made combating this problem a priority, particularly to ensure the proper conduct of elections, preventing external interference and hybrid threats that could jeopardize them (Casero-Ripollés et al., 2023).

Although electoral campaigns do not occupy a central place in disinformation research (Salaverría & Cardoso, 2023), some previous studies have identified certain characteristics of this type of content. Initial evidence exists regarding the temporal distribution, geographic reach, typology, dissemination platforms, and topics of disinformation in recent electoral processes, among other factors.

Regarding temporal distribution, recent electoral campaigns have recorded an increase in the circulation of hoaxes (Baptista & Gradim, 2022). Additionally, political disinformation has one of the highest virality rates (Aral, 2021). It should be noted that false content travels up to 70% faster than true information (Vosoughi et al., 2018).

Previous research has identified two key moments for the spread of falsehoods during campaigns. The first is electoral debates, where a high volume of false content is concentrated (Baptista & Gradim, 2022; Domalewska, 2021; Molina-Cañabate & Magallón-Rosa, 2021). Another critical point of increased dissemination of these deceptive messages is the polling day (Rosa, 2019). Some studies have shown that the circulation of hoaxes increases as the campaign progresses and approaches election day (Molina-Cañabate & Magallón-Rosa, 2021; Rosa, 2019). However, this effect was not observed in the 2020 US elections. In that campaign, disinformation volume did not substantially increase as polling day approached or during candidate debates, but rather when Donald Trump made a substantial change in his strategy of using false information (Pedriza, 2021).

On the other hand, some studies have shown that geographic context is a determining factor in electoral disinformation. National information environments shape this phenomenon, as each country's political and communicative context affects how false content spreads during elections (Humprecht, 2019). For instance, significant differences have been identified in the use of hoaxes during campaigns in Spain and Ecuador (Rodríguez-Hidalgo et al., 2021).

Previous studies have demonstrated that disinformation is a complex phenomenon that can take various forms. Such content can be false or partly false, and it can also rely on satire, loss of context, or even be generated by AI (Wardle & Derakhshan, 2017). There is little evidence regarding the presence of these modalities in campaigns. A recent study on the 2022 Colombian elections detected a significant presence of decontextualized information, where a truthful fact is taken out of context and distorted by mixing truth and falsehood (Gutiérrez-Coba & Rodríguez-Pérez, 2023).

Another aspect characterizing electoral disinformation relates to the platforms through which false content is spread. According to several studies, social media serve as one of the primary channels for disseminating hoaxes. In the 2019 elections in Uruguay, Facebook was the main distribution channel for this type of content (Molina-Cañabate & Magallón-Rosa, 2021). Similarly, X (formerly Twitter), Facebook, and WhatsApp were key platforms for spreading false information during the 2019 elections in Spain, with pseudo-media and party websites making a minimal contribution to this campaign (Rojano et al., 2020). Mobile instant messaging services, such as WhatsApp, have also played a significant role in spreading hoaxes in both Brazil (Canavilhas et al., 2019) and Spain (Escayola, 2022; Garrido et al., 2021).

Legacy media are also used for disinformation in an electoral context. Political candidates utilized these media types to disseminate false information during the 2020 US election campaign (Pedriza, 2021). Recent studies

indicate that trust in mainstream media reduces public misconceptions, while trust in social media information increases them (Vliegenthart et al., 2024).

As for the topics of electoral disinformation, several previous studies indicate that immigration was a major theme. This issue was highly prominent in the 2019 elections in Spain and Ecuador on X (Rodríguez-Hidalgo et al., 2021) and in the same year's European elections in Italy (Pierri et al., 2020). However, immigration did not prominently feature among misleading content in the 2019 elections in Portugal (Baptista & Gradim, 2020).

Campaign events, especially electoral debates, are also a notable topic within electoral hoaxes. In the 2019 elections in India (Akbar et al., 2022) and Spain (Rojano et al., 2020), respectively, this issue took a prominent position. Similarly, electoral debates became one of the topics most linked to false information in the 2022 elections in Portugal (Baptista & Gradim, 2022).

Other studies have identified additional topics in electoral disinformation. In the 2019 elections in India, for instance, issues such as corruption, religion, nationalism, gender, and development also stood out (Akbar et al., 2022). In the 2019 European Parliament elections in Italy, key topics were national safety and nationalism, while issues related to Europe's global management had an insignificant presence in that campaign (Pierri et al., 2020). Satire emerged as a significant theme related to electoral falsehoods in the 2019 Bogotá (Colombia) mayoral campaign (Melo et al., 2023).

In their analysis of the electoral cycle from 2019 to 2022 in Spain, Lava-Santos et al. (2023) found that public and sectoral policy issues, with more than half of the total, and ideological-political issues were the most prominent among false content in campaigns. In contrast, campaign-related issues and politicians' private life issues played a secondary role.

Finally, another important topic related to campaign disinformation is electoral integrity. This concept refers to international standards and global norms governing the proper conduct of elections (Norris et al., 2014, p. 788). It includes electoral malpractices, which are first- and second-order violations of these global norms, exemplified by inaccurate voter registers, partisan gerrymandering, polling maladministration, vote-buying, clientelism, pro-government media, erroneous counts, cash-saturated campaigns, electoral fraud, and excessively high legal barriers to office (Norris, 2013).

Accusations of the violation of fair electoral procedures, particularly electoral fraud, are among the most significant topics in recent campaigns, especially following accusations by Donald Trump in the 2020 US election (Domínguez-García et al., 2023; Enders et al., 2021; Lewandowsky et al., 2023). In Nigeria, Kerry (2021) demonstrated the prevalence of this issue in electoral disinformation since the late 1990s. In the 2023 Spanish elections, false information questioning electoral integrity was one of the main topics (Casero-Ripollés & Alonso-Muñoz, 2024). Specifically, in this case, such content focused on the postal voting procedure. Since the elections took place near summer vacation dates, this issue became central to public debate, making it one of the main aspects of disinformation. Three hoaxes were spread on this topic: the feasibility of exercising this right, the security of the process, and the possibility of fraud through this system (Casero-Ripollés & Alonso-Muñoz, 2024). Finally, some research suggests that pseudo-media are one of the primary channels contributing to spreading content that questions the integrity of the electoral process (Fernández, 2020).

Despite this body of knowledge contributed by previous research, we still know relatively little about the characteristics of electoral disinformation content. Moreover, most literature on this issue focuses on single-case studies that examine a single country or electoral campaign. Therefore, new approaches to this subject are needed to better understand its distinctive features from a comparative perspective. This research aims to fill this gap in the existing literature.

3. Data and Method

The objectives of this research are:

O1: To determine the temporal distribution and peaks of activity in the spread of disinformation during the 2024 European Parliament elections.

O2: To identify the countries and European regions most affected by the circulation of false content during the 2024 European Parliament elections.

O3: To recognize the types of publications and disinformation most used during the 2024 European Parliament elections.

O4: To identify the topics of disinformation most prevalent during the 2024 European Parliament elections.

O5: To discover the platforms where false information appears and is disseminated during the 2024 European Parliament elections.

The methodology is based on applying the quantitative content analysis technique. In this way, the content attributes of false information circulated during the 2024 European Parliament elections have been coded. Our study is descriptive, as it aims to obtain evidence to explore the phenomenon of electoral disinformation and its main characteristics, allowing us to understand accurately and systematically how it works. This approach is advisable for relatively new or understudied subjects like this one.

The 2024 European Parliament elections were held between June 6 and 9, 2024. To cover a sufficiently broad period, our analysis spans two full months, from May 1 to June 30, 2024. This allows us to study disinformation spread before the elections and the subsequent period following the vote.

This research adopts as a methodological strategy the use of content generated by fact-checkers as a reliable proxy for access to false information. The lack of veracity of these contents has been demonstrated as a result of a standardised journalistic verification process. Therefore, they can be considered as hoaxes and thus be assimilated to disinformation. Furthermore, previous research on political disinformation (Dourado & Salgado, 2021; Pedriza, 2021; Rosińska, 2021) has used the same strategy to construct the sample, a circumstance that lends validity and credibility to our methodological approach.

The units of analysis that make up our sample were obtained using verified false information from fact-checking agencies across different EU countries. For this purpose, we used the Elections24Check

database (https://elections24.efcsn.com), a joint project of the European Fact-Checking Standards Network (EFCSN) and its participating member organizations, supported by the Google News Initiative, which compiles and classifies electoral disinformation. Each fact-checker is part of the EFCSN and shares their election fact-checks from their own websites with the central Elections24Check database. EFCSN members apply the guidelines of the European Code of Standards for Independent Fact-Checking Organizations (https://efcsn.com/code-of-standards), created in 2022, to ensure standards of independence, transparency, and journalistic quality. This homogenizes the fact-checking methods and avoids biases between partners from different countries.

The sample was accessed via the website https://backoffice.elections24.efcsn.com. The first step was to select the period to be analyzed. The results were then filtered by direct reference to the EU. In this way, false content directly related to the EU was selected, discarding those related to national or regional issues in a given country. Thus, we obtained a final sample of 278 hoaxes directly related to the 2024 European Parliament elections, covering 20 EU countries, which enables us to conduct cross-national comparisons.

The coding process combined a manual process for some variables with the use of pre-coded data from the Elections24Check platform. Two coders participated in the analysis. The intercoder reliability test showed a common understanding of the categories (Holsti's $CR \geq 0.8$).

Our analysis model is based on six variables to measure the different characteristics of disinformation related to the 2024 European Parliament elections. First, the publication date indicates the day the false information was published by a fact-checker. The country specifies the geographic location related to the fraudulent content published. Regarding the type of publication, we distinguish between: (a) debunking articles, referring to the process of fact-checking the accuracy of what a politician or an EU official claims as true; and (b) political fact-checks, referring to the process of fact-checking the accuracy of content that circulates on the internet and is replicated by people on one or more social platforms, media, and others.

Regarding the type of disinformation, six categories were established: (a) AI-generated, referring to content created using an AI tool or technique; (b) false, content that has no basis in fact; (c) partly false, content that has some factual inaccuracies; (d) missing context, content that implies a false claim without directly stating it; (e) satire, content that uses irony, exaggeration, or absurdity; and (f) true, content that contains no inaccurate or misleading information.

