

European Digital Media Observatory

Platforms' Implementation of the CoP Commitments on Media Literacy, Research and Fact-checking

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1. Evaluating VLOPSEs' Compliance under the CoP: Methodological Challenges

By signing up to the Code of Practice on Disinformation (CoP), very large online platforms and search engines (VLOPSEs)¹ have acknowledged the legitimate interest of the public to receive accurate and timely information about the risks that their services may pose regarding the online spread of disinformation, as well as their efforts to effectively mitigate them. In addition to the creation of a publicly accessible Transparency Centre, VLOPSEs signatories of the CoP have agreed to report every six months on the progress made in the implementation of their commitments under the CoP, including relevant qualitative elements and service level indicators, on country-by-country basis.

In September 2023, Google, Meta, Microsoft and TikTok, submitted their first progress reports², covering actions undertaken during the first semester 2023 in respect of each of their main services³. Overall, according to some preliminary analysis⁴, these reports attest platforms' efforts in providing more granular and insightful data, showing appreciable improvements in terms of completeness and relevance, compared to the baseline scenarios submitted in February 2023. Moreover, they included information on critical aspects, such as the potential of generative AI for creating and disseminating disinformation, as well as actions taken to reduce disinformation surrounding Russia's war in Ukraine. However, criticism and concerns have also been aired regarding a general worsening of disinformation-related risks at global scale, and the apparent inability of major online platforms to ensure timely and effective responses.

A comprehensive evaluation of the quality and effectiveness of the actions reported by VLOPSEs signatories of the CoP raises a number of methodological challenges. Firstly, the commitments and measures foreseen by the CoP are wide in scope and technical in nature. Notably, the risk mitigation measures detailed in the CoP encompass a variety of aspects, including scrutiny of ad placements, user-facing transparency tools for political and issue ads, safeguards against fast-evolving manipulative tactics, techniques and procedures (TTP), solutions to boost citizens' resilience to disinformation, as well as cooperative frameworks for empowering researchers and fact-checkers. Analysing the quality and impact of platforms' compliance actions across such diverse fields inevitably requires distinct, **field-specific expertise**.

Secondly, the CoP is intended to operate as a flexible instrument catering for the specificities of the services concerned. Assessing the effectiveness of each signatory's

¹ See definition in Article 33 of the [Digital Services Act](#).

² These reports are accessible [here](#) through the Transparency Center.

³ Google reported specific measures implemented in Search and YouTube; Meta's report included Facebook and Instagram; Microsoft's report covered specifically LinkedIn and Bing, while TikTok focused on its main video sharing service.

⁴ <https://digital-strategy.ec.europa.eu/en/news/code-practice-disinformation-new-reports-available-transparency-centre>

actions through linear cross-platform comparisons may be problematic. For instance, monetisation channels and opportunities on YouTube, Facebook or TikTok differ considerably and, therefore, their policies on demonetisation of disinformation may be difficult to compare. In the same vein, different types of services (e.g. search engines v. social media) or services of the same type offered by different platforms (YouTube v. TikTok) are not equally vulnerable to the same forms of TTPs identified under the CoP and, therefore, the reported policies and metrics do not always allow for a linear ranking of platforms' performances. An objective oversight and comparative evaluation of VLOPSEs' reported actions can hardly be done without **feedback from different stakeholders with field-specific expertise, based on their practical experience with different service-specific solutions**.

Thirdly, even where certain commitments are not strictly dependent on the specificities of a particular service (e.g. funding of fact-checking activities), platforms may legitimately decide to prioritise different policy approaches. For instance, under the CoP pillar on empowerment of the fact-checking community, Meta has opted for an approach that prioritises direct funding through bilateral agreements with individual fact-checking organisations. By contrast, Google has strongly invested in a dedicated, independent vehicle (the European Media and Information Fund), which provides support to fact-checking organisations without interference by the donor in the choice of the projects. An analysis of the merits and drawbacks of these two approaches requires **a systematic collection of relevant stakeholders' insights over an appropriate observation period**.

Finally, while the VLOPSEs' reports follow a harmonised reporting template consisting of 152 reporting elements (110 qualitative elements, and 42 service level/quantitative indicators), the sheer volume of information, combined with persistent data gaps and varying degrees of clarity in the way the information is presented, makes their analysis and evaluation a lengthy and labour-intensive exercise. To manage a regular, timely and evidence-based evaluation of VLOPSEs' half-yearly reports, the Commission and competent national authorities should therefore consider setting up a collaborative framework, allowing for the **integration and overall assessment** of the insights collected from representative communities of different stakeholders.

2. EDMO's Role under the CoP

While EDMO is not a signatory of the CoP, several provisions rely on EDMO for an advisory, consultative and/or facilitating role in both the implementation and monitoring phases of the Code. In particular, EDMO participates to the works of the CoP Task Force whose goals include improving the effectiveness of the Code and its monitoring. In this context, signatories have committed *"to improve and optimise the monitoring and reporting framework of the Code, including the service level indicators, within the Task Force, building in particular on feedback from the European Commission, ERGA and EDMO"* (measure 40.5).

As a pluri-disciplinary network that brings together stakeholders from the research, fact-checking and media literacy communities with specific expertise in the area of

disinformation, EDMO and its fourteen regional and national Hubs (the EDMO Network) are well placed to contribute to the systematic collection of relevant insights on the implementation of CoP, and provide therefore a useful feedback to the signatories of the CoP, as well as to the Commission and ERGA, as advocated in measure 40.5.

The EDMO Network has already provided such feedback through two recent contributions. Firstly, in September 2023, GADMO and EDMO Ireland jointly released an analysis⁵ of the baseline reports submitted by Google, Meta, Microsoft, TikTok, and Twitter⁶. They looked at the full set of commitments under the CoP, and assessed, compared and rated, at the level of each individual implementing measure, the degree of completeness and relevance of the information provided by the signatories. However, this contribution did not enter a deeper analysis of the quality and effectiveness of the reported actions. Secondly, in January 2024, BROD published an analysis⁷ of the first progress reports submitted by Google, Meta, Microsoft and TikTok, focusing on the CoP areas relating to scrutiny of ad placements, transparency of political advertising, service integrity, and empowerment of users and fact-checkers. However, the scope of this analysis was limited to Romania and aimed only at highlighting variations or discrepancies in the implementation of the CoP in Romania, compared to other EU countries.

Considering these previous contributions, EDMO has decided to **test a new approach with a view to facilitating the evaluation of the quality and effectiveness of the actions reported by VLOPSEs**, in those areas of the CoP where the expert communities connected to, or operating within the EDMO Network have both field-specific expertise and practical experience.

The three surveys annexed to the present report are the result of such an endeavour.

3. Scope and methodology of EDMO Community Insights

Given its current structure, composition and expertise, the EDMO Network has gained valuable insights **specifically in relation to the pillars of the CoP dealing with media literacy, empowerment of researchers and empowerment of fact-checkers**. Therefore, in terms of scope, the three surveys presented in this report focus on the following CoP commitments.

In the **media literacy** area:

- Commitment 17, which requires signatories to develop, promote, or support media literacy tools and activities across the EU to enhance critical thinking, particularly among vulnerable groups; and
- Commitment 21, whereby signatories are expected to facilitate access by users to multilingual tools for assessing the factual accuracy of sources, namely through

⁵ GADMO and EDMO Ireland analysis is accessible [here](#).

⁶ Twitter was included in the analysis, as the work began before the company announced it would leave the CoP.

⁷ BROD's analysis is accessible [here](#).

fact-checks or warning labels, while continuously developing and deploying labelling or warning systems that better cater for users' needs, based on scientific evidence.

In the area of **empowerment of the research community**:

- Commitment 26, which requires VLOPSEs to provide access to non-personal data and anonymised, aggregated, or manifestly-made public data for the purposes of conducting research on disinformation, including through automated means such as APIs;
- Commitment 27, enabling vetted researchers to access a wider set of non-public data through data sharing programmes or other governance structures, which include the development, funding and cooperation in Europe with an independent third-party body that can carry out the vetting process; and
- Commitment 28, whereby VLOPSEs are expected to provide adequate, structural support to the European research community, including sufficient human resources to accommodate the needs of the research community, allocation of funding for relevant research projects, and avoidance of adversarial actions.

In the area of **empowerment of fact-checkers**:

- Commitment 30, requiring VLOPSEs to establish a framework for transparent, structured, open, financially sustainable, and non-discriminatory cooperation between them and the EU fact-checking community, including adequate funding, with a view to achieving fact-checking coverage in all Member States;
- Commitment 31, whereby the platform signatories have pledged to integrate, showcase, or otherwise consistently use fact-checkers' work in their platforms' services, processes, and contents, with full coverage of all Member States and languages; and
- Commitment 32, calling for VLOPSEs to provide European fact-checkers with prompt, and whenever possible automated, access to information that is pertinent to help them to maximise the quality and impact of fact-checking.

In terms of methodology, two questionnaires, comprising of 25 questions for the media literacy area and 33 for the research area, were sent by EDMO to all regional and national EDMO Hubs on 21 December 2023. As the members of the EDMO Network comprise of around 25 organisations engaged in the media literacy field and almost 60 academic or research organisations, it was possible to reach out to a significant number of qualified stakeholders. Where necessary, bilateral exchanges took place to clarify or complete the replies to the questionnaire. The fact-finding phase ended on 21 February 2024.

The questions to the EDMO Media Literacy Community were aimed at gathering feedback on the following specific elements, with reference to the first semester 2023:

- i.* Media literacy initiatives and campaigns designed and deployed directly by platform signatories, including their perceived quality and reach;

- ii.* Promotion of, or financial support to local media literacy activities carried out by EDMO Hubs or other organisations, including adequacy of such promotional and funding efforts;
- iii.* Collaborations and partnerships between platform signatories and media literacy experts from the EDMO Hubs or other relevant local organisations regarding the design and effectiveness of media literacy tools and initiatives;
- iv.* Consultations of media literacy experts from the EDMO Hubs and/or other relevant local organisations, by platform signatories, for measuring the impact of labelling and targeted warning systems.

Following this first fact-finding phase, the collected insights have been analysed and summarised in the “*EDMO Hubs survey on the implementation of the CoP commitments designed to empower users*” (hereafter “Media Literacy Survey”, see [ANNEX 1](#)).

The questions to the EDMO Research Community were aimed at gathering feedback on the following main elements, again with reference to the first semester 2023:

- i.* EDMO Network researchers’ experience with VLOPSEs’ service-specific APIs and other transparency tools to access non-personal, aggregated, anonymized or public data;
- ii.* VLOPSEs signatories’ cooperation efforts towards allowing access to non-public data by vetted researchers;
- iii.* References to concrete instances of structural support provided to independent research on disinformation, including funding of independent research projects, and avoidance of adversarial actions.

The collected insights have been then analysed and summarised in the “*EDMO Hubs survey on the implementation of the CoP commitments designed to empower researchers*” (hereafter the “Research Survey”, see [ANNEX 2](#)).

While similar on substance, the approach followed in the area of empowerment of the fact-checking community has followed a slightly different process. To leverage insights from the wider community of fact-checking organisations adhering to the European Fact-Checking Standards Network (EFCSN)⁸, a dedicated survey was conducted by the EFCSN among its member organisations in December 2023, with a view to collecting their feedback on the following aspects:

- i.* Agreements between VLOPSEs signatories and independent fact-checking organisations to achieve fact-checking coverage in all EU Member States;
- ii.* Integration and use of fact-checking into VLOPSEs services;
- iii.* Access to information for fact-checkers.

The EFCSN survey was released in January 2024 under the title “*Fact-checking and related Risk-Mitigation Measures for Disinformation in the Very Large Online Platforms*”

⁸ The EFCSN is a registered association that represents more than 50 independent fact-checking organizations from over 30 European countries that are committed to the highest standards of independence, transparency, and methodological quality as required by the European Code of Standards, and whose adherence to those is evaluated periodically by independent experts.

and is reproduced herewith for ease of reference (hereafter the “Fact-Checking Survey”, see **ANNEX 3**).

As a note of caution, it should be stressed that all three surveys share certain limitations. Firstly, only the implementing actions undertaken by the signatories during the first semester 2023 are examined. Therefore, subsequent updates in VLOPSEs’ compliance policies across the three areas are not covered.

Secondly, all three surveys do not enter into a detailed scrutiny of each qualitative reporting element and/or service level indicators. The insights provided in each survey should be regarded as expert opinions, reflecting the direct experience gained by a qualified sample of relevant stakeholders in relation to the actions reported by VLOPSEs signatories. Therefore, they may help signatories to identify the areas where further efforts are expected, but cannot constitute the sole basis for possible enforcement actions under the Digital Services Act (DSA)⁹.

Thirdly, such insights are not necessarily representative of the whole stakeholder communities affected by the implementation of the CoP in their respective areas of expertise. Cross-platform rankings and comparative evaluations of individual VLOPSE’s services will need, therefore, to be further refined in future iterations, notably by broadening the sample of respondents and expanding the analysis at a more granular, country-by-country level. Nevertheless, even at this stage, EDMO considers that the collected insights may help regulators to better focus their monitoring work on the current, most problematic implementation issues.

4. Highlights

Each one of the three surveys includes detailed recommendations for future improvements that are specific to each investigated area. From a more general, high-level perspective, certain cross-cutting messages should nevertheless be highlighted.

i. Access to data: a pre-condition for transparency and accountability that is long overdue.

The Research Survey shows that data transparency and data access through APIs (Commitment 26) continues to be a key priority for the research community. Despite encouraging reports by all platforms on recent launches of new tools for researchers, the uptake of APIs appears slow and piecemeal, with very few European researchers seemingly using such APIs at present. In particular, the only tool that is reported as widely used by the EDMO research community remains CrowdTangle which, however, Meta announced will be shut down in August 2024. The very recent set up of a range of new APIs, combined with a generally limited awareness of their functionalities, cumbersome application procedures and potential legal risks, seem to be at the origin of such a poor market uptake. While greater uptake may be expected as the tools continue to be rolled out and refined, it emerges that simply launching an API for researchers may not be

⁹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32022R2065>

enough to meet the requirements of Commitment 26 and ultimately the DSA. Platform signatories must make the research community aware of such tools, make them usable, and tailor them to the needs of researchers.

When it comes to access to non-public data under Commitment 27, the development of structures and bodies to provide access to vetted researchers is generally considered as work in progress. Survey respondents indicate that dedicated data-sharing structures and partnerships with EDMO Hubs have not been, and are not being developed, while all VLOPSEs signatories state that they are part of an *ad hoc* working group for the creation of an Independent Intermediary Body. Such a Body, however, has not yet been created at the time of writing. A specific concern has also been aired regarding how research-sharing and data-access agreements, as envisioned under the CoP, can be developed in practice without restricting the ability of the research community to conduct their activities independently and without interference.

Concerning access to data for fact-checkers under Commitment 32, similar concerns emerge from the Fact-Checking Survey of the EFCSN. Beyond service-specific differences (with Meta's services and LinkedIn receiving a better score than Google's services and TikTok), the overall message is that improvements are generally slow and the available interfaces for accessing information that is pertinent to help maximise the quality and impact of fact-checking are still inadequate. In particular, for video or image-first services, platforms do not provide monitoring tools allowing keyword searches in databases that include the texts of the automatically generated subtitles and graphics. Moreover, granular information on the patterns of consumption of a given content is mostly unavailable. Also, the quality of systems to surface potential disinformation to fact-checking partners is generally very poor for those working in languages other than English. As regards search-engines, the survey emphasises the persistent lack of meaningful data on findability of, and user engagement with fact-checks.

ii. Structural support and funding of expert communities remain inadequate.

The indications emerging from the Media Literacy Report suggest that most VLOPSEs signatories are stepping up their efforts under Commitment 17 through the development of new, in-house initiatives aimed at enhancing critical thinking. The insights collected across the EDMO media literacy community suggest that the campaigns organised by Google lead the platforms' league, followed by TikTok, Meta and Microsoft, in terms of quality and reach. However, most of the reported campaigns are either implemented in few EU languages and/or not active in all EU Member States, while human resources allocated to local teams are still insufficient to swiftly cope with crisis situations.

As regards structural support to local media literacy activities deployed either by members of EDMO Hubs or external independent organisations, the picture is even bleaker. In this respect, the information provided by the signatories in their reports is generally poor, and survey respondents mention only few instances where certain Hubs' initiatives have received operational, promotional or logistical support from the platforms. Worryingly, such instances concern only a limited number of Member States and refer to occasional, one-off initiatives. Moreover, examples of promotion by platform signatories of Hubs' campaigns hosted on their services are even more rare.

It is also worth highlighting that financial support provided by Facebook and Google to independent media literacy initiatives seems to be higher for organisations outside the Hubs than for organisations within the Hubs and, even when provided, funding is framed within short-term commitments, disregarding the fact that MIL initiatives should be seen as long-term endeavours.

Microsoft stands out as the only signatory that, to the best of the respondents' knowledge, has not provided any support whatsoever, either structural or financial in nature.

The above concerns find an echo in the findings of the Research Survey (in relation to Commitment 28), where most of the respondents indicated that they were not aware of funding arrangements for independent research projects between the platform signatories and EDMO Hubs. Respondents who answered in the affirmative referred to indirect funding from Google, via the European Media and Information Fund, for research and investigations of disinformation in Europe. In this connection, some respondents also emphasised the importance of ensuring independent and unrestricted research, which they feared could be undermined by financial arrangements between platforms and research organisations.

