Contribution ID: db1dbd03-6684-40a0-b6fa-a46f4d6c2b98

Date: 15/09/2020 15:33:37

Public survey for European Democracy Action plan

Introduction

The Commission's Political Guidelines announced a European Democracy Action Plan under the headline ambition of a new push for European Democracy. The Commission intends to present the Action Plan towards the end of 2020.

The aim of the European Democracy Action Plan is to ensure that citizens are able to participate in the democratic system through informed decision-making free from interference and manipulation affecting elections and the democratic debate.

The Commission has started the preparation of the European Democracy Action Plan and would like to consult the public on three key themes:

- Election integrity and how to ensure electoral systems are free and fair;
- Strengthening media freedom and media pluralism;
- Tackling disinformation.

In addition, the consultation also covers the crosscutting issue of supporting civil society and active citizenship.

When providing your contribution, you may opt to fill in one or more of the four sections, according to their relevance to your areas of interest. Please note that a specific public consultation on the Digital Services Act package is open until 8 September 2020 and covers also elements relevant in the context of the European Democracy Action Plan.[1]

[1] https://ec.europa.eu/digital-single-market/en/news/consultation-digital-services-act-package

About you

- *Language of my contribution
 - Bulgarian
 - Croatian
 - Czech
 - Danish

0	Dutch
•	English
	Estonian
	Finnish
	French
	Gaelic
	German
	Greek
	Hungarian
	Italian
0	Latvian
0	Lithuanian
0	Maltese
	Polish
	Portuguese
	Romanian
	Slovak
	Slovenian
	Spanish
0	Swedish
*I am	giving my contribution as
0	Academic/research institution
•	Business association
0	Company/business organisation
	Consumer organisation
	EU citizen
	Environmental organisation
	Non-EU citizen
	Non-governmental organisation (NGO)
0	Public authority
0	Trade union
	Other

^{*}First name

	EDIMA			
*Su	ırname			
	EDIMA			
*En	nail (this won't be p	oublished)		
	info@edima-eu.org			
	_			
	EDiMA			
*Or	ganisation size			
		nployees)		
		,		
		,		
	3 (,		
Tra	ansparency registe	r number		
Cl	heck if your organisation is on t	the <u>transparency register</u> . It's a v	oluntary database for organisations	seeking to influence EU decision-
	53905947933-43			
	,	a or that of your organization		
	Email (this won't be published) info@edima-eu.org Organisation name 255 character(s) maximum EDIMA Organisation size Micro (1 to 9 employees) Small (10 to 49 employees) Medium (50 to 249 employees) Large (250 or more) Transparency register number 255 character(s) maximum Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.			
				and Miquelon
	Albania	Dominican	Lithuania	
		Republic		and the
				Grenadines
	Algeria	Ecuador	Luxembourg	Samoa
	American	Egypt	Macau	San Marino
	Samoa			

Andorra	El Salvador	Madagascar	São Tomé and Príncipe
Angola	Equatorial Guinea	Malawi	Saudi Arabia
Anguilla	Eritrea	Malaysia	Senegal
Antarctica	Estonia	Maldives	Serbia
Antigua and Barbuda	Eswatini	Mali	Seychelles
Argentina	Ethiopia	Malta	Sierra Leone
Armenia	Falkland Islands	Marshall Islands	Singapore
Aruba	Faroe Islands	Martinique	Sint Maarten
Australia	Fiji	Mauritania	Slovakia
Austria	Finland	Mauritius	Slovenia
Azerbaijan	France	Mayotte	Solomon
			Islands
Bahamas	French Guiana	Mexico	Somalia
Bahrain	French Polynesia	Micronesia	South Africa
Bangladesh	French Southern and Antarctic Lands	Moldova	 South Georgia and the South Sandwich Islands
Barbados	Gabon	Monaco	South Korea
Belarus	Georgia	Mongolia	South Sudan
Belgium	Germany	Montenegro	Spain
Belize	Ghana	Montserrat	© Sri Lanka
Benin	Gibraltar	Morocco	Sudan
Bermuda	Greece	Mozambique	Suriname
Bhutan	Greenland	Myanmar Myanmar	Svalbard and
		/Burma	Jan Mayen
Bolivia	Grenada	Namibia	Sweden
Bonaire SaintEustatius andSaba	Guadeloupe	Nauru	Switzerland

Bosnia and Herzegovina	Guam	Nepal	Syria
Botswana	Guatemala	Netherlands	Taiwan
Bouvet Island	Guernsey	New Caledonia	Tajikistan
Brazil	Guinea	New Zealand	Tanzania
British Indian	Guinea-Bissau	Nicaragua	Thailand
Ocean Territory		_	
British Virgin	Guyana	Niger	The Gambia
Islands			
Brunei	Haiti	Nigeria	Timor-Leste
Bulgaria	Heard Island	Niue	[◎] Togo
	and McDonald		
	Islands		
Burkina Faso	Honduras	Norfolk Island	Tokelau
Burundi	Hong Kong	Northern	Tonga
		Mariana Islands	
Cambodia	Hungary	North Korea	Trinidad and
			Tobago
Cameroon	Iceland	North	Tunisia
		Macedonia	
Canada	India	Norway	Turkey
Cape Verde	Indonesia	Oman	Turkmenistan
Cayman Islands	Iran	Pakistan	Turks and
			Caicos Islands
Central African	Iraq	Palau	Tuvalu
Republic			
Chad	Ireland	Palestine	Uganda
Chile	Isle of Man	Panama	Ukraine
China	Israel	Papua New	United Arab
		Guinea	Emirates
Christmas	Italy	Paraguay	United
Island			Kingdom
Clipperton	Jamaica	Peru	United States