The topic variable was measured by distinguishing between the following categories: (a) politics related to the EU, (b) national or regional context issues, (c) legislation, (d) migration, (e) gender, (f) religion, (g) climate, (h) terrorism, (i) Ukraine war, (j) Israel–Gaza war, (k) EU funds, (l) election integrity, (m) EU institutions, (n) 2030 Agenda, (o) security and defence, (p) economy, (q) energy, (r) Covid-19, (s) politicians' private life issues, (t) health, and (u) others.

Finally, for the platform, we coded where the false content appears by distinguishing between: (a) Facebook; (b) Instagram; (c) X; (d) TikTok; (e) YouTube; (f) WhatsApp; (g) Telegram; (h) media, for well-known legacy and digital media; (i) pseudo-media, for platforms that disguise as media to spread false information, violate journalistic conventions, and serve radical political ideologies (Palau-Sampio, 2023), (j) website, understood as a general web page and related content identified by a common domain name; (k) party website, a webpage connected to a political party; and (l) other.

4. Results

4.1. Temporal and Geographic Distribution of Electoral Disinformation

During the analyzed period (from May 1 to June 30, 2024), a total of 278 pieces of false information related to the 2024 European Parliament elections were detected. This amounts to an average of 5.25 hoaxes per day across the 20 EU countries.

According to the frequency of publication, we observed that the daily average was exceeded on 19 occasions. However, six days stand out above the rest (Figure 1). May 29 saw the highest activity level, with 18 hoaxes, followed by May 28 (12 hoaxes), and June 4–7 (10, 14, 15, and 16, respectively). In this latter case, given that the elections were held between June 6 and 9, depending on the country, we detected an increase in disinformation activity on the days closest to polling day. However, after analyzing the headlines of major international media outlets, we could not identify any significant event that would explain the increase in activity on May 29.

Although the volume of content decreased after election day, the dissemination of false information continued. This indicates that electoral disinformation continues to operate and circulate beyond the closing of the polls, extending its influence into the aftermath (Figure 1).

It is noteworthy that none of the peaks in activity coincided with the debate among the frontrunners of the main party groups in the European Parliament, held during the Eurovision broadcast on May 23.

Considering the geographic distribution of false content (Table 1), half of the electoral disinformation originated in Spain (27.7%) and Poland (21.2%). These are two regions with a significant presence of the far
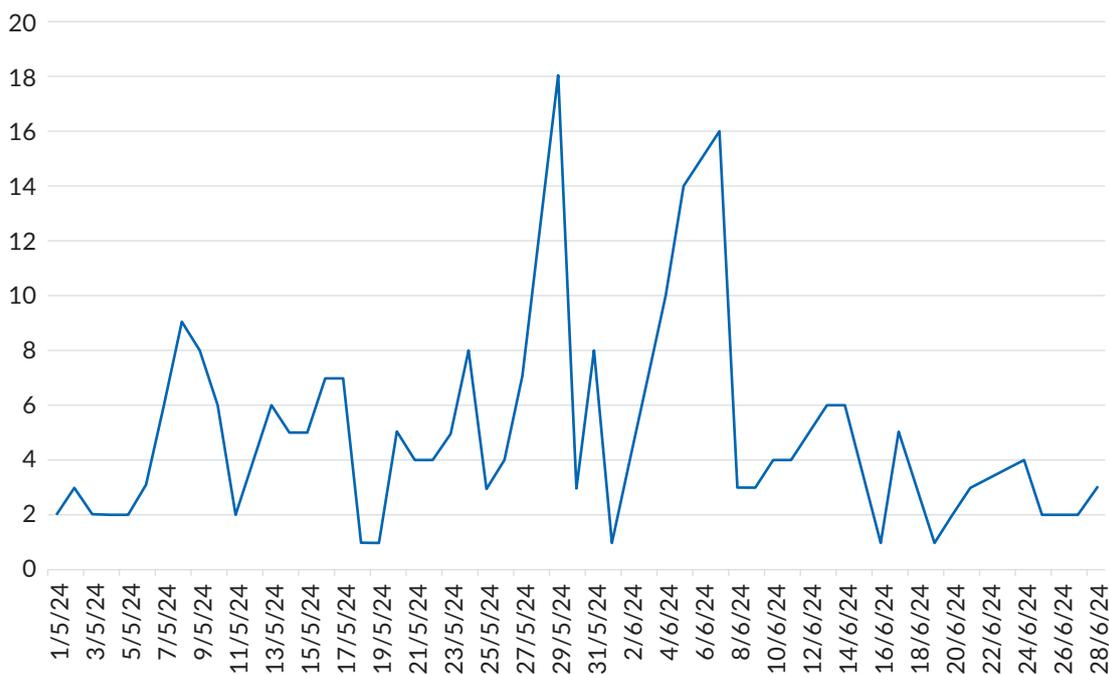

Figure 1. Daily distribution of false information related to the 2024 European Parliament elections.

right, particularly in Poland, where the Law and Justice Party (PiS, in its Polish acronym) held power until the 2023 parliamentary elections.

At a second level, with percentages between 5% and 10%, false information originating from Germany (9.7%), Belgium (7.6%), Portugal (7.2%), and France (6.1%) also stands out (Table 1). As in the previous case, these four countries have a significant presence of far-right parties, such as Alternative for Germany in Germany, Chega in Portugal, and the National Rally in France. During the 2024 European Parliament election campaign, these political formations were highly critical of the EU and the handling of issues like immigration and the economy (Mudde, 2024).

By region, Southern Europe accumulated the highest percentage of electoral disinformation, with 41.7%, followed by Eastern Europe with 31.4%. Finally, Western Europe accounted for 25.6%, and Northern Europe for only 1.4% (limited to cases in Denmark), ranking last.

Table 1. Distribution of false content by country of origin.

Country	N	%
Austria	4	1.4
Belgium	21	7.6
Bulgaria	6	2.2
Croatia	5	1.8
Czech Republic	5	1.8
Denmark	4	1.4
France	17	6.1
Germany	27	9.7
Greece	10	3.6
Hungary	1	0.4
Italy	9	3.2
Latvia	7	2.5
Lithuania	1	0.4
Luxemburg	1	0.4
Netherlands	1	0.4
Poland	59	21.2
Portugal	20	7.2
Romania	1	0.4
Slovenia	2	0.7
Spain	77	27.7
Total	278	100

4.2. Type of Publication and Typology of Disinformation

The analysis reveals that most publications were debunking articles during the 2024 European Parliament elections (68.3%). These publications verify the accuracy of content circulating on the internet and replicated on one or more social media platforms or through legacy media. Such false content can alter the quality of

the democratic process and jeopardize the functioning of the elections. Conversely, the remaining 31.7% pertains to political fact-checking, which involves verifying the accuracy of statements made by an EU official or political actor to assess whether their claims are true.

Regarding the type of disinformation, 59.4% refer to completely false content (Table 2), where pieces of information are designed and disseminated with the deliberate intention of deceiving the recipient. Secondly, 23.4% of the total is related to the lack of context (Table 2), in which the content is true but presented in a different context from where it originally occurred.

At this point, it is worth noting that content generated with AI, despite its rise, had almost no presence in the 2024 European Parliament elections, accounting for only 1.1% (Table 2).

Table 2. Typology of disinformation in the European Parliament elections.

Type of disinformation	%
AI-generated	1.1
False	59.4
Missing context	23.4
Partly false	5.4
Satire	0.4
True	10.4
Total	100

4.3. Topics of Electoral Disinformation

The topics of electoral disinformation in the 2024 European Parliament elections are characterized, first, by their diversity, as no single topic dominates (Table 3). Secondly, the two most recurrent topics were electoral integrity (20.5%) and migration (12.9%; see Table 3). In the first case, false content was directly related to the conduct of the European elections. False information on this topic originated particularly from Spain and Germany, where accusations of electoral fraud were made, claiming, for example, that votes cast for Vox (Spain) or Alternative for Germany (Germany) were not counted. In this context, some hoaxes falsely claimed the possibility of dual voting—marking percentages for more than one party on the same ballot, which invalidated the vote.

Regarding migration, electoral disinformation focused on asylum quotas established between countries and border control. Additionally, some hoaxes linked being an immigrant to receiving subsidies, which, according to their arguments, would encourage mass migration to Europe. In this context, false information called for the re-establishment of national borders and the restriction of free movement of people. Spain, Poland, and France were the countries where this topic was most frequently repeated. These are three countries where anti-immigration discourse has intensified over the last decade (Alonso-Muñoz & Casero-Ripollés, 2020).

Thirdly, issues related to climate change (7.9%) and legislation (7.6%) stand out (Table 3). In both cases, Poland was the country most affected by false information on these issues. Regarding climate change, most hoaxes referenced the use of new technologies to modify it and the adverse effects that 5G technology

Table 3. Topics of false information debunked during the 2024 European Parliament elections.

Topic of disinformation	%
Politics related to the EU	3.6
National/regional context issues	3.2
Legislation	7.6
Migration	12.9
Gender	1.8
Religion	1.1
Climate	7.9
Terrorism	0.4
Ukraine war	5.8
Israel–Gaza war	3.6
EU funds	2.9
Electoral integrity	20.5
EU institutions	4.3
2030 Agenda	0.4
Security and defence	1.8
Economy	6.1
Energy	3.2
Covid-19	5.0
Politicians' private life issues	5.4
Health	1.8
Others	0.7
Total	100

could generate. It is surprising that, while climate has significant weight in electoral disinformation, the 2030 Agenda has an almost negligible presence (0.4%).

On the other hand, issues related to legislation referenced potential regulatory changes stemming from new directives approved by the European Parliament. Here, two strategies can be observed. The first refers to the perceived inability to legislate on key matters such as immigration. The second is related to the loss of sovereignty by member states, given that national legislation cannot contravene regulations approved by the European Parliament. In this regard, some hoaxes were related to the approval of a European directive to decriminalize child pornography, an increase in bureaucracy for exporting products, or a ban on animal farming.

A fourth group of topics includes false content accounting for 5% to 6% of the total. These hoaxes are related to the economy (6.1%), the Ukraine war (5.8%), politicians' private lives (5.4%), and Covid-19 (5%; see Table 3). Notably, despite the World Health Organization declaring an end to the Covid-19 pandemic in May 2023, this issue continued to appear in disinformation related to the 2024 European Parliament elections.

Finally, false content related to topics on EU policies, institutions, and funds reached low levels, ranging between 4.3% and 2.9% (Table 3). This reveals that, despite the rise in Eurosceptic discourse driven by

populism in recent years (Alonso-Muñoz & Casero-Ripollés, 2020), the EU and its institutions were not the central focus of disinformation during this electoral campaign.