Moreover, while a large majority of respondents indicated not to have experienced overt adversarial actions from platform signatories in connection with the execution of their research projects, other types of obstacles were mentioned, including potential financial costs associated with obtaining access to APIs, or the risk of hefty fines in case of inadvertent misuse of APIs.

The Fact-Checking Survey of the EFCSN reveals that similar concerns are widely spread also among fact-checkers. Structural and financial support advocated under Commitment 30 is regarded as generally insufficient to achieve fact-checking coverage in all Member States, although some platforms seem to offer more structured and sustainable cooperation frameworks than others. In this field, Meta is considered as the signatory having made most progress towards a more predictable and proportionate compensation of the work of its partner fact-checking organisations.

iii. Progress towards the integration of independent experts' feedback into platforms' user-facing tools is still patchy and insufficient.

In the media literacy area, no significant progress has been made by signatories to step up collaborations with independent experts in the design, implementation, and impact measurement of media literacy tools and activities (Commitment 17). The Media Literacy Survey reveals that consultations of experts from the EDMO Network occurred only sporadically, in a limited number of Member States and only in respect of certain (social media) services. No respondent seems to be aware of consultations sought by Google Search and Bing on the above matters. Moreover, even in the rare cases when platforms consulted certain Hubs' experts, they failed to follow-up. Hence, it is unclear if and how, in such cases, expert's feedback would have been taken into account in the deployment of platforms' media literacy tools and activities.

The same goes for platforms' collaborations with independent experts, under Commitment 21. Research and testing of effective labelling and warning systems, notably targeted at users having interacted with disinformation content on their services,

has involved independent experts only in very few reported cases and, for certain platforms, never. Moreover, the search for independent scientific evidence, aimed at maximising the impact, usefulness and/or positive reception of labelling and warning systems employed by signatories appear to be at best sporadic.

When it comes to fact-checking, the progress made by signatories towards a systematic integration of fact-checkers' work in their services, processes, and contents (Commitment 31), is uneven and generally struggles to achieve full coverage of all Member States and languages.

Looking at social media services, the Fact-Checking Survey points to Meta's third-party fact-checking program as an example of progress, insofar as it allows partner organizations to proactively flag problematic content on Facebook, resulting in the labelling of that content, sharing with users of evidence and context underpinning the rating of a particular claim, and possibly reducing the virality of flagged content. In the case of TikTok and LinkedIn, despite the establishment of partnerships with certain independent fact-checking organisations, the Survey regrets the slow-paced expansion of fact-checking coverage, as well as an insufficient level of transparency regarding the use of labelling or warning systems and/or metrics on content on which the platform has taken action. A specific criticism concerns YouTube, which seems to require fact-checkers to produce video content without financial contribution and without considering alternative approaches, including integration of fact-checks in videos through overlays and other visual cues to add context.

Looking at search engines, the approach followed by both Google Search and Bing, consisting in marking fact-checking articles on ClaimReview and surfacing rich snippets for users searching for information on already-debunked claims, is regarded as an appropriate way to empower users. However, this model continues to rely entirely on voluntary, and often unpaid, work of the European fact-checking organizations,. The Survey questions therefore its long-term sustainability, while its implementation in languages other than English remains unclear.

5. Next Steps

Overall, the attached surveys show the potential for EDMO to provide useful feedback to CoP signatories and regulators, as foreseen under the CoP Measure 40.5. The media literacy, research and fact-checking areas, where the expert communities connected to, or operating within the EDMO Network hold significant field-specific knowledge, are those EDMO's contribution can represent a substantial value added.

However, the Surveys conducted through the present pilot project have also shown certain methodological limitations, as pointed out in section 4 above. Therefore, for future iterations, EDMO will engage with all the regional and national EDMO Hubs to address such limitations, include a wider array of relevant organisations in the consultative phase, and deepen its analysis with a view to gain more granular and robust insights at Member State level.

Annex 1: EDMO Hubs Survey on the implementation of the CoP commitments designed to empower users



EDMO Hubs Survey on the implementation of the CoP commitments designed to empower users

1. Introduction

Section V of the Code of Practice on Disinformation contains a range of commitments and measures whereby platform signatories have agreed to design and implement specific actions aimed at empowering users. The present analysis summarizes the main outcomes of a survey distributed to the EDMO Hubs' media literacy experts with a view to gathering their insights on the actions effectively taken by platform signatories at Member State level, which were specifically aimed at raising media literacy standards and critical thinking among users. Based on the reports submitted by platform signatories in September 2023, the survey delved in particular into commitments 17¹⁰ and 21¹¹ of the CoP.

Questions pertaining to commitment 17 aimed to gauge the experience of EDMO's community of experts in three specific areas¹²:

- i.* Media literacy initiatives and campaigns carried out by platform signatories, including their quality and reach;
- ii.* Promotion of, or financial support to local media literacy activities carried out by EDMO Hubs or other organisations;
- iii.* Collaborations between platform signatories and media literacy experts from the EDMO Hubs or other relevant local organisations regarding the design and effectiveness of media literacy tools and initiatives.

As far as commitment 21 is concerned, the survey aimed to investigate the extent to which media literacy experts from the EDMO Hubs and/or other relevant local organisations were consulted by platform signatories for measuring the impact of labelling and targeted warning systems¹³.

Measures relating to fact-checking under the CoP chapter on empowerment of users were not included in the survey as they were covered by the analysis carried out by the EFCSN (see Annex 3).

Hubs' replies to the survey are summarised and grouped below under three sections, namely: (i) Media and Information Literacy (MIL) activities and campaigns; (ii) Promotion

¹⁰ Commitment 17 emphasizes the need for signatories to enhance media literacy and critical thinking, particularly among vulnerable groups, by developing, promoting, or supporting media literacy tools and activities and collaborating with media literacy experts in the design, implementation, and impact measurement of such tools and activities.

¹¹ Commitment 21 focuses on better equipping users with tools to identify disinformation including fact-checks and warning labels available in all Member States languages as well as incorporating scientific evidence and user needs analysis into designing effective labelling and warning systems.

¹² Commitment 17, and in particular measures 17.2 and 17.3, were subscribed by the following VLOPs: Meta (Facebook; Instagram); TikTok; Google (YouTube; Search); Microsoft (LinkedIn; Microsoft Bing);

¹³ Measure 21.2, subscribed by the following VLOPs: Meta (Facebook; Instagram); TikTok; Google (YouTube); Microsoft (LinkedIn)

of, or financial support to local MIL activities carried out by EDMO Hubs or other organisations; and (iii) Collaboration with the experts' community. Experts from the Hubs were also given the possibility of sharing further thoughts and/or recommendations, which are reported at the end of this annex.

Each section first provides a recap of the activities listed by platform signatories in their September 2023 reports and then summarises the results of the survey. It should be noted that some of the activities mentioned by the platform signatories were undertaken prior to the relevant reporting period. These instances are included in the present analysis with an indication of the date at which the reported activities effectively took place. Moreover, for an exhaustive list of the activities implemented by the platforms, it is recommended to refer to the reports published in the CoP Transparency Centre (disinfocode.eu).

2. VLOPs and VLOSEs media literacy activities and campaigns

The main activities reported in September 2023 by platform signatories under commitment 17.2 are the following.

Meta (Facebook; Instagram)

Facts in Focus Campaign. This campaign targeted citizens of all ages and focused on the critical assessment of information in users' feeds. It involved collaboration with local artists and creators to develop content illustrating how to identify and respond to disinformation. This campaign was implemented in Slovakia, Lithuania and Bulgaria in July 2023 and set to continue in the second half of 2023.

Collaboration with DigQ. Meta partnered with DigQ, a Slovak NGO specialised in digital literacy, to launch a campaign featuring a short video on how to recognize and respond to disinformation. This campaign started in August and continued in September 2023.

Upcoming Campaign: Meta also reported on a third campaign to be implemented in Slovakia but no specific information on its aims and target was provided.

TikTok

TikTok mentioned several media literacy campaigns conducted both on and off the platform, addressing specific topics, including national elections, the War in Ukraine and COVID-19.

On Elections: (i) In connection with the 2023 Finnish Elections, TikTok launched a search guide on March 6, 2023, in collaboration with The National Audiovisual Institute, directing users to updated election information; (ii) In view of the 2023 Greek Elections, TikTok rolled out a campaign on May 3, 2023, featuring a search intervention and an in-app Election Hub. The hub connected users to authoritative sources and encouraged education on misinformation via AFP's Greek Fact Check page; (iii) For the 2023 Spanish Elections, TikTok deployed a search intervention and in-app election hub on July 23,

2023, which involved a collaboration with fact-checking partners Newtral and Maldita to produce educational content.

On the War in Ukraine: eight localized media literacy campaigns were implemented in Poland, Slovakia, Romania, Ukraine, Hungary, Estonia, Latvia, and Lithuania. Users searching for war-related keywords were directed to tips created in partnership with fact-checking partners to identify and prevent the further sharing of misinformation.

On COVID-19: a comprehensive campaign across multiple jurisdictions was conducted, involving the use of notice tags and search intervention tools directing users to authoritative information from expert organizations, such as local public health sites or the WHO.

Google (YouTube; Search)

Google reported, among others, the following main campaigns.

As regards [YouTube](#), the “**Hit Pause**” campaign went live as of June 2023 in all EEA Member States. According to the report, access to authoritative sources was facilitated on the YouTube homepage. In search results, information panels would also appear alongside search results and videos to provide more context and to help people make more informed decisions about the viewed content. Moreover, in 2022, during the French presidential election, text-based information panels about a candidate, how to vote, and election results were displayed to YouTube users. According to the report, this may happen also during other election periods.

As regards [Google Search](#), the measures reported in September 2023 are not new compared to what was reported in January of the same year. Google Search expanded the availability of **content advisories** for searches in French and German. Moreover, Google Search added two sections to its ‘About This Result’ features in the EU, namely the ‘Your Search and this Result’ section and the ‘Personalization’ section. Finally, following its **Super Searchers Programme** in Brussels, Google reported that it worked with Public Libraries 2030 to implement trainings in Ireland, Italy, and Portugal.

Both for YouTube and Search, Google reported about a large **pre-bunking experiment**. The latter was launched in September 2022 and ran until January 2023. According to Google it reached almost a third of the Polish, Czech, and Slovak populations, garnering over 38 million views. These videos helped individuals better identify two rhetorical strategies commonly used to spread false claims online. The initiative was then extended to Germany in partnership with Moonshot Consulting and local NGOs.

In addition, Google funded the project ‘**BuloBús: Route against misinformation**’ implemented by Maldita.es, with a minibus travelling through 20 towns across Spain between in Spring 2023 to promote media literacy.

Google is also providing funding to the independent European Media and Information Fund (**EMIF**), which finances media literacy activities, among others.

Microsoft

LinkedIn emphasised its general goal to raise its users' awareness about civic discourse, electoral processes, and public security through its global team of news editors, with its content moderation teams closely monitoring associated conversations in a number of languages. More specifically, it reported the “**Know the facts about coronavirus**” link, which appears first in the list of search results. The storylines on this page were made available in 8 languages across 54 countries. It also mentioned the ‘**Special Report: Coronavirus**’ box above ‘**Today’s News and Views**’ with story lines relevant to COVID-19 and including updates from the World Health Organization and Centers for Disease Control and Prevention.

Moreover, LinkedIn’s blog provides information regarding efforts in a number of areas, including features such as ‘**How We’re Protecting Members from Fake Profiles**’, ‘**Automated Fake Account Detection**’, and ‘**An Update on How We Keep Members Safe**’. In addition, LinkedIn members are enabled to identify misinformation and inauthentic behaviour through links to the **News Literacy Project**, **The Trust Project** and **Verified**, all of which are claimed to develop information literacy campaigns built on industry research and best practices. These resources can be accessed via LinkedIn’s . Help Center.

As regards [Bing Search](#), the platform strives to include answers or public service announcements at the top of search results pointing users to authoritative information on a searched topic, or warnings on particular URLs known to contain harmful information. Where circumstances warrant (such as public health crises or major elections), Bing Search may provide information hubs for users to easily access a centralized repository of authoritative information. **Bing Search Intelligent Answers** provides users with informative panels and direct answers to certain search queries, and is now available in 100 languages. Bing Search’s “**Knowledge Cards**” feature gives users a single view of authoritative information on a specific topic. Bing Search also provides users with public service announcements (PSAs).

Microsoft also **partners with NewsGuard** to help users evaluate the quality of the news they encounter online. Within the EU, NewsGuard is currently available in France, Germany, and Italy with plans for future expansion.

Bing Chat also helps inform users of the uses and limitations of generative AI-driven search experiences, such as by reminding users that they are interacting with a generative-AI system and that mistakes can occur. The new Bing FAQs and similar explanatory documents like blog posts and **The New Bing: Our Approach to Responsible AI** also help to educate users on the nature of AI-driven search experiences and informs users of uses, safeguards, and limitations of this emerging technology.

Against this backdrop, the data below reflect the actual experience of the expert community, based on the replies provided to the survey by the EDMO Hubs.

2.1 Quality and reach of platforms’ campaigns

When asked if hubs had observed in practice any media literacy campaigns conducted by platform signatories in the country(ies) they cover, 43% of respondents answered

positively for Facebook and YouTube, followed by 36% for TikTok, 29% for Google Search, 14% for LinkedIn and Instagram and 7% for Bing.

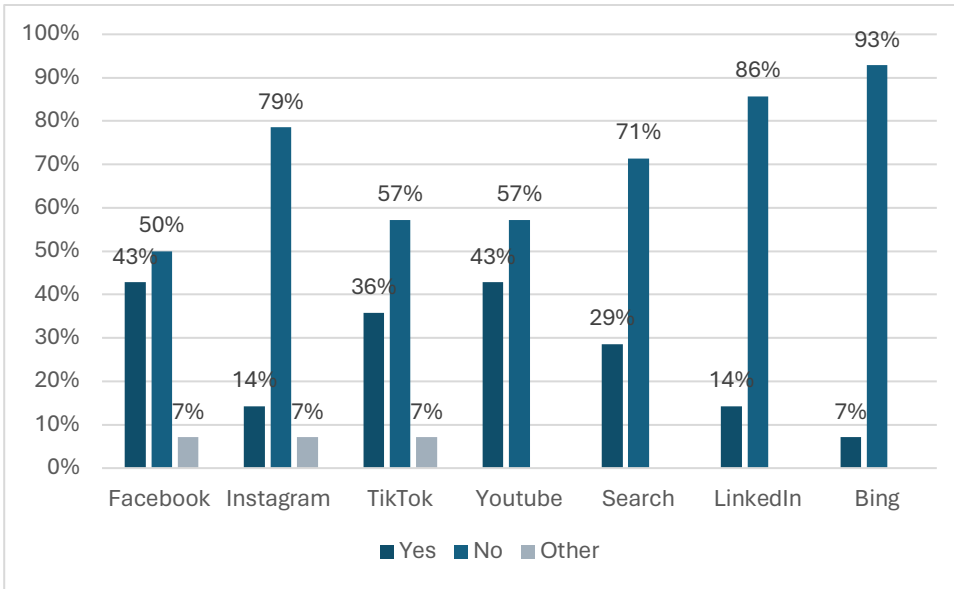


Figure 1. Are you aware of any media literacy campaigns conducted by platform signatories in your country(ies)?

From additional details provided by the Hubs on platforms' campaigns, it can be noted that Google was considered to support and/or conduct the highest number of campaigns that Hubs had observed, with a total of 9 campaigns reported, followed by Meta (6), TikTok (3) and Microsoft (1).

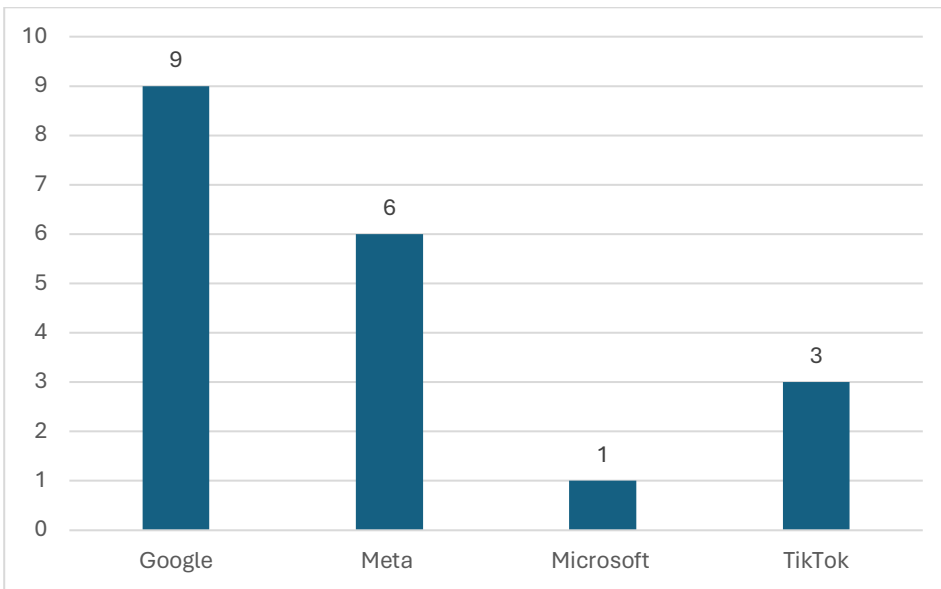


Figure 2. If yes, please list and describe one or more campaigns below, numbering them from 1 to 5

Hubs' scores assigned to platform signatories' campaigns based on quality and reach suggest that the best-performing platform was Google (3.6/5) followed by TikTok (3/5), Meta (2.5/5) and Microsoft (2/5).