0	Cocos (Keeling) Islands	Japan	0	Philippines	0	United States Minor Outlying Islands
0	Colombia	Jersey		Pitcairn Islands		Uruguay
0	Comoros	Jordan	0	Poland	0	US Virgin Islands
	Congo	Kazakhstan		Portugal		Uzbekistan
	Cook Islands	Kenya		Puerto Rico		Vanuatu
	Costa Rica	Kiribati		Qatar		Vatican City
	Côte d'Ivoire	Kosovo		Réunion		Venezuela
	Croatia	Kuwait		Romania		Vietnam
0	Cuba	Kyrgyzstan		Russia		Wallis and
						Futuna
0	Curaçao	Laos		Rwanda		Western
						Sahara
	Cyprus	Latvia		Saint		Yemen
				Barthélemy		
	Czechia	Lebanon		Saint Helena		Zambia
				Ascension and		
				Tristan da		
				Cunha		
0	Democratic	Lesotho	0	Saint Kitts and	0	Zimbabwe
	Republic of the			Nevis		
_	Congo		_			
	Denmark	Liberia		Saint Lucia		

*Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

1	agree with the	personal	data	protection	provisions
	agree with the	personar	data	protection	PIOVISIONS

Questions on election integrity and political advertising

Fair democratic debates and electoral campaigns as well as free and fair elections in all Member States are at the core of our democracies. The space for public debate and electoral campaigns has evolved rapidly and fundamentally, with many activities taking place online. This brings opportunities for the democratic process, public participation and citizen outreach but also challenges, inter alia concerning the transparency of political advertising online and possible threats to the integrity of elections. Ahead of the 2024 European Parliament elections, changes to the role of European political parties might also be considered.

(i) Transparency of political advertising

Q1 Have you ever been targeted[2] with online content that related to political or social issues, political parties (European or national), political programmes, candidates, or ideas within or outside electoral periods ('targeted political content')?

[2	Paid for ads and any form of personalised content promoted to the user
	■ 1. No, never
	2. Yes, once
	☑ 3. Yes, several times
	4. I don't know

Q2. If you receive such targeted political content, are you checking who is behind it, who paid for it and why you are seeing it?

■ 1. No, I am not interested	
2. I don't know how to do it	
3. Yes, occasionally	
4. Yes, all the time	
■ 5. I don't receive targeted political conter	าt

Q3. To what extent do you agree with the following statements related to targeted political content you have seen online?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
--	----------------	-------------------	-------------------------------------	----------------------	-------------------	------------------------------------

Targeted content was labelled in a clear manner	•	0	0	0	0	0
It was easy to distinguish paid for targeted content from organic content	•	0	0	0	0	0
3. It was easy to identify the party or the candidate behind the content	0	•	0	0	0	0
The content included information on who paid for it	0	•	0	0	0	0
5. The information provided with the content included targeting criteria	0	0	•	0	0	0
6. The ad was linked to a database of targeted political content	0	0	•	0	0	0
7. The targeted political content offered the possibility to report it to the platform	•	0	0	0	0	0

Q4. Which of the following initiatives/actions would be important for you as a target of political content?

	Not at all	A little	Neither a lot nor a little	A lot	Absolutely	Don' t know
Disclosure rules (transparency on the origin of political content)	0	•	0	0	0	0
Limitation of micro-targeting of political content, including based on sensitive criteria, and in respect of data protection rules	0	0	•	0	0	0
3. Creation of open and transparent political advertisements archives and registries that show all the targeted political content, as well as data on who paid for it and how much	0	•	0	0	•	0
Political parties to disclose their campaign finances broken down by media outlet	0	0	0	•	0	0
5. Prohibit foreign online targeted political content	0	•	0	0	0	0
Prohibit online targeted political content altogether	•	0	0	0	0	0

7. Rules limiting targeted political content on the election day and just before	0	0	•	0	0	0
8. Other	0	0	0	0	0	0

Q5. Online targeted political content may make use of micro-targeting techniques allowing advertisers to target with high precision people living in a specific location, of a certain age, ethnicity, sexual orientation or with very specific interests. Do you think that:

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
Micro-targeting is acceptable for online political content and it should not be limited	0	0	•	•	0	•
Criteria for micro-targeting of political content should be publicly disclosed in a clear and transparent way for every ad	0	•	•	•	•	•
Micro-targeting criteria should be strictly limited	0	0	•	0	0	0
Micro-targeting criteria should be banned	0	0	0	•	0	0

Please explain

EDiMA members consider that the European Commission should prioritise its policy action in the area of political advertising, outlining measures applicable to all relevant actors, including advertisers, but also political parties and candidates. Member States should be supported in order for them to equip their competent electoral authorities with appropriate means. Coordinated action should be supported too and sanctions imposed, where necessary.

We believe it is important to clearly define what constitutes micro-targeting in this context, the policy objectives sought and how the existing legal framework addresses these, prior to evaluating the appropriateness of restrictions to micro-targeting or imposing transparency obligations on advertisers.

Q6. EU countries regulate offline political advertising on traditional media (e.g. press, television) in the context of local, national or EU elections. These rules limit the amount of airtime or maximum expenditure permitted for political advertising on broadcast TV or print media. Do you think similar rules should also apply to online targeted political content?