Considering the topics of false content by origin, we also observe some relevant patterns. First, false content originating from Germany was concentrated in only five topics, while content from other countries showed a high thematic dispersion, especially in the case of Spain (Table 4).

Secondly, each country had a predominant topic. For example, in Belgium and France, false content related to migration was dominant (23.8% and 35.3%, respectively), while in Spain and Germany, hoaxes about electoral integrity stood out (81.5% and 29.9%, respectively), and in Poland, climate change was prominent (16.9%). The importance of these issues within each country's society explains the prevalence of these topics in the false content that went viral during the 2024 European Parliament elections.

Thirdly, it is noteworthy that false information about the conflicts in Ukraine and Israel–Gaza was present only in Spain and Germany (Table 4), but not in other EU countries. Despite the significance of both conflicts for the EU, they played a minor role in the electoral disinformation during the European Parliament campaign.

Table 4. Campaign's main topics of false information by country of origin (%).

Topic of disinformation	Belgium	Germany	Spain	France	Poland	Portugal
Politics related to the EU	—	3.7	1.3	—	6.8	5
National/regional context issues	—	—	9.1	5.9	—	5
Legislation	—	3.7	1.3	29.4	13.6	15
Migration	23.8	—	13	35.3	15.3	—
Gender	—	—	1.3	—	1.7	5
Religion	4.8	—	1.3	—	1.7	—
Climate	9.5	—	5.2	5.9	16.9	10
Terrorism	—	—	1.3	—	—	—
Ukraine war	—	7.4	5.2	5.9	—	5
Israel-Gaza war	—	—	7.8	5.9	—	—
EU funds	9.5	—	1.3	—	3.4	10
Electoral integrity	4.8	81.5	29.9	—	—	15
EU institutions	9.5	—	2.6	5.9	10.2	—
2030 Agenda	4.8	—	—	—	—	—
Security and defence	4.8	3.7	—	—	—	10
Economy	19.0	—	3.9	5.9	10.2	5
Energy	—	—	1.3	—	6.8	10
Covid-19	—	—	5.2	—	3.4	—
Politicians' private life issues	4.8	—	7.8	—	1.7	—
Health	—	—	1.3	—	6.8	—
Others	4.8	—	—	—	1.7	—
Total	100	100	100	100	100	100

Therefore, our results reveal that the national context determines the primary topic of false information. Thus, the relevance of electoral disinformation is determined by the importance of specific topics in the public debate and the political culture of each country.

4.4. Platforms for Electoral Disinformation

Regarding the platforms of origin of false content during the 2024 European Parliament elections, X (32.4%) and Facebook (21.9%) were the two main channels through which hoaxes were disseminated (Table 5). TikTok (9.7%) also stands out, a platform that has been recognized in the literature for its ability to viralise false content (Hidalgo-Cobo et al., 2025).

A notable percentage of false information was also spread through legacy media (13.3%; see Table 5). This type of content refers to statements by politicians in these media that are completely or partially false. In such cases, the spread of hoaxes falls on the political actors themselves, not journalists, who have no opportunity to verify information in real-time. In this context, political actors use legacy media strategically, turning them into unintentional amplifiers of electoral disinformation.

Table 5. Platforms of origin of false information.

Platform	%
Facebook	21.9
Instagram	3.6
Legacy media	13.3
Party website	2.5
Pseudo-media	2.9
Telegram	1.1
TikTok	9.7
Website	1.1
WhatsApp	0.4
X	32.4
YouTube	7.9
Other	3.2
Total	100

Although the literature suggests that, in contexts like Brazil (Canavilhas et al., 2019) or Spain (Garrido et al., 2021), mobile instant messaging services experience high circulation of false content during electoral periods, our findings show that both WhatsApp (0.4%) and Telegram (1.1%) played a minor role in spreading false content during the 2024 European Parliament elections (Table 5). Pseudo-media also had a minor presence in the dissemination of hoaxes (2.9%; see Table 5).

When analysing the most prevalent topics on each platform, several interesting findings emerge. First, platforms with a smaller role in distributing false content, such as pseudo-media, Telegram, or WhatsApp, showed greater thematic concentration (between three and six topics per platform). Conversely, platforms with a more significant role in circulating false information, such as X, Facebook, or TikTok, displayed high thematic fragmentation, with between 10 and 18 topics per platform (Table 6).

Table 6. Disinformation Topics by Platform.

	Facebook	Instagram	Legacy media	Other	Party Website	Pseudo-Media	Telegram	TikTok	Website	WhatsApp	X	YouTube	Total
Politics related to the EU	4.9	—	5.4	—	—	—	—	7.4	—	—	2.2	4.5	3.6
National/regional context issues	—	—	8.1	11.1	—	—	—	—	—	—	5.6	—	3.2
Legislation	3.3	40	—	—	57.1	12.5	—	11.1	33.3	—	4.4	9.1	7.6
Migration	4.9	—	24.3	33.3	—	—	—	7.4	—	—	13.3	31.8	12.9
Gender	1.6	—	5.4	—	—	—	—	—	—	—	—	9.1	1.8
Religion	1.6	—	—	—	—	—	—	—	—	—	2.2	—	1.1
Climate	13.1	10	5.4	11.1	14.3	12.5	—	11.1	33.3	—	4.4	—	7.9
Terrorism	—	—	—	—	—	—	—	—	—	—	1.1	—	0.4
Ukraine war	11.5	—	2.7	—	—	50	33.3	3.7	—	—	2.2	—	5.8
Israel–Gaza war	4.9	20	2.7	—	14.3	—	—	—	—	—	3.3	—	3.6
EU funds	1.6	—	10.8	—	14.3	—	—	3.7	—	—	—	4.5	2.9
Election integrity	16.4	—	5.4	11.1	—	—	33.3	40.7	—	—	34.4	4.5	20.5
EU institutions	1.6	—	8.1	—	—	—	—	—	—	100	3.3	18.2	4.3
2030 Agenda	—	—	2.7	—	—	—	—	—	—	—	—	—	0.4
Security and defence	—	—	5.4	—	—	12.5	33.3	—	—	—	1.1	—	1.8
Economy	8.2	—	5.4	22.2	—	12.5	—	—	33.3	—	3.3	13.6	6.1
Energy	3.3	—	8.1	—	—	—	—	7.4	—	—	1.1	4.5	3.2
Covid-19	9.8	10	—	—	—	—	—	3.7	—	—	6.7	—	5
Politicians' private issues	8.2	10	—	—	—	—	—	3.7	—	—	8.9	—	5.4
Health	3.3	10	—	11.1	—	—	—	—	—	—	1.1	—	1.8
Other	1.6	—	—	—	—	—	—	—	—	—	1.1	—	0.7
Total	100	100	100	100	100	100	100	100	100	100	100	100	100

The second finding is that six topics were disseminated across six or more platforms: legislation, migration, climate, Ukraine war, electoral integrity, and economy (Table 6). The fact that these topics spread across such a variety of platforms increases their chances of going viral, thereby reaching a larger audience.

Thirdly, regarding the platforms that serve as the main origin for a larger number of false contents, on Facebook, disinformation about electoral integrity (16.4%), climate (13.1%), and the Ukraine war (11.5%) stood out. Additionally, it is noteworthy that 9.8% of the content spread on this platform, owned by Meta, was related to Covid-19 (Table 6). On X, 34.4% of the falsehoods were about issues related to electoral integrity, and 13.3% to migration (Table 6). On TikTok, alongside hoaxes about electoral integrity (40.7%), false content about climate (11.1%) and legislation (11.1%) was also spread.

Finally, in terms of disinformation disseminated by political actors through their appearances in legacy media, false information about immigration (24.3%) and EU funds (10.8%) were particularly notable. This latter finding reveals that political actors used disinformation strategies via legacy media to question and criticize EU institutions.

Our findings show that, depending on the topic, the platform used for spreading false content varies. Therefore, we can affirm that not all electoral disinformation circulates through the same channels.

5. Discussion and Conclusions

Elections are a key period for democracy. They represent an essential moment for various political parties to deploy their communication strategies aimed at persuading citizens. Over the past decade, electoral campaigns have been characterized both by the consolidation of new digital platforms and by disinformation (Keller et al., 2020; López et al., 2023).

The findings from this research allow us to identify several relevant descriptive insights regarding the characteristics of electoral disinformation content in the context of the 2024 European Parliament elections.

First, our findings indicate that, during this electoral campaign, an average of more than five false pieces of information were detected daily, signifying a notable presence of false content. According to previous studies (Molina-Cañabate & Magallón-Rosa, 2021; Rosa, 2019), polling day is a peak moment for the spread of hoaxes. However, in contrast to these prior findings (Baptista & Gradim, 2022; Domalewska, 2021; Molina-Cañabate & Magallón-Rosa, 2021), electoral debates were not key moments for the dissemination of falsehoods in the 2024 European Parliament elections. Interestingly, we found that the spread of false content goes beyond the end of the elections. The closing of the polls does not mark the end of electoral disinformation. This highlights the ongoing nature of this phenomenon, whose life cycle extends over time.

Second, in geographical terms, Southern Europe first, and Eastern Europe second, recorded the highest number of false content pieces during the campaign, with Spain and Poland emerging as the countries most affected by this problem. This may be due to the significant presence of extreme right-wing parties that use false information and conspiracy theories in their communication strategies (Garrido et al., 2021; Rachwol, 2023). Additionally, our results indicate that a different topic gained prominence in each country, demonstrating that the national context determines the preferred topics of electoral disinformation.

Our findings demonstrate that national contexts influence the characteristics of this phenomenon (Humprecht, 2019) and reveal significant territorial differences within the EU. Although electoral disinformation is a global problem, its geographic impact is uneven. Therefore, efforts and solutions to combat this phenomenon must combine a European perspective with approaches tailored to each national context.

A third relevant finding concerns the typology of electoral disinformation. Completely false and decontextualized content were predominant in the 2024 European Parliament elections. The notable presence of decontextualized and distorted messages aligns with findings from previous research in countries such as Colombia (Gutiérrez-Coba & Rodríguez-Pérez, 2023). Additionally, it is important to highlight that the presence of content created with AI during the campaign was minimal despite the growing

relevance of this technology nowadays. This might suggest that AI incorporation into electoral disinformation is, for now, underdeveloped and limited. Nevertheless, this could also indicate low current detection and verification capacity rather than low usage.