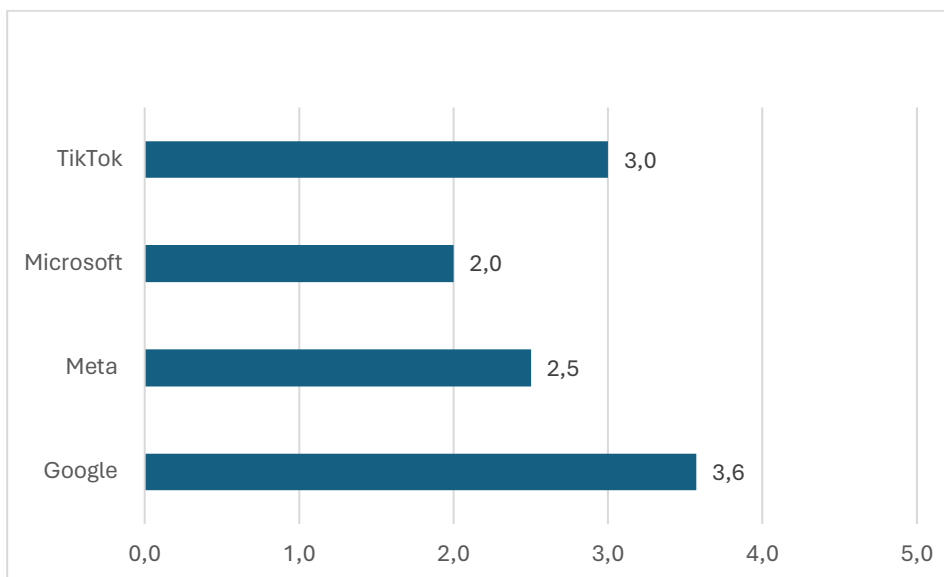


Figure 3. Could you please assign a score to each campaigns on a scale of 1-5, according to their reach and quality?

2.2 Best known platforms' campaigns

Hubs mentioned in particular certain initiatives carried out by Google, Meta and TiKTok.

Google

Among the campaigns conducted by **Google**, the YouTube “Hit Pause” campaign was the most mentioned. It was described as an initiative aiming at enhancing users’ critical media literacy skills via educational public service announcements (PSAs) distributed on YouTube’s home feed and pre-roll ads, and on a dedicated YouTube channel. The “Info Interventions” video series by the YouTube Trust & Safety team was also mentioned.

The initiative “Google for Education” was also referenced as providing digital literacy courses for users and educators. Respondents also rated most positively (5/5) Google’s actions to support local and regional initiatives to increase media literacy in the Baltics, with projects aiming at capacity building for civil society organisations (CSOs), resilience building for Baltic media facing potential hybrid warfare, and financial support provided to an NGO-led media literacy campaign in Estonia. ¹⁴

TikTok

As for **TikTok**, respondents mentioned a dedicated campaign the platform is planning ahead of the 2024 European Parliament elections, and its collaboration with the German-based organisation Correctiv to develop the video campaign “Facts against fakes,” active in Germany and Austria from October 2023 till Spring 2024.

With an average score of 3 out of 5 for the reach and quality of its media literacy campaigns, TikTok qualifies as the second best-performing platform. It is interesting to

¹⁴ Conflict of interest disclaimer: some organisations within the Baltic Engagement Centre for Combating Information Disorders (BECID) have mentioned having benefitted from Google’s financial support to conduct activities aimed at enhancing media literacy in Estonia, Latvia and Lithuania. ¹⁴

observe that TikTok’s campaign “Facts against Fake” is the only example given by the respondents of cooperation between VLOPs and local organisations.

Meta

Three initiatives by **Meta** were specifically referenced: (i) the “Get Digital!” initiative, a platform providing materials aiming to promote digital citizenship through partnerships with organizations like UNESCO and UNICEF; (ii) the “Youth Design Jam”, a roundtable format event with youth and professionals to discuss Meta policy and products to promote healthy platform use; (iii) the "My Place" campaign launched in August 2022 in the Czech Republic and other European countries, aiming to raise users' awareness about the existing tools to increase their security and privacy while using Facebook and Instagram services.

Google and Meta’s activities were mentioned the most and, as noted above, differ by 1.1 percentage points in the average score for reach and quality assigned to the media literacy activities connected to their services. Google’s best performance is reinforced by some respondents assigning a very high score (5/5) to Google’s actions to support local and regional initiatives to increase media literacy in the Baltics.

2.2.3 Partnerships with MIL organisations

In general, among the referenced media literacy campaigns, there are limited instances of successful partnerships with local organisations. For example, when referring to the YouTube “Hit Pause” campaign, respondents underlined that the initiative was developed in partnership with a US organization, National Association for Media Literacy Education (NAMLE). However, when in June 2023 the campaign was extended to all EEA Member States, YouTube did not enter into partnerships with local organisations to tailor the campaign to the characteristics of the local and regional audiences. Overall, although many mentioned it, the YouTube “Hit Pause” campaign was scored only twice for an average of 2.5/5 in terms of reach and quality.

Hubs highlighted that when platforms reached out to explore collaboration for media literacy initiatives to be conducted at the local and/or national level, the outcomes of the consultations and consideration of feedback provided were unclear. Some mentioned that, to the best of their knowledge, no follow-up actions were taken. Among the additional comments, it was stated for example that:

“The Flemish knowledge centre for digital and media literacy, Mediawijs, was contacted by Meta and TikTok about possible campaigns. Besides some exchange of ideas, no action was taken by the platforms. For the Brussels-Wallonia Federation and Luxembourg, we are not aware of nor have been informed about any campaign being formed by any platform signatories”¹⁵.

“Meta claims that since the Russian invasion of Ukraine, it has launched educational media literacy campaigns to raise awareness on spotting disinformation in several countries, including Bulgaria. Meta claims to be working with AFP for Bulgaria but provides only generalised data of ads removed for violating Meta's disinformation policy without sufficient context.”¹⁶

¹⁵ Belgium-Luxembourg Research Hub on Digital Media and Disinformation (EDMO BELUX)

¹⁶ Bulgarian-Romanian Observatory of Digital Media (BROD)

2.2.4 Tailoring of campaigns to vulnerable audiences

In terms of addressing vulnerable groups in the context of media literacy campaigns or initiatives that platforms are conducting in the country(ies) covered by the Hubs, respondents reported an overall poor performance of platform signatories across their services.

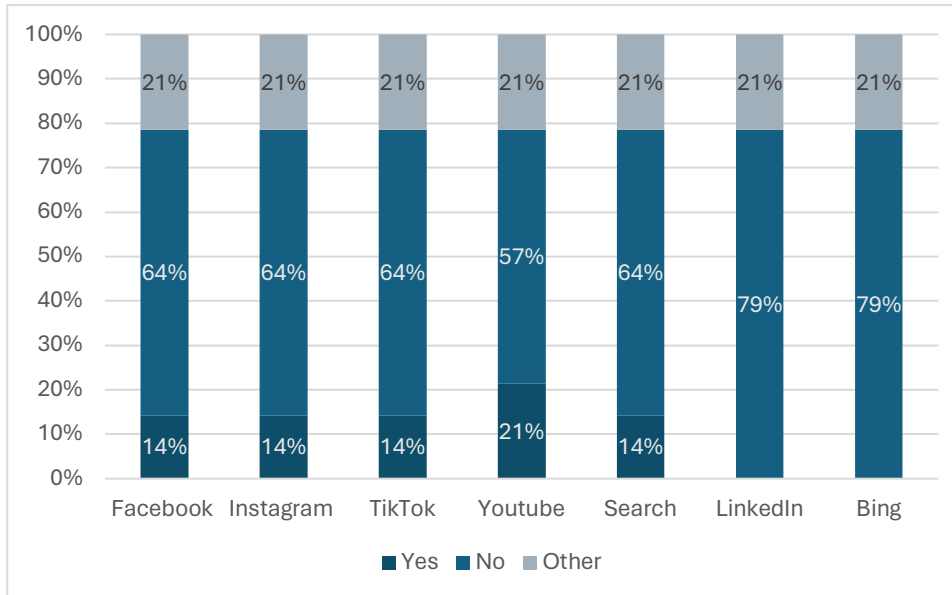


Figure 4. Are vulnerable groups specifically targeted by platform signatories' media literacy activities and campaigns in your country(ies)?

According to the replies collected from the experts of the EDMO Hubs, the best-performing service is YouTube for which 21% of the respondents identified campaigns conducted on the service that targeted vulnerable groups.

Respondents also mentioned a media literacy campaign on Facebook targeting elderly people in Spain and Portugal, which was scored 3/5 for reach and quality.

3. Promotion of, or financial support to media literacy activities carried out by EDMO Hubs or other organisations

As regards the promotion or support to local media literacy activities platforms do not provide further information in addition to what has already been mentioned in the previous section. The data below reflect the answers provided to the survey by the EDMO hubs.

3.1 Direct support to EDMO Hubs MIL activities

When asked if organisations in the EDMO Hubs received promotional or financial support from platform signatories to conduct activities aimed at enhancing media literacy and critical thinking, 21% of the respondents replied positively for Facebook and TikTok, followed by 14% for Instagram and Google Search and 7% for YouTube. Among the comments, one respondent shared that it is not clear whether the promotion or support

received from Google was to be understood as an action undertaken in the context of its commitment under the CoP.

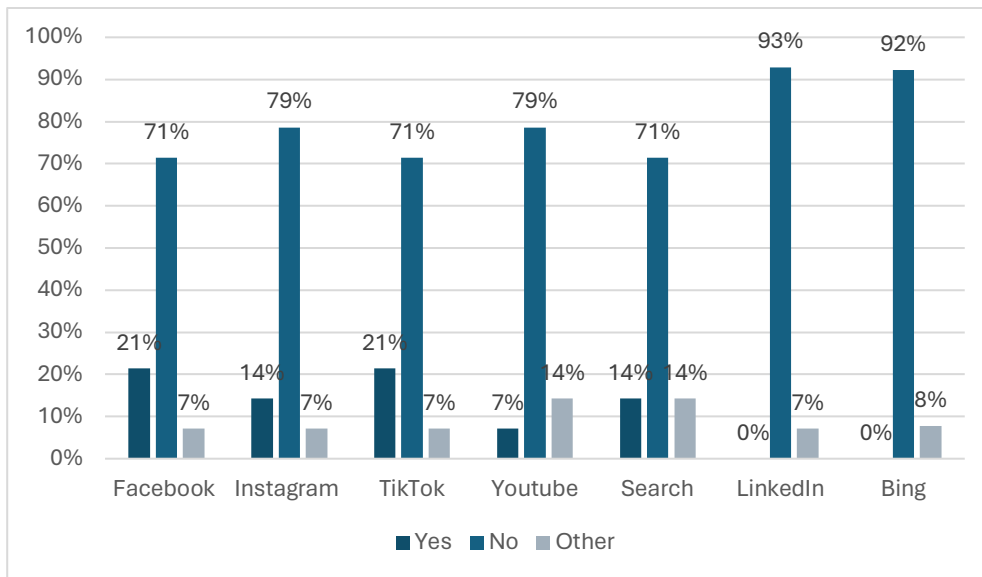


Figure 5. Have any activities aimed at enhancing media literacy and critical thinking conducted by organisations in your hub received promotion or support from platform signatories in the context of the CoP?

When asked to provide more information on the media literacy activities promoted and/or supported by platform signatories and, if applicable, on the type of support received, respondents mentioned the following:

Meta

Meta supported a project to enhance media literacy skills in vocational secondary schools in the Netherlands by donating 400 Meta Quest 2 virtual reality headsets to underserved groups. Meta also signed together with TikTok and Snapchat the manifesto of the media literacy campaign #NotHere. Held from 9-17 November 2023 as part of the BENEDMO Media Literacy Week, the campaign focused on protesting unwanted and offensive behavior online.

TikTok

TikTok supported Nieuwscheckers, a fact-checking initiative at Leiden University, Netherlands, to develop videos on election-related disinformation. Additionally, it was reported that TikTok contributed to promoting the Spanish #CajaDeHerramientas media literacy campaign hosted on its platform. Finally, TikTok financed and promoted a video series “Facts against fake” developed by Correctiv and Reporterfabrik in Germany.

Google

The Flemish Knowledge Centre for Digital and Media Literacy, Mediawijs, reported having had the opportunity to host media literacy events at the Google Atelier Digital in Brussels for several events like the Mediacoach training, the News in the Classroom Day or the Desinform. Additionally, the Central European Digital Media Observatory (CEDMO) mentioned that Google provided financial support for one million euros to Charles University, the main research center of the CEDMO Hub. The funds were

deployed to finance a project dedicated to researching information disorders in the Central European area especially those related to the war in Ukraine. It was underlined that the financial support provided to CEDMO will contribute to expanding research and raising the level of media and digital skills in the Czech Republic, Slovakia and Poland.

In general, it can be noted that support provided by platform signatories to the Hubs' media literacy activities, either financial or in-kind (e.g., equipment or venue) is more prominent than promotion by platform signatories of Hubs' campaigns hosted on their services.

2.3.2 Support to initiatives deployed by other MIL organisations

Respondents were also asked if they were aware of platform signatories' funding provided to organizations outside the Hub active in their country(ies) to promote or support activities aimed at enhancing media literacy and critical thinking.

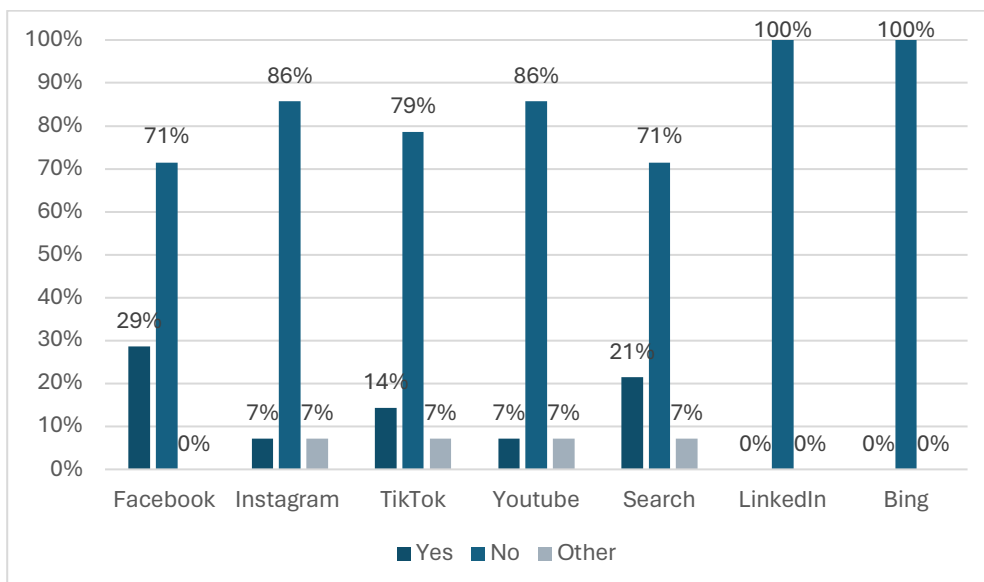


Figure 6. Are you aware of funding provided by platform signatories to organisations in your country(ies) outside the hub to promote or support activities aimed at enhancing media literacy and critical thinking?

According to the replies, 29% of the respondents declared they were aware of funding made available by Facebook, 21% by Google Search, 14% by TikTok and 7% by Instagram and YouTube. Regarding LinkedIn and Bing, there was no awareness of funding made available for media literacy activities outside the Hubs.

Overall, it seems that financial or in-kind support provided by Facebook and Google Search is higher for organisations outside the Hubs compared with support provided to organisations within the Hubs.

Among the comments, certain respondents observed that financing is being offered, but not always via open calls or public projects, rather based on suggestions from consultancy firms who do scouting for the signatories of the CoP.

Among the projects mentioned, Hubs report that **Google** has provided funding to the following organisations: i) “Bibliothèques sans Frontières” / “Bibliotheek zonder Grenzen” conducting media literacy training and activities in Belgium to promote critical thinking in

schools as well as workshops for parents on digital issues at home; ii) DeCheckers, a non-profit organization bringing together fact checks from various media organisations in Flanders, active to counter misinformation including through training programs; iii) Netherland Bureau Youth & Media coordinating the Internet Helden curriculum. Regarding Google, respondents also critically referenced the ClaimReview program, denouncing the lack of financial compensation of fact-checking organizations for the integration of fact-checking articles on Search.

It should be stressed that the survey's questions referred to funding and support provided by platforms directly to individual organisations. However, as regards Google, it should be observed that the platform has provided indirect support to a variety of media literacy projects in Europe, through the Google Digital News Initiative's donation to the European Media and Information Fund (**EMIF**), which started its funding operations in 2022, on the basis of a transparent implementation framework enabling a fair and competitive allocation of resources and safeguarding the independent design of the supported initiatives. At the time of writing, the Fund has committed over 4.3 Million Euros to support twelve projects dedicated to improving media literacy in eighteen EU member states, plus the United Kingdom.

Looking at **TikTok**, respondents mentioned the following organisations that were supported by the platform: (i) Reporterfabrik for the realization of the media literacy campaign "Facts against fakes" conducted together with Correctiv in Germany; (ii) Logically Fact for the realization of a media literacy campaign to raise awareness of disinformation in the Nordics.

Respondents also mentioned **Meta's** Third-Party Fact-Checking Program. Through this partnership, fact-checkers can proactively flag disinformation content on Facebook, which may result in the labelling of that content with additional contextual information, enabling users to understand why an independent fact-checker has rated a particular claim as false, partially false, or lacking context.