1. Yes

2. No

3. I don't know

Please explain your answer

At EU level, Member States follow very different approaches when it comes to offline electoral rules, the level of harmonization is minimal in this field. Such measures are often deeply rooted to the political culture on each of the Member States.

While we are not against specific rules applying in the online world during election periods, we firmly disagree with the idea that similar rules should apply online and offline. These two ecosystems feature very different services, and it is very difficult to compare the exposure of a specific website at any given time to the audience of the evening news broadcast on the main TV channel in a specific country.

At EU level, the Commission should carefully assess on a case by case basis which provisions make sense to apply to the online environment, such as campaign financial rule, and how to best complement measures already taken by online platforms in this space as reported during the months prior to the 2019 European elections.

(ii) Threats to electoral integrity

Q1. Do you believe the following are real and existing threats to the electoral process in the EU and its Member States?

	Yes	No	Don' t know
1. Intimidation of minorities	•	0	0
2. Intimidation of political opposition	•	0	0
3. Micro-targeting of political messages, that is messages targeted to you or a narrowly defined group	0	0	•
4. Information suppression, that is the purposeful lack of information on a topic	•	0	0
5. Disinformation or fake accounts run by governments, including foreign governments	•	0	0
6. Divisive content, that is content created to divide society on an issue	•	0	0
7. The amplification of content that makes it difficult for you to encounter differing voices	•	0	0
8. Intimidation of women candidates	•	0	0
9. I or someone I know has been targeted based on sensitive criteria such as gender, ethnicity or sexual orientation	•	0	0
10. Content where I could not easily determine whether it was an advertisement or a news post	0	0	0

[IF (Q1=11: Please define]						
Q1.	 1 IF Q1=YES for any answer option 1. Have you felt personally intimidation content? 2. Could you tell us more about yo 			•	rgeted	d political	
Plea	ase explain your answer						
Q1.	European Political Parties: Is there scope to further give a stron paigns for EU elections? Please list	_	-	•			
	1 0			•	,	•	
		Not at all	A little	Neither a lot nor a little	A lot	Absolutely	Don' t know
	Better highlighting the links between the national and European Political Parties, for example by displaying both names on ballot papers and in targeted political content	at		a lot nor a	1 .	Absolutely	t
-	national and European Political Parties, for example by displaying both names on ballot	at		a lot nor a little	1 .	Absolutely	t
-	national and European Political Parties, for example by displaying both names on ballot papers and in targeted political content 2. More transparency on financing (e.g. information about how much national parties contribute yearly to the European Politicla	at	little	a lot nor a little	lot	Absolutely	t
-	national and European Political Parties, for example by displaying both names on ballot papers and in targeted political content 2. More transparency on financing (e.g. information about how much national parties contribute yearly to the European Political Parties budgets) 3. Bigger budgets for European Political	at all	little	a lot nor a little	lot	Absolutely	t
	national and European Political Parties, for example by displaying both names on ballot papers and in targeted political content 2. More transparency on financing (e.g. information about how much national parties contribute yearly to the European Political Parties budgets) 3. Bigger budgets for European Political Parties 4. Strengthening the European campaigns by	at all	little o	a lot nor a little	lot	Absolutely	t

11. Other

(iv) European Elections

- Q1. In your opinion what initiatives at national level could strengthen monitoring and enforcement of electoral rules and support the integrity of European elections (multiple selections possible)?
 - 1. Strengthened sharing of information and monitoring activity across borders and between authorities
 - 2. Technical interfaces to display all political advertisements as defined by online service providers
 - 3. Technical interfaces to display all advertisements (political or not)
 - 4. Clear rules for delivery of political ads online in electoral periods, similarly to those that exist in traditional media (TV, radio and press)
 - 5. Independent oversight bodies with powers to investigate reported irregularities
 - 6. Enhanced reporting obligations (e.g. to national electoral management bodies) on advertisers in a campaign period
 - 7. Enhanced transparency of measures taken by online platforms in the context of elections, as well as meaningful transparency of algorithmic systems involved in the recommendation of content
 - 8. Privacy-compliant access to platform data for researchers to better understand the impact of the online advertisement ecosystem on the integrity of democratic processes
 - 9. Greater convergence of certain national provisions during European elections
 - 10. Stronger protection against cyber attacks
 - 11. Higher sanctions for breaches of the electoral rules
 - 12. Other please specify

Please explain your answer

The statements above are quite broad and make it difficult for us to provide accurate feedback. However, we want to emphasise that protecting democratic elections from disinformation is a joint effort which cannot be successful if only one or just a few of the stakeholders get involved. Roles and responsibilities need to be shared among a wide group of stakeholders – governments, electoral bodies and regulators, campaigners, political parties, online platforms, traditional media as well as watchdogs and users. Being at national or at EU level, fostering the dialogue and coordinating the efforts of all of these stakeholders will go a long way in enforcing electoral rules and fighting against disinformation.

On a stronger protection against cyber-attacks: We continue to encourage candidates, parties, and politicians to further adopt security features to their online services, for example, two factor authentication. These simple measures are significantly important, both during an election and outside of one, as they provide greater protection and security to information that could otherwise be harmful.

Greater cooperation across Member States during EU elections is crucial, and so is easily accessible and timely information regarding candidates and parties.