Fourth, regarding topics, two stand out: electoral integrity and migration. Regarding the first, false information about electoral procedures, such as dual voting and accusations of electoral fraud, were the main falsehoods. The prominence of this issue aligns with findings from previous research in countries such as the US, Spain, and Nigeria (Casero-Ripollés & Alonso-Muñoz, 2024; Domínguez-García et al., 2023; Enders et al., 2021; Kerry, 2021; Lewandowsky et al., 2023). The focus on electoral integrity reveals that one of the main objectives of disinformation was to discredit and delegitimize the elections and their mechanisms. In this regard, the dissemination of false content could be aligned with the promotion of anti-political and anti-democratic attitudes, making hoaxes about electoral integrity highly damaging and erosive to democratic health.

On the other hand, the prominence of migration in disinformation during the 2024 European Parliament elections supports the findings of previous research (Pierri et al., 2020; Rodríguez-Hidalgo et al., 2021) and may reflect the communication strategy of the far-right in different European countries (Mudde, 2024). These parties have promoted an anti-immigration discourse in recent years (Magallón-Rosa, 2021; Narváez-Llinares & Pérez-Rufí, 2022). Our data reveal that this campaign could go a step further in leveraging this topic, incorporating it into electoral disinformation to place it at the centre of public debate and potentially generating political benefits for the extreme right wing.

Our findings also help to identify additional characteristics of topics associated with electoral disinformation. One is the persistence of certain issues within this phenomenon. This is the case with Covid-19, which, despite being largely behind us, still held some significance in the 2024 European Parliament elections. This reveals that the thematic agenda of electoral disinformation includes issues capable of persisting over time. Another relevant finding is that, despite the criticisms of the European project promoted in recent years (Alonso-Muñoz & Casero-Ripollés, 2020), neither the EU nor its institutions were at the core of disinformation during this electoral campaign. A possible explanation could be that this type of content was more focused on pushing one of the main topics of the extremist agenda (migration) and discrediting electoral processes to weaken democracy (electoral integrity) rather than disparaging the EU itself.

A fifth set of findings concerns the platforms through which false information circulated during the electoral campaign. Our results reveal that weak-tie platforms, especially X and Facebook, dominate in the spread of hoaxes. Moreover, a wider variety of topics circulate through these channels. In contrast, strong-tie platforms, such as Telegram and WhatsApp, have limited influence on the spread and concentrate on fewer issues. Although these data challenge some previous studies that have shown a high volume of falsehoods circulating through these channels during electoral processes (Canavilhas et al., 2019), it is worth noting that our results may be influenced by the greater challenges in applying fact-checking in these environments. This may be a limitation in detecting falsehoods in these media, potentially leading to underrepresentation.

Despite the prominence of social media, our findings reveal that the spread of false information in election campaigns involves a wide variety of platforms. This supports the notion that disinformation also exists within a hybrid communication environment that combines old and new media (Chadwick, 2017). In this sense, our

results show that legacy media also contribute significantly to the spread of falsehoods. These cases involve misleading soundbites and statements from political actors who use these media strategically to misinform. Thus, legacy media become unintentional amplifiers of false content. Finally, we found that the distribution platforms of electoral hoaxes vary by topic. In other words, not all falsehoods circulate through the same channels, demonstrating the complexity of this phenomenon. The fact that major digital platforms are affected by disinformation suggests that the mechanisms implemented by major tech companies to curb this problem still have room for improvement.

This research has some limitations. First, our approach is descriptive, as it aims to provide an initial systematic and accurate analysis of electoral disinformation content, a topic that has been under-researched from a comparative perspective. Despite this limitation, this study provides a solid foundation for future research that delves deeper into this phenomenon. A second limitation relates to using information verified by independent fact-checkers as a proxy for determining which content constitutes electoral disinformation. We acknowledge that this may introduce biases in the sample based on the methods, resources, and working dynamics employed by fact-checking agencies. However, numerous previous studies have used this approach (Baptista & Gradim, 2022; Gutiérrez-Coba & Rodríguez-Pérez, 2023; Lava-Santos et al., 2023; Molina-Cañabate & Magallón-Rosa, 2021; Pedriza, 2021; Rojano et al., 2020; Rosa, 2019), demonstrating its relevance for scholars analyzing this topic.

Despite being a descriptive study, this research provides some relevant trends that help us understand the profiles of the disinformation phenomenon during a highly significant political event, such as the 2024 European Parliament elections. These results may be a hypothesis-generating way to foster new research on electoral disinformation. Moreover, they may have practical applications in designing public policies and actions aimed at more effectively combating this problem, which is highly detrimental to the health and future of democracy both in Europe and globally.

Conflict of Interests

The authors declare no conflict of interests.

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About the Authors

Andreu Casero-Ripollés is full professor of journalism at the Universitat Jaume I de Castelló (Spain). He has been dean of the Faculty of Humanities and Social Sciences and is president of the Spanish Society of Journalism (SEP). His research focuses on digital political communication and disinformation in Europe.

Laura Alonso-Muñoz is associate professor of journalism at the Universitat Jaume I of Castelló (Spain). Her studies have focused on the analysis of disinformation, the use of social media by political actors, citizens, and the media, and the study of the populist phenomenon in the digital environment.

Diana Moret-Soler is a predoctoral researcher at Universitat Jaume I of Castelló (Spain). Her research focuses on the intersection of politics, digital platforms, and society within the context of the climate movement.

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ARTICLE

Post-Truth Politics in Action? Representation of the Media in Spanish Radical Parties' Electoral Campaigns

Taru Haapala [1,2] 🔟 and Juan Roch [3] 🔟

[1] University of Jyväskylä, Finland
[2] Department of Political Science and International Relations, Universidad Autónoma de Madrid, Spain
[3] Department of Political Science, Universidad Nacional de Educación a Distancia, Madrid, Spain

Correspondence: Taru Haapala (taru.haapala@uam.es)

Abstract

Recent research on the EU's institutional response to post-truth politics has shown a gradual shift of focus from external threats to internal democratic challenges, including populist parties and elections. The case of Spain is particularly relevant as the country's "disinformation landscape" has been assessed as exhibiting "acute political and media polarisation" originating from weak media regulation and changes in political and media environments. Furthermore, the Spanish media landscape is characterised by high levels of media ownership concentration with a lack of transparency regarding media influence on governments and politicians. In this context, this article examines how Spanish left and right radical parties discursively constructed media elites for their political purposes and the (potential) evolution of their electoral campaign discourse in 2019 and 2024. We expect that the increasingly central role of the debate on digital regulation at the EU level and the context of post-truth politics more broadly serve as a new ground for radical parties with a populist discourse to delegitimise mainstream media. The primary sources of the study include the left-wing (Unidas Podemos/Sumar) and the right-wing (Vox) party leader campaign speeches and manifestos in national and EU elections in 2019 and 2024. Our findings show that, when it comes to European elections, the Spanish populist discourse has an increasing trend towards the inclusion of more transnational discourses on media and media elites, especially regarding disinformation and post-truth, although with significant differences between the left and the right.

Keywords

campaign speeches; European elections; media elites; populist discourses; post-truth politics; Spain

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1. Introduction

In recent years, the EU has taken a proactive role in its institutional response to post-truth politics. This is seen in the growing policymaking and regulation regarding disinformation, fake news, and political advertising, to name a few. However, as it is highlighted in this thematic issue's editorial (Tuñón Navarro et al., 2025), the regulation only represents a part of the EU's response, as political actors are also creating innovative ways of communication due to changing journalistic practices. Since the Covid-19 pandemic and the Russian unlawful invasion of Ukraine, policymakers, and the academic literature have become increasingly aware of the need to discuss how to protect democratic communication processes (Tuñón Navarro et al., 2019). It is in the context of the post-truth scenario and the assumed decline of democratic practices that the European Commission has started to create policies in defence of democracy (García-Guitián et al., 2024). In terms of policy focus, it has prompted a gradual shift of discursive framing from external to internal threats (Sampugnaro & Trenz, 2024). The assumed internal problems include the propagation of fake news, populist discourse, and new radical or populist political parties as likely challengers of "truth."

In this context, radical parties on the left and right have increasingly used a populist discourse that pits "people against the elites" and may mobilise a Manichean depiction of the political landscape (Mudde, 2004, 2021; Müller, 2016). Furthermore, the discourse operates with a multifaceted and changing representation of the elites, which are always negatively conceived but characterised differently depending on the left- or right-wing leaning of the political parties (see Roch, 2021; Roch & Cordero, 2024). Previous research has shown that radical left-wing parties focus mainly on economic elites, while radical right-wing parties confront primarily political and cultural elites (Gomez et al., 2015; Pirro et al., 2018). It still remains unexplored, however, *how* the populist discourse used by the left and the right may include media conglomerates as part of the elites and, more generally, how the media conceived as traditional media channels, as well as the internet and social media platforms (Voltmer & Sorensen, 2019), are undermined in the populist discourse by radical parties as a development of post-truth politics (Conrad, 2024).

This article offers insight into the populist "representation of the media" as discursive activity posed by the assumed conditions of post-truth politics that delegitimise mainstream media (Conrad, 2023; Egelhofer et al., 2021; Holtz-Bacha, 2021). It examines the populist discourse on the role of the media and media elites by Spanish radical right and left parties in the 2019 and 2024 European elections. Specifically, it aims to answer the research question: How do these parties discursively construct the role of the media and media elites, and in what ways has the Spanish populist discourse undermined the media as "elites" in the 2019 and 2024 EU elections? The intention here is not to make direct causal claims between EU policy-making on post-truth politics and the political activities of Spanish radical populist parties. Rather, this study aims to contribute to the existing literature on post-truth politics and populist discourse with an analysis of this empirical case study comparing the 2019 and the 2024 electoral campaigns related to the role of the media and radical parties with populist discourses in a national context.

Through this Spanish case study, we examine how the radical parties discursively construct the assumed role of media elites and the representation of "the media" in two consecutive EU elections as well as its relationship with post-truth politics. In Spain, the mainstream media outlets have undergone more concentrated ownership and have been criticised for party political interference. According to a recent study, the "disinformation landscape" in the country shows "acute political and media polarisation"

(Romero Vicente, 2023, p. 3), which originates from weak media regulation as well as changes in political and media environments.

