European Digital Media Observatory

How is disinformation addressed in the member states of the European Union? – 27 country cases

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Abstract

The report is composed of 27 cases – the EU member states – and describes how national governments and policymakers address disinformation. The case studies identify legislative and non-legislative approaches, strategies, policy documents, as well as proposed laws and policies, complemented with information about certain structural conditions that can impact countries' measures on disinformation. The aim of the report is to better understand what kinds of policy tools are commonly utilised in EU member states to create a safer information environment and to foster greater societal resilience – complementing an already institutionalised European approach on disinformation. Moreover, it aims to identify dominant approaches and to help policymakers understand what mix of policies can be preferable in certain contexts.
The report presents selected findings concerning countries, as gathered from available reports and policy documents reviewed by EDMO Hubs, and does not necessarily reflect the views of EDMO or intend to provide a comprehensive picture of legislative or policy landscape.

Introduction

Disinformation is considered one of the greatest threats to the functioning of democracies in the 21st century (Bennett & Livingston, 2020). The problem is not unrelated to some recent worrying developments: populist and extremist forces are increasing their vote share, trust in the media and state institutions is decreasing – and so does the policymaking and civil society community's ability to tackle the complex challenges that societies face (from public health emergencies through economic crises to climate change). There are indications that disinformation, including large-scale foreign information operations, can, indeed, contribute to these problems. As such, designing effective responses to disinformation is high on the agenda of policymakers in Europe – both in member states and on the EU level, where a European approach on disinformation includes online platform regulation, media literacy, risk assessment and mitigation, strategic communications, as well as support to many relevant projects.

In the digital environment, many private actors are involved in the governance of online speech – thus, they make decisions on content moderation and amplification or enjoy immunities that shape the environment in which disinformation is produced, shared and how it is consumed by audiences. As such, the regulation of online communication takes place in a free speech "triangle", which involves not just the speaker/publisher and the state, but also online intermediaries, such as big tech (Balkin, 2018). Often the term governance is used to describe the ways in which platform action is shaped by actors wishing to encourage safe and responsible behaviour on platforms – the term refers to an evolution of regulation, in which new actors participate in the shaping and enforcement of rules, such as private companies and civil society actors (Flew, 2021). This will also be reflected in the focus of laws and policies: in terms of restrictive regulation, the traditional approaches, especially those codified in criminal law, emphasise the need to hold the communicator or the publisher to account, while first Germany and France, followed by the European Commission, have been spearheading regulation that focuses on the responsibilities of information intermediaries, such as social media service providers that control the dominant infrastructure of news dissemination and consumption.

In this domain, while the so-called Brussels effect plays a role in providing a standard to regulate the online sphere globally (Bradford, 2019), problems still remain, as most major online platforms are US-based, and find it hard to adapt to the requirements of other jurisdictions (Georgetown University Law Center Global Law Scholars, 2022). At the same time, many countries utilised soft(er) approaches as well, in a facilitative way, to strengthen the resilience of members of society to harmful, fabricated content – such as strengthening media literacy and enabling fact-checking operations. Many countries still rely on criminal law to hold publishers of misleading content to account, but those approaches are rather problematic. The criminalisation of sharing fabricated messages is considered ineffective (Dragomir et al., 2024) and can have a significant chilling effect on public discourse (Brogi et al., 2023).

In this report, we are assessing the 27 different approaches across EU member states to address the problems of disinformation and related concepts. By disinformation and

related concepts, we mean fabricated, harmful content that is distributed across a multitude of channels, with the potential to undermine political processes or pose threats to a democratic society. Following the definition of Wardle and Derakhshan (2017), we consider disinformation to be *intentionally* spread harmful and misleading content, but focusing on national approaches, we leave open the option for national policymakers to address other information disorders, including misinformation, which, according to Wardle and Derakhshan (2017), is false or misleading content that is spread *without the intent* to harm – as well as to introduce integrated approaches to tackle a larger set of information disorders. The definitions of the European Democracy Action Plan and the Code of Practice on Disinformation highlight that disinformation is spread to make political or economic gain. Given that disinformation often originates from abroad, we will also use the term foreign information manipulation and interference (FIMI). We will see that, across the EU, there are multiple approaches, depending on policymakers' assessment of the threat and decisions related to the protection of free speech. This is important to mention at the beginning, as the regulation of disinformation and misinformation is connected to freedom of expression, which is constitutionally protected across the EU member states.

We cover 27 countries in this report, based on input from researchers from the European Digital Media Observatory (EDMO) Hubs in addition to consulting secondary sources such as the country reports and data collection of the Media Pluralism Monitor 2024, the Media Literacy Index 2023, the Reuters Digital News Report,[1] the State Media Monitor and academic literature on the topic. The narrative-focused country fact sheets of EU Disinfo Lab and Oreste Pollicino's edited volume *Freedom of Speech and the Regulation of Fake News*, and Democracy Reporting International's *A Safer Digital Space* report were especially helpful in this exercise. We provide a profile of each country, covering their overall approach to dealing with disinformation.

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[1] We consulted the 2023 Media Literacy Index, which puts countries in one of five clusters based on some structural criteria, such as the country's quality of education and the degree of media freedom, the 2024 Reuters Digital News Report's (DNR) assessment of the proportion of the population that trust most news most of the time (in percentage), as well as a number of different aspects captured by the Media Pluralism Monitor 2024. In the assessment, we consider a number of standalone variables, as well as, in certain cases, combinations of variables (referred to as indicators or sub-indicators) of the Media Pluralism Monitor 2024. The indicator on media literacy is made up of a number of questions considering the quality and range of public and private measures to foster media literacy in the countries of interest, as well as the level of digital skills, as measured by Eurostat; the variable on the effectiveness of journalists' professional association and/or media councils is a standalone question considering the existence, membership, independence and impact of organisations representing journalists and mediaworkers, as well as upholding journalistic rules and norms; the indicator on the independence and effectiveness of the media authority is made up of multiple questions aiming to assess the functioning of the media regulators of the country, especially focusing on its effectiveness and independence from interest groups; the indicator on the independence of the public service media considers the extent and mechanisms of funding, as well as the safeguards that make sure that the public service media can work independently of the government; the sub-indicator on the rules on political advertising online considers the practice and regulation related to political advertising in online media and on social media (including transparency obligations); The variable "Is there a national strategy to tackle disinformation?" assesses whether there is a national strategy including multiple actors, covering multiple policy domains, to deal with a complex threat as disinformation.

Due to the limits to data available across countries, we refrain from assessing what approach can be considered most effective – not to mention that countries differ based on variegated histories, legal cultures, media systems and susceptibility to disinformation. Therefore, the optimal policy mix can differ from country to country. That said, it is safe to say that there is always room for improvement.

We acknowledge that disinformation is a moving target, and therefore measures are constantly evolving. This paper reflects the situation on 15 December 2024. We do not cover at this point the implementation of the Digital Services Act (and the nomination of Digital Services Coordinators) in member states, given that it is a moving target, with many significant developments taking place after the finalisation of this document.

How disinformation manifests in Europe

The problem of disinformation is thematised in the public discourse and is part of the political agenda across the countries we cover, even though the exact effect of disinformation, among other things on the outcome of elections, is hard to assess (see Altay et al. 2023). The European Digital Media Observatory's (EDMO) Task Force on the 2024 European Parliament Elections (Panizio, 2024) identified AI-generated content, and especially deep fakes as a major concern in the run-up to the EU Parliament elections of 2024, but also highlighted that there has been a multitude of coordinated campaigns (both by foreign and national actors) in the context of EU elections. In terms of disinformation topics that could compromise the integrity of European elections, the report highlighted the spread of narratives that aim to portray the EU and its organs as authoritarian: these institutions allegedly impose measures on citizens that have no popular support, such as promoting the consumption of insects or putting additional burden on the people on the pretence of addressing wars or climate change. The EDMO fact-checking network, for example, identified an influential narrative according to which the "EU's end-of-life vehicle directive would ban car repairs and force citizens to buy new cars" (EDMO fact-checking network, 2024a:5), albeit this is not at all intended by EU policy.

In many cases, disinformation messages raised doubt about the validity of the ballot or attempted to mislead voters about the election process (for example, suggesting that voters should select multiple choices when casting their vote) (EDMO fact-checking network, 2024c:4). Russia's war of aggression in Ukraine has also been a divisive issue in European elections – triggering narratives that suggest that the EU or certain political parties were involved in warmongering (EDMO fact-checking network, 2024c:6). Immigration-related disinformation can also contribute to more EU-scepticism – as the EU is often seen as a driving force behind open border policies (Harteveld et al. 2018).

In December 2023, one of the top 4 disinformation narratives was the claim that the European Commission imposed a ban on the use of the term "Christmas" (EDMO fact-checking network, 2024b). In the month prior to the European Parliament Election,

EU-related disinformation amounted to 15% of the total detected disinformation content (EDMO fact-checking network, 2024c).

Risks of disinformation were also communicated on the member state level. Prior to the elections, the German Federal Returning Officer, who is in charge of guaranteeing the integrity of the election process in the country, communicated an expected increase in foreign disinformation, especially originating from Russia. Cyberattacks were not seen as likely but were still considered a possible threat – especially hack-and-leak attacks that exploit vulnerabilities of computer systems or networks to get access to sensitive information that can be widely distributed. Its communication highlighted that disinformation attacks were not only about getting a preferred candidate elected, but also about undermining trust in elections, and consequently in democratic institutions (The Federal Returning Officer, 2024). This insight is relevant in many country contexts. One of the largest disinformation operations was identified by the German Foreign Ministry: in the context of an extensive disinformation campaign on X (formerly Twitter), 50.000 accounts spread disinformation, and in certain days published up to 200.000 posts. The campaign was likely coordinated by a foreign state (Rosenbach & Schult, 2024). A year earlier, French authorities reported about another (possibly Russian-origin) disinformation campaign: as part of the so-called doppelgänger campaign was built around the spreading of content that mimics the design of well-known French and German news media outlets (Khatsenkova, 2023).

While the disinformation discourse is focused mainly around Russia's information operations (Lanoszka, 2019), politicians of the member states can also contribute to the spread of disinformation, as statements or advertisements can be built around false or misleading claims related to the opponent or certain political issues.[2] Especially far-right and populist parties, politicians and their supporters can be considered sources and amplifiers of such messaging (Marwick & Lewis, 2017). This is even more so since the polarised political climate can incentivise physical violence and attacks from radicalised individuals. Examples can be found across the EU. In the past year, the most widely-documented case was the assassination attempt on Slovak Prime Minister Robert Fico in May 2024, which he barely survived. Danish Prime Minister Mette Frederiksen was assaulted by a man only a few days prior to the EP election[3]. In Germany, Deputy Prime Minister Robert Habeck got trapped on a ferry boat, after it was attacked by an angry mob in January 2024[4], and a politician of the far-right AfD (Alternative for Germany) was stabbed at a rally in Mannheim[5].

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[2] For cases when disinformation can originate from politicians, and even the governing party or state institutions, see relevant chapters of Echeverría, M., García Santamaría, S., & Hallin, D. C. (2025). State-Sponsored Disinformation Around the Globe: How Politicians Deceive their Citizens. Routledge.
[3] Gigova, R. & Norgaard, K. (2024, 07. June). Danish Prime Minister Mette Frederiksen attacked by man in Copenhagen. CNN. https://edition.cnn.com/2024/06/07/europe/danish-prime-minister-mette-frederiksen-attacked-intl-latam/index.html
[4] DW (2024, 01. May). Habeck: Angry farmers trap German minister on ferry. Deutsche Welle. https://www.dw.com/en/habeck-angry-farmers-trap-german-minister-on-ferry/a-67895293?
[5] Kirby, P. (2024, 05. June). New knife attack wounds local German politician. BBC. https://www.bbc.com/news/articles/c877vynl2zgo

The EU approach and what it means

International organisations, such as the United Nations Educational, Scientific and Cultural Organization (UNESCO) and the World Health Organisation (WHO) often design programs to address certain disinformation-related challenges, and existing international law instruments can be applicable to disinformation, their impact is limited.[6] At the same time, the European Union has been at the forefront of designing policies to tackle disinformation that are widely praised for their potential – one of the first measures being the initiation of the East StratCom Task Force[7] in 2015 (at the European Council Meeting on 19-20 March) with the aim of identifying and countering harmful narratives that can destabilise European societies (Vériter, 2024), followed by a communication on hybrid threats,[8] which saw intentionally-spread misleading messages as one of its key concerns (Abbamonte & Gori, 2023:130). The sources of such narratives were, at the time, widely considered to be state-connected actors from the Russian Federation, a country that had not much earlier invaded the neighbouring Ukraine and was using its propaganda apparatus to influence public opinion in a number of countries, including EU members. The acronym FIMI (Foreign Information Manipulation and Interference) is widely used in policy discussions to refer to information-manipulation efforts by foreign state-sponsored entities – the concept overlaps with disinformation, but it identifies its targets not based on content but the behaviour of actors (tactics, techniques and procedures).[9]

Soon it became obvious that the source of harmful, untrue and misleading narratives can be more than just a foreign power. They can originate just as easily from a country's own citizens, who knowingly or unwittingly share information that can have adverse effects on society. Designing action against such content is a delicate issue, as the communication of people on matters of public interest is key to an open society, and it is in every EU member state protected by the law – limitations need to be justified and can only be imposed in a proportionate manner. Not to mention that the content

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[6] The Georgetown University Law Center Global Law Scholars (2022) program's Law and Disinformation in the Digital Age study mentions the the 1936 International Convention on the Use of Broadcasting in the Cause of Peace, the human right to self-determination, the concept of State sovereignty, and Art. 8 of the International Law Commission's Articles on the Responsibility of States for Internationally Wrongful Acts – all of which might apply only in cases when disinformation originates from a foreign entity, but even then, it is not likely that states will comply, moreover, according to the authors of the study, determining what can be considered "truth" is even harder in the international context. Relevant aspects were also described in Scmitt, M. N. (ed, 2017). Tallinn Manual 2.0 on the International Law Applicable to Cyber Operations. Cambridge University Press. https://www.cambridge.org/core/books/tallinn-manual-20-on-the-international-law-applicable-to-cyber-operations/E4FFD83EA790D7C4C3C28FC9CA2FB6C9

[7] Which is part of the European External Actions Service.

[8] Hybrid threats are new forms of conflicts that rely on a wide arsenal of tools to destabilise countries. Van Raemdonck & Meyer (2024) argue that disinformation "has the potential to undermine fair election processes and endanger public health [and therefore] it qualifies as a hybrid threat." Van Raemdonck, N., & Meyer, T. (2024). Why disinformation is here to stay. A socio-technical analysis of disinformation as a hybrid threat. In Addressing Hybrid Threats (pp. 57-83). Edward Elgar Publishing.

[9] See: Hénin, N. (2023). FIMI: Towards a European redefinition of foreign interference. *EU Disinfo Lab.* https://www.disinfo.eu/wp-content/uploads/2023/04/20230412_FIMI-FS-FINAL.pdf

of disinformation messages would in most cases be considered as legally permissible communication – only concerns about its possible impact make it subject to public policy action. For this reason, European policy makers had early on put an emphasis on safeguarding fundamental rights while tackling disinformation – and had been advocating for a European approach in order to avoid a fragmented European policy landscape in light of a border-crossing problem (Nenadić, 2019, European Commission, 2018). The EU's approach to tackling, in particular online, disinformation rests on the notion that legal content, even if it might be considered harmful "is generally protected by freedom of expression and needs to be addressed differently than illegal content" (European Commission, 2018:1).

The comprehensive approach on the EU level started with the establishment of the High Level Expert Group on Fake News and Online Disinformation. This initiative enabled a discussion between scholars, the industry, civil society and policymakers, with the aim of defining the path towards European policy initiatives to deal with the threat of disinformation. In its report (High Level Expert Group on Fake News and Online Disinformation, 2018), the group advocated for a multidimensional approach that emphasised the transparency of online news production, the health and diversity of news media markets, the importance of media literacy measures, recommended that online platforms develop tools that empower their users, and asked for more research on disinformation.

In parallel with the work of the High Level Expert Group and the Code of Practice, the European Commission's Action Plan against Disinformation[10] was published in 2018, with the aim of protecting the democratic systems in the context of elections, building on the work done by the East StratCom Task Force. It identified the measures that the European Commission and its High Representative were expected to take, in cooperation with the EU's member states and the European Parliament. The European Council Horizontal Working Party on Enhancing Resilience and Countering Hybrid Threats is also of great importance here. This working group has the central coordinating role in the EU for a joint EU response to hybrid threats.