4. Collaboration with the experts' community

The followings are the main activities reported by VLOP and VLOSE signatories in their September 2023 Reports as regards their collaboration with the experts' community under commitments 17.3 and 21 of the CoP.

Meta (Facebook; Instagram)

Meta reports several partnerships with experts for their digital citizenship efforts, including government bodies (e.g. ministries of education and media regulators), independent fact-checkers, parent-teacher associations, academic institutions (e.g. Yale and Harvard University), and organizations such as the European Association for Viewers Interests (EAVI) and the UNESCO Institute for Information Technologies in Education (UNESCO IITE). Meta is also part of the Steering Committee of the EU Digital Citizenship Working Group, launched in December 2020, aiming to contribute multidisciplinary expertise from civil society and industry to the ongoing EU discourse on digital citizenship.

However, Meta does not provide any information regarding how they undertake or support research and testing on the impact of labelling and targeted warning systems.

TikTok

As regards collaboration with the experts' community on the design and effectiveness of media literacy tools and initiatives, TikTok reports its collaboration with fact-checkers, academics, NGOs and government entities. In particular, the following partnerships are mentioned:

- **Election campaigns:** (i) For the Finnish elections, TikTok partnered with The National Audiovisual Institute, directing users to their Media Literacy website; (ii) In the context of the 2023 Greek elections, TikTok worked with fact-checking partner Agence France Press (AFP), linking users to its Greek Fact Check page via search intervention and an in-app Election Hub.
- **War in Ukraine:** (i) TikTok partnered with Fakenews.pl in Poland; (ii) Campaigns in Slovakia, Romania, Ukraine, Hungary, Estonia, Latvia, and Lithuania were launched in partnership with Lead Stories.
- **Covid-19:** In addressing COVID-19 misinformation, TikTok established partnerships with the WHO Tech Taskforce and European media and fact-checking organisations like AFP, Facta, Logically, Lead Stories, Newtral, Science Feedback, Teyit, DPA, and Reuters.

Under commitment 21.2, TikTok reports about consultations with researchers from the Massachusetts Institute of Technology (MIT) in the United States and the University of Regina in Canada. These consultations aimed to comprehend the impact of presenting users with accurate information after their interaction with disinformation claims.

Google (YouTube and Search)

Concerning the involvement of the experts' community, YouTube has reported that it has a process for running experiments on new features, collecting feedback, and gradually rolling out new and improved product features, including labelling and information panels. At times, YouTube may also commission research from third parties to get broader insights into market trends, perceptions, or product opportunities. Moreover, all YouTube users, including fact-checkers, can report misinformation or misleading video content.

Microsoft

LinkedIn reported that, so far, it has not undertaken and/or supported separate research and testing on the potential efficacy of warnings or updates targeted to users that have interacted with content that was later actioned upon for violation of our Professional Community Policies. LinkedIn currently removes, rather than labeling or providing context on content that violates their policies.

Against this backdrop, the data below reflect the actual experience of the expert community, based on the replies provided to the survey by the EDMO Hubs.

4.1 Design and effectiveness of media literacy tools and activities

When asked if any experts from their Hub had ever been consulted to advise platform signatories on the design, implementation and impact measurement of tools and activities to improve media literacy and critical thinking, 29% of respondents declared that this happened for Facebook, 14% for both TikTok and YouTube, followed by 7% for Instagram and LinkedIn. Regarding Google Search and Bing, there is no awareness of experts within the Hubs consulted on the above matters.

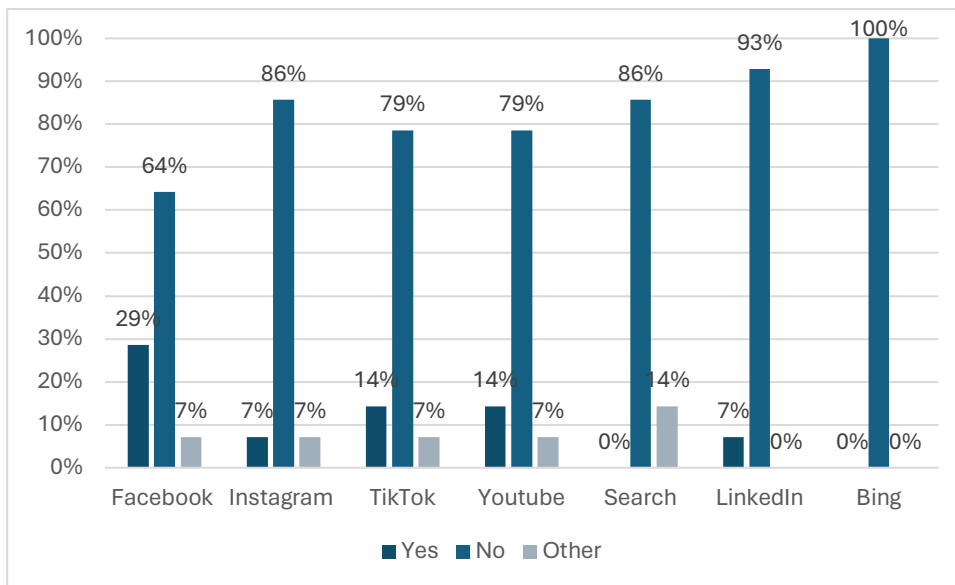


Figure 7. Have any experts from your hub ever been consulted to advise platform signatories in the design, implementation and impact measurement of tools and activities to improve media literacy and critical thinking?

Among the comments, some respondents highlighted that, even when consulted by platform signatories, no follow-up was offered. They also underlined that it is often unclear if and how the outcome of the consultation would have been taken into consideration. For example, respondents declared:

“Google often consults with us to get feedback, but we have no knowledge of our feedback being directly put into use.”¹⁷

“Representatives from TikTok and Facebook joined a round table on disinformation organised by Sound and Vision once to discuss media literacy activities. They actively participated in the conversation; however, this did not lead to a follow-up from their side.”¹⁸

When asked if they were aware of experts in their country(ies) outside the Hub who were consulted to advise platform signatories on the above matters, 7% of the respondents declared that to the best of their knowledge, this happened for Facebook, Instagram and TikTok and 14% for YouTube. Regarding, LinkedIn there is no awareness of other experts consulted.

Data on experts outside the Hubs are lower compared to consultation with experts within the Hub.

¹⁷ Iberian Digital Media Research and Fact-Checking Hub (IBERIFIER)

¹⁸ Belgium-Netherlands Digital Media and Disinformation Observatory (BENEDMO)

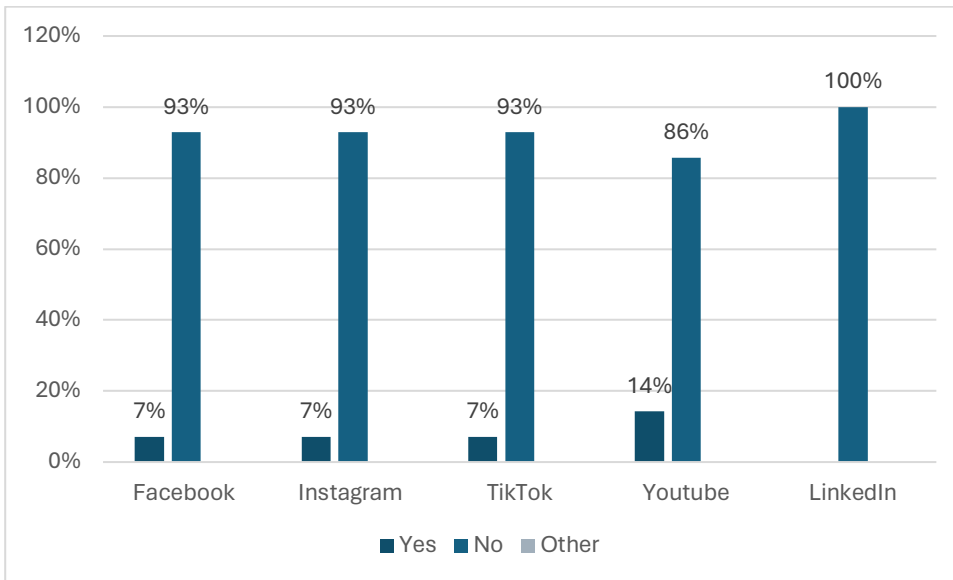


Figure 8. Are you aware of experts in your country(ies) outside the hub who were consulted to advise platform signatories on the above matters?

4.2 Labelling and targeted warnings

Experts from the Hubs were also asked if they were consulted by platform signatories to conduct research and testing on warnings or updates targeted to users who have interacted with content that was later actioned upon for violation of the signatories' policies. They were also asked if they knew about this having happened to local experts outside the Hub.

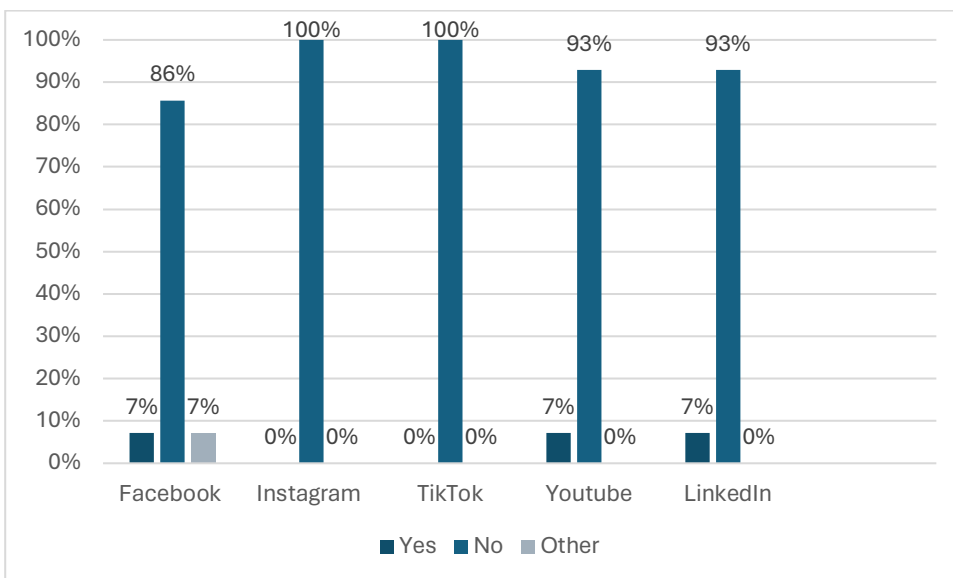


Figure 4. Have experts from your hub been consulted by platform signatories to conduct research and testing on warnings or updates targeted to users who have interacted with content that was later actioned upon for violation of the signatories' policies?

7% of the respondents said they were consulted by Facebook, YouTube and LinkedIn, while none was contacted by Instagram and TikTok. These figures change when the Hubs were asked if, to the best of their knowledge, they were aware of experts in their country(ies) outside their Hub who were consulted to advise platform signatories on the above matters. In this case, 7% stated they knew about Facebook, Instagram and TikTok

having consulted with other experts and 14% reported about being aware that YouTube did it.

When asked if experts from their Hub were consulted by platform signatories to provide scientific evidence on how to maximise the impact, usefulness and/or positive reception of labelling and warning systems employed by signatories, 7% of the respondents confirmed that they were consulted by Facebook, TikTok, Google Search and LinkedIn.

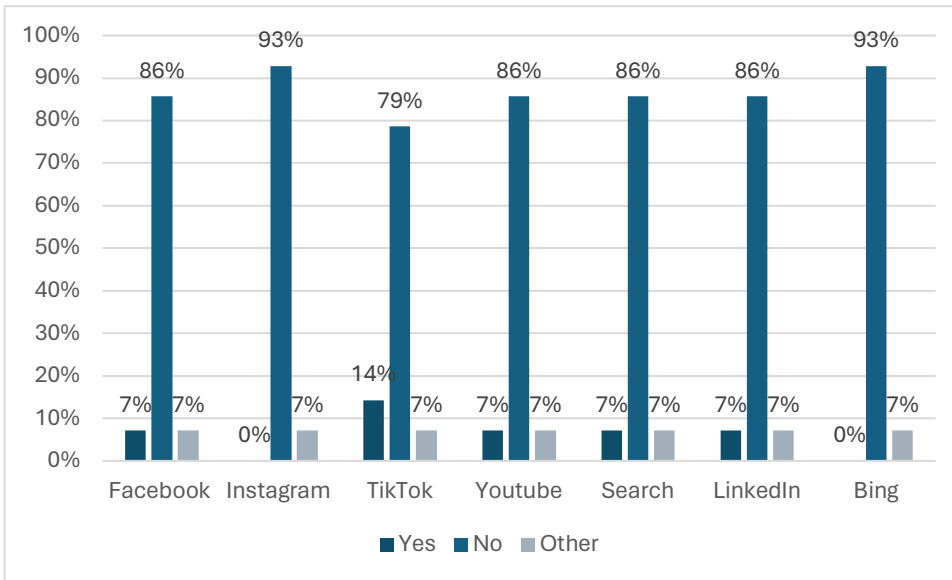


Figure 10. Have experts from your hub been consulted by platform signatories to provide scientific evidence on how to maximise the impact, usefulness and/or positive reception of labelling and warning systems employed by signatories?

7% of the respondents answered that YouTube and LinkedIn consulted other experts in their countries to provide scientific evidence on how to maximise the impact, usefulness and/or positive reception of labelling and warning systems employed by signatories.

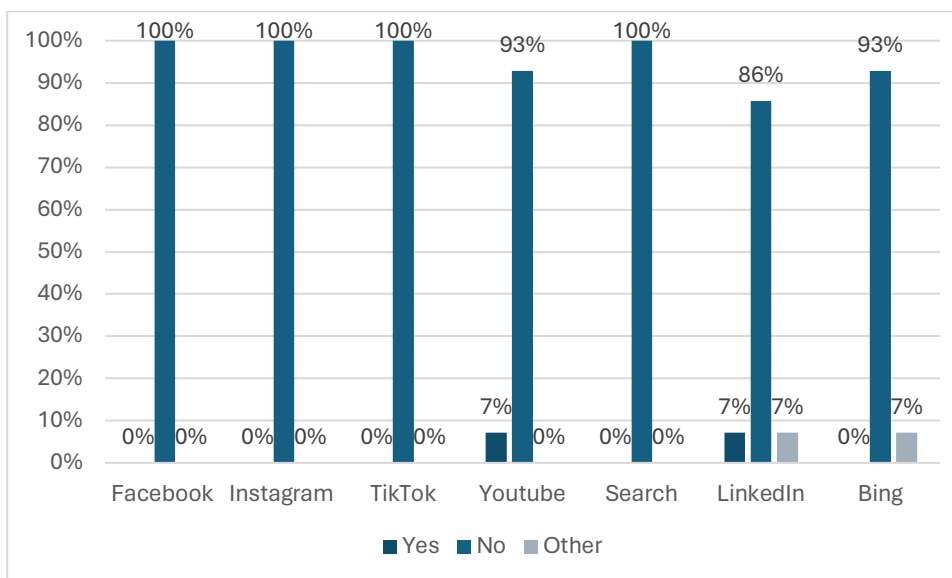


Figure 11. Are you aware of experts in your country(ies) outside the hub who were consulted to advise platform signatories on the above matters?

5. Recommended areas for further improvements

The following recommendations seem to emerge from the above analysis, as well as from specific suggestions put forward by the EDMO Hubs.

1. Media literacy campaigns should be implemented in a more inclusive and equitable manner. Online platforms should ensure they implement measures for vulnerable groups and that their policies in this regard are easily accessible.
2. MIL campaigns of a general nature should be implemented in local languages and in all EU Member States to avoid discrimination between EU citizens. It is a source of concern that most of the reported MIL campaigns are either implemented in few EU languages and/or not active in all EU Member States. Platform signatories should also ensure that they have local teams with sufficient human resources in all MS, especially to swiftly cope with crisis situations.
3. Longitudinal studies and specific metrics allowing for the assessment of the impact of the media Literacy measures should be foreseen. Ensuring broad and measurable impact is seen as key.
4. Online platforms should always involve independent media literacy experts when designing, implementing and assessing media literacy campaigns. In other words, collaboration with local experts in all Member States should be structured and planned, rather than occasional. Moreover, when online platform signatories consult with experts, they should be clearer as to how experts' advice is taken into consideration in the design, implementation, and ex-post assessment of their MIL activities.
5. Users should get clear explanations on how the services of the platforms work. In addition, transparency about, and explanations on how content is moderated should be ensured in all MS and languages. This should be accessible to users when they access given content.
6. Online platforms should provide sufficient financing to independent media literacy organisations in all EU member states, either directly or through dedicated funding vehicles. MIL initiatives should be seen as long-term endeavors, to cope with technological developments and lifelong learning processes. Therefore, it is recommended to commit to long-term initiatives rather than single, once-off, actions.



European Digital Media Observatory

Annex 2: EDMO Hubs Survey on the implementation of the CoP commitments designed to empower researchers



EDMO Hubs Survey on the implementation of the CoP commitments designed to empower researchers

1. Introduction

Chapter VI of the CoP contains specific commitments aimed at empowering the research community. In particular, commitments 26, 27, and 28 are addressed to platform signatories with a view to:

- Ensuring an appropriate access to non-personal data and anonymised, aggregated, or manifestly-made public data for the purposes of research on disinformation through automated means such as APIs;
- Fostering the development, funding and cooperation with an independent, third-party body that can vet researchers and research proposals to enable access to any data which may be necessary to undertake research on disinformation;
- Supporting good faith, independent research into disinformation that involves their services.