We would encourage further initiatives at both national and regional level to improve election integrity across candidates and parties, for example during the EU elections the Elections Pledge from Alliance of Democracies https://electionpledge.org/, and during the Irish elections the Fair Play Pledge from The Irish Council for Civil Liberties, Transparency International Ireland and DCU FuJo https://fairplaypledge.org/.

Q2. In your opinion what initiatives at European level could strengthen monitoring and enforcement of rules relevant to the electoral context?

· ·	
1	1. Strengthened sharing of information and monitoring activity across
	borders and between authorities
V	2. European-level obligations on political advertising service providers
	3. European-level shared online monitoring and analysis capability being
	made appropriately available to national authorities
	4. Cross border recognition of certain national provisions
	5. Other

Please	explain	your	answer

Questions on strengthening media freedom and media pluralism

Freedom of expression and freedom and pluralism of the media are enshrined in the Charter of Fundamental Rights of the European Union (Article 11), and their protection is underpinned by Article 10 of the European Convention on Human Rights. They are essential elements of a healthy democratic system. Whilst in general the EU and its Member States score well on a global scale, there are signs of deterioration (as shown by the Media Pluralism Monitor) and the sector is facing challenges from threats to the safety of journalists (including strategic lawsuits against public participation – 'SLAPP lawsuits') to the transformation of the sector, with digital technologies and new players transforming the established business model of advertising revenue. The COVID-19 pandemic has worsened the situation, both in the

EU and outside of the EU, from restrictive national legislation to critical loss of revenues for the media sector.

Initiatives to strengthen media freedom and media pluralism will build in particular on the analysis and areas covered by the upcoming Rule of Law Report, with a focus on improving the protection of journalists, their rights and working conditions. Please note that the Commission also intends to propose, by the end of the year, an Action Plan for the Media and Audiovisual sector to further support the digital transformation and the competitiveness of the media and audiovisual sectors and to stimulate access to quality content and media pluralism.

(i) Safety of journalists / conditions for journalistic activities
Q1. Are you aware of issues regarding safety of journalists and other media actors or conditions for journalistic activities in your country? 1. Yes (please justify) 2. No (please justify) 3. I do not know
Please explain your answer
 Q1.1 If yes, what kind of issue? 1. Lack of proper sanction applied to perpetrators of attacks against journalists— Yes/No 2. Abuse of defamation laws or other laws aiming at silencing journalists and news media — Yes/No 3. Lack of legal safeguards for journalistic activities — Yes/No 4. Lack of institutions to protect journalists — Yes/No 5. Online hate speech — Yes/No 6. Cyberbullying — Yes/No 7. Physical threats — Yes/No 8. Other — please specify
Please explain your answer

Q2. Are you familiar with the concept of 'strategic lawsuits against public participation' (SLAPPs)?

1. Yes
☑ 2. No
3. Don't know
Q2.1 If yes, are you aware of such lawsuits in your own Member State?
1. Yes
2. No
3. Don't know
Please explain your answer
r lease explain your answer
Q3. In your opinion, on which SLAPP related aspects should the European Union-
level action be taken (multiple answers possible):
1. Regular monitoring of SLAPP cases in the European Union
2. Financial support for journalists facing SLAPP lawsuits
3. Rules on legal aid for journalists facing SLAPP lawsuits
4. Cross-border cooperation to raise awareness and share strategies and
good practices in fighting SLAPP lawsuits
5. EU rules on cross-border jurisdiction and applicable law
6. None of the above
7. Other – please specify
Please explain your answer
Q4. Do you think that the EU should act to strengthen safety of journalists and
other media actors / improve conditions for journalistic activities?
1. Yes (please justify)
2. No (please justify)
3. I do not know
Please explain your answer

Q4.1 If yes, how?

1. By issuing guidance – Yes/No				
2. By setting up dedicated structured dialogue with	h Mem	ber Stat	es – Ye	s/No
3. By providing financial support – Yes/No				
4. Other – please specify				
Please explain your answer				
Q5. Are you aware of any issues regarding the protection	on of j	ournalist	c sourc	es in
your country?				
1. Yes (please provide concrete examples)				
2. No				
3. I do not know				
Please explain your answer				
Q6. Are you aware of any difficulties that journalists are access information / documents held by public authoriti country? 1. Yes (please provide concrete examples)		_	-	d
2. No				
3. I do not know				
- 3. I do flot know				
Please explain your answer				
(ii) Media independence and transparency				
Q1. How would you characterise the situation with rega	rds to	indepen	dence c	of
media and journalism in your country?		•		
	Not	To a	To a	Don'
	at	limited	great	t
	all	extent	extent	know

1. The government controls or exerts pressure on media outlets

2. Powerful commercial actors control or influence editorial policy

of media outlets

3. Journalists are afraid of losing their job or of other consequences and avoid voicing critical opinions	0	0	0	0
4. News media, in particular public broadcasters, provide balanced and representative information, presenting different views, particularly in times of electoral campaigns	0	0	0	0
Q2. How important is the support for independent journ journalists and bloggers/web journalists) and the protection		•	_	ınce
independent journalists to supporting democracy in the	EU ar	nd intern	ationally	/?
1. Very important				
2. Important				
3. Not important				
4. Don't know				
Q3. Do you feel sufficiently informed about the ownershare consulting? 1. Yes	nip of t	he media	a outlets	s you
2. No (please explain)				
3. I do not know				
Please explain				
Q4. Should it be mandatory for all media outlets and conformation about their ownership on their website? 1. Yes (please explain) 2. No (please explain) 3. I do not know	mpani	es to pu	blish de	tailed
Please explain				
Q5. Should content by state-controlled media, where go control over editorial lines and funding, carry specific la 1. Yes (please explain) 2. No (please explain)				;t
3. I do not know				