The empirical focus of this study is on the discursive framing of traditional media and digital media, including newspapers, TV, radio, and social media. The corpus is based on Spanish radical left and right party leaders' campaign speeches and party manifestos during the 2019 and 2024 European elections. Exploring campaign speeches is a way to capture direct political communication between the populists and their supporters. While social media can be viewed as another form of direct communication between politicians and citizens, some studies suggest that the political discourse in electoral speeches provides a more detailed picture of populist communication (e.g., Sorensen, 2021) with the "people" confronted by several types of "elites." We include the party manifestos in our corpus in order to explore a more formal genre in the analysis defining the positions and discourses of populist parties regarding the "discursive construction of discontent" (Schmidt, 2022), which is also valuable for this study.

This article first discusses the theoretical framework of post-truth politics and the role of populism in delegitimising the media before briefly explaining why Spain is a relevant case study. Next, we discuss the methods and data used for the analysis; then, we present the findings of the study; and, finally, we end with a discussion and concluding remarks.

2. Theoretical Framework: Post-Truth Politics, Populism, and Delegitimation of the Media

Within the past decade, post-truth politics has become a major field of study for understanding the erosion of fact-based liberal democratic politics. It is, for example, understood in terms of distrust and uncertainty when it comes to truth claims (Harsin, 2018) in a hybridised media climate that sees a constant epistemic struggle over political discourse (Galpin & Vernon, 2024). This is manifested in the normalisation in Western democracies of accusations of "fake news" and "disinformation" (Monsees, 2023).

The concept of post-truth politics itself remains contested (Hannon, 2023; Hyvönen, 2018). The ongoing scholarly debate about the related transformations on entering the "post-truth era" (d'Ancona, 2017), marked by "indifference" to facts and truth (Conrad & Hálfdanarson, 2023, p. 2), also includes those who do not fully agree with the diagnosis, focusing more on the *claims* about post-truth and how they shape public discourses on politics (Chambers, 2021; Christensen, 2022; Hannon, 2023). There is, however, general agreement on the epistemological challenges posed by what is commonly called "post-truth."

Furthermore, post-truth politics comprises several "interlinked phenomena" (Conrad & Hálfdanarson, 2023, p. 3), such as the decline of trust in experts (Harsin, 2018), democratic institutions (Cosentino, 2020), and news media (Michailidou & Trenz, 2021), which can be seen in various manifestations such as online rumours, conspiracy theories, and internet hoaxes. Cosentino (2020, p. 8) has pointed out that the ongoing "epistemic crisis" affects several political contexts globally and is not only caused by social media platforms but stems from a more general distrust of Western media and political institutions. This climate of distrust is favouring, in particular, the populist discourse.

In our case study, we focus on the populist discourse of Spanish radical parties and how it undermines trust in the media. For gaining a deeper understanding of the mechanisms of the populist discourse within the

framework of the changes in independent and pluralist media and political environments, it is useful to empirically investigate the discursive articulations of "truth" and "freedom" of the populist discourse, as well as the overall representation and definition of the media as "untrustworthy," or even outright "illegitimate."

As previous literature has confirmed, "post-truth politics" can be observed in populist accusations that the mainstream media is a generator of disinformation (Conrad, 2023, 2024; Egelhofer et al., 2022). Examining the effects of the populists' frames of "fake news," Egelhofer et al. (2022, p. 627) found that they are used with impunity to undermine journalists, suggesting that politicians' accusations of disinformation have become normalised, which also supports the earlier findings that show growing public tolerance for "fake news" claims in politics (see Higgins, 2016). This is particularly the case of the radical right across the board in Western Europe. Providing a comparative view, Holt and Haller (2017) investigated accusations of how the right-wing PEGIDA movement in Germany criticised the assumed "lying press" on Facebook pages in Germany, Austria, and Norway, and their results showed two modes of contestation: affirmative allegations of "liar" state-owned media and opposing alternatives for mainstream media.

Recently, Conrad (2024) has employed the concept of "post-truth populism" to illustrate how the populist discourse is intrinsically related to post-truth phenomena, namely, how the populist discourse is *delegitimising*, not merely criticising or contesting, mainstream media. The undermining of trust in the media is deeply affecting the integrity of quality journalism. In populist discourse, professional journalists are framed as "part of a corrupt liberal elite" that disguises and fails to report the "truth" (Conrad & Hálfdanarson, 2023, p. 3). Recent developments even include assaults, both physical and verbal, especially from elements of the radical right, against public service media (Conrad, 2024; Holtz-Bacha, 2021). Conrad's (2024, p. 167) finding is that populist discourse has a hypocritical element of "giving voice" to an allegedly marginalised group, while it actively is "imposing a singular version of truth."

From a political communication perspective, populist claim-making can be viewed as the "performance of populist ideology," forming part of a populist communicative process (Sorensen, 2021, p. 40). Populist ideology is highly dependent on communication with "the people." "Populistic truth" hinges on representations of citizen discontent that build upon binary relationships, such as the "elites" vs. the "people." Depending on the various national contexts, the populistic performance of anti-elitism can mark as their target, for example, the "lying media" (Sorensen, 2021, p. 42). More importantly, the performative side of the populist discourse is further accentuated in the transforming political and media environments. The changes, including the proliferation of alternative media outlets and the growing role of social media, are connected to the mediatisation of politics. The transformations in media have created increasing pressure for politicians to adopt "mediatised discourse," which has become the accepted way for them to communicate with citizens (Mazzoleni, 2014, p. 43). The mediatisation of politics, thus, affects political speeches by favouring populistic simplifications for publicity.

The following analysis is a contribution to the post-truth politics literature on populist discourse shaping distrust towards media "elites." Here, we loosely employ Christensen's (2022, p. 95) definition of "post-truth politics" which, rather than framing it in terms of an "era" as such, refers to it as a "reconfiguration of institutional relationships and cultural patterns" that are challenging and shaping the "boundaries of political engagement and democracy." This relational approach takes into consideration the international impact of "political truth-making" practices (Christensen, 2022, p. 92), which is useful for making sense of the populist

discourses in our Spanish case study in the EU post-truth politics response context. In other words, we seek to show the discursive constructions of truth claims by the radical parties in relation to their communicative processes, focusing on the delegitimation efforts of the media in EU election campaigns.

It is clear that the assumed vision of post-truth politics has become the main discursive framework for EU regulation to protect democracy, imposing media sanctions and affecting populist party politics at the domestic level (Sampugnaro & Trenz, 2024, p. 91). At the regulatory level, these threats are being reframed to legitimise new policies (García-Guitián et al., 2024). In this sense, we expect that the increasingly central role of the debate on EU regulation related to post-truth phenomena may have impacted the political landscape in Spain, in particular, the discursive articulations and frames mobilised by Spanish radical left and right parties about the media. Furthermore, we expect the campaigns of the 2019 and 2024 EU elections to reflect the highly partisan and polarised political and media environment, as radical parties with populist discourse hold a central role in national politics.

3. Spain as a Case Study

The case of Spain is relevant for this study as the country's "disinformation landscape" has been assessed as exhibiting "acute political and media polarisation" (Romero Vicente, 2023, p. 3), which originates from weak media regulation as well as profound changes in political and media environments since 2011. Increasingly, the Spanish media landscape is characterised by high levels of media ownership concentration with a lack of transparency regarding media influence on governments and politicians (Reporters Without Borders, 2023). Even before, the old "informational ecosystem" was exhibiting signs of polarised political debate, which has since been expanded to digital media outlets with amplified intensity (Badillo-Matos et al., 2023, p. 81). The newly established populist parties on opposite sides of the political spectrum, namely Vox and Podemos, have brought with them the unexpected emergence of party-affiliated media. In a situation of weak regulation, where anyone can claim to be a journalist if supported by a communication outlet, increasing clashes between politicians and media are taking place. It was reported that the "de-escalation of the conflict over the Catalan independence issue, which had triggered a great deal of violence against journalists by protesters and police, has drastically reduced attacks" (Reporters Without Borders, 2023). However, an increasing number of journalists are being harassed on social media platforms, including by far-right and far-left politicians and trolls.

Based on comparative research of media systems (Bücher et al., 2016), showing largely the same case groupings as Hallin and Mancini's (2004) polarised–pluralist and democratic–corporatist models in Western European democracies, we know that the Spanish media system can be defined as a combination of a "noninclusive press market" and "low journalistic professionalism" which is labelled as "weak press" (Bücher et al., 2016, pp. 218–219). This literature categorises the country's media system as "polarised–pluralist," corresponding to other Southern European countries, such as Italy and Greece, highlighting strong "political parallelism" and high press subsidies (Bücher et al., 2016, p. 220). These features make Spain an ideal setting to explore how radical parties from both the left and right use media criticism as a tool for delegitimising mainstream media in the post-truth context. The relevance of Spain is further underscored by its increasingly central position within the EU, where ongoing debates about digital regulation, such as the Digital Services Act and the Digital Markets Act, are influencing how disinformation is framed and regulated across member states. As such, Spain is a critical case to examine how radical parties challenge the media in

the post-truth context, offering insights that can be applied to other EU member states with similar media system dynamics.

The transformations and increasing importance of Spanish radical parties in national politics since 2019 indicate their relevance in the formation of the national political agenda and political discourse. Hence, it is crucial to focus on the Spanish radical left (Podemos, Sumar) and radical right (Vox) parties, and how they discursively frame media and media elites in their electoral campaign agendas in the 2019 and 2024 EU elections. Podemos (since 2023 with Sumar) and Vox both emerged from previous political crises in Spain. The austerity measures enforced by the centre-left-wing Spanish government during the Eurozone crisis in 2009 led to a major economic downturn in the country. With it, a chain of events paved the way for the proliferation of radical parties, first active in the regions and then nationally. In 2017, the Catalan nationalists organised a unilateral independence referendum, affecting the rise of the radical-right party Vox, and led to its electoral success in the following years. The more recent Covid-19 pandemic crisis in Spain saw some elements of the previous crises (Plaza-Colodro & Miranda Olivares, 2022), as political polarisation and partisan politics became further amplified. During the pandemic, Spanish politics were dominated by the responses of "populist" parties to national government measures and a polarisation of ideological positions (e.g., Magre et al., 2021). A recent study has also shown that the pandemic recovery saw the employment of politicising strategies by right-wing opposition parties (Haapala, 2024).