Previous analyses of the Baseline Reports provided by platform signatories in January 2023 revealed that progress in this area has been slow,¹⁹ and that often signatories failed to provide relevant information in their reports.²⁰ In their own assessment of the baseline reports, EDMO Hubs researchers from EDMO Ireland and GADMO, found that ‘Empowering Researchers’ was the worst rated section of the CoP, and that platforms’ performance across this Section was poor or less than adequate. Moreover, the lack of efforts, clarity and progress in this area was considered particularly concerning in light of upcoming obligations regarding researcher access to data under Article 40 of the DSA.²¹

The present analysis looks at the September 2023 reports by platform signatories and is based on a survey carried out across all 14 EDMO Hubs, from 21 December 2023 till 12 February 2024, the aim of which was to gather insights from the EDMO Hubs’ community of researchers with a view to assessing how their practical experience compares to the actions reported by the platforms.

2. Access to non-personal, aggregated, anonymized or public data through automated means

2.1 Platform Signatories' Reporting on Commitment 26

Commitment 26 covers the availability of access to non-personal data and anonymised, aggregated, or manifestly-made public data for research purposes on Disinformation, including through automated means such as APIs. In EDMO’s view, researcher APIs constitute the ideal tools to allow for access to real-time data and, therefore, for

¹⁹ <https://www.medialaws.eu/automated-access-to-non-personal-data-for-research-purposes-on-disinformation-under-the-strengthened-code-of-practice/>

²⁰ <https://democracyreporting.s3.eu-central-1.amazonaws.com/images/64e5c848b14ab.pdf>

²¹ Kirsty Park, Stephan Mündges, ‘Assessment of VLOP and VLOSE Signatory Reports for the Strengthened Code of Practice on Disinformation’, 38.

empowering researchers. The reports submitted in September 2023 by platform signatories appear to show considerable progress in this area compared to the baseline reports, with most platforms reporting on developing recent APIs for researchers, or opening them up to European Researchers. See Figure 12 for an overview of the extent to which these API-sharing mechanisms have been used by the EDMO research community, as reported by the fourteen EDMO Hubs that contributed to this survey. CrowdTangle has been used more extensively than similar API-access mechanisms, such as Meta's new Content Library or those from other platforms. Platform signatories list also other tools and datasets that contribute to increased transparency and may be useful for conducting research on disinformation, especially as access to most researcher APIs appears to remain currently limited to academic institutions.

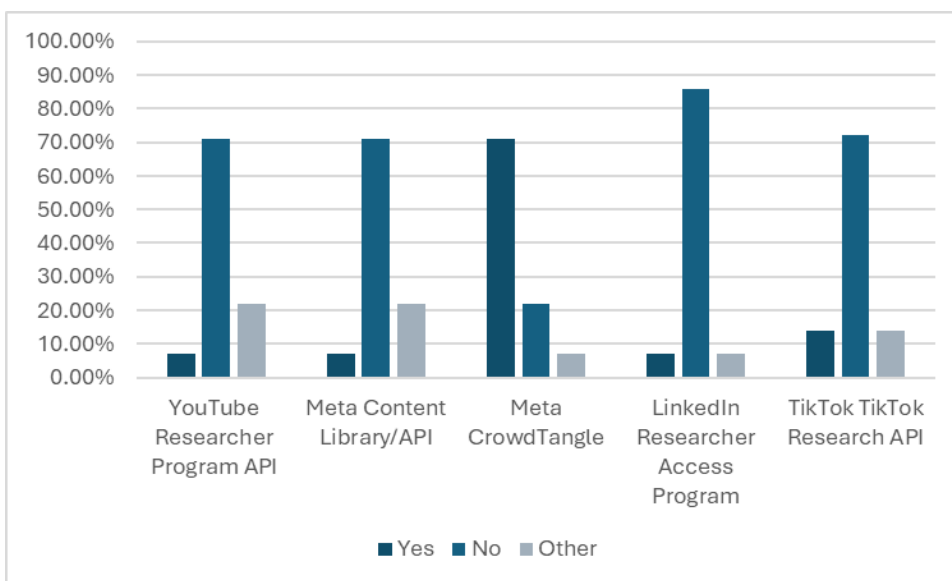


Figure 12. Use of API access mechanisms by the fourteen EDMO Hubs.

Google/YouTube

Google's report on Commitment 26 provides information on several tools and datasets, including the YouTube Researcher Program, as well as Google Trends and Google Fact Check Explorer.

– YouTube Researcher Program

The report contains information on the YouTube Researcher Program, which provides scaled, expanded access to global video metadata across the entire public YouTube corpus via a Data API. Information available via the Data API is reported to include video and channel titles and descriptions, views, likes, keyword searches, and other data. The API is reported to be open to academic researchers affiliated with an accredited, higher-learning institution. The report also provides the number of unique researchers accessing the YouTube Researcher Program API in H1 2023, broken down by Member States. The information provided regarding the country breakdown is crucial to understanding the uptake of the API by researchers throughout Europe, and Google is the only platform signatory who provided this information in its September 2023 reports. However, the breakdown also gives a picture of the limited use of the tool at present, with a total of 33 researchers from only 9 countries having access to the API. This appears to be partly

due to the low number of applications (41 in total), while roughly a third of applications (14) appear to have been rejected.

The EDMO survey asking EDMO Hubs about their experience of using the YouTube Researcher Program API found that only one Hub had experience of using the API for research purposes. While the reasons behind should be explored further, such findings demonstrate that although the Researcher API has been accessible at least since January 2023, the Researcher API remains little used, and is probably still not well known in the EDMO research community. More in detail, some EDMO Hubs explicitly stated that they are considering applying, other Hubs report experience of using the generic YouTube API (not for researchers), while one hub reports using the researcher API indirectly via the Node XI Software.

– *Other transparency tools*

Google has provided information on several other transparency tools, particularly on Google Trends and Google Fact Check Explorer, and their uptake across the EU.

EDMO Hubs were asked whether they have had experience of using these tools for their research on disinformation. Seven (out of 14) Hubs reported using one of these tools in their research or teaching activities. Overall Google Trends was considered to be useful for a quick overview and to track trend data of a given issue, and in providing real-time insights into the popularity of disinformation topics. Its wide scope enables researchers to analyze trends across regions and languages. However, it was reported to not be very strong in finetuning search phrases (i.e. wildcards, or regular expressions). Further, Google Trends does not provide raw numbers, only a simple indicator of interest over time ranging from 0 to 100, providing no real insight into the actual number of searches or queries.

Regarding Google Fact Check Explorer, EDMO Hubs commented on its freely available API, which was reported to have no limits for querying the data from the API and to provide valuable information about fact-checking articles. Those EDMO Hubs that used the tool reported that it is useful for global research and in providing an overview of debunked claims, but may not capture all relevant fact-checking information, while it also contains duplicate fact checks and no original claims.

Overall, the survey indicates that the key tool for research developed so far by Google, the YouTube Research API, remains underutilized. Other transparency tools provide some insight into specific areas, which may be useful for more limited research on disinformation.

Meta

The most significant development since the baseline report is the announcement in June 2023 about the rolling out of a new suite of tools for researchers: the Meta Content Library and API. Meta also continued to report on a number of existing tools, datasets and transparency reports, including CrowdTangle, the Community Standards Enforcement Report, the Widely Viewed Content Report, the Quarterly Adversarial Threat Report, the Ad Targeting Data Set, the URL Shares Data Set, the Research Platform for CIB Network Disruptions. Regarding the uptake of the tools and processes described in the report by

researchers, Meta was unable to provide the relevant data for the SLI (26.1.1). While the metrics concerning the use of the new Content Library and Content Library API are not provided, given the recent establishment of the tools for researchers, it is not clear why such data is not provided as regards CrowdTangle.

– *Meta Content Library and API*

According to the report, the recently launched Meta Content Library and API will provide the most comprehensive access to publicly-available content across Facebook of any research tool Meta have built to date. The new Meta Content Library and API is meant to provide near real-time public content from Facebook and Instagram. The Library is reported to include data from public posts, pages, groups, and events on Facebook, as well as public posts and data from creator and business accounts for Instagram. Data from the Library can be searched, explored, and filtered on a graphical user interface or through a programmatic API. The Content Library API allows programmatic queries of the data and is designed for computational researchers familiar with R or Python. Researchers from qualified academic and research institutions pursuing scientific or public interest research topics will be able to gain access to these tools according to the report.

When asked about their experience in using the Meta Content Library and API one EDMO Hub reported that they were already using the tools, while two Hubs were in the process of applying for authorization to access the tools. All other hubs replied not to have any experience with these tools. This may be due to the recent launch of the tools as well as lack of awareness about their availability.

– *CrowdTangle*

As in the baseline report, Meta's September 2023 report continues to refer to CrowdTangle, a content discovery and social monitoring platform that provides access to a subset of public data on Facebook, including engagement metrics and analytics for public pages, public groups, and verified profiles. Following news reports that Meta was planning to shut down CrowdTangle, Meta announced on 14 March 2024 that it will decommission CrowdTangle in five months (14 August 2024) and replace it with the Meta Content Library.²² A number of EDMO Hubs already reported that new users are no longer able to apply to CrowdTangle, and the registration has been unavailable for some time. Further, one EDMO Hub reported that the whole app does not appear to be actively maintained anymore. Overall, out of 14 EDMO Hubs, 10 reported that they had experience of using CrowdTangle. For those Hubs that did have access, a number of them reported slow approval rates and very little communication provided with regard to the application process, with one Hub reporting that they were able to gain access only on the fourth request, while one Hub reported it to be the only API option the lawyers at their university approved, as the fines for other access options in the contracts were a liability.

²² https://www.wsj.com/tech/meta-to-replace-widely-used-data-tooland-largely-cut-off-reporter-access-43fc3f9d?st=03b0jxytn5r2xec&reflink=desktopwebshare_permalink&utm_source=substack&utm_medium=email

With regard to the experience of using CrowdTangle, Hubs' views appeared to be varied, with one Hub reporting that the API worked well, another reporting an average level of satisfaction and lamenting 'a few glitches', and others complaining about the app no longer being maintained. Responses by Hubs provided some insight into the accessible data, and how the information is provided including the following observations and criticisms: (i) the API is rate-limited on the level of the organization, hence data is sometimes throttled, (ii) accessible data is fairly limited to posts of only the most popular public pages and groups (iii) information is selectively presented by the platform, (iv) not all groups are included as default, but they can be added manually. Finally, one Hub reported on their experience of using the web interface as opposed to the API access: "The experience is neutral, and the main complaint is the inconsistency of the data, which can be problematic if someone else is trying to verify the research results." Only one Hub was able to compare the new API experience with CrowdTangle, reporting it to be average.

– *Other transparency tools*

With regard to the other transparency tools reported by Meta, in particular the Community Standards Enforcement Report, the Widely Viewed Content Report, the Quarterly Adversarial Threat Report, the Ad Targeting Data Set, the URL Shares Data Set, and the Research Platform for CIB Network Disruptions, 6 EDMO Hubs reported they used at least one of the tools for their research on disinformation or in their teaching activities. One Hub reported that they requested access to the Research platform for CIB Network Disruptions in January 2023, but never received access or a response from Meta. The transparency reports were generally considered to provide useful guides on trends, but lacking in more detailed information. One EDMO Hub reported on their experience of using the URL Shares Data Set: "The data set is very rich in content, well structured, and the admission process via Social Science One was very useful and effective. Unfortunately, we can only use it via one access point, as the contracts were not suitable for our employees to sign due to high fines. In addition, the data cannot be used for network analyses as hoped due to its granular structure."

Overall, the survey conducted with EDMO Hubs indicates that the key new tool for research developed, namely Meta Content Library and API remains underutilized. Once researchers increasingly gain access to the tool, they will also be able to assess whether the Meta Content Library and API constitute an improvement compared to the previous API offered by Meta, CrowdTangle, amidst complaints of it no longer accepting new applications and lacking maintenance. Other transparency tools provide useful resources and insight into specific areas which may be useful for more limited research on disinformation.

Microsoft

Microsoft reports new implementation measures regarding Commitment 26, in particular related to LinkedIn and its launch of a new Beta program to allow bonafide researchers to access public data for research on the impact of misinformation and other online harms impacting the EU. The report mentions further that LinkedIn is expanding its API access for public data for disinformation related research purposes and a number of links to further information are provided, including further information on the application process. Finally, the report mentions also that APIs including non-public data may be made

available for research purposes based on special requests and the ability of the researcher to protect personal data pursuant to GDPR and relevant intellectual property rights. Upon approval, the researcher's application will be provisioned with the relevant APIs. With regard to reporting on the uptake of the program, Microsoft too explains they will make available this information in future reports because the program has only recently launched.

Microsoft also reports on several other Microsoft or Bing tools or datasets for research on disinformation, including in particular Microsoft Responsible AI Toolbox, Bing MS MARCO collection of datasets, ORCAS: Open Resource for Click Analysis in Search, Bing search dataset for Coronavirus Intent, Bing APIs, Keyword Tools and Backlinks, and Researcher tools: code & datasets - Microsoft Research.

When asked about their experience of using the newly launched LinkedIn API, only one EDMO Hub reported to have experience of using the LinkedIn Researcher Access Program. As with other newly launched APIs, this indicates that releasing a new tool for researchers does not automatically equate with its uptake, and awareness of the newly launched API is probably lacking at present within the researcher community. Concerning the other transparency tools reported by Microsoft, two EDMO Hubs reported on using at least one of the tools presented. In particular, one Hub reported experience of using the Bing Search API commercially.

TikTok

Similarly to other platform signatories, TikTok also reports on a recently launched API for researchers in Europe, which EDMO considers a very significant development with regard to data access for researchers by the platform. While the API was already reported on in the baseline report as it was initially launched in the US and accessed by US-based academic researchers, in its September 2023 report, TikTok emphasises the important development of expanding the Research API to Europe and EU-based researchers. The API is reported to provide researchers with access to public data on content, accounts and comments from the platform. Similarly to other platform signatories (with the exception of Google) TikTok does not provide information on the use of the API across Europe but states to be committed to sharing metrics in the next reporting period on its use by EU-based researchers. When asked about their experience of using the new research API, two EDMO Hubs reported that they had applied for access, but were still waiting for a response, respectively 4 weeks and two months later. Similarly to other recently launched researcher APIs, also the uptake, and probably the awareness and knowledge, of the TikTok API appears to be fairly limited in the European disinformation research community.

The TikTok September 2023 report also contains information on a few other transparency tools, including the TikTok Code reports, the TikTok Community Guideline Enforcement Reports, the Commercial Content related APIs, and the Ad Library. When asked about their use of such tools, five EDMO Hubs reported experience of using at least one of these tools in their research on disinformation. More specifically, three Hubs reported experience of using the TikTok Ad Library and its underlying API for research and analysis on disinformation, including to check the commitments to political advertising on TikTok. Among them there appeared to be agreement that the Library and underlying data were easy to use, but a weakness was the fact that the Ad Library now has a

download limit and is no longer accessible at scale. Finally, one Hub reported experience of previously scraping data with Python.

These Service Transparency Reports and Tools have been used by nearly half of the fourteen Hubs in the case of Google and Meta, while those from Microsoft and TikTok were used to a lesser extent, see Figure 13.

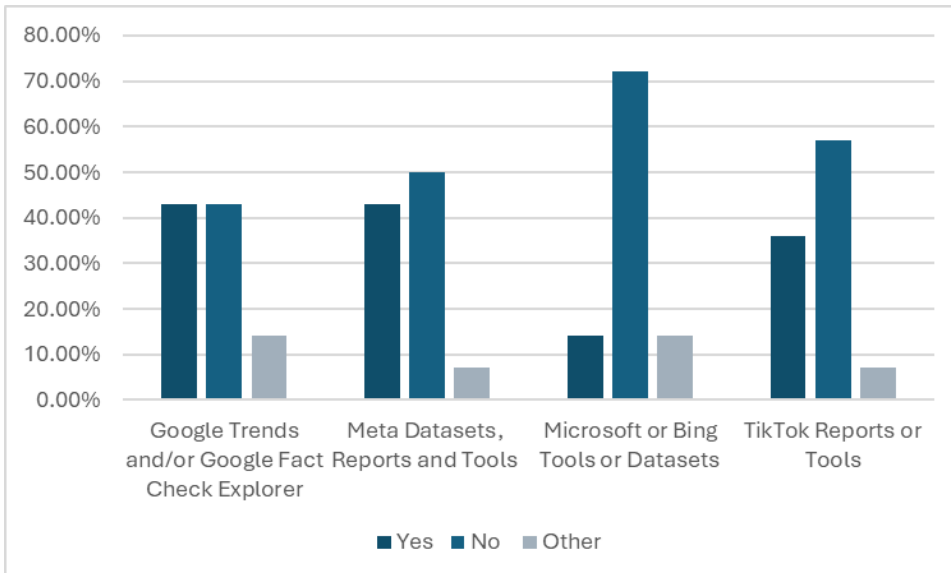


Figure 13. Use of Service Transparency Reports and Tools by the fourteen EDMO Hubs.

2.2 General observations from the EDMO Hubs research community

Overall, data transparency and data access through APIs continues to be a key priority for EDMO Hubs, with the general feeling that greater transparency is key to ensure effective research on VLOPs and VLOSEs. While some EDMO Hubs shared the view that some improvements have been witnessed in the last year, most significantly regarding open data libraries and content APIs for researchers, other EDMO Hubs considers that the situation has remained static or even deteriorated, see Figure 14.