Please explain
Q6. Do you think information from independent media and trustworthy sources
should be promoted on online intermediary services (such as search engines,
social media, and aggregators)?
1. Yes (please explain)
2. If yes, please give examples of how it could be achieved and how to
distinguish sources to be promoted?
☑ 3. No (please explain)
4. I do not know
Please explain
Online platforms play an important role in fostering media pluralism and promoting user engagement. However, the systematic promotion of "independent media and trustworthy sources" raises important questions, such as who will rule that a source is indeed trustworthy, and based on which criteria?
Q7. Do you think further laws or institutions should be put in place in your country
to strengthen media independence and transparency in any of the following areas?
1. Transparency of state advertising and state support to news media /
journalism – Yes/No
2. Transparency of media ownership – Yes/No
3. Promotion of information from independent media and trustworthy
sources- Yes/No
4. Ownership limitations of commercial actors – Yes/No
□ 5. Ownership limitations of political actors – Yes/No
6. Rules to prevent foreign (extra-EU) based manipulative and hate-
spreading websites from operating in the EU - Yes/No
7. Other – please specify
8. No, what is in place is sufficient
9. No
10. I do not know

Please explain your answer

1.	Yes
	Yes
	Not responding
4.	No No
6.	
im	reality, it may be difficult to address some of the above-mentioned areas. For example, it might be almost possible to determine whether a website is operated by foreign or by domestic actors. Rules that would quire certainty on attribution would be difficult to enforce for public and private actors alike.
00 D	to you think that the Elliphould get to atranathan madic independence and
	o you think that the EU should act to strengthen media independence and
_	parency in any of the following areas? (Multiple answers possible)
	1. Transparency of state advertising and state support to news media / journalism – Yes/No
	2. Transparency of media ownership – Yes/No
	3. Promotion of information from independentmedia and trustworthy sources—Yes/No
	4. Ownership limitations of commercial actors – Yes/No
	5. Ownership limitations of political actors – Yes/No
	6. Other – please specify
V	7. No
	8. I don't know
Pleas	e explain your answer
1.	No
2.	
3.	
5.	
Q9. If	you answered yes to some of the options of the previous question, how
should	d the EU act in these areas?
	1. By issuing guidance – Yes/No
	2. By setting up dedicated structured dialogue with Member States – Yes/No
	3. By providing financial support – Yes/No
	4. By adopting legislation – Yes/No
_ ;	5. Other – please specify

Please explain your answer
Q10. EU countries have rules applying to media content such as news or current affairs, in general (e.g. rules on editorial independence, objectivity/impartiality), and in particular during elections (rules on scheduling and the balance of the programmes, moratoria on political campaign activity, opinion polls). Do you think similar rules should apply online? 1. Yes 2. No 3. I don't know
Please explain your reply.
Each online platform is different and takes a variety of actions to fight disinformation. Blanket rules will not help as they will apply to a multitude of different services. As a result, we believe that transparency is pivotal in addressing the common objective of ensuring free and fair election in the EU and beyond, but we would caution against attempts to harmonise processes in ways that would not allow the needed flexibility for companies. It is not possible to distinguish between different schedules and time slots in the online space as it is in the offline space, so this requirement would essentially amount to a general monitoring obligation in contradiction to Art 15 of the e-commerce Directive.
Q11. Should the role of and cooperation between EU media regulators in overseeing respect for such standards, offline and online, be reinforced? 1. Yes 2. No 3. I don't know
Please explain your reply.
(iii) Cross-border cooperation, media and press councils, self-regulation
Q1. Are you aware of the existence of a press or media council or another media self/co-regulation body supervising journalistic ethical standards and conduct in your country? 1. Yes 2. No

Q1.1 If yes, what are the main activities of a press or media council or another media self/co-regulation body in your country?
1. Please specify
2. I do not know
Please explain your answer
Q1.2 Do you think press or media councils should be established in all EU
countries?
1. Yes (please explain)
2. No (please explain)
Please explain
Q1.3 In order to address the challenges in the media sector, which activities should
be prioritised by press and media councils or other media self/co-regulation bodies?
1. Incentivising exchanges of best practices and promoting journalistic
standards, in particular online – Yes/No
2. Providing support for journalists in the process of digitalisation of media sector – Yes/No
3. Ensuring effective complaints handling mechanisms – Yes/No
4. Establishing links between journalists and citizens to increase trust – Yes /No
5. Contributing to the fight against disinformation online – Yes/No
6. Other - please specify
Please explain your answer
Q2. What role, if any, should the EU play to facilitate cross-border cooperation?
1. Provide financial support to media councils or other media self/co-
regulation bodies – Yes/No
2. Set up an EU-level coordination network – Yes/No

3. Promote citizens' awareness about their activities – Yes/No
4. Other (please specify)
5. No role
Please explain your answer
Questions on tackling disinformation

Designed to intentionally deceive citizens and manipulate our information space, disinformation undermines the ability of citizens to form informed opinions. Disinformation can also be a tool for manipulative interference by external actors.

(i) Scope

Q1. The April 2018 Commission Communication on Tackling online disinformation: a European Approach defines disinformation as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm.[4]

Do you think this definition should be broadened and complemented to distinguish between different aspects of the problem?