The Commission's Action Plan highlighted the need to increase transparency and accountability in the digital environment, and to empower members of society to withstand disinformation, instead of relying simply on penalising publishers of disinformation. As such, it assigns a great value to facilitative/enabling approaches, taking also into consideration the earlier highlighted free speech triangle of the state, the communicators and big tech. The action plan emphasised that 1) the EU should increase its capabilities to detect disinformation, 2) strengthen its responses (for example, through the establishment of a rapid alert system), 3) mobilise the private sector to take action against disinformation, and to raise awareness in society (through supporting fact-checking and research) (see also Gori & Abbamonte, 2023:139-140). The issue of media literacy – which is key to societal resilience to disinformation – has also been addressed on the European level. The revised Audiovisual Media Services

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[10] Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions. *Action Plan Against Disinformation.* JOIN(2018) 36 final. https://commission.europa.eu/system/files/2018-12/eu-communication-disinformation-euco-05122018_en.pdf

Directive (2018/1808) of 2018 emphasises that member states need to improve societies' media literacy skills, and such measures should consider the ability of critical thinking. The Digital Education Action Plan (COM/2020/624) emphasises the need to foster such skills through education and training. The Expert Group on Media Literacy meets annually to identify and facilitate good practices. However, so far, limited information is available on how the EU or its different member states fare on the issue of media literacy (Goodman, 2021).

Still in 2018, the self-regulatory Code of Practice on Disinformation was passed, ahead of the European Parliament elections of 2019. As part of this ground-breaking effort, some of the largest online platforms have committed to obligations that were otherwise not required from them by law: they promised they would prevent purveyors of disinformation from generating revenues through their services, limit the use of bots, improve the transparency of political advertising, while at the same time empowering users and researchers. In 2020, the European Digital Media Observatory (EDMO) was established to support the work done under the Code, which, by 2022, had established local hubs that represented all EU member states. Despite the promising nature of the Code of Practice's text, its impact was limited due to a lack of compliance and oversight. In 2022, a new Strengthened Code of Practice on Disinformation[11] was published to address some of the problems experienced during the first iteration of this self-regulatory exercise. It included clear metrics and monitoring mechanisms that allow the tracking of improvements and thus contribute to the effectiveness of the initiative. At the same time, it has been a worrying development that despite an increase in signatories to this code, Twitter (later renamed X), which is one of the largest online platforms and home to a multitude of disinformation actors, has opted to leave the process after it failed to fulfil many of its commitments.[12]

While the Code of Practice itself started only a self-regulatory instrument, it was turned into a co-regulatory code of conduct under the Digital Services Act (DSA - 2022/2065), thereby serving as a guidance for platforms' mandatory risk mitigation efforts. Although not specifically disinformation-focused, the DSA is a powerful tool that establishes a framework for transparency and clear accountability on online platforms, especially those that are referred to as "very large online platforms" (VLOPs),[13] such as the previously mentioned X or the services operated by Alphabet (Google) and Meta (Facebook). The DSA, among other things, sets out obligations for these platforms to identify and mitigate systemic risks, such as disinformation, calls for a code of conduct for online advertising, and requires VLOPs to undergo a yearly audit on their own expenses. In certain countries, this European approach is considered, to some extent, concerning: Ireland, Sweden and Finland, for example, published a joint non-paper

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[11] 2022 Strengthened Code of Practice on Disinformation. https://ec.europa.eu/newsroom/dae/redirection/document/87585

[12] Pitchers, C. (2023, June 5). Twitter has chosen 'confrontation' with Brussels over disinformation code of conduct. Euronews. https://www.euronews.com/my-europe/2023/06/05/twitter-has-chosen-confrontation-with-brussels-over-disinformation-code-of-conduct

[13] As well as "Very Large Search Engines" or VLOSEs.

that highlighted the possible risks of over-blocking if provisions are applied to content that is not "manifestly illegal".[14]

Additional protections of the online information environment in the EU can be found, among other things, in the Digital Markets Act, the European Media Freedom Act, the Artificial Intelligence Act, and the Regulation on the transparency and targeting of political advertising.

While the European approach, once fully developed, can provide significant protections for citizens who use social media or other online services all over Europe and can foster some convergence, it is important to highlight that tackling disinformation is a rather complex exercise, and the mainly platform-focused European approach is just one of its components. This was made clear during Russia's invasion of Ukraine in February 2022. Policymakers saw the threat of Russian-origin disinformation and war-propaganda based on fabricated information as imminent, not just on social media, but also spreading through broadcast services, international media outlets and messaging services. Thus, on 2 March, the official ban of the Russian international media outlets *RT* (formerly Russia Today) and *Sputnik* was published in the EU's Official Journal. A Council regulation and decision provided legal grounds to take both outlets (including different language editions) off the air and block their online content inside the EU, as a sanction to Russia for the invasion of Ukraine and as a defensive move against harmful disinformation in that critical period.[15] Later, additional channels, such as *Rossiya RTR/RTR Planeta, Rossiya 24/Russia 24* and *TV Centre International*, were added. The ban outlined in the Council decision and regulation meant a discontinuation of transmission and distribution through satellite and cable, as well as the blocking of content on "IP-TV, internet service providers, internet video-sharing platforms or applications, whether new or pre-installed" of the operators *RT* and *Sputnik*.

The ban has found immediate implementation across the EU, by media authorities, institutions and operators by any means involved in its implementation. However, this measure was not the first of its kind, and may not even be among the most effective, due to limitations in enforcement – the websites of the outlets remained available for some time after the Council decision in certain member states, and in Hungary, there

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[14] "Safeguarding freedom of speech online – a joint non-paper on the DSA by Sweden, Ireland and Finland" (18 June 2021). Published by Politico.
https://www.politico.eu/wp-content/uploads/2021/06/18/joint-non-paper-on-the-DSA-final46.pdf

[15] European Commission President Ursula von der Leyen announced on 27 February that RT and Sputnik would be banned in the EU. The sanction was published in the Official Journal on 2 March, in the form of a Council Decision (CFSP) 2022/351 of 1 March 2022 amending Decision 2014/512/CFSP#, integrated in the Council regulation (EU) 2022/350 of 1 March 2022 amending Regulation (EU) No 833/20144. The legal basis of the regulation is art 215 TFUE under EU's external action and the common foreign and security policy (CFSP). When a decision adopted under CFSP "provides for the interruption or reduction, in part or completely, of economic and financial relations with one or more third countries, the Council, acting by a qualified majority on a joint proposal from the High Representative of the Union for Foreign Affairs and Security Policy and the Commission, shall adopt the necessary measures. It shall inform the European Parliament thereof." Paragraph 2 of the article says that "[...] the Council may adopt restrictive measures under the procedure referred to in paragraph 1 against natural or legal persons and groups or non-State entities" and (par. 3) adds that "[t]he acts referred to in this Article shall include necessary provisions on legal safeguards."

were even complaints by civil society that, despite the ban, media outlets, including the public service media, kept relying on *RT* as a source for their reporting on the situation in Ukraine, just to name a few (Kapronczay, 2022). At the same time, we can also see that the EU-wide ban doubled down on member state efforts. The regulators in the Baltic countries and Poland had acted even a few days before[16] the Council regulation, and independently from it, by suspending the retransmission of a number of other Russian-origin television programmes on the ground of threats to national security or in application of art. 3.3 of the EU's Audiovisual Media Services Directive (AVMSD)[17], stating that a member state can limit freedom of reception and retransmission when an audiovisual media service provided under the jurisdiction of another state prejudices or presents a serious and grave risk of prejudice to public security, including the safeguarding of national security and defence.

Even in previous years, the AVMSD was effectively used by member states to limit Russian broadcasting, especially in the Baltic states,[18] as it allows for the suspension of transmitting programmes that incite hatred (as seen in the case of Latvia and "Rossiya RTR"[19]). On 2 February 2022, the German Commission for Authorisation and Supervision (ZAK) also decided to ban *RT*'s German edition.[20] As a response to the criticism of the EU ban, Art. 17 of the European Media Freedom Act (EMFA) proposed a coordinated approach, which would be initiated by at least two national regulators

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[16] Munch, E. (2022, 25 February). Situation in Ukraine prompts reactions from NRAs across Europe. European Platform for Regulatory Authorities. https://www.epra.org/news_items/nras-react-to-the-crisis-in-ukraine

[17] Directive (EU) 2018/1808, and previously Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive).

[18] In a 2021 opinion, the European Regulators Group for Audiovisual Media Services (ERGA) found that the Latvian National Electronic Mass Media Council's decision No. 68/1-2 on restricting the retransmission of Rossija RTR on the country's territory for 12 months was substantiated and compatible with the AVMSD, as the service provider had repeatedly infringed the material provision of Art. 6(1) of the Directive ("Without prejudice to the obligation of member states to respect and protect human dignity, member states shall ensure by appropriate means that audiovisual media services provided by media service providers under their jurisdiction do not contain any: incitement to violence or hatred directed against a group of persons or a member of a group based on any of the grounds referred to in Article 21 of the Charter") in a way that, in the specific context of a former member of the Soviet Union with a significant ethnic Russian population, is "suitable to aggravate tensions impeding a peaceful coexistence of sovereign nations and ethnicities". In addition, the opinion also mentions that prohibitions have taken place before, both in Latvia and Lithuania. See: https://erga-online.eu/wp-content/uploads/2021/04/2021-03-10-ERGA-Opinion-on-decision-No.-68-1-2-of-the-Latvian-National-Electronic-Mass-Media-Council-as-adopted.pdf

[19] European Commission (2019). Latvia's decision to suspend broadcast of the Russian language channel "Rossiya RTR" complies with EU law. Digibyte | Publication 06 May 2019. https://digital-strategy.ec.europa.eu/en/news/latvias-decision-suspend-broadcast-russian-language-channel-rossiya-rtr-complies-eu-law

[20] It sanctioned RT's German edition for failing to possess the correct licence for broadcasting in Germany (the broadcaster had a Serbian licence and never applied for a German one). The statement said "[t]he organisation and distribution of the TV program via live stream on the internet, via the mobile and smart TV app 'RT News' and via satellite must be discontinued."

and overseen by the European Board for Media Services (the body to be preceding the European Regulators Group for Audiovisual Media Services).[21]

All these measures highlight the complexity of the disinformation problem. Not only does a successful approach require a multitude of coordinated responses, policymakers also need to be aware of, and be willing to correct, unintended consequences of their measures. While the European Commission works on creating a common approach, European measures cannot work without the cooperation of member states. Moreover, the differences in countries' level of resilience and the nature of the threat they face will keep national regulation on the agenda

Addressing disinformation challenges in EU member states

Austria *is a country with limited measures against disinformation. Criminal law responses are foreseen if disinformation is published before elections or overlaps with incitement against protected groups.*

The fact-sheet of the EU Disinfo Lab shows that even mainstream media are included among the actors of disinformation – such as the tabloid *Kronen Zeitung,* which reported news items related to refugees which were verified as non correct (Schäfer, 2023). Certain disinformation narratives are amplified by the far-right Freiheitliche Partei Österreich (ÖFP) which became the strongest party in the legislative election in 2024, but wasn't given a mandate to form a government. During the pandemic, the MFG – Menschen-Freiheit-Grundrechte party was formed by members of the anti-vaxxer community. The party won three seats at the 2021 Upper Austrian state elections. Sympathisers of these parties operate media outlets, such as the website *AUF1* and the regional television channel *RTV*. Following a cooperation between these two media, the Komm Austria media regulator started an investigation for lack of proper registration (Schäfer, 2023). Other fringe media in Austria include *unzensuriert.at* (Grabner, 2020) and *wochenblick.at* (Heigl, 2021). In 2017, 16 district newspapers republished a claim about the alleged ban of St. Nicholas Day, as a response, the Austrian Press Council highlighted that the publication violated points 2.1 (demand for diligence and accuracy in research and reproduction) and 7.1 (refrain from slander and defamation) of the journalists' ethical code (Schäfer, 2023).

There are certain structural factors that contribute to Austrian society's resilience against disinformation. Digital education is part of the compulsory secondary school curriculum, but there is no comprehensive governmental strategy fostering the development of media literacy (Seethaler & Beaufort, 2024). The Media Literacy Index of 2023 puts Austria in the 2nd cluster of well-performing countries, while trust in the media is at 35%. The media regulator and the public service media are independent

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[21] The overview of the European approach in this chapter is partly based on the policy paper Media Regulation and Resilience to FIMI in the Context of European Regulations by Konrad Bleyer-Simon for the British Embassy in Skopje and the Institute for Communication Studies.

(MPM, 2024). The public service media has a show that educates on disinformation; independent fact-checking organisations in Austria include the *APA-Faktencheck* of the national news agency, which is owned by 12 newspapers and the public service media, *Mimikama*, an association focusing on online safety and *Medizin Transparent*, a website focusing on medical disinformation, run by the Universität für Weiterbildung Krems. *APA* and *Medizin Transparent* are certified by the European Fact-Checking Standards Network and the International Fact-Checking Network (IFCN).

Art. 276 of the Austrian Criminal Code, which dealt with the intentional spreading of false rumours, was removed in 2015. Art. 264 deals with the spreading of false information, ahead of elections or referendums. According to this article, a person who publishes false content that is capable of dissuading voters or affecting their votes might be penalised with up to six months imprisonment or fines, while Art. 283 on incitement to hatred can be used if disinformation is published in a way that it could hurt certain minority groups. Due to strong anti-refugee sentiments, the Austrian Criminal Code's article on incitement to hatred was amended in 2015 to include refugees as a protected group. The State Protection Service – the governing body of the general law enforcement, which is part of the Ministry of Interior – asked for measures to penalise those who spread disinformation (ORF, 2023), but there was no follow-up on this request.

The 2020-2024 government program (of the previous government of the conservative ÖVP and the Greens) included a paragraph on "Protection from disinformation" but the implementation was lagging behind – in practice, both a comprehensive strategy and research is missing in the country (Seethaler & Beaufort, 2024). An action plan to combat deep fakes[22] was published in May 2022 (Kabelka, 2022), as a cooperation of five ministries, but it did not lead to concrete measures. In late 2023, MPs of the political party NEOS criticised the government for underperforming on media literacy and tackling disinformation, and asked for the establishment of a department against disinformation.[23] The Federal Ministry of Education, Science and Research publishes media literacy materials and supports the Saferinternet.at digital literacy website (DRI, 2023).

Belgium *is a country with many media literacy measures. At the same time, neither legislative, nor non-legislative approaches are emphasised so far against disinformation.*

As the country housing most EU institutions and the NATO headquarters, foreign interference is considered a problem in Belgium (Gentil & Sessa, 2024a) – including Chinese originated activities, such as the Paperwall operation in 2024 (Alaphilippe, 2024). Due to the shared language, both the French and the Dutch information environment have an effect on Belgium, with a possible influx of disinformation (Alaphilippe, 2023).

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[22] Aktionsplan Deepfake. https://www.bmi.gv.at/bmi_documents/2779.pdf
[23] Parlamentskorrespondenz Nr. 1450 vom 22.12.2023. Neu im Verfassungsausschuss. Anträge der SPÖ und der NEOS zum Bereich Medien. https://www.parlament.gv.at/aktuelles/pk/jahr_2023/pk1450

Belgium is in the second cluster of well-performing countries in the field of media literacy, according to the Media Literacy Index 2023. Trust in the media is 44%, which is higher than in most EU countries, but still shows that a significant part of society is suspicious of mainstream information sources. The media regulators and public service media are considered independent (MPM, 2024). Fact-checking projects exist on both the Francophone public broadcaster *RTBF* (the *Faky* fact-checking project) and the Flemish public broadcaster *VRT* (also collaborating with *deCheckers*). Two other fact-checking projects are EFCSN members: *Factcheck.Vlaanderen* and *Knack*. They are also part of the EDMO fact-checking network. The government launched the stopfakenews.be website to collect policy proposals from society.

There is no general law prohibiting disinformation, and the Belgian constitution puts a great emphasis on freedom of speech – meaning that the scope of measures that can be taken against individual spreaders of mis- or disinformation is limited. According to the assessment of the Media Pluralism Monitor 2024, the spread of disinformation is still considered relatively low in Belgium. This lack of threat perception disincentivises politicians from passing measures that would deal with disinformation (Valcke & Wauters, 2024). Art. 443 of the Penal Code deals with false and defamatory statements, and there is a significant burden of proof to prosecute a person for creating or sharing disinformation in Belgium (Lambrecht & Cloots, 2023:59). In a prominent case, the Ghent Court of Appeal imposed EUR 5,000 of damages to *BelemtürkTV* and its editor-in-chief for publishing made-up information about an MP – the court found that the publication of the article (which alleged that the MP had terrorist ties) was aimed at preventing the MPs re-election.