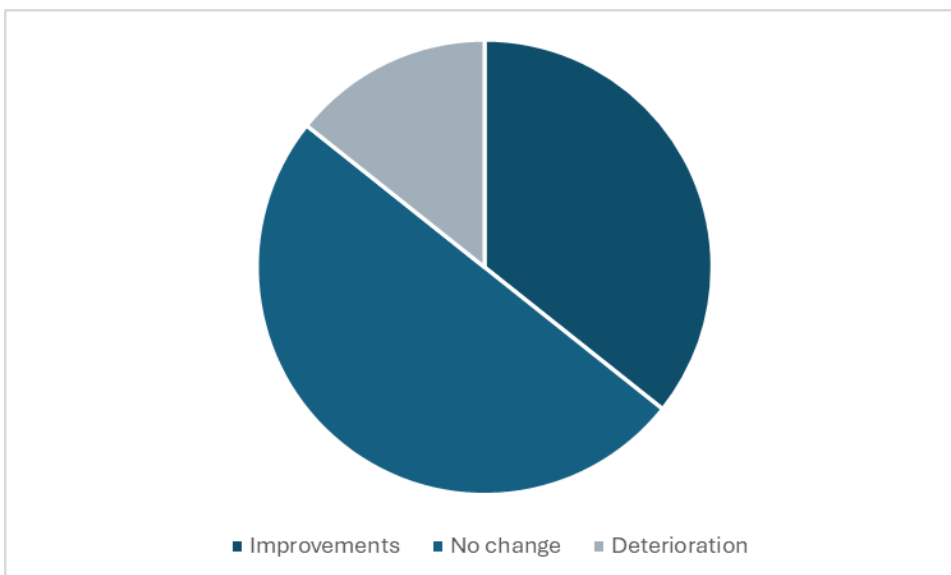


Figure 14. EDMO Hubs views on improvement vs deterioration regarding data access

As positive trends, a majority of Hubs emphasised the development of new tools by signatories, as detailed above. In particular, data repositories specifically for researchers, Ad data repositories providing user-friendly graphical interfaces and, most importantly, more comprehensive and documented APIs for large scale research were mentioned as welcomed steps forward. One Hub noted explicitly that “the problem is not the access to data but most likely awareness on the different tools that have been developed in recent years.”

When it comes to reported deteriorations, the main criticism concerned the decision by X (ex-Twitter, which is no longer among the signatories of the CoP) to charge significant fees to researchers for accessing their API, while completely canceling the Twitter/X Academic research access program. The shutting down of their data repository and API, which was widely used by the research community, was reported to be a serious setback for research data access. The new option to data access (<https://developer.twitter.com/en/use-cases/do-research>), which was quietly rolled out by X for research related to the DSA only, was reported to be available only for “Qualified research under the Article 40 of the Digital Services Act”. One EDMO Hub reported not being able to get access to data even when the application was clearly falling under Article 40 of the DSA.

Further, the current uncertainty surrounding CrowdTangle was reportedly impacting several research projects, as well as conditioning the scope for future research. In this connection, the Meta Content Library and API appeared to be available only via “Researcher Platform, (which) is a virtual data clean room that provides secure access to Facebook and Instagram datasets and tools designed for researchers.” This kind of virtual data clean room is of very limited use (or even impossible to be used at all) by computer-science/AI researchers, because of the requirement to “export your research outputs under agreed-upon terms and conditions. Research outputs can consist of code, figures, tables, graphs and statistics.” While the Meta Content Library and API currently remains underutilized as discussed above (2.1), only once researchers increasingly gain access to the tool, will they also be able to assess whether the Meta Content Library and API constitute an improvement compared to CrowdTangle.

More general observations were provided by EDMO Hubs concerning the current conditions underlying the use of APIs by researchers. Concerns were expressed in respect of the current conditions imposed in contracts by the platforms, including the risk of large fines for research organizations and the lack of existing mechanisms to protect research organizations from such risks. In particular, one Hub reported that the contractual requirements are very difficult to reconcile with the conditions of independent research and the protection of employees by the university. As a result, it reported having to set up workarounds that entail other risks and further delay the projects. In addition, the authorisation procedures, especially at Meta, do not appear to be geared towards finding solutions in a timely manner and enabling access, but rather to have become even more complicated over the past few years. In this respect, open sources of information were considered by one Hub to offer the advantage of enabling ad hoc analyses when necessary, “without having to go through months of approval procedures and legal checks.” Finally, one Hub reported a shift in the field towards a renewed appreciation for building custom scrapers that are no longer dependent on the services offered by the platforms.

When asked about whether there was anything they would like to propose to ensure that the commitments are properly implemented, and what were the most pressing issues to be prioritized, the majority of EDMO Hubs indicated, firstly, that improvements for data access and data transparency were the main priority in this area. Complaints were expressed concerning the length of the application process by platforms, making it difficult for researchers to realise the intended research projects within the funding period. By contrast, the review of the research projects by a dedicated unit were considered very useful to enable a fast process. One Hub suggested that the establishment of such intermediary institutions across countries and platforms would be welcomed. Secondly, given the challenges of reconciling the contractual requirements with the conditions of independent research and the protection of employees by the university, as well as the increasingly complicated authorisation procedures, one Hub recommended a degree of standardisation through common model contracts. In a similar vein, another Hub recommended to “minimize bureaucracy and ensure that platforms respond swiftly so that research time and resources are used optimally.” Another EDMO Hub recommended that a legal protection/insurance system for public research institutions, NGOs and independent researchers should be established.

Other general observations and suggestions by EDMO Hubs, specifically regarding the APIs, included:

1. Need for platforms to *pro-actively* raise awareness of the different tools developed in recent years, especially in the form of APIs. In the words of one Hub: “It is very important for researchers to get a comprehensive documentation of the data repositories API”.
2. Trainings and tutorials on how to retrieve available data is crucial for researchers to optimize the time spent on data collection. A well-defined dictionary for returned data objects after a request is very important too.
3. Platforms should set clear rules to clarify:
 - who is *eligible* to carry out relevant research (YouTube researcher Program limits the eligibility to “accredited, higher-education institution that can grant degrees”, which completely leaves out research institutes);
 - what is considered to be eligible research (to prevent X from rejecting relevant applications);
 - the *format* of data access (to prevent Meta providing very limited virtual data clean rooms, rather than a standard API);
 - maximum *length of application evaluation process* (to prevent TikTok having too long evaluation periods).
4. Further information on fact-checked/flagged content, as it is currently unclear if data detected as misinformative is accessible to researchers when is removed by the platforms. Additionally, if data is flagged as misinformative, it would be useful for researchers to gather more information on incidence, for instance through timestamps to assess users’ engagement before and after the flag.

3. Cooperation with vetted researchers for data access

Under commitment 27, relevant Signatories commit to provide vetted researchers with access to a wider set of data, through data sharing programmes or other governance structures. To this end, relevant Signatories should facilitate the development, funding and cooperation with an independent third-party body that can carry out the vetting process. Moreover, Signatories should provide an overview of timelines, practical outcomes and impact of the process and any partnerships, programmes and other forms of engagement with researchers.

3.1 Platform Signatories' Reporting on Commitment 27

Google (Search and YouTube)

In its Report of September 2023, Google mentioned its continuous engagement with relevant stakeholders from industry and academia, including EDMO, as part of the Working Group for the Creation of an Independent Intermediary Body (hereafter "Working Group"). However, such a Body has not yet been created at the time of writing.

Regarding pilot programmes aimed at data-sharing with vetted researchers for the purpose of investigating disinformation (Measure 27.4), it is reported that Google Search continues to explore options for this purpose. For YouTube, YouTube's global Data API is mentioned as a relevant fulfillment of this measure.

Meta (Instagram and Facebook)

Meta mentions its cooperation with the Working Group and EDMO, and its intention to share a dataset with researchers from the latter via a third party. Meta iterates the need for "a clear code of conduct for both platforms and researchers to follow is essential to effectively balance a desire for more transparency and research with protection of personal data".

For Measure 27.4, Meta mentions data sharing with independent researchers on coordinated inauthentic behaviour ([CIB](#)).

Microsoft (Bing and LinkedIn)

Microsoft also mentions its participation in the above-mentioned Working Group.

For Measure 27.4, Microsoft mentioned partnership with Princeton University and the Carnegie Endowment for International Peace, to fund and share data with the Institute for Research on the Information Environment (IRIE), but to what extent this benefited the research community within Europe remains unclear.

TikTok

Like the other VLOP Signatories, TikTok highlighted its ongoing participation in the Working Group.

Regarding data sharing with vetted researchers as part of pilot programmes, the platform stresses that it is one of the few VLOPs to commit "to participate in a data access pilot with EDMO in order to trial the process for sharing data with vetted researchers designated under the DSA."

3.2 Observations from EDMO Hubs research community on Commitment 27

Overall, the development of structures and bodies to provide access to vetted researchers is generally viewed by EDMO Hubs as work in progress. Survey respondents predominantly indicated that specific data-sharing structures and partnerships have not been, and are not being used within the EDMO Hubs' research community. One survey respondent in particular mentioned the value that the research community ascribes to their ability to conduct research independently and without interference. However, this raises the issue of how specific research-sharing agreements, as envisioned under the CoP, can be developed in practice.

4. Signatories' support for researchers and prevention of adversarial actions

Under Commitment 28, platform signatories pledge to provide adequate and structural support to the research community, in the form of sufficient human resources to accommodate the needs of the research community, prevention and assessment of adversarial actions against the research community, and allocation of funding for relevant research projects²³.

4.1 Platform Signatories' Reporting on Commitment 28

Google (Search and YouTube)

Regarding staff support for researchers and prevention of adversarial actions, Google mentions its commitment to transparency and consultation of researchers to identify needs and issues, as well as to provide feedback on their projects. The September 2023 report mentions its willingness to cooperate with EDMO on an annual consultation on researcher's experiences.

Regarding funding for projects, Google highlights its support to initiatives aimed at countering disinformation in Europe, in the form of its donation to the European Media and Information Fund (EMIF). In addition to the fact-checking and media literacy projects that have been supported by EMIF, the Fund has also supported initiatives from the

²³ More specifically, the Commitment includes the following measures to achieve its objectives. Measure 28.3: "Relevant signatories will not prohibit or discourage genuinely and demonstratively public interest good faith research into Disinformation on their platforms and will not take adversarial action against researcher users or accounts that undertake or participate in good-faith research into Disinformation". Measure 28.4: "As part of the cooperation framework between the Signatories and the European research community, relevant Signatories will, with the assistance of the EDMO, make funds available for research on Disinformation, for researchers to independently manage and to define scientific priorities and transparent allocation procedures based on scientific merit".

research community in Europe. At the time of writing, EMIF has committed over 1.8 million Euros in support of thirteen projects aimed at investigating instances of disinformation, covering fourteen EU member states, plus the United Kingdom. The Fund has also committed over 3 million Euros in support of eight research projects covering eight EU member states, plus Switzerland and the United Kingdom.

Meta (Instagram and Facebook)

In its September 2023 report, Meta affirms its commitment to providing "the tools and data that researchers need to study Meta's impact on the world." As examples, the Meta Content Library and API are mentioned, as is CrowdTangle.

Regarding Measure 28.4 on dedicated funding for research projects, it is stated that "No reporting possible at this stage."

Microsoft (Bing and LinkedIn)

For both Bing and LinkedIn, the Microsoft report mentions that resources have been made available for researchers, alongside with consultations and data-sharing initiatives already mentioned in the analysis of Commitment 26.

Information regarding funding of projects is not provided, but is available upon request, per the report.

TikTok

TikTok mentions a variety of means to ensure that researchers are supported and able to express their views. Among these means are the Safety Advisory Council for Europe, comprising members from academia and civil society; the Outreach & Partnerships Management Team, aimed at establishing partnerships with the research community; and Trust and Safety teams, for consulting with the research community. The report also refers to the data-sharing initiatives mentioned in the analysis of Commitment 26.

Moreover, TikTok states its availability to cooperate with EDMO on a pilot programme for sharing data with vetted researchers, but no mention of funding initiatives is made.

4.2 Survey Responses Regarding Commitment 28

The majority of the respondents indicated that they have not experienced adversarial actions from platform signatories. However, two respondents confirmed that they had experienced such actions. This included discontinuation of previously functioning API sharing systems, such as the TikTok Advertisement Library, and subsequent blocking of the respondent's IP-address upon using said APIs²⁴. Other obstacles encountered by the respondents were contractual and financial obligations that restricted their ability to conduct research. These include potential financial costs associated with obtaining access to APIs, or fines levied by platforms after using APIs.

²⁴ The underlying reasons for these adversarial actions are unknown.

Funding agreements between platform Signatories and the Hubs' research community appear limited. The majority of the respondents indicated that they were not aware of such arrangements within their Hubs. Some respondents also emphasised the importance of independent and unrestricted research, which they feared would be impeded by any financial agreements between platform Signatories and the research community.

Respondents who answered in the affirmative referred to indirect funding from Google, via the European Media and Information Fund's (EMIF) support for research and investigations of disinformation in Europe. One respondent mentioned support from Facebook, which committed an unrestricted gift of \$100,000 to a project titled 'Defending Online and Offline Civility: Analyzing and Debunking Online Hate Speech'. This project aimed to investigate the link between hate speech and disinformation.

Regarding funding agreements between VLOP and VLOSE Signatories and organisations outside the Hubs, the respondents mentioned some, but limited, awareness of such agreements.

5. General conclusions and recommendations

The September 2023 reports on 'empowering researchers' by the platform signatories demonstrate that this is a rapidly changing area, with a number of new tools that are being developed by platforms especially through researcher specific APIs to allow access to researchers to real time data under Commitment 26, also to meet the requirements of relevant provisions under the DSA (in particular Art. 40.12).

Despite positive reports on recent development of new tools for researchers by all platforms, a number of limitations appear to be currently hindering their use by the research community. In particular, several reasons may be ascribed to the lack of use of new APIs by EDMO Hubs, starting most obviously from their recent set up. Other reasons include lack of awareness of the new tools, complicated or lengthy application procedures and potential legal risks deriving from their use. While greater uptake may be expected as the tools continue to be rolled out and refined - also in context of DSA – it is clear from the current report that simply launching an API for researchers may not be enough to meet the requirements of Commitment 26 and ultimately the DSA. Platform signatories must make the research community aware of such tools, make them usable, and tailor them to needs of research community.

As a result of such limitations, overall the uptake of APIs appears slow and piecemeal, with very few European researchers appearing to use such APIs at present. In particular, the survey indicates that EDMO hubs are not currently using the new APIs, with one exception, and the only tool that is reported to be used widely by the EDMO Community remains CrowdTangle, which Meta announced will be shut down in August 2024. With Meta's new Content Library still being rolled out, its accessibility and user-friendliness are still in question. As such, access to Meta's data may de facto be deteriorating until the Library is fully operational, in Europe.

While some platforms appear to be more advanced in this area than others, further information must be gathered from the research community to understand the type of

data available and its accessibility, including whether new products constitute significant improvements on previous ones. Given most tools are still being tested, it remains difficult to understand their utility and how they compare to previous instruments.

Several concrete suggestions emerge from the foregoing analysis, which platforms should consider implementing as soon as possible.

1. Given the urgency of wider data access for researchers, and the key role of independent research in enabling transparency and independent oversight, especially in the context of new technological developments as generative AI and upcoming elections worldwide, it is essential that:
 - Platforms tools and interfaces for data access are rolled out fast, are comprehensive, clear and user friendly;
 - Similarly, the need for application procedures to be clear and for applications by researchers to be approved swiftly are crucial building blocks for each data access system to be functional;
 - Finally, the suggestion for applications to be approved at organizational level, as opposed to being linked to specific projects, can make the APIs easier to use and maximise their use by the research community in the long term.
 - The data provided meets the needs of the research community by enabling incremental access to data, which should also include providing researchers with information on data that is flagged as misinformative.
2. Need to raise awareness about the newly developed APIs, including making the information clear and user friendly and providing training and support to the research community on these tools.
 - While EDMO has been running a training series for researchers inviting platforms to provide training to the EDMO community of researchers on the datasets and tools available, more detailed and practical training and capacity building is urgently needed to make these tools usable and allow researchers to provide independent oversight and accountability at scale as is clearly envisaged in the DSA.
 - Allowing access to the APIs also to researchers from civil society will be fundamental in reaching such a goal. Platforms should clearly step up their efforts in this area;
 - Further, greater standardization of APIs will allow the research community to use them more widely, rather than having to gain specific skills for each platform. Going forward the question may be raised of whether specific tools could be developed which could enable the use of APIs by researchers from different disciplinary backgrounds beyond data scientists.
 - Providing support to researchers entering legal contracts emerged as a concrete pressing need from the EDMO research community.

3. A suggestion to lower the barrier was to foster collaborations between platforms and researchers on issues within the Code such as “conduct research and testing on warnings or updates targeted to users who have interacted with content that was later actioned upon for violation of the signatories’ policies”. In this way, academic researchers could learn to work with the available data alongside experts from the platforms, while platforms would benefit from the knowledge gained through these research projects and improve the implementation of their commitments.