- [4] Public harm includes threats to democratic processes as well as to public goods such as Union citizens' health, environment or security. Disinformation does not include inadvertent errors, satire and parody, or clearly identified partisan news and commentary.
 - 1. Yes (please specify)
 - 2. No (please specify)
 - 3. Don't know

Please explain your answer

We agree that inadvertent errors, satire and parody, or clearly identified partisan news and commentary should definitely not be considered disinformation

On the issue of definitions related to disinformation, we believe that the EDAP presents a unique opportunity to clarify what is misinformation, harmful misinformation and disinformation, and how these concepts are linked. It will allow European institutions to better grasp the measures needed to address these related but distinct concepts.

Q2. So far, the European Commission has addressed the spread of disinformation through a self-regulatory approach, which has resulted in a Code of Practice on Disinformation being subscribed by major online platforms and trade associations representing the advertising industry. Do you think that this approach should be:[5]

[5] This question complements the questionnaire for the public consultation on the
Digital Services Act, which focuses on illegal content
1. Continued as it is currently pursued (status quo)
$^{ m I\hspace{1em}I}$ 2. Pursued but enlarged to a wider range of signatories
3. Pursued but combined with a permanent monitoring and reporting programme
$^{\square}$ 4. Pursued but on the basis of a substantially reviewed Code of Practice
5. Pursued but accompanied by a regulatory framework fixing basic
requirements for content moderation, data access and transparency, as well
as respective oversight mechanisms
6. Pursued but accompanied by a regulatory package fixing overarching
principles applicable to all information society services and establishing
more detailed rules for dealing with disinformation under such general principles
7. Replaced by special regulation on disinformation
8. abandoned altogether, as all forms of restriction or control on content
posted online by internet users and which is not illegal in nature (e.g. illegal
hate speech, incitement to terrorism) could endanger freedom of speech
9. Other (please explain)

Please explain your answer

The code of practice is a tool that has achieved a great deal to-date, especially in the context of the EU elections and COVID-19. The Code itself thought needs to continue to evolve based on experience and for it to truly be able to tackle disinformation should also include signatories from the media sector to ensure that there is a form of collaboration and a commitment for the various sectors to jointly tackle disinformation. The Code should take a more inclusive approach that embodies the entire news ecosystem, including advertisers, smaller online services, blogs, hosting platforms, press, journalists, media, researchers, and even political groups, who are a few of the parties that both contribute to the creation and dissemination of information.

Any updates to the Code or new initiatives should be technology-neutral, not based on a single service, business model, or company, and should be more inclusive of experts and civil society organisations to present a better understanding of emerging threats.

We would also like to underline the need for consistency and coherence among different but coexisting EU policy instruments and proposals that address many of the same policy objectives and challenges, but from slightly different angles; to name a few the Digital Services Act, AVMSD, EC Action Plan on Disinformation and EC Communication to tackle COVID-19...

Q3. Have you ever encountered the following measures to reduce the spread of disinformation on social media platforms?

	Yes	No	Don' t know
Alerts when attempting to share or publish content that has failed a fact-check by journalists or a fact-checking organisation	•	0	0
2. Notifications to users who have previously engaged with content or sites that have failed a fact-check by journalists or a fact-checking organisation	0	•	0
3. Clear labels above content or sites that have failed a fact-check by journalists or a fact-checking organisation	•	0	0
4. Mechanisms allowing you to report disinformation	•	0	0

Q3.1 If yes, on which platforms have you encountered this?

- 1. Google
- 2. Facebook
- 3. Twitter
- 4. YouTube
- 5. WhatsApp
- 6. Other (Please specify)

Please explain your answer

This question takes a very narrow view of the measures taken to address disinformation by focusing on one, or a few services. This should not discount that there are many different types of services which take measures to tackle disinformation based on the nature of the service and how it is used by the users – e.g. limitations on message forwarding.

(ii) Disrupting the economic drivers for disinformation

Q1. What type of measures should online platforms and advertising networks operators take in order to demonetise websites that create, present or disseminate disinformation?[6]

[6] Please note that this question refers to monetisation of websites that systematically publish false or misleading information, which is not illegal in nature. Monetisation via advertisement placements of web sites publishing illegal content is addressed within the context of a separate questionnaire for the public consultation on the Digital Services Act.

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and publish them	0	•	0	0	0	0
2. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and remove the ad accounts concerned	0	0	0	•	0	0
3. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and temporarily suspend the ad accounts concerned	0	0	0	•	0	0
4. Establish and regularly update lists of websites identified by fact-checkers as occasional sources of disinformation (grey list approach) and give the advertisers the possibility to selectively exclude such websites	0	0	•	0	0	0
5. Block ad accounts only for those websites that engage in deceptive behaviour (e. g. spamming, misrepresentation of identity, scraping content from other sources, containing insufficient original content, etc.)	0	0	0	•	0	0

6. Ensure a systematic scrutiny of websites providing advertisement space and limit ad placements only on those websites that are considered trustworthy by reputable indexes (white list approach)	0	0	0	0	•	0
7. Ensure transaparency of platforms vis-à-vis advertisers and provide for third-party verification (e.g. position of the ads, the content the ads are run next to, metrics)	0	0	•	0	0	0
8. Other	0	0	0	0	0	0

Q2. Paid-for content on issues of public interest is promoted on social media platforms both during and outside electoral periods. Due to the special prominence given to such paid-for content in news-feeds and other systems for displaying content online, users may be misled as to its credibility or trustworthiness, irrespective of the veracity of the content. Do you think that issue-based advertising / sponsored content of political context:

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
Should be systematically labelled	0	•	0	0	0	0
2. Should be systematically labelled and collected in public, searchable repositories	0	0	•	•	0	•
3. Should be subject to the same rules as on political advertising (see above section)	0	0	0	•	0	0
4. Should not be regulated	0	•	0	0	0	0

(iii) Integrity of platforms' services

Q1. Do you think there should be targeted regulation at EU or national level to prohibit deceptive techniques such as the use of spam accounts and fake engagement to boost posts or products?