To increase resilience, the federal government commissioned an expert group on fake news and disinformation in 2018, which highlighted the positive obligation of the government to facilitate a healthy public debate. Building on the EU High-Level Expert Group's recommendations, it proposed a consultation model with key actors and tools to unmask disinformation, as well as to promote media literacy and quality journalism (Lambrecht & Cloots, 2023:52). It did not make recommendations related to elections, but it would favour consultations between academia, media, journalists, NGOs and online platforms that may contribute to research, media literacy or quality journalism. The online platforms that are active in the country are expected to be in constant dialogue with the government about the measures they take to mitigate the spread of disinformation and ensuring that researchers have sufficient access to the necessary data. It also promoted the idea that researchers develop algorithms and interface plug-ins that help users improve the plurality of their media usage. In addition, the Belgian Senate published an information report (Parl. St. Senaat 2021-2022, n 7-110/3), which acknowledged that political parties may also spread disinformation – and proposes that candidates have a legal responsibility for the factuality of their statements and that their deontological codes require that they refrain from spreading untrue content. It also asks them to refrain from the use of bots, and emphasises transparency obligations on social media.

In February 2022, the federal government introduced the National Security Strategy, in collaboration with the Egmont Institute, a non-profit think tank. Albeit not its main focus, the strategy highlights disinformation and the spread of foreign-origin extremist

content as key concerns.[24] Aside from the federal government, regional governments also play a role, for example, through the funding of certain projects. Moreover, in April 2024, the Belgian Senate approved a report[25] emphasising the impact of foreign interference, especially during elections, and making recommendations, ranging from the implementation of a code of conduct to ethical guidelines.

In the context of elections, the General Directorate for Identity and Civil Affairs of the Federal Public Service (FPS) Interior is responsible for organising federal, regional, and European elections. Before, during and after the elections, the FPS Interior takes various measures to ensure the safety and transparency of the elections. The National Crisis Center monitors which false messages or misleading information circulate in Belgium and it also communicates counter-messages, if needed. The Belgian Institute for Postal Services and Telecommunications has been designated as the Belgian Digital Services Coordinator (DSC) under the DSA.[26]

Bulgaria *is a country where a number of measures were proposed over the years, but did not materialise. Currently, there are few legislative or non-legislative measures.*

The Governance Program for the period from June 2023 to December 2024 mentions the fight against disinformation as a priority, but, according to the MPM2024, the "[c]ooperation between different stakeholders to tackle disinformation is in its early stages" and the Bulgarian Coalition Against Disinformation (which brings together representatives of the European Commission, the national authorities, the media, fact-checkers and NGOs[27]) has been rather inactive so far (Spassov et al. 2024). Disinformation originates from a number of actors, including politicians but also "civil servants, and journalists in traditional media" (Wesolowsky, 2024) – and occurrences of "mushroom websites" mimicking established media were reported (Wesolowsky, 2024). Pro-Russian or ultranationalist political groups like Revival are spreaders of specific (loud) types of disinformation. The Bulgarian Socialist Party is also a source of disinformation – albeit more tempered and nuanced while incorporating some of the same themes.

Society is considered vulnerable to disinformation (Margova & Dobreva, 2023) and Bulgaria is, according to the Media Literacy Index 2023, the lowest performing country of the EU in terms of media literacy – it shows significant weaknesses in PISA scores, which reflect the quality of general education. However, over the years, there has been an increase in media literacy activities, the subject has been introduced in some schools, but there is still room for improvement (Tsankova et al. 2022). Trust in the media is low (29%). The public service media is under the control of the state (State

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[24] Stratégie de sécurité nationale. https://www.egmontinstitute.be/content/uploads/2022/02/NVS_Numerique_FR.pdf

[25] S.7-344. Fiche du dossier. Rapport d'information relatif à la lutte contre les ingérences de puissances étrangères visant à saper les fondements de l'état de droit démocratique. https://www.senate.be/www/?MIval=/dossier&LEG=7&NR=344&LANG=fr

[26] Institut belge des services postaux et des télécommunications. https://www.ibpt.be/consommateurs

[27] Представяне на Българска коалиция срещу дезинформацията. https://bulgaria.representation.ec.europa.eu/novini-i-sbitiya/novini-0/predstavyane-na-blgarska-koaliciya-sreschu-dezinformaciyata-2022-04-01_bg

Media Monitor, 2024), while the fact-checking organisation *Factcheck.bg* is an independent initiative of the Association of European Journalists - Bulgaria (AEJ), certified by both the IFCN and the EFCSN. The *Bulgarian National Television* participates in the EDMO fact-checking network.

In general, it can be said that the unstable governments of the past years made it hard to propose long-term solutions to deal with disinformation (Margova & Dobreva, 2023). The levels of state capture and corruption are another key factor. There was an attempt to apply the Radio and Television Act to online platforms, and thereby grant the Council for Electronic Media (the national regulatory authority) new oversight powers to charge online spreaders of disinformation and request a court order to block access. The Bulgarian parliament's Culture and Media Commission rejected the proposal. Another proposal would have included "disinformation in the internet environment" in the country's Personal Data Protection Act, allowing the Commission for Personal Data Protection to discontinue access to media or even social media – but it was widely criticised.[28] Later, the former Minister of e-Government, Bozhidar Bojanov of the Democratic Bulgaria party proposed a bill that would oblige social networks to delete "troll" profiles.

According to its proposer, the Anti-Disinformation Bill would aim at the methods of distribution rather than the content of communications, and would complement the EU's Digital Services Act, by requiring social networks to do more to identify fake profiles and "trolls". The law would also include appeal mechanisms in cases when accounts were blocked or removed by social media.[29] This draft law has been criticised for the use of unhelpful and exclusionary rhetoric. For example: framing anonymity as a "threat" to democracy can alienate individuals who rely on anonymity for safety and self-expression. This is particularly relevant for marginalised communities. By framing anonymity as a threat, emphasising accountability without considering community dynamics, and relying on a singular narrative of resilience, the proposal risks marginalising essential voices and perpetuating existing inequalities. In February 2024, a draft law for amendments to the Electronic Communications Bill was proposed for discussions. The law deals, among other things, with coordinated inauthentic activity and the monetisation of disinformation, and assigns obligations to the Communications Regulation Commission (CRC) and the Minister of Electronic Government.[30] The United States and Bulgaria signed a Memorandum of Understanding (MOU) to fight foreign information manipulation.[31]

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[28] Mohan Pai, J. et al. (2023). A Safer Digital Space: Mapping the EU Policy Landscape to Combat Online Disinformation and Hate Speech 27 Case Studies. Democracy Reporting International.

[29] Божидар Божанов: Внасяме законопроект, който ще задължи Facebook да идентифицира тролове и анонимни профили. https://demokrati.bg/strong-bozhidar-bozhanov-vnasyame-zakonoproekt-kojto-shte-zadalzhi-facebook-da-identifitsira-trolove-i-anonimni-profili-strong/

[30] BROD Hub (2024, 12 February). Anti-disinformation bill proposed for discussion in Bulgarian Parliament. https://brodhub.eu/en/news/anti-disinformation-bill-proposed-for-discussion-in-bulgarian-parliament/

[31] U.S. and Bulgaria to Collaborate on Combatting Disinformation. https://bg.usembassy.gov/u-s-and-bulgaria-to-collaborate-on-combatting-disinformation-09-25-2023/

Croatia *has few legislative measures related to disinformation. Among non-legislative measures, independent fact-checking is considered a priority.*

According to a study commissioned by the regulatory body Agency for Electronic Media (AEM), disinformation in Croatia is emerging as a significant problem (see Grbeša Zenzerović & Nenadić, 2021). Similarly, a report by Pro-fact highlights the problem of COVID-19 disinformation and conspiracy theories in Croatia. Moreover, there are reports showcasing that some Croatian media are among the leading producers of disinformation (see Tardáguila, 2019). The origin of foreign disinformation is often the neighbouring Serbia (Brautović, 2022 & Brautović, 2023). The Media Literacy Index 2023 puts Croatia in the 3rd cluster, as a "transitional" country. Trust in the media is at 32%. The State Media Monitor (2024) sees signs of state capture in the case of the public service media. Faktograf is Croatia's independent fact-checking organisation and a verified member of the EFCSN.

Art. 16. of the Act on Misdemeanors against Public Order and Peace provides that a person who invents or spreads false narratives that disturb the peace and tranquillity of citizens can be punished with a fine of EUR 700 to 4,000 or 30 days of imprisonment.[32] Falsity is presumed, unless the opposite is proven. The National Security Strategy and the Homeland Security System Act make a reference to hybrid operations (Škorić & Rittossa, 2023).

The National Recovery and Resilience Plan for 2021-2026 made the tackling of disinformation one of its priorities, especially through the establishment of an independent fact-checking system and by supporting quality journalism. The Agency for Electronic Media issued public calls for activities and projects, among other things related to fact-checking, through the tender on the "Establishment of verification of media facts and public data disclosure systems", which is part of the National Recovery and Resilience Plan. In two tenders for the allocation of non-refundable funds for the establishment of fact-checking organizations, a total of 21 projects were selected, to which a total of slightly more than 4 million euros was allocated for the establishment of fact-checking systems. All selected projects are required to collaborate on a project's collaborative platform, which will be established by the Agency for Electronic Media. The agency has also created a platform for promoting media literacy through UNICEF and supports all those involved in media education, especially children and young people, but also adults.

Cyprus *is a country where only limited information is available on the official approach towards disinformation. The criminal code specifically mentions "false news", but otherwise neither legislative, nor non-legislative approaches are significant.*

According to the MPM 2024, "Cyprus has no strategy or any legal /regulatory framework specific to disinformation" (Chrystophorou & Karides, 2024). As the island is divided between the Greek and Turkish speaking parts, tensions are common, which

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[32] The fines were drastically increased in 2023. See: Parliament votes in law drastically increasing fines for misdemeanors. https://www.sabor.hr/en/press/news/parliament-votes-law-drastically-increasing-fines-misdemeanors.

can provide a fertile ground for information manipulations (Jacobson, 2023). Cyprus and Greece share a common language and significant cultural ties, which enable narratives to flow between the two countries, particularly through media and social media platforms. The northern part of the island is Turkish-speaking, requiring attention to an additional language of potential disinformation messages. This connection often facilitates the rapid spread of misinformation and disinformation, especially on topics of shared concern. Common narratives include themes of armed conflicts, migration and refugee issues, public health crises, regional politics such as EU and NATO policies, and social issues like LGBTQ+ rights. Taxitary (2024) mentions that disinformation narratives related to immigration and the LGBTQ+ community were published even in major news media, but also spread by far-right actors. Anti-Ukrainian narratives are amplified by pro-Russian actors (Taxitary, 2024)– as Cyprus is popular amongst Russian investors. Giomelakis et al. (2024) found that Cypriot society is very exposed to disinformation – especially on social media.

When it comes to the structural conditions impacting media literacy, Cyprus is in the 3rd cluster of so-called "transitional" countries, according to the Media Literacy Index 2023. According to the Standard Eurobarometer 2023, 32% of the population trust the media. Fostering media literacy is one of the statutory duties of the Cyprus Radio Television Authority. The Cyprus Pedagogical Institute, under the Ministry of Education and Culture, supporting educational programs on media literacy (Giomelakis et al. 2024). *Fact Check Cyprus* is an independent fact-checking organisation that is certified by the IFCN and member of the EDMO fact-checking network.

Art. 50 of the Criminal Code makes it an offence to disseminate "false news" or "news that can potentially harm civil order or the public's trust towards the State or its authorities or cause fear or worry among the public or harm in any way the civil peace and order," and the offence carries a possible two-year prison sentence.[33] The proposed "fake news" bill aimed at criminalising personal insults online, but turned out to be divisive.[34] In addition, the passing of a law against disinformation is on the agenda.[35]

The **Czech Republic** *has so far taken a small number of measures to address disinformation challenges. Some proposed measures faced backlash whilst certain introduced actions were reversed in the past years.*

Disinformation narratives in the Czech Republic are in most cases in line with pro-Kremlin messages. Politicians, such as former President Miloš Zeman, and some media such as *Parlamentní Listy* have contributed to their dissemination. Many media outlets are controlled by people with political interests. RSF's press freedom index

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[33] Ο περί Ποινικού Κώδικα Νόμος (ΚΕΦ.154). http://www.cylaw.org/nomoi/enop/non-ind/0_154/full.html

[34] Theodoulou, N (2023, 22 March). 'Fake news' bill proves divisive. CyprusMail. https://cyprus-mail.com/2023/03/22/fake-news-bill-proves-divisive/

[35] Cleaver, T. (2023, 1 December). Fake news top of agenda as Procopiou meets Demetriou. CyprusMail. https://cyprus-mail.com/2023/12/01/fake-news-top-of-agenda-as-procopiou-meets-demetriou/

ranks the Czech Republic as 17th in the worldwide ranking, and the Media Literacy Index of 2023 places it in the 2nd cluster. Both these indexes imply that the country is relatively resilient to information threats. The public service media is considered independent by the State Media Monitor (2024); the Czech fact-checking organisation *Demagog.cz* is a signatory of the International Fact-Checking Network, member of both the European Fact-Checking Standard Network (EFCSN) and of the EDMO fact-checking network.

Official action against disinformation is very limited. There is no legal definition of the concept or any law specifically concerning disinformation. The Czech criminal code recognizes a few crimes that might overlap with disinformation (such as defamation, spreading of alarming news, etc.). However, the criminal code only applies in cases where the perpetrator´s actions are socially harmful and the application of liability according to other legal regulations (such as civil liability) does not suffice – not to mention that applying it in the case of disinformation would be considered risky for the freedom of expression. In the past years, there were some cases when people publishing disinformation were tried for crimes of spreading alarming messages or terrorism support and propaganda.[36] In April 2023, the police president stated there are 73 ongoing police investigations that deal with disinformation.[37]

In early 2023, the Ministry of Interior presented a first draft for a law concerning the spreading of content threatening national security, but the attempt faced a massive backlash. The proposal would have given the Ministry of Interior the power to restrict access to certain information society services in case the content would constitute a threat to national security.[38]

After Russia's invasion of Ukraine, approximately twenty websites were blocked in the Czech Republic for spreading propaganda by the Czech domain registry (CZ.NIC) as an administrator of the top-level domains at the end of February 2022. None of these actions were based on a proper legal basis which resulted in multiple lawsuits against the Czech Republic, Czech mobile operators and the Czech domain registry.[39] The courts at various levels issued differing, and at times contradictory, resolutions.

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[36] These include a person who asked their followers to use all means necessary to block the legislation procedure of the pandemic law, as well as a person spreading videos on social media, claiming that NATO is planning to occupy the Czech Republic and people who refuse vaccination are about to be shot. See: Idnes (2023). Čermák dostal 5,5 roku za podporu terorismu. Prasata a fašisté, křičeli na soudce. https://www.idnes.cz/zpravy/domaci/tomas-cermak-soud-odvolani-terorismus.A230719_0901 35_domaci_prch and Seznam Zprávy (2023). Soud potvrdil Peterkové podmínku, její příznivci vylomili u soudu dveřehttps://www.seznamzpravy.cz/clanek/domaci-zivot-v-cesku-priznivci-peterkove-vylomili-dvere-do-jednaci-sine-soud-jednani-prerusil-231774

[37] Novinky.cz (2023). Kvůli dezinformacím zahájila policie 73 trestních stíhání. https://www.novinky.cz/clanek/internet-a-pc-bezpecnost-kvuli-dezinformacim-zahajila-policie-73-trestn ich-stihani-40429772

[38] Article 2 and 3 of the proposed law concerning the spreading of content threatening national security.

[39] For example, there is an ongoing dispute between the AC24.cz website and the T-Mobile internet operator – which runs at various court levels. To illustrate the complexity of the dispute – one instance ruled in favour of AC24.cz and ordered T- Mobile to pay monetary compensation for a loss of profit, while the other dismissed the claim. For instance, the district court decided that T-Mobile had to pay profit compensation to the AC24.cz website's administrator for blocking its content. Příjem z reklamy před blokací? ‚Až 200 tisíc měsíčně,' uvedl před soudem provozovatel ‚dezinfowebu'.

The Ministry of Interior, the Ministry of Defence and the Ministry of Justice published a study titled "Analysis of the Czech Republic's readiness to face a serious disinformation wave". This Analysis was created based on an Action plan for the National Security Audit.[40]

The Centre for Hybrid Threats operates under the Ministry of Interior. In 2022, the Council of Ministers approved the creation of the Forum against Disinformation Campaigns in the Field of National Security, which enables civil society, academia and the private sector to raise awareness around emerging threats and propose joint activities to address them. In the same year, the position of a Media and Disinformation Commissioner was created. The Commissioner, who was supposed to coordinate actions of different bodies, drafted an action plan that proposed public funding to civil society organisations working on the issue, and recommended that the government stop placing advertisements on the websites of purveyors of disinformation. The creation of this position was heavily criticised, and as a consequence, the tasks of the Commissioner were passed to the national security advisor (Dragomir et al., 2024). Moreover, the national plan to tackle disinformation was cancelled. On 30th May 2024, Otakar Foltýn, a former head of the military police, was introduced to the position of the coordinator of strategic communication of the government.[41] His position is a substitute to the cancelled position of the commissioner for disinformation. The mandate of this commissioner includes society's defence against disinformation and external influences.