Annex 3: Fact-checking and related Risk-Mitigation Measures for Disinformation in the Very Large Online Platforms

Published by the European Fact-Checking Standards Network (EFCSN)



European Fact-Checking
Standards Network

Fact-checking and related Risk-Mitigation Measures for Disinformation in the Very Large Online Platforms and Search Engines

A systematic review of the
implementation of big tech
commitments to the EU Code of
Practice on Disinformation

January, 2024



European Fact-Checking
Standards Network

The European Fact-Checking Standards Network a.i.s.b.l Boulevard Bischoffsheim 39, boîte 4, 1000 Brussels
Fact-checking and related Risk-Mitigation Measures for Disinformation in the Very Large Online Platforms

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Summary

In September 2023, the Digital Services Act (DSA) became applicable for the services that [have been already designated](#) as Very Large Online Platforms (VLOPs) or Very Large Online Search Engines (VLOSEs). As a key part of their renewed obligations, these companies are now responsible for having “reasonable, proportionate and effective risk-mitigation measures” for the systemic risks “stemming from the design or functioning of their service and its related systems, including algorithmic systems, or from the use made of their services”.

As disinformation is one of those risks that have “actual or foreseeable negative effects on democratic processes, civic discourse and electoral processes” it is worth looking at how some of the designated services are approaching one of the best known risk mitigation tools available: independent fact-checking. Particularly since most of those services are also signatories of the Code of Practice on Disinformation that is slated to become a DSA Code of Conduct.

The key commitments of the Code of Practice on Disinformation’s chapter on the empowerment of fact-checkers are (1) that platforms conclude agreements with independent fact-checking organizations to have complete coverage of the EU member states and official languages, (2) that they integrate or consistently use fact-checking in their services for the benefit of their users, and (3) that they provide fact-checkers with access to the data that they need to maximize the quality and impact of their work.

Using public data from those companies’ last DSA and Code of Practice semiannual reports, plus the insights of the European fact-checking community, the European Fact-Checking Standards Network (EFCSN) has produced this thorough evaluation of how and if the very large online platforms/search engines are fulfilling their commitments to the self-regulatory Code in force since early 2023. Major findings include:

- **YouTube** lists as partners “EU based fact-checking organizations” that are in Myanmar, Indonesia, or Brazil.
- **Google Search**’s reported integration of fact-checking fully relies on the unpaid contributions of fact-checking organizations to ClaimReview, in direct contradiction with the Code of Practice.
- **TikTok** does not work with a local fact-checking organization in 19 out of 27 EU member states and in some “covered” countries, they reviewed less than 15 videos over six months.
- **Facebook** does offer independent fact-checking to users in almost every EU member state, but more country-specific data would be welcome to assess the depth of that fact-checking coverage.
- **Instagram** shows substantially fewer fact-checking labels than Facebook even though it has access to the same fact-checks, indicating difficulties in access to data for the fact-checkers or lack of better scaling systems within Meta.



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- **WhatsApp** partners with fewer fact-checking organizations in fewer countries than in the previous reporting period.
- **Bing**, despite saying that it relies on ClaimReview to integrate fact-checks in search results, showed not even one fact-check on the first page of results in 15 different countries over a period of six months.
- **LinkedIn** is using automatic translation tools to moderate disinformation as its only fact-checking partner does not work in 75% of the official languages of the EU.
- **X-Twitter** ranks worst in a survey of European fact-checkers as not a single fact-checking organization considers the company to take disinformation seriously.
- **Telegram** is a critical actor in the dissemination of disinformation in the EU and more attention should be devoted to effective DSA implementation on its public components.































About the EFCSN:

The European Fact-Checking Standards Network is a registered association that represents more than 50 independent fact-checking organizations from over 30 European countries that are committed to the highest standards of independence, transparency, and methodological quality as required by the European Code of Standards, and whose adherence to those is evaluated periodically by independent experts.

Contact: policy@efcsn.com

Compliance at a glance

-  **No progress or no information**
-  **Not enough progress or not enough information**
-  **Some progress**

Service	Agreements and fact-checking coverage	Integration and use of fact-checking	Access to information for fact-checkers
YouTube			
Google Search			
Facebook			
Instagram			
TikTok			
WhatsApp			
Bing			
LinkedIn			
X - Twitter			
Telegram			

Service by Service Analysis

YouTube

According to [YouTube's own reporting](#), the video platform has over 900 million monthly users in the European Union, likely making it the biggest platform in Europe. At the same time, YouTube has played [a central role](#) in the dissemination and monetization of disinformation globally, and in the [growth of conspiracy theories](#) and polarization. The fact-checking community has reached out to YouTube about this repeatedly, [publicly](#) and privately. In a recent EFCSN survey of European independent fact-checking organizations, YouTube was considered to be the very large online platform that took the disinformation problem least seriously among all of the current Code signatories.

Agreements and Fact-checking Coverage

During the reporting period, YouTube made little progress towards fulfilling its commitment under the Code of Practice to “*set up agreements between them and independent fact-checking organisations to achieve fact-checking coverage in all EU Member States*”. In the aforementioned survey, no European fact-checker reported having that kind of agreement with YouTube. Subsequently, YouTube was not able to produce any significant reporting on the impact, nature, coverage, or effectiveness of a fact-checking program that does not exist.

Regardless, the most worrisome aspect of YouTube's report is the apparent misrepresentation of some of its current actions as if they were the implementation of the Code of Practice. For example, the company lists 10 “EU-based fact-checking organisations in the YouTube Partner Program (YPP)”:

- Some of the fact-checking websites mentioned focus on markets as far from the EU as Myanmar, Indonesia, or Brazil.
- Most, if not all, of fact-checkers mentioned appear to be on the list only because they are part of a larger Media house that does have a YouTube channel while most of the fact-checking operations themselves do not have one.
- The “YouTube Partner Program (YPP)” is a monetization scheme for any type of content creator in the platform that YouTube is passing as a genuine partnership with the European fact-checking community.

In its report, YouTube also highlights some grants (mostly those by the Google News Initiative or GNI) to fact-checking organizations in previous years as if they were partnerships to provide specific fact-checking coverage of an EU member state. Most of the time, though, those grants are funding programs in which fact-checkers provide training to third-party organizations or execute Media Literacy campaigns, rather than funding to produce fact-checking to be showcased or used by YouTube in any way.



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The action most often mentioned in YouTube's report is GNI's contributions to the European Media and Information Fund (EMIF) and to the International Fact-Checking Network (IFCN), which need some additional context:

- Taking into account EMIF's 52 active grants as of October 9, 2023, over 76% of the funding goes to projects that do not include any EU-based fact-checking organizations. Actually, among EMIF's 110 recipients, only 17% are EU-based fact-checking organizations, coming from just 11 EU member states.
- Of the recipients of the IFCN-administered fund, according to YouTube's report, 17% are EU-based fact-checking organizations located in 4 member states.
- 96% of the European fact-checking organizations do not think YouTube offers a "fair financial contribution for fact-checkers to combat disinformation on its service" as it committed to do in the Code of Practice.

The lack of progress by YouTube in concluding agreements with fact-checkers that allow for complete coverage of the EU and its official languages stays in the way of YouTube making meaningful advances in many other key areas of the Code. It is all the more regrettable because 63% of European fact-checking organizations say they already monitor YouTube for disinformation or publish debunks about content widely seen on the platform, while 92% express an interest in having an agreement with YouTube to provide fact-checking coverage of the platform in their countries.

Integration and use of fact-checking

This aspect is again the area where YouTube has made no progress whatsoever since joining the Code of Practice, despite repeated assurances in writing that it would "explore opportunities" to do so. In its report, the company says now that it "needs to have more video fact-checking content on the platform" before taking action, effectively putting the burden on the fact-checkers to produce video content while committing no long-term resources to this and offering no guarantees on how and if that content would be used, promoted, or compensated.

Assertions such as "YouTube allows fact-checkers to post and share both short- and long-form video content" or "users can subscribe to fact-checking channels to get notifications when new content has been uploaded" are the perfect illustration of how lack of action sometimes finds a way to be reported as implementation of the Code of Practice: yes, YouTube allows fact-checkers and everyone else on the planet with an account to post and share videos and get subscribers. The fact that YouTube does not intend to actively prevent fact-checkers from using its service cannot be construed as collaboration and is opposed to both the letter and the spirit of the "Empowering the Fact-Checking Community" chapter.

There are many different ways to at least test the integration of fact-checking in videos through overlays and other visual cues to add context. A wide variety of different solutions could have already

been deployed in line with YouTube's commitment to use the work of independent fact-checkers consistently and collaborate with them "starting by conducting and documenting research and testing".

However, if YouTube wishes to state that its vision for integrating fact-checking depends on the production of video content by fact-checking organizations, that would require more information about how those videos would be used by the platform and how it intends to support it. Video production requires more time and more investment, and certainly more resources than "an open session about content strategy and best practices" that YouTube has reported. Its current actions do not in any way align with YouTube's assertion that supporting fact-checking is "a critical piece of the product integration commitment".

Access to information for fact-checkers

YouTube has committed to "provide fact-checkers with prompt, and whenever possible automated, access to information that is pertinent to help them to maximise the quality and impact of fact-checking" through "appropriate interfaces (...) to access information on the impact of contents on their platforms" and to work with EFCSN and EDMO in a framework to that purpose. While those conversations can advance, it is worth analyzing the specific challenges presented by YouTube in this aspect and highlighting some assertions in its report that do not align with the expressed commitment.

As in some other parts of the report, YouTube implies that the information already available to all users is the same necessary to "maximise the quality and impact of fact-checking" whereas we beg to differ. While YouTube provides users with information about the impact of their own contents, what fact-checkers are more concerned about is information about public content by other users, particularly as they investigate claims.

In that sense, those interfaces could be extremely valuable if fact-checkers were to use them to run, for example, keyword searches on the transcription of videos (data that should already be available through the automatically-generated subtitles in some cases). Or if they could obtain information on the patterns of consumption of a given content through time, geographically, and whether or not it has been promoted or monetized and how. This was already communicated to YouTube after the publication of its baseline report in January 2023.

If YouTube still has not been able to report any data on the use of such an interface (SLI 32.1.1) it is because the interface does not exist and its reported actions in this area are thus not serving the purpose envisioned by the Code to provide pertinent information to fact-checkers to do their job. Again, YouTube reports that it does not discriminate against fact-checkers, so unless they did so before signing the new Code of Practice, it is hard to see any advancement at all.

Google Search

Google Search, with [over 800 million monthly users in the EU](#), is by far the largest search engine there is and consequently the most influential service in shaping what Europeans see when they look for information online. For years now, European fact-checkers have alerted Google Search that its anti-disinformation strategy, based on the use of ClaimReview review mark-up, was not sustainable as it relied on the good will of fact-checking organizations contributing their content and marking it up without compensation. As explained to Google also after its baseline report, this goes strongly against its commitment to “provide fair financial contributions to the independent European fact-checking organisations for their work to combat Disinformation on their services”.

Agreements and Fact-checking Coverage

In this section of its report, Google Search portrays the contributions of the Google News Initiative (GNI) to the European Media and Information Fund (EMIF) and to the International Fact-Checking Network (IFCN) as if those were agreements to provide fact-checking coverage of the European Union. As was the case with YouTube, this is not accurate; it is again helpful to provide some context to the grants already in place:

- Of EMIF’s 52 active grants as of October 9, 2023, over 76% of the funding goes to projects that do not include any EU-based fact-checking organizations. Actually, among EMIF’s 110 recipients, only 17% are EU-based fact-checking organizations, coming from just 11 EU member states.
- Of the recipients of the IFCN-administered fund, according to YouTube’s report, 17% are EU-based fact-checking organizations located in 4 member states.
- According to the European fact-checking organizations themselves, only 15% have an agreement with Google and over 95% do not think Google offers a fair financial contribution to fact-checkers to combat disinformation on its service, as it committed to.
- Even with all those caveats and limitations, those resources are welcome and much needed. The EFCSN is as always open to discuss how they can better serve the needs of the independent fact-checking organizations and the overall objective of providing full fact-checking coverage of all EU member states and languages, with a particular focus on funding being more stable and not subject to yearly projects not always related to fact-checking.

Some of the other additional partnerships Google Search reports with fact-checking organizations in EU member states are grants that fund programs in which they provide training to third-party organizations such as Media outlets or execute Media Literacy campaigns. The funding is not dedicated to provide fact-checking coverage of a member state and it does not entail Google Search using the fact-checks produced by those organizations in any way.

For all those reasons, Google Search is unable to provide any information on the number of Member States and languages covered by its agreements with fact-checking organizations (SLI 30.1.1) again



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because it does not have any. There is a clear possibility to address this key shortcoming in the future, as 100% of European fact-checkers, all of those that were surveyed, said they were “interested in entering an agreement with Google to provide fact-checking coverage” of their countries.

Integration and use of fact-checking, and access to information for fact-checkers

According to Google Search’s own reporting, there have been no changes in the way the service uses and integrates fact-checking during this reporting period, and it does not plan to implement any in the next one. The surfacing of fact-checking rich snippets for users when they search for information on already-debunked claims is a valid and significant way to empower users of search engines, but it is impossible not to question the sustainability of this model if it continues to rely entirely on the unpaid work of the European fact-checking organizations.

Google Search’s current approach depends on the fact-checkers voluntarily marking the articles they produce in the ClaimReview Schema so they can be surfaced for users. The EFCSN has been in touch with Google about options to fairly compensate for that labor-intensive and much-specialized work, as it is an issue that greatly concerns the fact-checkers and has had an impact on the availability of fact-checks through ClaimReview across different European countries.

As for the metrics provided in the report, Google offers the number of impressions of rich snippets and the number of available fact-checks that can be surfaced, both per member state, but it would be useful to add the number of unique articles used per member state for both categories, as it would provide a more meaningful measure of how the integration benefits users in each member state.

Google Search reports that its “use of fact-checks does not involve taking specific actions with regards to content that is fact-checked” and so far refuses to clarify whether the insights of fact-checkers have any influence on its judgments on the authority or reliability of a site when building search results. What we know for sure is that users have no way to flag a particular search result or link as containing disinformation, depriving Google of useful insights on the content it puts in front of the users, insight that could be invaluable for researchers and fact-checkers as well.

Another topic of concern about Google Search is related to the display of disinformation on privileged and curated spaces such as Google News, Google Discover or functionalities like snippets or “People also ask”. The impact of those on how users acquire information is considerable and the EFCSN calls on Google to work with fact-checkers to make sure authoritative information is promoted and disinformation gets at least contextualized.

Facebook

Meta's Facebook has reported having [well over 250 million monthly users](#) in the EU and it is the most popular service among those considered strictly as social media. After playing a central role in the first large-scale controversies about disinformation online, Facebook became the first major digital platform to enter a global partnership with fact-checking organizations in 2016 to build a third-party fact-checking program that was later implemented in other Meta services.

Agreements and Fact-Checking Coverage

As a result of that long-standing relationship, Facebook reports that it has agreements with at least one fact-checking organization in all but one of the EU member states (Malta) to provide fact-checking coverage. While Meta withholds specific information on how they ensure fair financial contributions, 74% of the European fact-checking organizations believe Meta does, according to an EFCSN survey. There is almost unanimous agreement that contributions offered are enough to cover costs and that editorial independence is respected at all times.

Integration and use of fact-checking

Meta's third-party fact-checking program allows partner organizations to proactively flag contents on Facebook as containing disinformation, resulting in the labeling of that content so users can access the evidence on why an independent fact-checker has rated a particular claim as false, partially false, lacking context... According to Facebook's report, some of those ratings are also used to reduce the virality of some contents.

EFCSN believes that proactive flagging contributes to ensuring the editorial independence of fact-checkers to make their own decisions on what to investigate and prevents artificial limitations on their work, but also keeps most of the contents online for users to have the final say on whether they want to interact with them or not. This aligns with the Code's overarching objectives of empowering users and fact-checkers.

Facebook's assessment of the impact of this integration model includes the number of contents treated with a label due to fact-checkers' assessment and the percentage of attempted reshares of fact-checked content that were not completed after a fact-checking warning was surfaced, both reported on a member-state level as suggested by the EFCSN after Meta's baseline report. It speaks to the effectiveness of the integration that 37% of EU users who saw the warning chose not to share the content, a level of impact unheard of in organically curbing the dissemination that is 100% respectful of freedom of speech, too.

This level of granularity can and should be extended to SLI 31.1.1 as the "number of articles written by third party fact checkers" is only provided through a global single figure that gives no meaningful



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information on how and if users are benefitting from this integration differently in different EU countries. There should also be more information on the relationship between fact-checking and repeat offender policies and the challenges of independent verification of AI-generated content.

Access to information for fact-checkers

In line with the Signatories' commitment to "provide fact-checkers with prompt, and whenever possible automated, access to information that is pertinent to help them to maximize the quality and impact of fact-checking", Meta reports that they gather "signals, including how people are responding and how fast the content is spreading" that might indicate that a content is disinformation, and use them to surface those contents to their fact-checking partners.

More clarity could be provided on those signals but more importantly, as EFCSN has expressed repeatedly to Meta, the content surfaced is rarely relevant for the fact-checkers that operate in languages different from English. It is also important to stress that, among the tools provided by Meta to its partners in the last few years, access to CrowdTangle has been clearly the most useful for the work fact-checkers do on Facebook. As Meta has reported a move towards funding Newswhip during the last reporting period, it is unclear whether this new tool would be equally effective.

Instagram

Instagram also has [over 250 million monthly users](#) in the EU and the platform is also covered by Meta's Third-Party Fact-Checking Program. In the past Instagram has been shown to play a significant role in the [dissemination and amplification of harmful disinformation](#) and, because the service mostly showcases images and short videos, it is a particularly hard one for fact-checkers to monitor for disinformation.

Agreements and Fact-Checking Coverage

Through Meta's Third-Party Fact-Checking Program, Instagram reports that it has agreements with at least one fact-checking organization to cover all but one of the EU member states (Malta), partnerships that according to 74% of the European fact-checking organizations represent a fair financial compensation "for their work to combat Disinformation on their services" as committed to in the Code of Practice.