1	Yes
	1 ->

☑ 2. No

3. Don't know

4. Other

Q1.1 If you replied yes to the previous question, what do you think should be the most appropriate measures to tackle the above-mentioned manipulative techniques and tactics?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
Label the content as artificially promoted	0	0	0	0	0	0
Demote the content to decrease its visibility	0	0	0	0	0	0
3. Suspend or remove the content because the use of manipulative techniques is contrary to platforms' terms of service	0	©	•	•	©	•
Suspend or remove the accounts engaging in manipulative techniques	0	0	0	0	0	0
5. Invest in internal intelligence systems to detect manipulative techniques	0	0	0	0	0	0
6. Invest in artificial intelligence to detect manipulative techniques	0	0	0	0	0	0
7. Other	0	0	0	0	0	0

Pl	Please explain		

(iv) Enhancing users' awareness

Q1. Do you agree that the following kinds of measures would help enhance user's awareness about how platforms operate and prioritise what users see first?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree
Promoting content from trustworthy sources	0	0	0	•	0
Promoting factual content from public authorities (e.g. on election date)	0	0	•	0	0

Providing tools to users to flag false or misleading content	•	0	0	0	0
Demoting content fact-checked as false or misleading	•	0	0	0	0
5. Labelling content fact-checked as false or misleading without demoting	•	0	0	0	0
6. Platforms should inform users that have been exposed to fact-checked content	0	•	0	0	•
7. Removing content which is found false or misleading and contrary to terms of service (e.g. threatening health or public safety)	0	•	0	0	•

Which sources do you consider as trustworthy?	
---	--

Q2. In your opinion, to what extent, if at all, can the following measures reduce the spread of disinformation?

	No contribution	Minor contribution	Little contribution	Major contribution	Don' t know
Demotion of posts or messages that have failed a fact- check by journalists or a fact- checking organisation in the newsfeed	•	•	•	•	•
2. Alerts if attempting to share content that has failed a fact-check by journalists or a fact-checking organisation	0	•	•	0	0
3. Notifications to users who have previously engaged with content that has failed a fact-check by journalists or a fact-checking organisation	©	•	•	©	•
4. Clear labels above content that has failed a fact-check by journalists or a fact-checking organisation	0	•	•	0	0
5. Mechanisms enabling readers to flag content that is misleading	0	0	•	0	0

6. Mechanisms to block sponsored content from accounts that regularly post disinformation	•	•	•	•	•
7. Closing of fake accounts and removal of automated social media accounts like bots	0	0	•	0	0
8. Closing of accounts that continuously spread content that has failed a fact-check by journalists or a fact-checking organisation	•	•	•	•	•
9. Allowing more diversity in suggestion algorithms designed to find videos, posts or sites that you might be interested in	•	•	•	•	0
10. Other	0	0	0	0	0

Q2.1. IF your answe	er=10, Please	specity:
---------------------	---------------	----------

Q3. To what extent, if at all, do you support the following measures to reduce the spread of disinformation?

	Do not support at all	Do not support	Neither support nor discourage	Support	Support fully	Don' t know
Demotion of posts or messages that have failed a fact-check by journalists or a fact-checking organisation in the newsfeed	•	0	•	•	©	•
2. Alerts if attempting to share content that has failed a fact-check by journalists or a fact-checking organisation	0	0	•	•	0	0
3. Notifications to users who have previously engaged with content that has failed a fact-check by journalists or a fact-checking organisation	•	•	•	•	•	•

4. Clear labels above content that has failed a fact-check by journalists or a fact-checking organisation	0	0	•	•	©	0
5. Mechanisms enabling readers to flag content that is misleading	0	0	0	0	•	0
6. Mechanisms to block sponsored content from accounts that regularly post disinformation	•	0	•	•	0	0
7. Closing of fake accounts and removal of automated social media accounts like bots	0	©	0	0	•	0
8. Closing of accounts that continuously spread content that has failed a fact-check by journalists or a fact-checking organisation	©	0	©	0	•	0
9. Allowing more diversity in suggestion algorithms designed to find videos, posts or sites that you might be interested in	0	0	0	0	0	•
10. Other	0	0	0	0	0	0

	Q3.1 IF	your	answer=10,	Please	specify	y :
--	---------	------	------------	--------	---------	------------

What safeguards and redress mechanisms do you consider appropriate and necessary to avoid errors and protect users' rights?