Denmark *emphasises non-legislative measures when dealing with disinformation; it provides support to media literacy and fact-checking activities. There appears to be a limited amount of disinformation in the country, and most measures focus on foreign actors.*

In the country, most attention is devoted to foreign actors, specifically Russia and China; but there are also fringe groups and conspiracy theorists spreading fabricated narratives online (NORDIS, 2022). Although there is evidence of disinformation campaigns related to the war in Ukraine, the extent of the disinformation threat is still considered to be minimal (Simonsen, 2024). Denmark is amongst the most resilient

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https://www.irozhlas.cz/zpravy-domov/prijem-z-reklamy-pred-blokaci-az-200-tisic-mesicne-uvedl-pred-soudem_2407310500_pik

The defendant T-Mobile sent an appeal to the municipal court, which decided to send the case back to the lower court. According to the judgement of the Municipal court in Prague, website blocking based on the non-binding request of state authorities contradicts the European rule of net neutrality. Hence, the court argued, T-Mobile has to bear responsibility, for example, by compensating for lost profit. ,Pro pravdu boží půjdeme až do Kostnice.' Obvodní soud opět projednává kauzu blokace webu AC24. https://www.irozhlas.cz/zpravy-domov/pro-pravdu-bozi-pujdeme-az-do-kostnice-obvodni-soud-opet-projednava-kauzu_2405071537_pik

Currently, there is also an example of case law, as the Constitutional Court rejected the complaint of AC24.cz's lawyer, who requested that the provider stops blocking their website.

[40] The material can be accessed here: Analýza připravenosti České republiky čelit závažné dezinformační vlně. https://www.mvcr.cz/chh/clanek/analyza-pripravenosti-ceske-republiky-celit-zavazne-dezinformacni-vlne.aspx

[41] Foltýn povede strategickou komunikaci vlády. Součástí bude i obrana před dezinformacemi. https://ct24.ceskatelevize.cz/clanek/domaci/obranu-pred-dezinformacemi-by-mel-vest-foltyn-nominaci-na-novy-post-potvrdil-radiozurnalu-349453

EU member states according to the Media Literacy Index 2023, which puts it in the first cluster of countries. Trust in the media is at 57%. The public service media and the media authority are independent (MPM, 2024).

Measures dealing with disinformation are mostly non-legislative, with media literacy being a priority. The media agreement for 2023-2026 emphasises the need to strengthen media literacy and digital education and increases the budget available for such projects. Denmark provides state funding to the independent fact-checkers *Tjekdet* and the Media Council for Children and Young People (Medierådet for Børn og Unge). The public service Broadcasting Corporation runs its own fact-checking service *Detector*.

While the term disinformation is not addressed directly in laws, influencing decision-making and public opinion on behalf of foreign actors is prohibited under the Law on Foreign Influence and under the Penal Code's Art. 108 (Simonsen, 2024). The Penal Code also prohibits propaganda aimed at helping the enemy during war or occupation.[42] Since 2015, there has been much public and political debate for the Media Responsibility Law to include social media. The government signalled its intent in 2022 to introduce a law that would mandate social media platforms to remove illegal content within 24 hours (DRI, 2023).

The government has an inter-ministerial taskforce dealing with disinformation, and initiated the Tech for Democracy Initiative in 2021 to foster the responsible and human-rights-abiding use of technology (DRI, 2023). The Center for Tech and Democracy was established under the Ministry of Culture; its task is to monitor the effect of international tech giants on democracy and Danish society. The Intelligence Service (PET) monitors foreign actors' activities and informs society about threats to opinion formation and the political decision-making. It also prepares key actors to deal with disinformation threats in relation to referendums and elections (Simonsen, 2024).

Estonia *has a strategy of psychological defence that builds on the country's strong track record in media literacy and an emphasis on international cooperation. Legislative approaches do not exist. As a country home to a large Russian community, it was among the first blocking the retransmission of Russian-origin media.*

Estonia's strategy focuses on "societal resilience" and "psychological defence" (referring to measures aiming at improving society's collective ability to withstand the effects of information manipulation attempts). According to the National Security Concept, which was adopted by Parliament in 2017, the aim of such an approach is to build resilience in society towards information interferences, especially in the context of crises. The approach has five pillars: 1) strategic communications, 2) media policy, 3) international cooperation,4) the integrity of elections and 5) media literacy (see: Voltri, 2022 as well as Palmer & Žuffová, 2024).

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[42] Vedtaget af Folketinget ved 3. behandling den 19. marts 2019. Forslag til Lov om ændring af straffeloven. https://www.retsinformation.dk/eli/ft/201813L00095

1) The Government Office oversees strategic communication efforts. The actions related to strategic communication include the monitoring of the information space, coordination and planning of messages across institutions, government communication during crises, as well as informing the public about information manipulations.[43] The Estonian Defence League (EDL, or Kaitseliit) is a voluntary security force under the Ministry of Defence. Volunteer members of the EDL were among numerous people who started the website propastop.org, which is now a well-established non-partisan monitoring site. For security reasons (i.e., targeted attacks, cyber-bullying, extortion towards the activists, etc.) the website has very few public faces and the active contributing members are not disclosed.[44]

2) Although Estonian media policy emphasises as minimal governmental interference as possible, content blocking took place in Estonia already before the European ban of *RT* and *Sputnik*. The Consumer Protection and Technical Supervision Agency, which acts as media regulator, suspended the rebroadcasting of five Russian television channels in February 2022, and continued restricting access to media it considered a threat to the country's information space. In May 2023, for example, 195 websites and 51 television channels were blocked. At the same time, there was support available for quality media outlets to provide news provision in Russian language – focusing on the needs and interests of the Russian-speaking audience. RSF's global press freedom index ranks Estonia sixth worldwide. Fact-checking is provided by the IFCN-signatory *Eesti Päevaleht / Ekspress Meedia.Geofacts* is a member of the EFCSN.

3) As a small country, Estonia was advocating early on for an international approach, it was among the initiators of the East StratCom Task Force and is a sponsor of the NATO StratCom Centre of Excellence operating in neighbouring Riga (Latvia). It cooperates with other Baltic countries on numerous projects. Already in 2008, the NATO Cooperative Cyber Defence Center of Excellence was established in Tallinn. In 2024, Estonia and the United States signed a Memorandum of Understanding to strengthen cooperation on countering foreign state information manipulation.[45]

4) To safeguard the integrity of elections, the State Electoral Office created an interagency task force in 2016. The Estonian Election Committee has debunked many myths about the threats of e-voting on democracy (Estonian Election Committee, 2024).

5) Media literacy has been part of the mandatory education curriculum for more than a decade, and since 2023 such courses also made it in the coursework of Russian-speaking children. 90 percent of the population has basic or above basic data and information literacy skills, according to Eurostat (Palmer & Žuffová, 2024). According

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[43] Republic of Estonia. Government Office. Strategic communication. https://www.riigikantselei.ee/en/strategic-communication

[44] See Propastop's website: https://www.propastop.org/contact/

[45] The United States of America and the Republic of Estonia sign Memorandum of Understanding on Countering Foreign State Information Manipulation. https://www.state.gov/the-united-states-of-america-and-the-republic-of-estonia-sign-memorandum-of-understanding-on-countering-foreign-state-information-manipulation/

to the Standard Eurobarometer 2023, 41% of the population trust the media. Interestingly, for years, the difficulty of the Estonian language has protected the population from scams and other malicious foreign influence – as the content they encountered simply has not been convincing enough for the native speakers (Kreek, 2021). This is also the reason why the Russian-speaking minority has historically been more susceptible to disinformation campaigns, and why the responsible institutions have been targeting their efforts to tackle Russian FIMI-activities. The situations is however changing – this natural language barrier has already weakened due to the adoption of LLM-based (large language models) technologies that are becoming increasingly available, accessible and more resourceful in mimicking the intricacies of small and complex languages (Elisa.ee, 2022). The explosion in the number of cyber-attacks, FIMI-campaigns, data phishing is well documented and exemplified in the Estonian Information Systems Authority yearbook (Estonian Information System Authority, 2024).

Finland *is seen as one of the most resilient countries to disinformation threats, with strong media literacy measures and a high trust in the media. There are no legislative measures.*

There is no dedicated disinformation-related lawmaking, but the country puts a great emphasis on soft measures and media literacy education. Building on the high quality of education in Finland, media and information literacy is considered among the highest in Europe. According to Dragomir et al. (2024) Finnish election disinformation mainly originates from far-right parties who spread conspiracy theories. There are also alternative media outlets and individuals who actively spread disinformation – some of them refer to themselves as "truth seekers" (Moilanen, Hautala & Saari, 2023). Still, being a neighbour of Russia, foreign disinformation is considered a strategic threat, and one of the country's security priorities, as such a number of public and non-governmental actors cooperate on mitigating its effects.

Finland shows strong signs of resilience to disinformation. It has the highest trust in the media (69 percent) among the countries covered; the Media Literacy Index 2024 puts the country in the first cluster, with relatively high PISA scores (74 in reading, 66 in scientific and 75 in mathematical literacy), high tertiary school enrolment and high trust in people. Its public service media and media regulator are independent (MPM, 2024), and journalistic self-regulation is respected in the country. The Finnish Council for Mass Media introduced a badge for responsible journalism to signal which media follow its decisions. The country has two independent fact-checking projects, *Faktabaari* and the local operation of the French news agency *Agence France-Presse*. In November 2024, the Finnish Broadcasting Company (public service media, *Yle*) has launched a new verification team that intends to collaborate with commercial media – and that cites the EDMO NORDIS partner *Faktisk.no*, another collaboration by stakeholders – as one of its inspirations.[46]

There are only a small number of possible measures against the entities that spread disinformation. The Finnish freedom of speech doctrine protects all kinds of speech,

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[46] Yle perustaa tiimin, jonka tehtävänä on varmentaa tietoa. https://yle.fi/a/74-20123044

and even the criminalisation of Holocaust denial is seen as a limitation to the freedom of speech in Finland. Chapter 24 of the Criminal Code deals with defamation and aggravated defamation – the penalty is a monetary fine, or up to 2 years imprisonment, in case it causes extensive suffering and damage. But this provision can only be used in cases that concern information about a particular person, and, in practice, disinformation rarely falls into this category. Still, hate speech and incitement to violence can be punishable. In the high-profile case concerning *MV Magazine*, an outlet which regularly published content hostile towards minorities and spread conspiracy theories, editor-in-chief Ilja Janitskin was convicted of 16 offences, including ethnic agitations, and sentenced to 22 months in prison by the Helsinki District Court (Neuvonen, 2023). Finnish cable operators stopped distributing *RT* already one day after Russia started its war of aggression in Ukraine – approximately a week before the EU sanctions against certain Russian-origin media. Finland – alongside Ireland and Sweden – published a joint non-paper that highlighted the possible risks of over-blocking if provisions are applied to content that is not "manifestly illegal".[47]

The last years have seen calls to step up counter-disinformation measures, for example by penalising the spread of foreign disinformation and upgrading disinformation preparedness, as society is getting increasingly polarised (Moilanen et al. 2023).[48] Cooperation exists in many domains. The Defence Forces, for example, work with other governmental agencies, while, in the field of media literacy, civil society actors collaborate with the National Audiovisual Institute (KAVI). Still, the challenge of rapidly changing technology, including artificial intelligence, would require an even broader collaboration with a variety of stakeholders – which goes beyond traditional media and information literacy (Horowitz, 2022).

France *emphasises both legislative and non-legislative measures, being one of the countries that has dedicated laws dealing with online platforms and disinformation. The focus of policymakers on disinformation is combined with an emphasis on media literacy.*

France has been a target of foreign information manipulation efforts several times, for example the Macron Leaks prior to the presidential elections in 2017. The impact of disinformation is considered moderate, but growing (Ouakrat & Sklower, 2024). Disinformation narratives are widespread, changing from one topic to the other. In 2023, the French authorities uncovered the Doppelgänger operation, during which hackers mimicked the layout of established French and German media outlets to publish fabricated stories, mainly favouring Russian interests (Reynaud & Leloup, 2023). The 2nd EEAS Report on Foreign Information Manipulation and Interference Threats recorded 25 cases of FIMI in France (between December 2022 and November

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[47] "Safeguarding freedom of speech online – a joint non-paper on the DSA by Sweden, Ireland and Finland" (18 June 2021). Published by Politico.
https://www.politico.eu/wp-content/uploads/2021/06/18/joint-non-paper-on-the-DSA-final46.pdf

[48] Among other things, the Finnish Security Intelligence Service (Supo) proposed in April 2022 that the deliberate dissemination of disinformation on behalf on foreign states should be criminalised (Neuvonen, 2023:180), and the Defence Report of 2021 highlighted the importance of addressing threats in the information environment.

2023) which is the third highest number in the EU. Homegrown disinformation often comes from far-right populist parties (France24, 2024).

There is a relatively high level of resilience in French society, due to a number of civil society and fact-checking projects. The digital investigation unit of *Agence France Presse* (AFP) is active in multiple countries (Hénin, 2023). Some other independent fact-checking organisations are *Les Surligneurs, Science Feedback, Le Monde - Les Décodeurs, Les Vérificateurs*, and *Libération - CheckNews*. France is in the 2nd cluster in terms of its media literacy preparedness, according to the Media Literacy Index 2023. Since 2022, the media literacy content of the compulsory curriculum has been updated to tackle, among other things, disinformation. Trust in the media is among the lowest in the EU, at 31%.

France has multiple relevant measures to deal with disinformation, but they seem uncoordinated (Hénin, 2023). It is one of the countries in Europe that introduced platform-specific regulation to safeguard the integrity of elections. The 22 December 2018 law (No. 2018-1202) on the Fight Against Manipulation of Information addresses the dissemination of deliberately misleading information, focusing on online media and online platforms. Its core pillars are: transparency duties of platforms, specifications of the powers of the audiovisual regulatory authority (l'Autorité de Régulation des Communication audiovisuelles et numériques, ARCOM – formally the Conseil supérieur de l'audiovisuel, CSA), cooperation duties of platforms, and the promotion of media literacy. In the three months prior to elections, the law grants powers to address harmful content in an expedited process, within 48 hours, after it has been reported, judges will assess "false news" by whether they are obvious, whether they are disseminated at a large scale and by artificial means, and whether they can lead to disturbances or might compromise the integrity of elections.[49]

The "Autorité de régulation de la communication audiovisuelle et numérique" (ARCOM) is the French independent public authority. Its internal structure also includes a directorate for online platforms.[50] In relation to disinformation, ARCOM's responsibilities include the monitoring of the "activity of online platforms, particularly in terms of the fight against the manipulation of information or against online hatred", as required under the 2018 Law on the Fight Against Manipulation of Information.[51] ARCOM can also suspend the broadcast of television channels in electoral periods.

The General Secretariat for Defence and National Security (SGDSN) runs VigiNum, a technical and operational state service responsible for vigilance and protection against foreign digital interference. VigiNum's task is to detect and assess any phenomenon of suspicious propagation of misleading or hostile content on digital platforms involving

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[49] LOI n° 2018-1202 du 22 décembre 2018 relative à la lutte contre la manipulation de l'information (1). https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000037847559
[50] Arcom Organigramme. https://www.arcom.fr/organigramme
[51] See Mohan Pai, J. et al. (2023). A Safer Digital Space: Mapping the EU Policy Landscape to Combat Online Disinformation and Hate Speech 27 Case Studies. Democracy Reporting International.

foreign actors intending to harm France and its interests. It has an ethical and scientific committee, and its mandate is strictly regulated by law.[52]

In addition to the previously mentioned policy approaches, the government set up a Commission on disinformation led by sociologist Gérald Bronner, called "The Enlightenment in the digital era". The Commission's report focuses, among other topics, on individual cognitive biases towards information and how the Internet and social networks reinforce them, the role of algorithms in the spread of disinformation, as well as the business model of online platforms.

Germany *has both legislative and non-legislative measures to counter disinformation, with many actors actively contributing to actions on disinformation.*

Germany is considered a target of foreign information manipulation attempts – the 2nd EEAS Report on Foreign Information Manipulation and Interference Threats recorded 31 cases in Germany, between December 2022 and November 2023, which is the second highest number in the EU. Prior to the European Parliament elections, one of the largest disinformation operations was identified by the German Foreign Ministry: in the context of an extensive disinformation campaign on X (formerly Twitter), 50.000 accounts spread disinformation, and on certain days published up to 200.000 posts. The campaign was likely coordinated by a foreign state (Rosenbach & Schult, 2024). A year earlier, the so-called Doppelgänger operation was uncovered – it utilised sites that mimicked the design of well-known French and German news media outlets (Khatsenkova, 2023). As German society is divided on a number of issues – such as immigration, energy security and the support provided to Ukraine –, both the local far-right and foreign interest groups benefit from fabricated stories on the topic.