By 2019, both Podemos and Vox had established their presence in regional and national parliaments. Since its founding, Podemos has evolved, and its complex internal dynamics have resulted in the emergence of divergent strategies within the party (Mazzolini & Borriello, 2022). While its leader Pablo Iglesias advocated a strategic partnership with Izquierda Unida (the United Left; of which the Communist Party is an important part), reflecting a more traditional leftist approach, its leader Íñigo Errejón emphasised a clearer populist strategy prioritising broad appeal and outreach to a wider segment of the electorate (Rico Motos & Del Palacio Martín, 2023). Although this ideological rift eventually culminated in Errejón leaving the party, Podemos never abandoned populist rhetoric and is still considered a populist party in most of the literature (Mazzolini & Borriello, 2022; Roch, 2024). Sumar is a left-wing coalition of parties created for the July 2023 national election and encompasses, among others: Movimiento Sumar, Podemos, Izquierda Unida, Más País/Más Madrid, Compromís, Catalunya en Comú, Chunta Aragonesista, and Més. Podemos had only five MPs in the overall 31 of the Sumar coalition. For the 2024 European elections, Sumar and Podemos ran separately. To date, there has been no systematic and definitive analysis of the populist discourse of Sumar due to its recent appearance. In the case of Vox, there is a lack of consensus regarding its classification as a populist party. While much of the literature identifies it as right-wing populist (Rama et al., 2021; Zanotti & Turnbull-Dugarte, 2022), the nationalist and conservative elements often take precedence over its populist characteristics (Marcos-Marne et al., 2024). Due to this ongoing debate on the categorisation of these parties as "populist," we prefer to refer to left- and right-wing radical parties using contingently the populist discourse, in accordance with recent approaches (Roch & Cordero, 2024).

Vox and Podemos both had candidates in general elections and European elections in 2019. Sumar, a newly formed radical-left party that had allied with Podemos in the snap general election in July 2023, subsequently joined a new minority coalition government with the main governing party, centre-left Socialist Workers' party (PSOE), presented separate candidates to Podemos in the 2024 European elections. The main reason for the previous merger of the two parties had been to unite the radical left-wing against the radical right. In the

municipal and regional elections held on 28 May 2023, Podemos lost regional government positions. Vox, for its part, had gained traction with the victory of the centre-right People's Party (PP) and joined, for the first time, several regional governments.

4. Methods and Data

As said, this article analyses discursive articulations about the media by Spanish radical left and right parties, aiming to shed light on the role of populist discourse to delegitimise the media in post-truth politics context. Using a text-as-data methodological approach, we integrate both quantitative and qualitative techniques to explore a comprehensive textual corpus. This corpus includes party manifestos and speeches by key leaders of Vox (radical right), Podemos, and Sumar (radical left) during the European election campaigns of 2019 and 2024 (see Table 1). Party campaign speeches are especially relevant for this analysis as they exemplify the direct communication between party leaders (representatives) and their audiences (citizens and potential voters), offering unique insights into the articulatory power of populist discourse. To complement this, we incorporate manifestos, a more formal genre, offering insights on party positions and discourses. The speeches collected correspond to the parties' primary representatives, considering their role in the party executive and their position as election candidates. As detailed in Table 1, the corpus comprises 93 campaign speeches and five election manifestos, forming the basis for a nuanced exploration of populist engagement with media narratives across the political spectrum. We collected all manifestos published by the three parties for the 2019 and 2024 European elections. For campaign speeches, our selection followed specific criteria: First, we focused exclusively on speeches delivered during election campaign events; second, these events had to occur within a window of one and a half months before or after election day; and third, the speakers were required to be election candidates or party executive leaders.

As a preliminary exploratory step, we conducted a qualitative analysis of the textual corpus to identify key terms used by the parties to refer to the media, encompassing both traditional and digital platforms. We specifically selected words that unambiguously pertain to the media landscape or various forms of communication media: *medios de comunicación* (media), *prensa* (press), *redes sociales* (social media), *televisión* (TV), and radio. Using these keywords, we performed a keyword-in-context analysis. Rooted in the text-as-data tradition, keyword-in-context is a textual analysis technique designed to examine how specific words or phrases are contextualised within a broader corpus. Keyword-in-context aims to capture the keyword along with a snippet of the surrounding text to provide insight into how the keyword is used in context. Thus, we identify all textual segments surrounding the keywords, specifically 10 words to the left

Table 1. Manifestos, campaign speeches, and periods of analysis.

	Vox	Podemos	Sumar
2019 European elections	• 10 campaign speeches • 1 election manifesto (6 April–26 May 2019)	• 11 campaign speeches • 1 election manifesto (23 March–26 May 2019)	—
2024 European elections	• 27 campaign speeches • 1 election manifesto (24 May–7 June 2024)	• 24 campaign speeches • 1 election manifesto (23 May–7 June 2024)	• 21 campaign speeches • 1 election manifesto (17 May–7 June 2024)

and 10 to the right from the keyword in the text, to have a broader textual context surrounding the selected keywords (see Gabrielatos & Baker, 2008, p. 11). After extracting these text snippets, we calculated the primary collocates associated with the keywords of interest for this study.

Collocation analysis is a technique of corpus linguistics to identify all words co-occurring significantly with the keywords and serves to capture one of the main forms used to generate patterns of signification (Baker, 2006; Baker & McEnery, 2015; Fairclough, 2003, p. 131). All collocates were extracted using the R programming language to analyse the textual corpus. Pre-processing steps and collocate computations were performed with the Quanteda package (Benoit et al., 2018), supplemented by additional R packages required for the calculations.

Collocates serve as valuable indicators offering initial insights into how an actor attributes meaning to a specific word, idea, or phenomenon. For example, the term "social media" can be framed either negatively or positively, depending on the collocates surrounding it. Additionally, it can acquire meaning through associations with broader economic, political, or cultural processes and phenomena. While collocates provide valuable initial indicators, a qualitative exploration of their context is necessary to deepen the analysis. This approach serves as a practical method for navigating the textual corpus, guiding the identification of nodal points and key meaning-makers related to the concept and phenomenon of "the media."

Thus, primary collocates function as entry points into the textual corpus facilitating a subsequent qualitative exploration. In this approach, quantitative and qualitative techniques are not adversaries but complementary tools that together enhance the analytical process of revealing critical constructions of the media by radical parties. While the core task remains the qualitative exploration of the text, the initial collocation analysis brings structure and focus to this process. Without this step, the analysis would likely be more fragmented and less capable of identifying key nodal points of signification. By prioritising the most relevant collocates, the qualitative exploration searches for the most relevant meaning constellations within the corpus. This focused approach is far more efficient and systematic than hand-coding which, even in the best scenarios, would be an excessively time-intensive undertaking.

In the second step of qualitative discourse analysis, we examine the problematisations in which media institutions, media elites, or media events are embedded (see Keller et al., 2018; Schünemann, 2018). This approach allows us to capture the specific discursive articulations employed by political parties to conceptualise the media, identify key causal events and conflicts associated with it, and analyse the actors involved in the context of post-truth politics. The qualitative discourse analysis has two primary objectives. First, we aim to uncover how the media are integrated into broader chains of significance, linking them to economic, political, or cultural processes, and assess whether these connections are framed positively or negatively. Within these causal chains, we also seek to identify the key actors and explore the extent to which they align with populist discourses that construct antagonisms between "the people" and "the elites" aiming to delegitimise the media. Second, we aim to compare these signification processes across the 2019 and 2024 elections, paying particular attention to the evolving role of populist discourse in framing and delegitimising the media.

This allows us to disentangle the different meanings given to the media by these parties and how the meaning constellations around media elites have evolved from the 2019 to 2024 European elections, in

order to discuss them in the broader context of the EU post-truth politics response through increasing regulation. This methodological strategy and case selection is not without its limitations. Although we concentrate on two relevant communication genres (speeches and manifestos), they do not exhaust the heterogeneity of communication tools used by radical parties, especially if we consider the expansion of social media. However, we assume that the approach is reasonably capable of capturing the main frames and discourses utilised by radical parties to delegitimise the media in the context of post-truth politics.

5. Results

5.1. First Period: The 2019 European Elections

In 2019, the radical right party Vox entered the parliamentary institutions, both at the European and national level. While Vox was on the rise, Podemos, the radical left contender, was using a defensive strategy. As can be seen in Figure 1, these two parties exhibited different framing strategies towards the media and media elites. Both parties, however, adopted a critical stance toward the media, associating it with political and economic elites. In the case of Vox, the media were framed in particularly negative terms and closely linked to the left-wing cultural and political class. For Vox, the two most important collocates were "offices" (*despachos*) and "progressives" (*progres*). The latter term is used pejoratively by Vox to refer to left-wing actors, particularly leftist politicians and cultural elites—similar to how Javier Milei in Argentina refers to *zurdos* (leftists). Vox even employs the expression "*progre* dictatorship" to underscore their claim that leftist elites dominate the media and aim to demonise the party: "The '*progre* dictatorship,' which is now dominating the media and is in the government of Spain, is only the vanguard and we can already glimpse where they want to take us with the demonisation of the media against Vox." (VOX España, 2019a)

The collocate *despachos* (offices) serves to portray more precisely how the leftist elites negotiate (at their offices) with the media owners: "Those who are in the progressive [*progres*] offices of the media, those multimillionaires who distort the truth and who only have one goal, which is to prevent the awakening of the living Spain [*la España viva*]" (VOX España, 2019b).
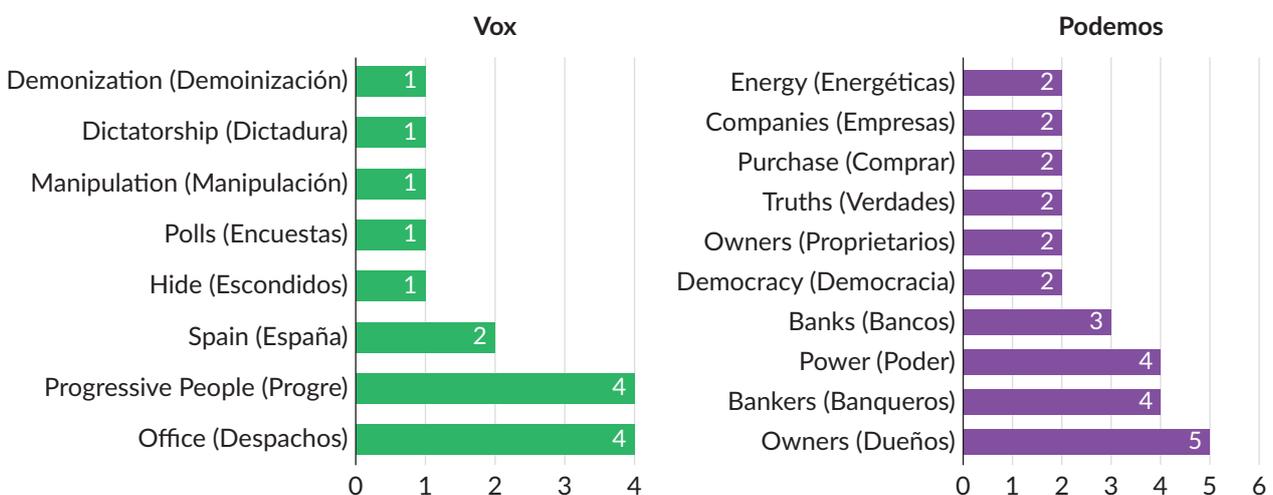

Figure 1. Main collocates of Vox (on the left side) and Podemos (on the right) for the 2019 European elections.