Integration and use of fact-checking, and access to information for fact-checkers

While the integration of fact-checking in Instagram is designed to be similar to that in Facebook, differences in the actual impact might appear. Meta reports significantly fewer labels applied in Instagram and, while some may view this as an indication of less prevalence of disinformation in the service, there are other considerations to be made that are related to both the integration and access to data issues.

As mentioned above, the quality of Meta's system to surface potential disinformation to its fact-checking partners is generally very poor for those working in languages other than English. In Facebook, that shortcoming is addressed by the fact-checkers through their own proactive flagging of disinformation in the service, but locating disinformation in Instagram through text-based native searches is more difficult because of the image-based nature of the service.

As with the other video or image-first services, it is crucial that platforms provide better monitoring tools for fact-checkers, including those that could allow keyword searches in databases that include the texts of the automatically generated subtitles and graphics. Also, the automated matching of already available fact-checks to the Instagram contents containing debunked claims could be improved and the EFCSN is ready to help in that process to the best of our ability.

TikTok

TikTok [declares 134 million ‘monthly active recipients’](#) in the EU and it is the most popular platform among the European youth, as [59% of them are users](#) of the service. TikTok has a fact-checking partner program, though small and with only six fact-checking organizations based in the EU. The EFCSN has voiced concerns in the past about the apparent reluctance to work with local organizations to cover their particular member states, as well as the lack of integration of fact-checking in the platform, preferring to remove most of the content it considers disinformation rather than provide users with additional contextual information.

Agreements and Fact-Checking Coverage

Since their last report in January 2023, TikTok has incorporated only one fact-checking partner, a US-based organization. Its fact-checking program claims to cover 22 EEA countries with just nine partners, only six of them based in the EU. Users in 19 out of 27 EU member states do not benefit from the insights of a local fact-checking organization with specific expertise in the country.

These limitations weigh heavily on the actual fact-checking coverage users receive: even in countries that are reportedly covered, like the Czech Republic or Slovakia, TikTok admits that less than 15 videos have been fact-checked during the reporting period of six months. In Poland, where TikTok had 10 million users¹ with a crucial election around the corner, 18 videos were fact-checked. In a full third of all “covered countries”, one or less videos were removed as a result of a fact-checking assessment over six months.

While the detailed reporting deserves praise, many of those metrics are simply indicative of a fact-checking coverage that is clearly insufficient or outright nonexistent in most member states and far from the objectives and the commitments of the Code of Practice. This is certainly not due to the unwillingness of fact-checkers to work with TikTok, as 73% of the European fact-checkers already monitor the platform for disinformation or publish debunks about content widely seen in it, while 91% would be interested in entering into an agreement with TikTok to provide fact-checking coverage of their countries.

According to its report, TikTok has made changes and all of their partner organizations are now able to proactively flag disinformation, something EFCSN long advocated for as a way to ensure the editorial independence of the fact-checkers in the program that were previously limited to analyze whichever contents were forwarded to them by the platform. However, this proactive flagging still happens outside of the usual fact-checking workflow, and the key issues remain: TikTok moderators receive the assessments by the fact-checkers, but might decide not to act on them or come to different conclusions, and editorial independence is not included in the core process of the workflow. It would be important to have metrics of how often moderators’ actions are guided by fact-checkers’ ratings, and

¹ TikTok DSA report, October 2023

clear rules on how moderation decisions are applied to ensure freedom of speech is respected on the users side.

Some fact-checking organizations reached out to the EFCSN to say this procedure affects their independence in that “everything has to be vetted by them”, and another that was in initial conversations with TikTok about a potential agreement was concerned that their work would be “returned to TikTok moderators for action” and “the results of which would not be clear or under the control of a fact-checking organization”.

Integration and use of fact-checking

According to TikTok, the main service that its fact-checking partners provide is to “review, assess and rate video content uploaded to their fact-checking queue”. After receiving the assessment, the platform’s moderators might decide to remove the video according to TikTok’s disinformation policies or, when the assessment is inconclusive, attach an “unverified” label that prevents it from being recommended and surfaces a warning to users before they are able to share it.

The key criticism offered by most fact-checkers to this approach is that the users that 1) saw the disinformation before; 2) are trying to access the content that has already been removed; or 3) are seeing it with the label “unverified”, all receive no information about why the content has been deemed to be disinformation. This goes against the [evidence from studies](#) that show that users “welcome warning-based approaches to counter fake news and are somewhat critical with less transparent methods [and] want social media platforms to explain why a post was marked as disputed”. The EFCSN thinks this approach goes against the Code’s overarching goal of empowering users to make informed decisions and has raised this concern with TikTok repeatedly, but the company so far rejects changing course even though the rationale for those moderation decisions, at least when fact-checkers are implicated, is already produced.

This is particularly worrying as the use of the label “unverified” has experienced an exponential increase in this reporting period, and users do not have access to any concrete information on why the label is applied. The label itself is an effective integration according to the data reported, since the percentage of users who choose not to share the video after seeing the warning pop up is 29.92%. However, it is lower than in other platforms with similar integration that do have that information available.

TikTok also mentions that it can also ask its partners for written reports about disinformation trends, but it is unclear whether and how that information is integrated or used. It would be valuable to know more about this in the future: how many partners have agreed to this, how many reports have been required, what is the process and regularity, and what are the reports used for.



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Access to information

TikTok mentions a new data-sharing pilot for partners that has been implemented during this reporting period. This bimonthly feedback is centered on the content fact-checked by the partner organization and its impact, namely whether a video was removed as a result of an assessment. We would appreciate more information on the feedback received by partners on this new pilot, but it is evident that (as with the other video platforms) it is crucial that better monitoring tools for fact-checkers are provided, including those that could allow keyword searches in databases that include the texts of the automatically generated subtitles and graphics. This would greatly strengthen the capacity of fact-checkers to spot and evaluate disinformation in the platform.

LinkedIn

Reporting on LinkedIn, a platform that could have up to [147 million](#) users in the EU, Microsoft says that “members do not tend to post reputationally harmful content like misinformation”, but [the use of fake accounts](#) to promote goods and services is well documented, as well as more usual forms of disinformation associated with [election integrity](#) or [conspiracy theories](#). LinkedIn has just one global fact-checking partner.

Agreements and Fact-checking Coverage

In its reaction to Microsoft’s baseline report, the EFCSN questioned whether one single fact-checking partnership could be sufficient to comply with their commitments on empowerment of fact-checkers and to provide effective fact-checking coverage in 27 countries and 24 official languages. In this reporting period, LinkedIn has not concluded any new agreements but has tasked its existing partner with more languages to cover.

Disinformation is strictly linked to the context in which it spreads and it is concerning that LinkedIn does not engage with fact-checking organizations with local expertise and, by its own admission, relies on a translation tool for human moderation in the majority of EEA states. Its partner is in charge of providing fact-checking in six languages, meaning 77% of the official languages of the EU are not covered. This is clearly not because of a lack of availability of partners, as EFCSN organizations already cover over 90% of those languages and 74% declare to be interested in partnering with the company.

Similarly to TikTok, LinkedIn’s policies on disinformation focus on removals and its internal content reviewers have the final say and decide whether to delete the piece of content after the assessment by the fact-checking partner. The importance of moderators is even higher for those countries which are not covered by its fact-checking partner and it is thus surprising that LinkedIn’s moderation team is proficient in only 7 of the languages spoken in the EU² (those currently covered by its partner plus two additional languages) while the rest of languages are moderated with the assistance of a “built-in translation technology”.

Integration and use of fact-checking

For this reporting period, LinkedIn has provided information under SLI 31.1.1 (‘use of fact-checks’) as to the number of publications reviewed by its fact-checking partner globally. EFCSN does not think such a count is adequate for assessing their compliance with a Code that is ‘European’. In addition to that, although the differences in methodology between reports make it hard to compare, the absence of improvement in coverage is quite obvious: in the baseline report, they mentioned 252 publications

² LinkedIn DSA Report October



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reviewed in the EU during one month. In this new report, the reporting period grows to six months and the scope becomes global, but the number of reviews is only three times higher.

Moreover, this SLI alone does not reflect on the impact of the integration of fact-checking in the platform. From the 765 pieces of content reviewed by the news agency, an extremely low number, LinkedIn does not report on the number of contents that are actually actioned as a result of the assessment or any other metric that shows their program is efficient.

LinkedIn does provide information broken down by Member States on the number of removals under Misinformation policy, and those numbers are very telling: in contrast to an average of 2,584 publications deleted in countries whose official language is covered by its fact-checking partner, the average drops to 100 or below in 40% of all the countries within EEA. Even if a focus on removals is not the most adequate in the EFCSN's opinion, it is important to note that even by that standard, LinkedIn is failing to fulfill its commitments.

Access to information for fact-checkers

In this section, LinkedIn reports that a live link is provided to its partner “which allows partners to easily determine whether that content was thereafter removed by LinkedIn”. This approach seems transparent with their partner and ideally, it would be continued and scaled whenever LinkedIn decides to extend their fact-checking coverage to comply with the Code.

Bing

Microsoft's Bing is the second most popular search engine in the EU, with [119 million average monthly users](#). With a ClaimReview-based approach to fact-checking similar to that of Google Search, Microsoft has been repeatedly told by fact-checkers in Europe about the risks of relying on a schema that expects fact-checkers to contribute their work without compensation, a model that goes against Microsoft's own Code of Practice commitment to "provide fair financial contributions to the independent European fact-checking organisations for their work to combat Disinformation on their services".

Agreements and Fact-checking Coverage

According to Microsoft's report, Bing's cooperation with fact-checking organizations remains nonexistent and unchanged since their baseline report. Currently, the search engine reports zero partners and thus does not comply with its commitment to set up agreements with fact-checking organizations but reports that it "is working to secure agreements with additional fact-checking organizations and is in active, productive discussions with several fact-checking organizations". EFCSN has been in detailed talks with Microsoft about Bing for almost a year, but so far those contacts have not translated into action.

For the time being, Bing relies exclusively on the ClaimReview Schema for its users to benefit from the work of fact-checking organizations when navigating the service. ClaimReview functions thanks to unpaid contributions of some fact-checkers that invest their time and resources in debunking and following the protocol to provide these fact-checks to search engines systems. Depending on organizations working on a voluntary basis is rather the opposite of the stated goal to offer "fair financial contributions" to European independent fact-checkers.

Outside the reporting of the chapter dedicated to the empowerment of fact-checkers, Microsoft mentions a partnership with one fact-checking organization to "identify, track and expose emerging information operations". The EFCSN supports this type of collaboration for exchange of information but it should not be used as a substitute for agreements that provide fact-checking coverage.

Considering the conversations between Microsoft and the EFCSN, their intentions expressed in the report, and that 81% of European fact-checking organizations surveyed by the EFCSN declare that they are willing to enter agreements with Bing, we hope those agreements materialize soon in an appropriate fact-checking program that complies with their signed commitments.

Integration and use of fact-checking & Access to information for fact-checkers

Because of the shortcomings explained above, the ClaimReview-based approach is not currently effective at the moment to reach full fact-checking coverage of all EU member states and official languages, as the Code of Practice envisions. This is seen clearly in the reported impact of the fact-checking integrations in Bing. During the reporting period of six months and in as many as 15 different countries, no ClaimReview tags (i.e. fact-check content) appeared on the first page of Bing search results at all.

Moreover, the difference between the number of tags during one month (included in the baseline report) and those during the six months of the current reporting period (1,090 to 4,184) reflects on the limited growth of a system that does not strengthen fact-checkers' capabilities in any way. Beyond that aspect, the information reported by Bing on the number of fact-checks that are marked on ClaimReview and thus available to be surfaced in rich snippets to users is inadequate: with only a global figure of available fact-checks, it is impossible to understand if users in different member states are having an equal chance of benefiting from the integration of fact-checking, particularly as smaller languages (and generally any other but English) have traditionally received much less resources from platforms.

WhatsApp

As an “interpersonal communication service”, WhatsApp is generally deemed not to be a very large online platform or search engine as defined by the Digital Services Act, and thus not subject to its various requirements including the obligation to report a number of average monthly users in the EU. As with other similar services, it remains to be determined if its public channels part might constitute a platform under the law. Nevertheless, WhatsApp is the only service to sign the Code of Practice on Disinformation’s specific commitment to “curb disinformation on messaging apps”, and is used by 93% of all users of private messaging in [Spain](#) and [Italy](#), or 86% in [Germany](#).

In this reporting period, WhatsApp reports partnerships with 13 fact-checking organizations in six European countries that have access to WhatsApp products (WhatsApp Business App and/or WhatsApp Business Platform). This is three fewer organizations and two fewer countries than reported in its baseline report. On their “Spread the Facts” grant, the amount of funding and the number of organizations that have benefited (three in two different countries) remains the same as in the baseline report.

“Forwarding labels, limits to messaging forwarding, and search the web tool” are the reported initiatives to limit the virality and empower users to fight disinformation. Nevertheless, data to assess the impact of the efforts are either outdated or non-existent. As EFCSN has already raised with Meta, it is important to provide that kind of information.

Finally, the ‘Channels’ functionality has been deployed globally during this reporting period although it has not been mentioned in Meta’s report. From evidence collected in similar unidirectional broadcast tools like Telegram (see page 23), we can foresee disinformation within this platform to diversify and evolve. We urge the company to address potential disinformation spread by the exploitation of these channels through initiatives adapted to its characteristics.

Non-signatories

Having taken into account that some services are extremely relevant to understand disinformation in Europe even though they have not signed or are no longer signatories of the Code of Practice, we have decided to include them in this analysis. That is the case of X/Twitter, that is also a designated very large online platform; and Telegram, which has reported a number of users that puts it well on track to be one if it keeps growing.

X/Twitter

X/Twitter decided to withdraw from the Code of Practice on Disinformation by the end of May 2023. Fears expressed by the EFCSN after their baseline report have materialized ever since: [less content moderation](#), [worse access to data](#), and [growing prevalence of disinformation](#). Inside or outside the Code, X/Twitter is not to be ignored as it is used by an [average of 112.2M active recipients](#) in the EU. For that, the EFCSN wants to share the assessment of X/Twitter's initiatives in the past months:

- In an EFCSN survey of European fact-checking organizations, not a single one considered that X takes the disinformation problem seriously.
- According to the same survey, X/Twitter has no agreements in place with independent fact-checking organizations and already-signed contracts between the company and fact-checking organizations never took effect after the change in ownership.
- The only initiative in place to address disinformation seems to be Community Notes. This community-driven model does not include any professional or methodological review and, by [assigning more weight](#) to users who are more “diligent about vetting details of notes”, is open to manipulation and has been exploited to even [display debunked disinformation](#) in the notes themselves.
- In its baseline report, X's commitment to provide access to relevant data was the only one that seemed on track thanks to its publicly accessible API, which used to stand out for granting public access to the platform's available data. Now, it has become a privilege that only a few can afford. By ending the free access to its API, the work of fact-checking organizations and researchers in the disinformation field has become increasingly difficult.



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Telegram

Telegram's number of active users in the EU stands at [39.5 million](#), growing closer to the threshold of 45 million users set by the act for a service to be considered a very large online platform and thus have additional obligations. The EFCSN already expressed in its reaction to the baseline reports that Telegram is a critical actor in the dissemination of disinformation in the EU and its absence from the Code is detrimental to its effectiveness.

Telegram users would certainly benefit from the platform implementing measures designed for private messaging apps under commitment 25. Additionally, the presence of representatives from the company in the permanent task-force of the Code of Practice would be convenient to discuss the role that Telegram's channels pose for the spread of disinformation and how to address it.

This type of functionality (also including the newly implemented WhatsApp Channels) has particular implications beyond virality, as these channels are very effective in the creation of communities that expand into other platforms and are [more likely to engage with and be impacted by disinformation content](#).

We encourage the task-force to keep working towards the integration of Telegram into the Code and the European Commission to revise the status of the service under the Digital Services Act (Recital 78, DSA).



European Fact-Checking
Standards Network

The European Fact-Checking Standards Network a.i.s.b.l Boulevard Bischoffsheim 39, boîte 4, 1000 Brussels
Fact-checking and related Risk-Mitigation Measures for Disinformation in the Very Large Online Platforms

Afterword:

Taking the EU Code of Practice Seriously

As the implementation of the Digital Services Act enters its key stage, an analysis of the fulfillment of the anti-disinformation measures already committed voluntarily by the major platforms is more relevant than ever. This document, looking at the already agreed actions outlined in the Code of Practice on Disinformation regarding fact-checking, presents a tough reality: that most of the very large online platforms and search engines are still far from fulfilling their promises and do not have effective risk mitigation measures against disinformation in place, as DSA requires.

Even though the Code of Practice is still a self-regulatory, voluntary tool, the largest and most influential actors among the signatories are expected to be true to their word and fulfill their commitments. That was certainly the expectation from institutions, stakeholders, and the public when the Code was presented already 18 months ago. As those expectations have not been met yet in terms of actions or reporting, and as the Code of Practice must become an official DSA Code of Conduct, the urgency for the very large online platforms and search engines to step up their efforts increases.

The EFCSN continues to be committed to the Code of Practice on Disinformation as a tool that has the potential to be effective at improving the online experience of 450 million people in the EU and countless in other countries: to empower them to be less vulnerable to deception and manipulation, also through the work of over 50 European independent fact-checking organizations. Still, as the fact-checkers have said from the beginning, the Code will be judged on its results, on the beneficial changes it brings. So far, those results are still few and far between. Much was expected, much was committed, and much has yet to be delivered.

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