There are signs of resilience in society, but there is room for improvement. Trust in the media is above average in Germany, but still not high: only 43 percent of the population trust most news most of the time (DNR, 2024). There is increasing hostility towards journalists in certain parts of society, in certain cases leading to attacks or harassment (Kalbhenn, 2024). The Media Literacy Index of 2023 puts Germany in the 2nd cluster of countries, meaning that it is a "well-performing" country: its PISA scores in scientific, reading and mathematical literacy, trust in people and the share of people with tertiary education are above average, but not among the highest in Europe, while its score for e-participation is among the lowest. Eurostat's (2023) data on the share of the population with basic and above basics information and data literacy skills shows Germany to be below average. There are high quality media literacy programs in Germany but in most schools, they are not part of the mandatory curriculum – neither is there sufficient attention paid to seniors and people in remote areas. The country has multiple independent fact-checking projects, operated, among others, by the public service media of states, the DPA news agency and non-profits like *Correctiv* or *Volksverpetzer*.

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[52] Laudrain, A. (2021, 22 November). France Doubles Down on Countering Foreign Interference Ahead of Key Elections. Lawfare. https://www.lawfareblog.com/france-doubles-down-countering-foreign-interference-ahead-key-elections-0

Germany has multiple soft measures related to disinformation. Media laws and journalistic self-regulation highlight the need for journalists to respect the truth – the German Press Council is considered effective and journalistic standards are followed by the mainstream press. As a federal system, Germany has multiple public service media outlets in the Länder (states); these are considered independent and high quality (MPM, 2024). The media authorities have the task of promoting media literacy and educating about disinformation, electoral commissions counter disinformation narratives on their websites.

There are no general provisions (criminal or administrative offence) in law regarding disinformation, however, the Criminal Code addresses untrue statements in cases in which they can have an impact on individuals, groups, or might seriously disturb the public order. Section 126(2) of the Criminal Code makes it possible to impose fines or even a prison sentence of up to three years if a person makes a statement that implies that an attack on public peace is imminent. Based on this provision, a blogger was fined EUR 12.000 in 2019 for claiming in a post that a terrorist attack took place. There were also cases in the past years, in which action was taken against media outlets that were considered sources of disinformation or propaganda. For example, on 2 February 2022, the German Commission for Authorisation and Supervision (ZAK) decided to ban *RT*'s German edition.[53] In 2024, the Federal Interior Minister Nancy Faeser banned the company publishing the far-right COMPACT magazine[54] – thereby impacting the distribution of the magazine as well as its social media presence. However, the ban turned out controversial and was lifted by a federal administrative court (Reuters, 2024).

When dealing with the disinformation threat, Germany's approach builds on multiple actors. The Federal Ministry of the Interior is tasked with identifying foreign disinformation, and responses are coordinated by a special task force of the ministry. Education and strengthening resilience is task of the Federal Ministry of the Interior, the Federal Ministry of Family Affairs, and the Federal Agency for Civic Education (Bundeszentrale für politische Bildung, BpB). Information exchange takes place under the Federal Ministry of Foreign Affairs and the Federal Ministry of Defence. To more effectively address foreign information attempts, the government created the Central Office for the Detection of Foreign Information Manipulation (Zentrale Stelle zur Erkennung ausländischer Informationsmanipulation – ZEAM) in 2024, which brings together the Ministry of the Interior, the Federal Chancellery, the Federal Foreign Office, the Federal Ministry of Justice and the Federal Press Office.

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[53] It sanctioned RT's German edition for failing to possess the correct licence for broadcasting in Germany (the broadcaster had a Serbian licence and never applied for a German one). The statement said "[t]he organisation and distribution of the TV program via live stream on the internet, via the mobile and smart TV app 'RT News' and via satellite must be discontinued".

[54] The minister provided the following explanation: "Our ban is a major blow to the right-wing extremist scene. It shows that we are also taking action against the people who are inciting hatred, encouraging the use of violence against refugees and migrants and seeking to overthrow our democratic state. The message we are sending is perfectly clear: We will not tolerate any efforts made to define who belongs in Germany or not based on ethnicity." Federal Ministry of Interior and Community (2024, 16 July). Major blow to the right-wing extremist scene: Federal Interior Minister Nancy Faeser bans COMPACT magazine. https://www.bmi.bund.de/SharedDocs/pressemitteilungen/EN/2024/07/exekutive1-en.html

Germany is one of those countries where laws regulate the conduct of online platforms, requiring transparency, the labelling of bots and quick response to illegal content – but disinformation is only addressed indirectly. The Network Enforcement Act (NetzDG), for example, compels large social networks and digital platforms to block and/or delete "manifestly illegal" content, which has been reported by users, within 24 hours. It was criticised for its potential chilling effect, however, once the Digital Services Act (DSA) is applicable, the Netz DG cannot be applied anymore.[55] Online platforms are specifically addressed in media regulation. For example, according to the Interstate Media Treaty (19(1)), certain social media profiles or YouTube channels need to abide by journalistic principles. They are monitored by the state media regulators, or by the accredited self-regulatory body that they are submitted to. This can lead to complaints, prohibition or blocking orders, but no fines.

Greece *is a country with a small number of legislative efforts to deal with disinformation, it emphasises especially criminal law provisions.*

Disinformation and misinformation are a major problem in Greece, especially following catastrophes and crises – e.g. after floods or wildfires (coverage of causes or number of deaths), but also related to political decisions, such as the potential impact of the technology used for new digital IDs. Greece is particularly vulnerable to Russian disinformation campaigns due to a combination of cultural and geopolitical factors. The shared religious background of Orthodox Christianity creates a sense of affinity that Russian narratives often exploit to build trust and credibility. Additionally, a historical mistrust or even resentment towards Western institutions, fuelled by events such as the financial crisis and perceived external pressures from the EU and NATO, provides fertile ground for disinformation to take root. Often disinformation is published on the country's most popular news websites (Dimitriadis, 2023). The public service media is not independent (State Media Monitor, 2024) and trust in the media is among the lowest in Europe, at 23% (DNR, 2024). The Media Literacy Index 2023 puts Greece in the third cluster of "transitional" countries – its PISA scores are low but tertiary education enrolment is reported as extremely high (100%). *Ellinika Hoaxes*, *FactReview* and *Greece Fact Check* are EFCSN and IFCN certified independent fact-checking organisations, as well as members of the EDMO fact-checking network.

Greece is one of the countries that passed a law in the past years that criminalises the publication of "false news" (Art. 36, 4855/2021). It deals with cases in which someone publicly or via the internet disseminates "false news" that is capable of causing fear in an indefinite number of people or in a certain circle or category of persons who are thus forced to carry out unplanned acts or their cancellation, with the risk of causing damage to economy, the country's defence capability or public health. The maximum sentence for the criminal offence is five years imprisonment. The law also penalises media outlets for publishing or republishing such content (DRI, 2023).

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[55] See for example: Engage (2023, 4 October). Digital Platform Regulation: Germany's Implementation Draft Bill of the Digital Services Act. https://www.engage.hoganlovells.com/knowledgeservices/insights-and-analysis/digital-platform-regulation-germanys-implementation-draft-bill-of-the-digital-services-act

The parliament ratified a law in December 2022 to form a Special Committee charged with overseeing the compliance of online media to "journalistic ethics". Noncompliant media can lose state advertising funds – a crucial source of revenue for media in Greece - for up to two years (Dimitriadis, 2023). The National Centre for Audiovisual Media and Communication[56] is active in identifying and countering disinformation (DRI, 2023).

Hungary *has no strategy on dealing with disinformation. Two restrictive measures, one of them an amendment of the criminal code, used disinformation or foreign interference as a pretence.*

Disinformation is widespread in the country, with a documented impact on public opinion (Political Capital, 2018). The government is considered a source of disinformation, while the government-captured public service media, and many government-aligned private news media outlets are seen as amplifiers of disinformation (Szicherle & Krekó, 2021). While foreign actors are not considered especially active in the Hungarian disinformation environment, government-aligned outlets (including the public service media) often use Kremlin-backed media as the source or motivation for the content they publish (Urbán et al., 2023). Disinformation in the media is often combined with defamation against the critics of the government (Bleyer-Simon, 2023) – many mainstream outlets published reports accusing opposition politicians, activists or business people of wrongdoing, using fabricated or unsubstantiated evidence. After the EU-wide ban of Russian-origin propaganda media, the Hungarian public service broadcaster continued using RT as a source of its reporting on Russia and Ukraine (Kapronczay, 2022).

The Hungarian population shows weak resilience towards disinformation. Trust in the media is among the lowest in Europe (DNR, 2024), the media system is extremely politicised and polarised – with the government capturing many private media outlets. Self-regulation has always been weak in Hungary, there is no press council, the National Association of Hungarian Journalists rarely takes positions, and a number of media outlets disrespect ethical standards. The public service media is governmentally controlled (State Media Monitor, 2024). Political advertising online is unregulated. In broadcast media, rules exist, but these are actively played – during the campaign for the European Parliament elections in 2024, for example, the public service media showed the social media advertisements of politicians from the governing party as part of its news bloc (see Trevisan & Bleyer-Simon, 2024). the country ranks 67th on RSF's media literacy index, as the government in power since 2010 took several measures to limit independent journalism.

Media literacy shows moderate risk: there are organisations in the country promoting media literacy – in part supported through the European Commission and the US State Department – and media literacy is mentioned in the national school curriculum, but studies show that not all schools offer such courses, and marginalised segments of

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[56] It is a legal entity operating under private law and supervised by the Ministry of Digital Policy, Telecommunications and Media, with a mission to foster and promote public and private initiatives, foreign and domestic, in all sectors of the audiovisual industry.

the population don't have access to proper training (MPM, 2024). Act CLXXXV of 2010 on Media Services and Mass Media sees a role for the public service media (Art. 83) and the media regulator (Art. 132) to promote media literacy – but both institutions are government-controlled and cannot be expected to provide a meaningful contribution to skills development, especially in the case of news literacy. According to Eurostat (2023), the share of the population with basic and above basics information and data literacy skills is above average. At the same time, the Media Literacy Index of 2023 puts Hungary in the 3rd cluster of countries with a risk of slipping further down: its PISA scores in scientific, reading and mathematic literacy, as well as those on trust in people and e-participation, are somewhat below those of Western Europe, the population share of people with tertiary education is below average. The fact-checking project *Lakmusz* is verified by the EFCSN and the IFCN, as well as a member of the EDMO fact-checking network.

There were two cases of (at least in part anti-disinformation) laws that were criticised for being repressive and vaguely phrased.

One of them happened in the case of the Covid-19 pandemic, when a law was introduced by executive fiat that changed the Criminal Code's definition of "scaremongering" (sec. 337) in a way that could have criminalised possible criticism of the government's management of the pandemic. Prior to the European Parliament and municipal elections of June 2024 the Sovereignty Protection Act (Act LXXXVIII of 2023 on the Protection of National Sovereignty) was introduced. The law, that is often compared to Russia's "foreign agent" law, targets news media and civil society organisations that are considered under the influence of foreign interests (according to the wording of the law, mainly from the United States, an ally of Hungary) – it specifically mentions disinformation in its text (Bleyer-Simon, et al., 2024). The remaining measures can be considered only window dressing. Hungary's national security strategy (Government Resolution 1163/2020) mentions disinformation as a threat, but it doesn't propose any action. The Ministry of Justice established the Digital Freedom Committee which published a "White Paper"[57] in 2020, examining the potential of platform regulation (also considering "deliberate misinformation" in the context of elections), but it did not lead to discussions or policy proposals.

In **Ireland***, there are legislative efforts relating to disinformation about the electoral process. A national strategy to counter disinformation has been in development, but is not yet implemented.*

The spread of disinformation in Ireland is moderately problematic, it plays a role in the discourse around refugees and LGBTQI rights. Populist and far-right political forces play a role in the spread of disinformation. As an English-speaking country, Ireland is influenced by the disinformation spreading across the US and the UK. Gallagher et al. (2023) found that disinformation by far-right actors became a growing threat in the country, and platforms' terms and services were not properly enforced to counteract the threats. Trust in the media is relatively high, compared to other countries (46%).

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[57] "White Paper" of the Digital Freedom Committee. https://digitalisszabadsag.kormany.hu/download/0/d2/92000/White_Paper_2020.pdf

The Media Literacy Index 2023 places Ireland in the 1st cluster, with good PISA scores and high trust in people. *Raidio Teilifis Eireann* (RTÉ) is a public-funded public service media, with no signs of interference. *The Journal FactCheck* is verified by IFCN, *Logically Facts* also provided Irish fact-checks. Both are members of the EDMO fact-checking network.

The Online Safety and Media Regulation Act established a new media regulator with the remit of monitoring harmful content. The Act covers certain instances of online harm – disinformation is not yet a category covered, but the Online Safety Commissioner can designate new categories. The 2022 Electoral Reform Act includes provisions to tackle online disinformation during elections and referenda (Culloty, 2023). Its stated aim is "protect[ing] the integrity of our electoral and democratic processes against the spread of disinformation and misinformation in the online sphere during electoral periods." It gives the Electoral Commission power to act on online mis- and disinformation – in particular when it manifests as online political (electoral) advertising and online electoral information. The Act foresees giving the Electoral Commission of Ireland the power to issue take-down and correction notices, labelling and access-blocking orders, and notices to operators or online platforms to inform end-users of manipulative or inauthentic behaviour during election campaign periods.

The Irish government created a multi-stakeholder working group, which works on the development of a National Counter Disinformation Strategy, under the leadership of the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media. It established a working group to develop a National Counter-Disinformation Strategy, which is composed of representatives from industry, academia, civil society, and government departments. While there is no tangible outcome of this work yet on the policy level, the establishment of the working group marks a first step towards devising coherent and comprehensive disinformation strategies (Flynn, 2024:27). The terms and references of the group highlight the need for media literacy initiatives in a targeted, complex governmental approach, the need for a comprehensive assessment of existing tools (both national and international best practices) to counter disinformation and address evolving threats, support for innovation in fact-checking and research, as well as contribution to the long-term assessment of the EU-level policies (the Code of Practice on Disinformation and the Digital Services Act). In addition, it highlights the role of independent news media on the local and national level and the need to better identify coordinated campaigns, for example, through better access to data for researchers.

However, it is to be seen whether there is enough support in society to upscale this nascent strategy: the Review of Submissions for the National Counter Disinformation Strategy Public Consultation in Ireland found that many stakeholders that participated in the consultation saw the creation of a strategy unnecessary or even undesirable due to the perceived risk of governmental overreach and possible adverse effects on freedom of expression.[58] Ireland was also one of the authors of a joint non-paper that

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[58] "While the survey did not pose the question of whether a strategy was required, it was clear from most of the responses from the general public that they did not feel that a strategy was needed. This

highlighted the possible risks of over-blocking if provisions are applied to content that is not "manifestly illegal".[59]

Italy *has no legal framework specifically aimed at disinformation. Laws were proposed in the past but not passed. Most tasks related to disinformation are delegated to the media regulator.*

Disinformation is considered a significant problem in Italy, with public awareness slowly increasing (see Vigevani et al., 2024). The public discourse is characterised by strong political polarisation, and far-right politicians are among the sources of disinformation in Italy (Sessa, 2023). There are signs of foreign information interference in the country – although to a lesser extent than in some other EU countries. The Russian-origin Doppelgänger project, for example, created Italian language websites that mimicked established media outlets (EUvsDisinfo, 2024). The Chinese-origin Paperwall operation included a network of six fake news websites targeting Italian audiences (Pompili, 2023). Italy is considered a "transitional" country in the 3rd cluster of the Media Literacy Index 2023. Trust in the media is at 34% and the public service media is often criticised for its lack of independence (MPM, 2024). Italy has a number of fact-checking projects, such as the EFCSN-members *Pagella Politica* and *Facta. Fact-checking de Lavoce.info* used to be IFCN certified.

There is no legal framework specifically aimed at disinformation. Art. 656 of the Criminal Code mentions the offence of spreading "false, exaggerated and biased news, likely to disturb the public order" – but as a remnant of the Fascist time it is not applied by the courts (Manetti, 2023). Defamation under Art. 595 of the Penal Code is aggravated if done on the internet. Art. 658 deals with false announcements of disasters, accidents or danger.