The other collocates were used by Vox to reinforce this representation of the media conglomerates controlled by the left. "Spain" was depicted in opposition to a coalition of media and left-wing elites. This alleged manipulation and control by the media extended to the "polls" which, according to Vox, were designed to influence Spaniards' voting behaviour. It is also pertinent to note that Vox's discourse concentrates on the traditional media, having no specific references to social media and digital media more broadly in the 2019 election campaign.

The radical left party Podemos also attacked the media but using a different discursive strategy. Podemos explicitly targeted media owners, emphasising the connections between media ownership and economic elites. In line with previous studies on populism and radical parties, Podemos seems to politicise more markedly economic issues related to the media, while Vox focuses rather on cultural issues (see Pirro et al., 2018; Roch, 2021):

> Our democracy is a limited democracy. The owners of the private media have more power than any Member of Parliament, maybe they will make us feel it in interviews during this campaign, but somebody has to tell the truth, the bloody truth. (Podemos, 2019a)

Indeed, the most important collocate in the Podemos textual corpus, *dueños* (owners), serves to indicate property relations, and the two following collocates in importance are mobilised to accuse "bankers" of using their "power" to manipulate information in the media. According to Podemos, these are economic relations that also involve political power since they have implications for the quality of liberal democracy. Less important collocates such as "purchase," "energy," or "companies" are used by Podemos to reinforce this same representation of the media emphasising its interconnections with a fraction of the political class and economic elites such as energy sector businessmen: "It is a scandal that there are bankers who can buy political parties and media and shameful that there are energy companies that can buy political representatives by recruiting former ministers and former presidents" (Podemos, 2019b).

5.2. Second Period: The 2024 European Elections

For the June 2024 European elections, the Spanish radical left ran separately, with Podemos on the one hand and the new left coalition party, Sumar, on the other, running on its own. Vox remained as the main radical right alternative to the centre-right PP and, although it was united as a party, there were also new fringe parties competing for the support of radical right voters in these elections. Thus, it was a more fragmented scenario in comparison to the 2019 European elections. It is noteworthy that, in the run up to the 2024 elections, the European political landscape was increasingly shaped by the centrality of disinformation and fake news in public debates and regulatory efforts, reflecting broader challenges to European liberal democracies.

In the case of Vox, there were significant changes in the framing of the media and the main problems of the politics of media communication (see Figure 2). The main collocates were oriented to confront the centre-right PP and to emphasise the threat to one of the main concepts mobilised by the radical right party: "freedom." This was then applied to confronting the media. Vox argued that media freedom was under threat, portraying it as one of the main challenges: "They have passed a European media law which means destroying media freedom and press freedom in Europe, they have passed a digital media law, a digital services law" (VOX España, 2024a). In Spain, the "old parties" and "systemic parties" (VOX España, 2024b), were portrayed as the
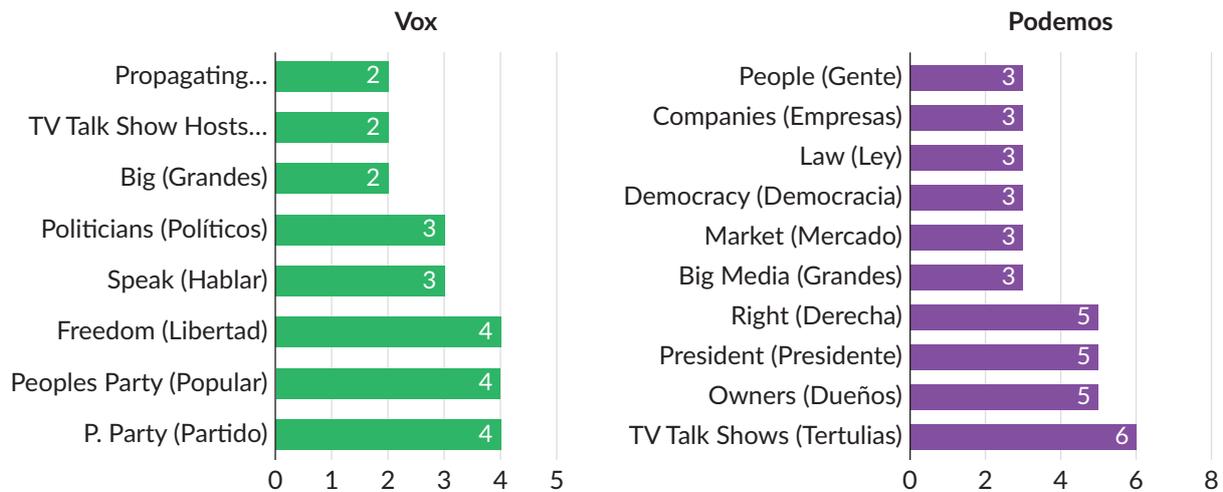
Figure 2. Main collocates of Vox (on the left) and Podemos (on the right) for the 2024 European Elections.

actors supporting policies that endanger media freedom and press freedom. In particular, Vox attacked the conservative PP:

> We denounce the People's Party, we denounce what they are doing, because I criticise them in the tribune of the Congress, and then the People's Party and their media, and their talk show hosts, and their reporters start to say: there is a clamp between Vox and the PSOE. Between Vox and the PSOE? Really? I mean, have they not listened? Have they not listened to what we think of his majesty Sánchez? (VOX España, 2024c)

"Connivence" between Spanish politicians and the media is emphasised by Vox, similarly to the previous period before the 2019 European elections. However, in the 2024 European elections, Vox suggests more clearly the connections between the EU, national mainstream parties, and the media. The issue is no longer just the "*progre* dictatorship" at the national level, but rather a coalition of interests tied to the EU, its policies, and the large-scale media serving those interests: "These media have been disseminating and promoting the 2030 Agenda for years. The 2030 Agenda continues to be disseminated and promoted by the IBEX companies, Big Banking, because apparently, they seem to be very nice words" (VOX España, 2024d). Vox portrays political elites in Brussels as those controlling the media and seeking to manipulate and ignore the "real" problems and concerns of the Spanish people:

> The mainstream media do not talk about the European elections. What do they want? What they want is for you to stay at home on June 9 and for them to continue with their grand coalition in Brussels, doing whatever they want, voting against the Spanish people and without any of the Spanish people finding out about it. (VOX España, 2024d)

In the case of Podemos, there are some continuities in comparison to the 2019 campaign, although we have also found significant changes. The radical left party still identifies property relations as one of the central problems of the media and relates this to the decay of democratic politics. The collocates "owners," "big media," and "democracy" serve to mobilise this representation of the media. However, new collocates emerge that introduce novel meanings in Podemos' discourse. As shown in Figure 2, these include "President" and "right."

The latter is used by Podemos to refer to specific forms of disinformation associated with the far right. One of the crucial problems identified by this party during this period is the propagation of disinformation and fake news by the far right, facilitated by sympathetic journalists and platforms:

> The extreme right is stopped by guaranteeing rights, the extreme right is stopped by preventing them from spreading their hatred, their lies through the media, the extreme right is confronted by pointing out the corrupt journalists who lie to the people every day from their platforms. (Podemos, 2024a)

Podemos pressures Prime Minister Pedro Sánchez (PSOE) to take strong action against media actors aligned with economic elites and the far right. The collocate "President" serves to appeal directly to Pedro Sánchez, asking for a proactive response to these threats:

> One question, President, what is it? Which ones? You have a lot of power, give it a name and a surname. Who are the presenters of these talk shows? What are their names? What does the judicial and media war mean to you? Something that affects the quality of Spanish democracy? Something that should push the government to ensure democracy in the media that act in a mafia-like and corrupt way with public licences? Something that should stop the elites of a judiciary that works politically for the right? (Podemos, 2024b)

Moreover, Podemos argues that the media operates as a "demand market" (Podemos, 2024c) in which politics and democracy become commodities. This urgent situation "should push the government to ensure democracy in the media that act in a mafia-like and corrupt manner" (Podemos, 2024b). Podemos focuses especially on the left-wing coalition government during the election campaign. This makes sense since, after the July 2023 snap general election, Podemos was excluded from the five ministers of the coalition government, broke up with Sumar, and campaigned alone for the 2024 European elections. In this context, Podemos tends to emphasise the inadequate measures by the left coalition to face the challenges of media disinformation and the far right. In a classical antagonistic divide of the populist discourse, Podemos represents the people (*la gente*) as opposed to the complex entanglement of the media, economic elites, and the far right:

> And for once again demonstrating that this political organisation is made with the hands, with the efforts of a lot of humble people who never appear on television, but who are the heart of this project. So, thank you very much and the loudest applause is really for you, comrades. (Podemos, 2024d)

Finally, the new left-wing coalition party Sumar devoted much less attention to the issue of media, media conglomerates, and disinformation. There were only four significant collocates (see Figure 3) for the overall corpus in relation to our keywords representing media, television, radio, and social media. Interestingly, Sumar did not focus on issues of media ownership, nor did it strongly criticise the media or media elites in relation to economic elites. Perhaps due to its participation in the national government coalition, Sumar's media discourse was much softer compared to that of Podemos.