- Robust Notice & Action mechanisms
- Effective redress and complaints
- Clear Terms & Conditions

Q4. Which information would you like to receive when reading the information on social platforms:

	Yes	No	Don't know
Better information about the source of the content	•	0	0
2. Whether the content is sponsored or not	•	0	0

3. Information about the micro-targeting (why the information is addressed to you)	•	0	0
4. Whether there are advertisements linked to the content	•	0	0
5. Liability of the provider for supplying false or misleading information	0	•	0

Oth	ner: please list				

Q5. As a user, when you come across information that you perceive as false or misleading, which options should be available to deal with such content (more than one reply is possible)?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
Removing that content from your feed	0	0	0	0	0	©
2. Removing that content from your feed and excluding similar content from being algorithmically promoted in your feed	0	©	•	•	•	•
Flagging the content to the platform for fact-checking	0	0	0	0	0	0
4. Receiving feed-back about the action taken by the platforms after flagging, including possible demotion	0	0	0	0	0	0
5. Flagging the content to competent authorities	0	0	0	0	0	0

Q6. End-to-end encrypted messaging services (such as WhatsApp, Telegram or Signal) can be used to spread false and harmful content. In your view, should such platforms introduce measures to limit the spread of disinformation, with full respect of encryption and data protection law (more than one reply is possible)?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
--	----------------	-------------------	-------------------------------------	----------------------	-------------------	------------------------------------

Introduce easy-to-find reporting or flagging system for users	0	0	0	0	0	•
2. Limit the possibility to forward the same content to many users	0	0	•	0	0	0
3. Limit the amount of people in a discussion group	0	0	•	0	0	0
4. In exceptional cases, proactively contact users about potential disinformation wave or promote authoritative conent (e.g. in cases like Covid-19 pandemic)	•	•	•	•	•	0
5. Other (please elaborate)	0	0	0	0	0	0

ГК	ease explain			

- Q7. Do you easily find information about how content is fact-checked on online platforms, and by whom?
 - 1. Yes
 - 2. No
 - 3. Don't know
- Q8. If your post is being fact-checked or labelled, do you know how to contest this if you do not agree?
 - 1. Yes
 - 2. No
 - 3. Don't know
- Q9. Which information should online platform publish about their factchecking /content moderation policy?

	Yes	No	Don't know
If they pay directly the factcheckers or if they work with an external factchecking organisation	•	0	0
2. How they decide which posts are factchecked	•	0	0

3. How many posts are factchecked		•	0	©
4. How to flag posts to be factchecked		•	0	0
5. Other, (please specify)		0	0	©
Please explain				
Q10. Do you think it should be modeles that enable users to seek content they have posted has be 1. Yes 2. No 3. Don't know	recourse in case their account h		`	•
Q11. Do you think it should be modern contact for each Member State in 1. Yes 2. No 3. Don't know		orovid	e poir	nts of
Q12. What kind of data and/or tracheckers need to be better able to including by foreign state and no	to detect and analyse disinforma			

Q13. How should the EU respond to foreign state and non-state actors who interfere in our democratic systems by means of disinformation (multiple answers possible)?

	Yes	No	Don't know
Analyse and expose state-backed disinformation campaigns	•	0	0
2. Conduct public awareness-raising campaigns	•	0	0
3. Support independent media and civil society in third countries	0	0	•
4. Impose costs on state who conduct organised disinformation campaigns	0	0	•

	Develop more effective public outreach and digital communication strategies	0	0	•
	6. Other, (please specify)	0	0	0
Ρl	ease explain			
	4. In your opinion, should content by state-controlled media social media?	ı outle	ts be	labelled
	1. Yes			
	2. No			
	3. Don't know			
Qı	uestions on supporting civil society and active citizens	hip		
as giv Ar Q	tem, holding those in power to account and stimulating public debate and cit in combatting some of the identified threats. In addition to this, participatory are citizens a chance to actively and directly participate in the shaping of plan major element in the context will be the upcoming Conference on the Future of the context will society is sufficiently involved in shaping rough consultation? 1. Yes 2. No 3. Don't know 21=2 What more could be done?	and delik ned or f	perative uture pu	e democracy ublic policies.
	Civil society could, for example, play an active role in the Code of Practice on Dis	sinforma	tion.	
	2. Do you think civil society should be more involved in conc promote democratic debate? 1. Yes 2. No 3. Don't know	rete E	U-leve	el actions
DI	assa avnlain vour answer			

Q3. Do you think actions should be taken at EU level to strengthen cooperation among civil society actors across borders? 1. Yes 2. No 3. Don't know Please explain your answer
r lease explain your answer
Q4. Do you think the EU should provide more financial support for civil society (for example under the 'Rights, equalities and citizenship' programme)? 1. Yes 2. No 3. Don't know
Q5. Are you aware of measures to increase media and information literacy/develop media literacy skills? What type of action do you deem to be most efficient/most appropriate in this area: 1. Formal education in school/university 2. Education online via social media platforms 3. Life-long learning 4. Exchange of best practices in expert fora 5. Don't know
Q6. Do you think that more participatory or deliberative democracy at the European level, with more possibilities for public deliberation and citizen engagement, beyond public consultations, would be: 1. A good thing 2. Neither good nor bad 3. A bad thing 4. Don't know

Please explain your reply

Q6.1 If given the opportunity, would you take part in a European participatory o deliberative democracy event? 1. Yes, absolutely
2. Yes, probably
3. Maybe
4. Probably not
5. No, not at all
6. Don't know
Q7. Are you familiar with the European Citizens' Initiative?
1. Yes, I have taken part in one before
2. Yes, but I have not taken part in one before
3. Not sure
4. No, I do not know what a European Citizens' Initiative is

Contact

SG-DSG2-UNITE-F1@ec.europa.eu