Before the snap elections of 25 September 2022, Sessa (2022) pointed out that the level of counter-disinformation initiatives was "worryingly low". Many attempts to introduce regulation on disinformation have failed: for example, the attempt to create a legal framework against disinformation and hate speech in 2017, and a protocol to tackle disinformation in 2018, out of fear that they would give authorities too much power (Sessa, 2023). In 2019, the Italian parliament discussed establishing a Parliamentary Commission of Inquiry on disinformation, but this was only approved by the Lower House, not the Senate.[60] An extensive report from the Italian Ministry of Foreign Affairs and International Cooperation on the coordinated efforts to spread disinformation has been published, highlighting policy recommendations for public

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[59] was also accompanied by a view that the strategy would result in censorship". p. 7. National Counter Disinformation Strategy Public Consultation. Review of Submissions. November 2023. https://assets.gov.ie/280301/074a3edd-57eb-4626-9c83-097ff59710f3.pdf

[59] "Safeguarding freedom of speech online – a joint non-paper on the DSA by Sweden, Ireland and Finland" (18 June 2021). Published by Politico.
https://www.politico.eu/wp-content/uploads/2021/06/18/joint-non-paper-on-the-DSA-final46.pdf

[60] Apa, E (2020). Parliament considers establishing an ad-hoc parliamentary committee of inquiry on the massive dissemination of fake news. Cortolano Cavallo. https://portolano.it/newsletter/portolano-cavallo-inform-digital-ip/parliament-considers-establishing-an-ad-hoc-parliamentary-committee-of-inquiry-on-the-massive-dissemination-of-fake-news

institutions, online platforms and private subjects (Gullo et al., 2022). Importantly, it stresses the need to take more initiatives and to publish, at least on an annual basis, a summary document of national priorities on actions against disinformation. During the COVID-19 pandemic, the government created a monitoring unit to deal with the spread of disinformation online, including on social media (Manetti, 2023).

Tasks related to disinformation – including the role of Digital Services Coordinator (DSC) under the DSA – were delegated to the media regulator AGCOM (Autorità Garante delle Comunicazioni). The authority looks at three areas: a) incitement to hatred and discrimination, b) electoral disinformation, and c) pandemic-related disinformation (Manetti, 2023:344). It publishes reports, and assesses the disinformation landscape through its Observatory on Online Disinformation. The Technical Roundtable for Safeguarding News-Media Pluralism and Fairness on the Online Platforms promotes self-regulation, monitors economic flows, assesses market solutions for fact-checking and promotes media literacy, as provided by Resolution no. 423/2017/CONS.[61]

Latvia *puts a strong emphasis on media literacy and engages in international cooperation to address foreign-origin disinformation. The country has both legislative and non-legislative measures.*

The country has a long history of opposing the Kremlin's narratives and information operations. Thus, the disinformation problem, which to a considerable extent originates from Kremlin-related sources in the country, is high on the political agenda, and can be felt in the public discourse (Hanley, 2023). According to the Standard Eurobarometer 2023, 47% of the population trust the media. A significant proportion of the population speaks Russian as the first language and is thus especially vulnerable to Russia-based propaganda, through Russia-based channels and local Russian-language media. Latvia has been a vocal proponent for international cooperation and a driver of a European approach – this is the case at least since the Latvian rotating EU Council presidency in 2015 and the establishment of the East StratCom Task Force the same year (Vériter, 2024). The NATO Strategic Communications Centre of Excellence and the Baltic Centre for Media Excellence, an NGO that facilitates the development of journalism and media literacy, are both based in Riga. When Latvia assumed the rotating Chairmanship of the Council of Europe's Committee of Ministers, the promotion of freedom of expression was among the priorities (BECID, 2024).

Latvia is one of the countries where measures have been taken to block access to Russian-origin media. After the Russian war of aggression against Ukraine, the National Electronic Media Council (NEPLP) banned broadcasting of all TV channels that are registered in Russia. Access to scores of websites, the contents of which are deemed to threaten national security, including Russia-based media outlets and social networking sites, has also been restricted.

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[61] In addition, another authority, the Data Protection Guarantor ordered in 2016 that Facebook block fake profiles (Resolution 27 January 2016, no. 4747581 Observatory on Online Disinformation).

The country's lawmakers have discussed the need for a law specifically aimed at disinformation – however, such legislation has not been passed (BECID, 2024). There is a possibility to prosecute publishers of disinformation under the Criminal Code's Arts. 231 (Hooliganism and gross disturbance of public order), 80 (Action Directed against the Republic of Latvia), 81 (Invitation of action Directed against the Republic of Latvia) and 157 (Defamation or intentional public distribution of false information). Of these, Article 231 was applied to the case of Niks Endziņš, a former owner of "fake news" websites, for a made-up story about the alleged collapse of a shopping mall in the Latvian capital, Rīga that interfered with the work of emergency services. Certain heads of media outlets, such as the Russian propaganda network *Sputnik*, have been arrested for espionage and for violating Russian sanctions (Hanley, 2023). In 2024, an amendment in the Criminal law was made, the new Art. 90 outlaws efforts to influence the election process through the use of deep fake technology. In addition, lighter disinformation-related offences can be prosecuted based on Article 11 of the Law on Administrative Penalties for Offences in the Field of Administration, Public Order, and Use of the Official Language, which concerns disturbance of public order.

The State Chancellery's Strategic Communications Coordination Department is one of the main actors in tackling disinformation. It monitors the information environment, holds training activities for civil servants, and is one of the institutions that promote media literacy. NEPLP, the media authority, monitors the work of the media organisations operating in Latvia and sanctions those that violate the respective laws. The country's action plan, called The National Concept on Strategic Communication and Security of the Information Space[62], involves 20 institutions and emphasises the need for strategic communication capacities, strong news media (providing funding and releasing information), societal resilience (including media literacy), cooperation with civil society and the private sector, as well as the need for international coalitions. The National Security Concept of the country also emphasises the importance of a strong information space, which in the document is interpreted as depending on Latvia-based quality mass media and quality journalism content, as well as the audience that, by consuming that content, contributes to societal cohesion – on the basis of the use of Latvian, as the only official state language. The country's national development plan for 2021-2027 is another document that highlights the need to strengthen the information space.

When looking at soft measures, we can find strong media literacy and training efforts. The promotion of media literacy is one of the key elements of the Latvian media policy developed by the Ministry of Culture. Various media literacy training activities are available, including for schoolchildren and seniors. The Media Aid Fund is a government-funded entity that administers grants to media organisations with the aim of strengthening the local and national media environment and facilitating quality journalism. Independent fact-checking in Latvia is done by a number of media organisations, the most prominent of which are *Re:Baltica* (a member of the EFCSN, IFCN and the EDMO fact-checking community) and *Delfi*.

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[62] The National Concept on Strategic Communication and Security of the Information Space. https://www.mk.gov.lv/en/media/15446/download?attachment

Lithuania *considers disinformation a national security issue. As other Baltic states, it puts an emphasis on media literacy and strategic communication. Some legislative measures address the publishing of disinformation on social media.*

Policymaking related to disinformation is predominantly framed as a national security issue in Lithuania. There are clear efforts towards inter-institutional cooperation between various stakeholder groups (DIGIRES, 2022), led by the National Centre for Crisis Management, a structural unit within the Government Chancellery. It plays the role of a competence centre and coordinator of activities, monitors threats and disseminates information to key stakeholders (Bleyer-Simon et al. 2025). Analysts of the Strategic Communications Department of the Lithuanian Armed Forces continuously monitor disinformation threats to Lithuania and post their monthly reports on their website (BECID, 2024). Lithuania is part of the steering committee in the OECD Expert Group on Governance Responses to Mis- and Disinformation.

Lithuania has a strong civil society scene that is active in information defence (Mays, 2023). The "Elves" are a self-organised group of volunteers who follow disinformation online with the intent of debunking, unmasking or reporting it to authorities. *Debunk.org* is an NGO that analyses disinformation, while *Delfi* has a fact-checking section, called *Lie Detector*. In the past, *Lithuanian National Radio and Television, LRT* used to operate as an IFCN-verified fact-checker. According to the Standard Eurobarometer 2023, 37% of the population trust the media.

According to Art. 19 of the Law on the Provision of Information to the Public, media outlets must not publish "intentionally disseminated false information". In 2024, Lithuania amended its Criminal Code to outlaw the use of manipulated social media accounts to disseminate information aimed at harming the constitutional order, territorial integrity, defense, or other interests of the state (Art. 118). Art. 8.11 of the 2018 Law on Cyber Security allows the National Cyber Security Centre to order the temporary shutdown of electronic communications providers, without a court order – for example as a response to a coordinated disinformation campaign (DRI, 2023).

A number of policy documents mention the need to strengthen the information environment, by addressing information threats, building resilience in society and supporting the media. These can be found, among others, in the 2020 government program, the "Lithuania 2023" development plan and the National Security strategy. The mitigation of the risks of disinformation is a key consideration in Lithuania's approach towards development cooperation – the Strategic Directions for Development Cooperation of the Republic of Lithuania calls for strengthening information resilience, through support for independent media and strategic communication, for example in the countries of the Eastern Partnership (BECID, 2024). The state provides funding to independent media outlets through the re-established Media Fund.

Luxembourg *has no dedicated legislation on disinformation, the government supports certain measures that aim at strengthening society's resilience.*

Although Luxembourg is one of the smallest countries in the EU, disinformation is considered a problem – especially due to the shared language, German and French language disinformation can reach people in the country (Gentil & Sessa, 2024b). There were also numerous fake narratives related to Russia's war in Ukraine and the Covid-19 pandemic, as well as homophobic disinformation content related to the country's former prime minister (Kies & Lukasik, 2024). In the past year, the Chinese-origin Paperwall operation was detected (Alaphilippe, 2024).

Luxembourg is in the 2nd cluster of the Media Literacy Index 2023 and has independent public service media. According to the Standard Eurobarometer 2023, 43% of the population trusts the media. The German press agency *DPA* provides Luxembourg-focused fact-checks, as well as *RTL Luxembourg* and *AFP*.

There are no rules or regulations that focus on disinformation or foreign interference. At the same time, the offences of defamation and slander (Art. 443 of the Criminal Code) can be established even in cases in which existing social media content was reshared. A 16 May 2023 law transposing the 23 October 2019 European Parliament and Council Directive (EU) 2019/1937 ensures the protection of whistle-blowers, as LuxLeaks actually paved the way for such protection at the EU level. The DSA's implementation in the country is overseen by the Competition Authority,[63] which is the designated Digital Services Coordinator (DSC). Further regulatory developments can be expected once the reform of the Electronic Media Law takes place (Gentil & Sessa, 2024b, Kies & Lukasik, 2024). Moreover, the government has guaranteed media representatives a law on public information access,[64] previously limited by personal data protection requirements.

The media literacy platform Bee Secure is operated by the Service National de la Jeunesse (SNJ) and the Kanner-Jugendtelefon (KJT) in cooperation with the Luxembourg House of Cybersecurity, the police, and the Public Prosecutor's Office. It has, among other things, developed a training module for schools. RTL, which serves as the country's public service media, has a section on its website called "Fact Check". The state-funded respect.lu website develops informative programs on disinformation. In early 2023, the declaration on building trust and strengthening democracy was adopted, which also launched the OECD Resource Center platform on disinformation and misinformation – the Luxembourg Ministry of Justice has made a financial contribution of EUR 100,000 to this centre.

Malta *has no national framework or dedicated policy to deal with disinformation. The criminal code has a relevant provision, but its use can endanger freedom of expression. The high number of SLAPPs implies that courts are often misused to censor independent journalists.*

The MPM2024 reports "a lack of a coordinated policy response to disinformation", and adds that "according to the Times of Malta's fact-checker Neville Borg, some degree

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[63] Digital Services Act – l'Autorité de la concurrence sera en charge de l'application du DSA au Luxembourg. https://concurrence.public.lu/fr/actualites/2023/09-11-dsa.html
[64] RSF: Luxembourg. https://rsf.org/en/country/luxembourg

of disinformation is commonly expected and tolerated in the highly politicised media landscape". In addition, belief in conspiracy theories is relatively widespread (Repeckaite, 2024). The worsening of disinformation is in part connected to the assassination of investigative journalist Daphne Caruana Galizia on 16th October 2017. For instance, online troll armies perpetuate false (and harmful) narratives and orchestrate coordinated attacks on anti-corruption activists and other members of civil society who call out wrongdoing. The public inquiry into the assassination of Caruana Galizia noted that she was the victim of a dehumanisation campaign that was 'orchestrated also by leading government exponents within the Office of the Prime Minister'.[65]

In addition, several Maltese journalists and media outlets have been targeted by spoofing attacks. In 2021, a major disinformation campaign took place in the form of a spate of false articles and emails purporting to be by journalists, bloggers and public figures (Malta Independent, 2021). A lot of these fakes supported conspiracy theories about the circumstances of Caruana Galizia's assassination. Much disinformation revolves around political issues that the journalist was investigating. A recent example: the ruling Labour Party (including the prime minister) appeared to try to frame a magisterial inquiry into a major fraudulent deal involving the privatisation of three of Malta's state hospitals, as well as the fallout of said deal, as a war wrought on the Labour Party by an unnamed 'establishment' having taken over state institutions.[66]

Malta does not have a media literacy policy, and media literacy is not a compulsory subject at any level of the educational curriculum. According to the Standard Eurobarometer 2023, 39% of the population trust the media. The independent *Times of Malta* newspaper has a dedicated fact-checking service funded through the Mediterranean Digital Media Observatory (MedDMO) project[67], though fact-checking is understood as a necessary process in every truth-seeking newsroom.

There is no formal national framework seeking to combat disinformation in Malta (see also Mallia, 2024). However, the Criminal Code[68] has a relevant provision – which is problematic from a human rights perspective. According to Art. 82, anyone who "maliciously spread[s] false news which is likely to alarm public opinion or disturb public good order or the public peace or to create a commotion among the public or among certain classes of the public" shall, upon conviction, be liable to a prison term and a fine. Although criminal libel was removed from Maltese law in 2018, following a media law reform in the wake of the assassination of investigative journalist Daphne Caruana Galizia, civil libel remained in place. Moreover, criminal libel is coming back into discussion. Last September, the outgoing president of the ruling Labour Party

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[65] Courtesy translation of public inquiry report published. https://www.daphne.foundation/en/2021/11/20/public-inquiry-translation

[66] Malta: Disinformation narrative report on hospitals deal. https://meddmo.eu/malta-disinformation-narrative-report-on-hospitals-deal/

[67] See https://meddmo.eu/

[68] Malta's Criminal Code is available at https://legislation.mt/eli/cap/9/eng/pdf

called for its reintroduction as well as for harsher penalties for libel cases.[69] Malta is the country with the highest number of strategic lawsuits against public participation (SLAPPs) per capita in Europe.[70] This shows that a person's or organisation's right to sue someone for defamation can be easily abused and used as an intimidatory measure against critics. Legal cases can last years in the Maltese courts, incentivising plaintiffs with bad motives.

The Netherlands *is a country with an anti-disinformation strategy, which builds, so far, mainly on non-legislative measures, such as supporting media literacy and fact-checking. Legislative measures are planned.*

The Netherlands is considered a country with high resilience against disinformation, displaying a high level of media trust (Humprecht et al., 2020) coupled with a proactive governmental approach (see Jahangir, 2023). Nevertheless, disinformation is becoming an increasing threat in the Netherlands, as far-right and anti-vaxxer conspiracy theorists are getting louder (Hameleers, 2024), especially on alternative media sites such as Telegram (Simon et al., 2023). The Media Literacy Index puts the Netherlands in the second cluster, related to the structural protections related to media literacy – its PISA scores in scientific and mathematical literacy are relatively high, as well as tertiary education enrolment. Trust in the media is at 54%. RSF's press freedom index ranks the Netherlands 4th worldwide. The Media Pluralism Monitor 2024 highlights that, thanks to long-term governmental policy, digital media literacy is strong in the country. Four out of five people have (above) basic digital skills. Many anti-disinformation measures are funded and initiated by the government (De Swert et al., 2024). The media authority and the public service media are independent (MPM, 2024).