Like Vox, Sumar focused especially on the idea of "freedom," but with clearly different connotations. In this case, the problem of freedom in the media is framed as a problem caused by the far right and the mainstream right. Sumar asks if the model of Feijóo (who is the national leader of the PP in Spain) and Ursula Von der Leyen is similar to Giorgia Meloni's attempts to control television and radio in Italy:
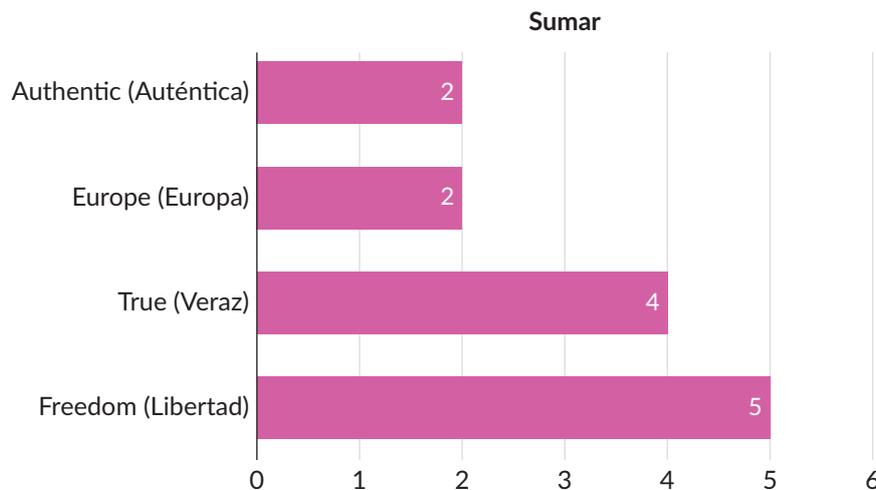
Sumar

Figure 3. Main collocates of Sumar for the 2024 European Elections.

> Is it or is it not acceptable to persecute freedom of the press and try to control the RTV as Mrs. Meloni has done? That is the model Feijóo and Von der Leyen are betting on, and we are not going to allow it in this election campaign. (Sumar, 2024a)

This is a position similar to that of Podemos, which consists of attacking the far right and mainstream right by linking them to the problems associated with media and democracy. However, the overall discourse of Sumar is not comparable to the strong confrontation proposed by Podemos. Most of Sumar's relevant statements contain neutral references to the media. They argue that the quality and exhaustiveness of the information in the media and social media can be improved by also expanding coverage of EU issues:

> We follow regional and national politics many times through the media or also through social networks, but what comes from Europe, from Brussels and Strasbourg, everything that reaches us many times is only echoes. However, I consider that there is a total connection between what happens in European institutions and what happens in our daily lives. (Sumar, 2024b)

In terms of the relationship between media and democracy, Sumar's position is more vague than that of Podemos. This relation between democracy, media, and disinformation is marginal in the overall representation of the media, and when Sumar refers to these topics, it makes general claims about democracy without identifying specific or concrete problems or positioning about policy orientations or EU regulations: "We want more democracy and, by the way, we want much more freedom of a truthful press. We want the freedom of a truthful, authentic and free press" (Sumar, 2024a).

6. Discussion and Conclusions

The results illustrate that the media and media elites were discursively framed by Spanish radical parties in their populist discourses with increasing attention paid to fake news and disinformation when comparing the 2019 and the 2024 European election campaigns. This finding confirms that the populist discourse exhibited by radical parties is a relevant object of study in the context of EU policymaking on post-truth phenomena with a shift to "internal" issues (cf. Sampugnaro & Trenz, 2024). However, while EU regulation on disinformation

does not directly constrain the populist discourse, it serves as a major background context for understanding the evolving framing strategy of radical parties, turning from a nationally defined debate to a discourse with transnational dimensions on disinformation. This context forces radical parties to take a more specific position on EU regulation and institutions that continues to hinge on the critique of the elites, as was seen in the case of Podemos and Vox, while adopting a pro-EU response and a lack of explicit anti-elitism in the case of Sumar. There are, however, substantial differences in the populist discourse regarding the media exhibited by these parties with distinct normative implications.

This article aimed to examine whether the populist discourse of Spanish radical parties would show signs of post-truth politics, especially as an effort, as recent research has shown in the case of the radical right in particular, to undermine and, ultimately, delegitimise the mainstream media (e.g., Conrad, 2023, 2024; Egelhofer et al., 2022). We loosely applied Christensen's (2022, p. 95) definition of post-truth politics, which refers to a "reconfiguration of institutional relationships and cultural patterns" that are challenging and shaping the "boundaries of political engagement and democracy." This relational approach focusing on the international impact of "political truth-making" practices was particularly useful in the context of the EU response to disinformation, in which populist claims about "truth" can have transnational relevance. Our findings indicate that the Spanish radical parties reshaped their populist discourse regarding the media in the run-up to the 2024 EU elections, indicating a transnational influence of the pre-electoral warnings by the EU institutions of the rise of radical right and electoral disinformation.

Furthermore, we showed that truth-claiming, especially by the radical right, corresponds to the interpretation of post-truth populists by Conrad and Hálfdanarson (2023), who argued that it relates to assertions of freedom of expression. The radical right party Vox discursively framed the media as controlled by leftist elites and contrary to the interests of "Spain" in the 2019 European elections. The mainstream political parties were said to conspire with the media, and thus, all of them were framed as untrustworthy. The radical right party portrayed the political and media elite as conniving and "distorting the truth." This term was applied to make a point about the assumed problem around media elites, to alert voters about the supposed collusion of political and media elites who try to prevent them from seeing "the truth" of the situation and threats to the Spanish nation. This discursive strategy of representing "the truth" on behalf of their voters corresponds to the radical right discourse in other countries, such as Germany (cf. Conrad, 2024). This was to be expected in light of what we already know about right-wing parties' populist strategies in Western Europe (see, e.g., Gomez et al., 2015; Pirro et al., 2018). Regarding the radical left, Podemos argued that the media is run by market entrepreneurs and economic elites. This party pointed more directly to the private funding and ownership issues related to the media. According to Podemos, it was the only one telling "the truth" to the Spanish public about the real relationship between the privately owned media and powerless parliamentarians in the 2019 EU elections, namely that the private investors ran the media and had politicians on their payroll.

In the run-up to the 2024 elections, European institutions and politicians warned about the threat of the far right and the disinformation spread in social media. The results showed references to the European pre-electoral debates in the populist discourse of Podemos and Vox in their portrayals of media representation, with only marginal references by Sumar. Vox focused on "media freedom," with the main threat being the enforcement of EU regulations, especially the Digital Services Act. At the domestic level, the radical right accused the conservative mainstream PP of supporting the passing of EU regulations on disinformation. In the 2024 election context, it should be noted that the Spanish radical right was attempting

to discursively distance itself from PP, who had also started to actively employ the rhetoric of freedom, especially since the regional president of the autonomous community of Madrid had successfully used it in recent elections (see Haapala, 2024). The claim was that the PP owned the media, which were part of the Brussels elite, who did not want to tell "the truth" about what was being decided on "against the Spanish people." This general and diffuse attack on the media undermines its very basic role as a legitimate intermediary actor to determine what is relevant, unimportant, or "fake" regarding the public interest. In other words, Vox party's discursive strategy about the media seeks to spread a generalised distrust of the media's role in democratic societies. From an international perspective, this strategy shows nothing new in terms of the developments of radical right populist discourse. While the radical right populist discourse in Western Europe has moved from merely confronting the media as the "lying press" (Holt & Haller, 2017) to accusations of "disinformation" (Egelhofer et al., 2021) and "fake news" of the mainstream media (Monsees, 2023), the same pattern can be confirmed in our analysis of the Spanish case.

Podemos used their populist discourse of deception but in a different way. In 2024, the focus on private ownership of the media addressed the social media presence of the radical right in the pre-electoral campaigns. The radical left confronted the privately owned, radical right media elites: "The corrupt journalists who lie to the people" (Podemos, 2024a). The party argued that the Spanish left coalition government's measures, in which it had no ministerial positions, were inadequate to face the challenges of media disinformation and the far right. This economic critique of the media implies a normative evaluation of the extent to which capital and economic interests more broadly may undermine the role of the media as intermediaries. What was specific to this radical left populist strategy was the direct appeal to the mainstream left-wing government led by Prime Minister Pedro Sánchez. In contrast to the radical right, it confronted the assumed "media war" with "mafia-like" media addressing the national government.

Podemos' critique of the media seeks to promote a more pluralistic and democratic media system capable of eliminating or reducing the intervention of big corporations and economic interests in media structure and communication. While the radical left party was calling out a "lying press," it did not seek to undermine voters' trust in mainstream, public service media. Sumar's discourse was framed by its newly acquired coalition government position and the right-wing parties' insistence on the term "freedom" as it tried to influence its reinterpretation. The European context was inferred by comparisons of the leadership of the PP with Von der Leyen and Meloni. Also, the party's confrontation with media elites was reduced to mere demands for "freedom of a truthful, authentic and free press" (Sumar, 2024a).

In sum, the results show that there is a distinct difference between left and right radical parties in confronting the media elites in the context of post-truth politics. It is in relation to the representations of the mainstream media that we find the radical right delegitimising the media, claiming that they are not telling the "truth," while the radical left presents its legitimate critique about "corrupt press" in a more pluralistic way, challenging the governing mainstream left-wing party to solve the problems. As shown, the populist discourse and different depictions of the elites and media elites by the left and right have particular normative implications for the critique and restructuration of the media. This research has shown how the repositioning of these parties in EU election campaigns implies the increasing centrality of social media and fake news, and the use of populist tropes in this arena, excluding Sumar, which avoids the topic. Further comparative research will be needed to explore the reactions of other radical parties in different European countries, to identify the extent to which national factors may intervene in the way in which these parties represent the media and media elites.

Conflict of Interests

The authors declare no conflict of interests.

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About the Authors

Taru Haapala holds the title of docent (adjunct professor) in political science at the University of Jyväskylä, Finland. Currently, she is a Tomás y Valiente senior researcher at the Department of Political Science and International Relations, Universidad Autónoma de Madrid, Spain, affiliated with the Madrid Institute for Advanced Study.

Juan Roch is an assistant professor of political science at National University of Distance Education (UNED), Madrid, Spain. He is author of *The Populism-Euroscepticism Nexus: A Discursive Comparative Analysis of Germany and Spain* (Routledge, 2023) and *¿Polarizados o Paralizados? Surgimiento y Transformaciones del Movimiento Democrático* (Tecnos, 2025).

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