In certain cases, the Criminal Code can be used against purveyors of disinformation – for example, in case the false content constitutes libel (Art. 261) or can manipulate elections (Art. 267). The Dutch government has released its strategy to tackle disinformation in December 2022 – the priorities are strengthening public debate (including digital resilience of society and increased awareness of disinformation) and limiting the spread and impact of disinformation (through a better developed legal framework).[71] As part of the strategy, the government supported several research projects and civil society initiatives. In the same year, a new cybersecurity strategy was announced for the years 2022-2028, which includes digital threats. The strategy builds on a broad cooperation between public, private and civil society organisations, under the leadership of the Cyber Security Council. Legislation and regulation is also

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[69] See here: Times of Malta (2024, 18 Sept.) Don't turn the clock on criminal libel, journalists' institute says. 'Criminal libel has a chilling effect on free speech'. Times of Malta. https://timesofmalta.com/article/dont-turn-clock-criminal-libel-journalists-institute-says.1098252
[70] Coalition Against SLAPPs in Europe (2023). SLAPPS: A Threat to Democracy Continues to Grow. https://www.the-case.eu/wp-content/uploads/2023/08/20230703-CASE-UPDATE-REPORT-2023-1.pdf
[71] Kabinet pakt desinformatie aan. https://www.rijksoverheid.nl/onderwerpen/desinformatie-nepnieuws/nieuws/2022/12/23/kabinet-pakt-desinformatie-aan

planned. In 2021, a voluntary code of conduct on political advertising was developed by the government, with an emphasis on labelling and transparency.[72]

The Dutch Ministry of the Interior and Kingdom Relations is one of the key players in tackling disinformation – among other things, it has published a guide for officials and others possibly dealing with disinformation.[73] It also supported the social business DROG in developing a game to increase disinformation-awareness and promote media literacy among aldermen and council members. The Network Media Literacy is a media literacy initiative of the Ministry of Education, Culture, and Science. It has set up the disinformation-awareness website *Isdatechtzo.nl*. *Nieuwscheckers* is a fact-checking initiative of the Journalism and New Media Department of Leiden University. In the past, the news website *NU.nl* has also published fact-checks.

Poland *has limited legislative or non-legislative measures. Most actions are related to national security.*

As a politically polarised society, Poland is exposed to a lot of disinformation. The former government of the Law and Justice party (PiS) has captured the public service media and weaponised it against the opposition. In addition, Poland is a neighbour of Ukraine and home to a large number of Ukrainian refugees, making it a target of foreign disinformation. The 2nd EEAS Report on Foreign Information Manipulation and Interference Threats recorded 33 cases of foreign information manipulation and interference in Poland (between December 2022 and November 2023) which is the highest number in the EU. Ahead of the elections in 2023, actors associated with the Belarusian state created websites that published misleading content in Polish language (EEAS, 2024). The Doppelgänger's campaign had also created fake Polish websites (EUvsDisinfo, 2024). Poland is in the second cluster of the Media Literacy Index 2023, among the countries that are rather resilient to information manipulations. The former Law and Justice (PiS - in power until 2023) government captured the public service media and put independent outlets under pressure, however, the climate has changed since then. The trust in the media is at 39% (DNR, 2024). The *FakeHunters* project is run by the Polish Press Agency. Other independent fact-checking projects include *Demagog, KONKRET24, AFP Sprawdzam, Wojownicy Klawiatury, Pravda* and *Przeciwdziałamy Dezinformacji*.

The country has no general regulation and lacks comprehensive policies to deal with disinformation. Introducing such action during the COVID-19 pandemic and Russia's attack on Ukraine turned out ineffective, as attempts were based on ad hoc government action. There are no guidelines or structures for public institutions, intelligence services and the government on how to react to and deal with disinformation (Zadroga, 2023). Some provisions of legal norms could be applied in the context of sanctioning disinformation. Art. 212 addresses the crime of defamation while Art. 216 covers the public insult of another person. These provisions are highly

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[72] Handreiking omgaan met desinformatie. https://www.rijksoverheid.nl/onderwerpen/desinformatie-nepnieuws/documenten/richtlijnen/2021/02/09/nederlandse-gedragscode-transparantie-online-politieke-advertenties

[73] Handreiking omgaan met desinformatie. https://www.weerbaarbestuur.nl/sites/default/files/inline-files/BZK%20-%20Handreiking%20omgaan%20met%20desinformatie.pdf

abstract. The Act of August 17, 2023 (Journal of Laws 2023.1834) amended the Polish Criminal Code and some other acts. It increased criminal punishment for spying, introduced a register of "spies," and introduced other restrictions related to the protection of strategic locations. The amendment is not explicitly dedicated to disinformation, but through its subject matter scope, it applies pressure on intensifying the penalisation of activities that involve, among other things, disinformation operations. This approach can raise concerns related to freedom of expression. After Russia's invasion of Ukraine, the National Broadcasting Council blocked the broadcasting of a number of Russian and Belarusian media outlets, based on already existing legal regulations (Broadcasting Law).[74]

In Poland, most measures fall in the domain of national security. The National Security Strategy of Poland mentions the need to build capacities to counter disinformation,[75] the Office for National Security and Special Services regularly updates society about disinformation narratives.[76] A Government Representative for the Security of the Information Space of the Republic of Poland was appointed by regulation in August 2022 (Dz.U. 2022.1714). In 2023, the Polish government published a total of 25 reports within the "special state services" section, in which it reported on disinformation activities undertaken against Poland.[77] The Polish Senate also passed a Resolution of Intention to deal with disinformation.[78]

Non-legislative tools are mostly limited to educational and information programmes. The National Broadcasting Council has no assigned competencies and tasks directly relating to disinformation, but it has undertaken educational and informational activities on the threats posed by the phenomenon of disinformation. An important role in implementing educational policy on the problem of disinformation, especially using e-tools, is played by the data networks operator NASK (Naukowa i Akademicka Sieć Komputerowa). It is a state-owned research institute supervised by the Ministry of Digitization. Its critical task is to guarantee cyber security. On the local level, there were information campaigns by municipalities.[79]

Portugal *has almost no legislative measures focusing on disinformation, but has numerous media literacy activities.*

Many Portuguese disinformation narratives are related to corruption – especially government corruption. Some anti-immigration and anti-refugee narratives also exist. Disinformation is not yet as strong as in most European countries, but has been

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[74] Załatwiaj sprawy urzędowe. https://www.gov.pl/web/krrit/krrit-weryfikuje-wszystkie-wpisane-do-rejestru-rosyjskie-i-bialoruskie-programy-telewizyjne

[75] National Security Strategy of The Republic Of Poland 2020. https://www.bbn.gov.pl/ftp/dokumenty/National_Security_Strategy_of_the_Republic_of_Poland_2020.pdf

[76] Dezinformacja przeciwko Polsce. https://www.gov.pl/web/sluzby-specjalne/dezinformacja-przeciwko-polsce2

[77] ibid.

[78] Komisje senackie przyjęły uchwałę ws. Przeciwdziałania dezinformacji w Polsce [Senate committees adopted resolution on Prevention of disinformation in Poland], 31.03.2023, Senat Rzeczypospolitej Polskiej / Aktualności / Inne / Komisje senackie przyjęły uchwałę ws. przeciwdziałania dezinformacji w Polsce.

[79] Such as the "Be resistant to disinformation" campaign by the Municipal Office in Lipsko.

increasingly touted by political actors, especially in the far-right. There are indications that most disinformation narratives in Portugal originate from abroad (Pardal, 2023), although there are no signs of systemic disinformation operations. Some small radical parties are visible on social media, and André Ventura, leader of the far-right party CHEGA can be considered one of the most prominent sources of disinformation (Pardal, 2023). Portugal still has high levels of trust in the media, at 56% (DNR, 2024). It's in the 2nd cluster of countries in the Media Literacy Index 2023, implying that the structural conditions for a resilient society are good. The public service media *RTP* is considered independent and Portugal ranks as one of the countries with the higher proportion of citizens regarding PSM as important both personally and for society as a whole (Cardoso et al., 2023).

The country has a number of independent fact-checking organisations. *Polígrafo* is a journalistic project focusing on debunking false narratives. *Viral Check* focuses on health-related disinformation. In addition, fact-checking is also provided by *Observador* and *PUBLICO*.

There are almost no legislative measures in the country. The "Portuguese Charter of Human Rights in the Digital Era" (Carta Portuguesa de Direitos Humanos na Era Digital, law n. ° 27/2021) was issued by the Portuguese Parliament in May 2021. Its Art. 6 establishes the right to protection from disinformation. In its originally proposed form, it included a definition of disinformation and the provision of state support for the establishment of fact-checking structures in the country. Due to criticism by the journalistic community, the article was amended, and currently it only mentions that the state establishes a protection regime against disinformation in the country to ensure compliance with the European Action Plan against Disinformation.[80] The 2023 National Strategy Against Terrorism[81] included explicit references to disinformation (OMEDIALITERACY, 2023). Some public bodies, such as the Directorate General for Education and Culture, the National Elections Board and the National Cybersecurity Centre support projects related to disinformation. One of the key actors in media literacy is the media regulator (Entidade Reguladora para a Comunicação Social).

Romania *does not have a comprehensive regulatory framework specifically targeting disinformation. Ad hoc measures were taken in the past, and the criminal code allows for certain measures against disinformation.*

Romanian mainstream media is highly politicised – this has led to mistrust in traditional media outlets (DNR, 2024). At the same time, society is increasingly relying on social media in its news consumption. One of the risks lies in the lack of transparency from technology platforms (e.g., inadequate moderation and non-compliance with DSA regulations), while anti-Western disinformation narratives proliferate on these mediums. Disinformation narratives are propagated by various actors, including political parties, social media influencers, and certain media outlets (as indicated by

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[80] Carta Portuguesa de Direitos Humanos na Era Digital. https://diariodarepublica.pt/dr/legislacao-consolidada/lei/2021-164870244

[81] Resolução do Conselho de Ministros n.o 40/2023, de 3 de maio. https://diariodarepublica.pt/dr/deta lhe/resolucao-conselho-ministros/40-2023-212551390

Cucu, 2023). Russian-origin disinformation is also considered a problem (Ioniță, 2024). The Media Literacy Index places Romania in the 4th cluster, as one of the EU members that are most vulnerable – PISA scores and tertiary education enrolment are low in the country. Trust in the media is also among the lowest in the EU, at 29% (DNR, 2024). The public service media is considered state-controlled (State Media Monitor, 2024). Ethical codes are not respected by many members of the journalistic profession (Lazăr & Costescu, 2023). The fact-checking organisation *Funky Citizens* is certified by the IFCN, *Factual* is an EFCSN member, *Freedom House* also operates a fact-checking project. *Funky Citizens* and *Freedom House* are part of the EDMO fact-checking network.

Romania does not have a comprehensive regulatory framework specifically targeting disinformation. However, Art. 404 of the (New) Criminal Code mentions that intentional spreading of untrue content can lead to 1 to 5 years in prison, if it can pose a threat to national security. Art. 405 criminalises propaganda for war (Lazăr & Costescu, 2023). During the Covid-19 pandemic, on 16 March 2020, Romanian President Klaus Iohannis issued a decree on the state of emergency (195/2020). Art. 54 of this decree enabled the Interior Ministry to suspend access to 15 websites that were seen as sources of disinformation, without a court order.[82] The decree has been criticised for violating the freedom of expression and the right to information, and it was highlighted that the criteria to assess the content of websites was opaque (Lazăr & Costescu, 2023).

Romania's approach to tackling foreign disinformation is influenced by broader EU efforts, such as the EU's Digital Diplomacy strategy and initiatives by the European External Action Service (EEAS) (European External Action Service, 2024) to identify and counter Foreign Information Manipulation and Interference. Romania and the United States signed a memorandum of understanding (MOU) to strengthen cooperation on countering foreign state information manipulation.[83] The 2020 National Defence Strategy included disinformation as a significant concern, but systematic actions to combat it have not materialised effectively. The Ministry of Foreign Affairs was implementing, between 2021 and 2023, a project called "Strategic planning on strengthening resilience to disinformation and hybrid threats". The Supreme National Defense Council (CSAT) approved the "National Strategy for Strategic Communication" in 2021. According to the non-governmental Global Focus Center, the strategy was not operationalised. It did not undergo a public consultation process, and its text is not shared with the public (Global Focus, 2023).

At the time of finalising this report, there were reports of foreign interference related to the Romanian Presidential elections on 24 November and 8 December, as well as the

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[82] Official Gazette of Romania, Part I, No. 212/16.03.2020. Decree on the establishment of the state of emergency in the territory of Romania. https://rm.coe.int/16809e375d, and Gotev. G. & Rotaru, S. (2020, 13 May). Romania shuts down websites with fake COVID-19 news. Euractiv. https://www.euractiv.com/section/all/short_news/romania-shuts-down-websites-with-fake-covid-19-news/

[83] United States and Romania Sign MoU on Countering Foreign State Information Manipulation. https://ro.usembassy.gov/united-states-and-romania-sign-mou-on-countering-foreign-state-information-manipulation/

Parliamentary elections on 1 December 2024 (European Commission, 2024). The results of the first round of the Presidential election had to be annulled, as the far-right candidate Calin Georgescu, who initially only had single digit support in society, came in first (Sarbu & Tanno, 2024) – undisclosed political advertisements on social media could have played a role (Botan, 2024).

Slovakia *has introduced or proposed both legislative and non-legislative measures in the past years, but a change in government might change the country's approach.*

According to the think tank GLOBSEC, disinformation was widespread in Slovakia during the 2023 national election (GLOBSEC, 2023). Members of Slovak society are more likely to believe in conspiracy theories than the population of other countries in Central and Eastern Europe, and politicians are often among the sources of disinformation (Dubóczi & Ružičková, 2023). There are several NGOs focused on independent fact-checking in Slovakia, such as *Infosecurity.sk*, *Konspiratori.sk* or *Demagog.sk.*

The country is an example of a country where policy measures of the past years were scaled back due to changing political interests. After years of inertia, in 2020, Slovakia started scaling up its anti-disinformation measures. The importance to increase resilience against hybrid threats and the importance of strategic communication was highlighted in the Programme Declaration of the Government of the Slovak Republic[84], the 2023 Government Programme Statement,[85] the Slovak Security Strategy[86] and the Slovak Defence Strategy[87] (see Dubóczi & Ružičková, 2023). The Ministry of Defense published the "Action Plan for Coordinating the Fight against Hybrid Threats 2022 - 2024" which highlights the need for coordinated mechanisms across ministries. As a response to the Russian aggression in Ukraine, Slovakia's law No. 55/2022 empowers the National Security Office to block websites that publish "malicious content". The Ministry of Interior operates the Center for Countering Hybrid Threats – however, it has no special powers concerning the spread of disinformation itself, apart from publishing analytical reports. The National Security Authority has a role to systematically monitor, evaluate, analyse and respond to activities that have the potential to polarize society, introduce insecurity, and thus undermine the legitimacy, and credibility of state institutions and the democratic constitutional order. It cooperates closely with the Situation Centre of the Slovak Republic, which operates at the Office of the Government of the Slovak Republic, and the National Security Analysis Centre, which is an analytical, communication and cooperation workplace of the Slovak Information Service based on the active participation of Slovak security authorities.

Criminal law is not used against perpetrators of disinformation. During the pandemic, there was an initiative from the Ministry of Justice to codify the spread of false information that can, among other things, cause alarm in society or endanger the

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[84] Programové vyhlásenie vlády Slovenskej republiky na obdobie rokov 2021 - 2024. https://www.vlada.gov.sk/share/uvsr/pvvsr_2020-2024.pdf

[85] Programové vyhlásenie vlády SR. https://www.vlada.gov.sk/programove-vyhlasenie-vlady-sr-2023/

[86] Bezpečnostná stratégia SR. https://www.mosr.sk/bezpecnostna-strategia-sr/

[87] Obranná stratégia SR. https://www.mosr.sk/obranna-strategia-sr/

health of people, but it was not accepted by the Slovak Parliament. In 2023, a law was proposed to deal with online platforms: the interdepartmental commenting process marked LP/2023/129[88] commenced for the Act on Measures to Increase the Security and Trustworthiness of Platforms in the Online Environment and the Amendment of Some Laws. The responsible institution is the Ministry of Investment, Regional Development, and Informatisation of the Slovak Republic (MIRRI). The draft law addresses three main areas: Expanding the definition of illegal content and tightening sanctions for its dissemination, establishing a legal framework for state intervention against disinformation, and restricting anonymity in online discussions.

The Media Services Act (Act no. 264/2022)[89] granted new competences to the Council for Media Services. The tasks of the media authority related to disinformation include initiating and conducting research and analytical activities in the media field to monitor and assess the state of the media environment, including the dissemination of disinformation. In this context, the Council for Media Services plans to publish analytical reports and to establish and develop cooperation with relevant government bodies and civil society organizations. The activities of media regulators extend to the European level: ERGA operates a working group on online misinformation, which is led by Slovakia's Council for Media Services.

The MPM 2024 country report highlighted that following the Slovak parliamentary election of 2023, the new government changed many staff members of the strategic communication units of ministries and the Government Office (Urbániková, 2024). One of the most effective forms of action against the disinformation in Slovakia was the establishment and operation of the Facebook profile *Hoaxes and Scams* which is one of the most visited Facebook pages in Slovakia[90] – the page is under supervision of the Ministry of Interior of the Slovak Republic and was registered in 2018. In December 2023, after the departure of its creator from the Slovak police, Dávid Púchovský, the page became less active, and its operation was shifted to the Centre Against Hybrid Threats under the Ministry of Interior of the Slovak Republic. The activities at this profile were muted after the introduction of a new government led by Róbert Fico. Currently, there are two similar profiles to Hoaxes and Scams.[91] One is supervised by the Ministry of Interior of the Slovak Republic, and another is run by Dávid Púchovský. This is supervised by apolitical project Hoaxes and Scams. According to Dávid Púchovsky, the content of the original profile does not include topics on hoaxes, hybrid threats, and similar fields.[92]

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[88] Zákon o opatreniach na zvýšenie bezpečnosti a dôveryhodnosti platfóriem v online prostredí a o zmene a doplnení niektorých zákonov. https://www.slov-lex.sk/vyhladavanie-legislativneho-procesu?text=LP%2F2023%2F129+&filter=1

[89] 264/2022 Z. z. Časová verzia predpisu účinná od 01.01.2023 do 29.02.2024. Zobraziť verziu právneho predpisu účinnú k. https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2022/264/20230101

[90] Denník N [without title] 23 Apr. 2024. https://dennikn.sk/minuta/3956083/

[91] Brožkovič, R. (2024, 30 Nov.). David Púchovský zo stránky Hoaxy a podvody: Na Slovensku vybuchla časovaná bomba, výpady Fica v zahraničí nikto neberie vážne. *Interez*. https://www.interez.sk/david-puchovsky-zo-stranky-hoaxy-a-podvody-na-slovensku-vybuchla-casovana-bomba-vypady-fica-v-zahranici-nikto-neberie-vazne/

[92] SME (2024, 16 Jul.) *Stránka Hoaxy a podvody sa hoaxom venuje minimálne, upozorňuje jej zakladateľ.* https://domov.sme.sk/c/23358042/stranka-hoaxy-a-podvody-sa-hoaxom-venuje-minimalne-upozornuje-jej-zakladatel.html

Slovenia *has, so far, limited measures against disinformation, neither legislative, nor non-legislative measures are prominent.*

Disinformation often originates from fringe online media; some purveyors of disinformation are connected to the right-wing populist Slovenian Democratic Party – SDS (Milosavljević & Biljak Gerjevič, 2024) – one of these media is *Nova24tv.si*, which is owned by investors close to the Hungarian governing party (Bulatović, 2022). The Media Literacy Index 2023 puts Slovenia in the 2nd cluster of "well-performing" countries. According to the Standard Eurobarometer 2023, 25% of the population trusts the media (DNR, 2024). The public service media was under governmental control under Janez Jansa's government and was seen as a source of disinformation (see: Savič, 2021), but is currently independent (MPM, 2024). The Slovenian press agency (STA) has a regular fact-checking project called *Ne/ja, razbijalka mitov,* and the Center for investigative journalism Oštro runs the fact-checking project *Razkrinkavanje*.

There is no legal, co-regulatory or self-regulatory framework to tackle disinformation in Slovenia. Measures by the government have mostly been fragmented and short-term. In July 2023, the Slovenian government published official recommendations on the prevention of hate speech, prepared by its official Strategic Council. Two of these recommendations mention disinformation (the importance of demonetisation and support to the development of programs that enable disinformation detection). Changes to the Mass Media Act were made available for public discussion – the text highlights the need to address harmful content, such as disinformation.[93] The Government Communications Office cooperates with the Ministry of Digital Transformation on awareness raising activities about disinformation. They set up a sub-page on the governmental GOV.SI portal to run the "Stop disinformation – reREAD, reTHINK, RECHECK" campaign.[94] In 2022, a bill was adopted to promote digital literacy (DRI, 2023).

Spain *proposed legislative measures and relied on criminal law to deal with publishers of disinformation, but overall, the extent of measures is limited. Digital literacy is considered a priority.*

Spain is very permeable to disinformation on almost any topic (Romero Vicente, 2023). It is highly polarised; 80 percent believe that disinformation is a problem. There are also many politicians that rely on disinformation narratives in their campaigns. There were signs of Doppelgänger's information manipulations in Spain as well (EUvsDisinfo, 2024). Being part of a linguistic community of 600 million native Spanish speakers, spread across twenty countries globally, facilitates the cross-border dissemination of disinformation narratives. The Media Literacy Index 2023 considers Spain a strong country in the 2nd cluster. Trust in the media is 33%. The RSF's press freedom index highlights that "[p]olitical polarisation is reflected in the media, which

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[93] Predlog predpisa Zakon o medijih. https://e-uprava.gov.si/si/drzava-in-druzba/e-demokracija/predlogi -predpisov/predlog-predpisa.html?id=16268
[94] Stop disinformation: reREAD, reTHINK, RECHECK. https://www.gov.si/en/news/2024-05-22-stop-disinformation-reread-rethink-recheck/

dangerously blur the line between news and opinion, contributing to a climate of distrust in journalism". The public service media is state-controlled. Spain has numerous independent fact-checking initiatives, such as *Maldita, Newtral, Verificat* and *Infoveritas*, as well as *Efe Verifica* and *Verifica RTVE* (the latter two are units inside public media organisations). Apart from these general fact-checkers, there are also organizations dedicated to debunking topic-centred disinformation; for example, *Salud sin bulos* (Health without myths) debunks health-related disinformation.

Spain is among the countries where criminal law was, in certain cases, used against publishers of disinformation (Dragomir et al., 2024). The first conviction for spreading disinformation, combined with inciting hatred, online was carried out in 2022. A person posted a video that accused a foreign minor of assaulting another person. The perpetrator was sentenced to 15 months in prison and a fine of 1,620 euros (Romero Vicente, 2023).

The National Security Council approved the Procedure for action against disinformation (Order PCM/1030/2020 of 30 October 2020) which highlights the need for cooperation between government agencies, the media, civil society and technology companies. The Spanish government sees digital literacy as the leading approach against disinformation (OMEDIALITERACY, 2023). The National Plan on Digital Competences[95] highlighted the need to strengthen society's digital literacy skills.

According to the Ministry of Foreign Affairs, multiple institutions in Spain are involved in detecting and reacting to disinformation, with the declared aim of complementing European policies. "The entire Public Administration is involved in the fight against disinformation, each Ministry from its area of competence and with special attention to possible threat scenarios."[96] In 2022, the Forum against Disinformation Campaigns in the Field of National Security was established. In November 2023, it presented its first report which is considered more of an academic exercise than a policy tool that could improve measures taken against disinformation. The report refers to 99 research projects related to disinformation, however, there is a visible lack of information exchange between academia, civil society and third- sector organisations (Suau et al., 2024:24-25). In 2023, the Socialist Party announced the establishment of a committee to detect and debunk "hoaxes" spread by right-wing parties, ahead of local and general elections. In July 2024, the President of the Spanish Government announced a plan to strengthen democracy: a roadmap with 31 measures, including on media transparency, plurality and accountability. The precedent of the plan was the European Democracy Action Plan, and some of the measures are related to the European Media Freedom Act.[97]

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[95] Plan Nacional de Competencias Digitales.
[96] The fight against disinformation. https://exteriores.gob.es/en/PoliticaExterior/Paginas/LaLuchaContra LaDesinformacion.aspx
[97] Council of Ministers. The Government of Spain presents the Action Plan for Democracy to strengthen transparency, pluralism and the right to information. https://www.lamoncloa.gob.es/lang/en/gobierno/co uncilministers/Paginas/2024/20240917-council-press-conference.aspx

Sweden *has no specific law or policy focusing on disinformation, it focuses on strengthening media literacy. Some measures exist to address foreign information operations.*

Sweden has many of the same conspiracy theories and disinformation narratives as the rest of Europe, related to vaccination, climate change, renewable energy and migration. NATO is also a topic; it was especially prominent as Sweden was preparing to become a member. In addition, actors supporting Russian interests (possibly from abroad) spread narratives that favour a change in the country's stance towards the conflict in Ukraine. There is also disinformation that is specifically aimed at immigrant communities: narratives, at times spreading in Arabic language, claim that social services are kidnapping Muslim children and force them to convert to Christianity – there are signs that the campaign was driven by foreign actors from Arabic speaking countries (Giandomenico & Linderstål, 2023). A new political party, called Nyans, has also picked up the narrative (Giandomenico & Linderstål, 2023).

Sweden is amongst the most resilient countries according to the Media Literacy Index 2023. Trust in the media is at 50%. The public service media and the media regulator are independent (MPM, 2024). *Källkritikbyrån* is an EFCSN-certified fact-checking initiative. Other projects are *Faktiskt, Dagens Nyheter* and *Viralgranskaren* – the latter two had IFCN certificates in past years. *Källkritikbyrån* and *Faktiskt* are part of the EDMO fact-checking network.

Sweden has no specific law or policy focusing on disinformation. Instead, the problem is indirectly addressed through broadcasting licenses and media subsidies, as well as initiatives to improve the population's media literacy (Färdigh, 2024). The Swedish approach resists the forms of regulation that would impose duties of content regulation on online platforms. Sweden – alongside Ireland and Finland – published a joint non-paper that highlighted the possible risks of over-blocking if provisions are applied to content that is not "manifestly illegal".[98] The criminal code deals with certain cases that might apply to publishing disinformation. Chapter 16, section 15 deals with false alarm, chapter 19, section 13 addresses cases when a person aims to influence opinion on behalf of foreign powers. Chapter 22, section 5 is about spreading rumours at times of war.[99]

The Swedish Media Council – a government agency in charge of empowering minors as conscious media users – is tasked by the government to foster media and information literacy in the country. The Psychological Defence Agency is a government agency, which was launched in 2022 to strengthen society's resilience to disinformation. It conducts studies and raises awareness. However, as a state agency, it is not allowed to monitor domestic actors (Giandomenico & Linderstål, 2023). The agency published handbooks that inspired agencies of other EU countries – one of its publications available in English is titled "Countering information influence activities. A

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[98] "Safeguarding freedom of speech online – a joint non-paper on the DSA by Sweden, Ireland and Finland" (18 June 2021). Published by Politico. https://www.politico.eu/wp-content/uploads/2021/06/18/joint-non-paper-on-the-DSA-final46.pdf

[99] The Swedish Criminal Code (English translation). https://www.government.se/contentassets/7a2 dcae0787e465e9a2431554b5eab03/the-swedish-criminal-code.pdf

handbook for journalists".[100] The agency collaborated with Meta during the 2023 election campaign to target information manipulation attempts (Färdigh, 2024). During the COVID-19 pandemic, the Swedish Civil Contingencies Agency was charged with monitoring disinformation campaigns on social media. In 2022, the government asked county administrative boards to provide regular security situation reports, which include assessments of the disinformation situation. The country provides financial support to neighbouring countries' actions against disinformation, and the Swedish Ministry of Foreign Affairs participated in several high-level dialogues with international partners and tech companies (DRI, 2023).

Discussion and conclusion

In addition to European approach of disinformation regulation and policy making, all EU member states have national measures to tackle disinformation in their countries. As the country profiles show, approaches vary from country to country, but similarities can be identified when looking at certain groups of countries. Nordic countries, including the three Baltic states emphasise media literacy to strengthen the resilience of society – Estonia and Finland particularly excel in this domain – but also take significant steps to counter foreign information manipulations with cybersecurity strategies. Notwithstanding this, there may still be challenges in the future, due to large language models and artificial intelligence – which can significantly change the way content is produced and consumed. International cooperation also plays an important role: apart from commitments made to the EU's Democracy Action Plan and the reliance on EU policy tools, some countries were driving their own international initiatives. The Baltic countries, for example, played an important role in the establishment of the East StratCom Task Force and the NATO StratCom Centre of Excellence. Countries bordering Russia, Belarus or Ukraine are also more likely to have taken measures to block certain foreign content providers that regularly publish propaganda or disinformation. Non-legal approaches on disinformation are, in general, more common in the EU than legal approaches. There are many proposed laws that did not pass in the end, either due to stiff criticism, changes in government, shifting priorities or a general lack of interest. In certain cases, soft measures, strategy documents or recommendations did not lead to actions.

Many countries have criminal law provisions that can be applied to publishers of disinformation – these can be articles dealing with slander, defamation, threats to public order. There are also measures aimed at actors who are aiming at influencing elections with false information. Malta, Cyprus and Greece even mention "false news" in their criminal laws. Criminal law approaches, however, are considered controversial, as they can have a chilling effect on freedom of expression and can only be applied in the most egregious cases of disinformation (and if the publisher is known) but cannot

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[100] Psychological Defense Agency (2024). Countering information influence activities. A handbook for journalists. https://www.mpf.se/psychological-defence-agency/publications/archive/2024-03-01-countering-information-influence-activities

significantly mitigate the problems associated with rapidly spreading false narratives and conspiracy theories. In many countries, proposed laws to penalise purveyors of disinformation were heavily criticised and could not be adopted. Germany and France are the two countries that are well-known for their laws focusing on online platforms – other countries, such as Italy and Bulgaria, tried to follow this approach but could not pass laws – the concerns were, in these cases as well, often related to freedom of expression.

While there is a growing understanding that disinformation is a multifaceted problem that requires coordination between different regulatory areas, from resilience building approaches to laws enabling action against disinformation actors, only a handful of countries (mainly those that consider themselves a key target of foreign disinformation actions) have a comprehensive strategy. While the transparency and integrity of the online information environment is relevant, among others in the French and German approach to platform regulation, the design and functioning of online platforms, as well as the mitigation of structural risks is mainly covered on the EU level.

There are also major discrepancies when it comes to the structural conditions (some of which may also be influenced by anti-disinformation actions, such as media literacy), varying levels of trust in the media (especially low in new and southern EU member states) or the independence of key institutions in securing a pluralistic and accountable information environment (the media regulator and the public service media, that are in some cases captured by governments with illiberal or authoritarian tendencies). The extent of civil society actions is also different across countries, but all EU member states have media literacy activities in place, local EDMO hubs operate in every country, and all 27 states have independent fact-checking organisations.

Belgium and Portugal, for example, are countries where robust structural fundamentals contribute to resilience in society, despite a lack of dedicated anti-disinformation policymaking. Similarly, Finland is well-prepared for challenges in the information sphere, but in this case, dedicated measures strengthen resilience. In these countries, media literacy is seen as playing an important role, just like in the countries of the Baltic region. France and Germany display more weaknesses when it comes to general resilience, this might also contribute to the limitations of their dedicated disinformation policies, despite the existence of a comprehensive strategy. Ireland and Italy are both countries with an awareness of the disinformation problem, where certain measures are visible, but their impact is limited: in Italy, the media regulator was tasked with anti-disinformation action and fact-checking activities are considered extensive, while in Ireland, high trust in the media and a strong media regulator could possibly contribute to the success of the nascent anti-disinformation strategy. Fact-checking activities can be clearly considered strengths of the Spanish and Croatian approaches, but there are visible deficiencies in remaining areas. EU member states that joined in the 2000s, especially Bulgaria and Romania, are in a worse position than most old members of the EU, as they had less time to develop effective institutions – this influences their responses to the disinformation threat. State capture and corruption can also paralyse the policy community's ability to create effective policies. Greece's contextual variables might show the impact of a long economic crisis and austerity measures, while in Hungary, Poland and Slovakia,

democratic deficits have led to weaknesses in disinformation policymaking. Although disinformation policymaking can be misused to introduce restrictive policies under the disguise of strengthening information integrity, there are not many examples of such cases in the EU. Controversies are rather about unintended side-effects. A notable example is Hungary, where a law to protect the country from foreign interference (including disinformation) was designed in a way that can be used to prosecute independent media outlets that are supported through grants of Western European and US donors.

The country cases presented in this paper only describe one aspect of countries' measures aiming at addressing the challenges posed by disinformation. This paper was conceived as a first attempt to outline the diverging approaches between countries, identify regional specificities, as well as best practices that could be implemented in other countries as well (both in the EU and beyond). It needs to be emphasised that these measures are complemented by many other possible actions and influenced structural conditions. The EU's approach of tackling disinformation through risk mitigation, platform governance, strategic communications and a range of other measures makes sure that all EU countries are covered by some relevant actions. Media literacy includes a broad set of measures that we could not discuss here in detail (for an assessment of different approaches, see, for example, Sádaba & Salaverría, 2023) – if done well, following a comprehensive whole-of-society approach, it can provide a significant contribution to a society's resilience to information manipulations. A strong and independent media landscape, with good public service media, is an important structural condition – measures to strengthen independent media are not anti-disinformation measures per se, but they have a great impact on the integrity of the information environment. They can empower societies and help them make informed decisions – and as such are emphasised (as complements or integrative parts of a comprehensive strategy) in many proposals and guidelines aiming at tackling disinformation. We plan to continue monitoring the situation in the countries of this report and provide more detailed descriptions and in-depth analyses of the approaches used, so that civil society and the policy community gains a better understanding of the policy mix that is best suitable to deal with the constantly evolving threat of disinformation.

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