EU DisinfoLab's position on a European Democracy Action Plan roadmap

26 August 2020

EU DisinfoLab welcomes the Commission's initiative to present a European Democracy Action Plan (EDAP), in particular the efforts to address **disinformation**.

We call for a renewed EU-wide approach, from focusing solely on foreign interference during electoral periods to instead approaching disinformation holistically, including information manipulation by domestic and pan-European actors.[1] When attribution can be established, it should be made public by EU institutions, and relevant sanctions should be considered. Any new regulatory initiatives against online information operations should be considered with great caution. Instead of regulating content, we should create the right conditions for resilience in society.

A. Funding a decentralised network of journalists, academics, fact-checkers and open-source investigators

This would be best achieved through a **decentralised** approach for a civil society ecosystem, comprising journalists, academics, fact-checkers, and open-source investigators. New types of expertise, such as open source investigations, do not fit within the existing funding scheme for fact-checking or independent media. **The EU must have an ambitious framework to fund this civil society ecosystem**. This would guarantee the healthy participation and empowerment of independent organisations to both counter disinformation and hold platforms accountable to democratic principles. Their findings would eventually provide evidence for the competent authorities to act. **We support renewing the Rights Equalities and Citizenship programme for this objective.** This could take the form of small grants, similarly available to startups, which would enable an active ecosystem tackling disinformation across Europe. In particular, funding should guarantee editorial freedom to prevent confirmation bias as well as any form of conclusions that could be perceived as censorship.

---

[1] https://www.disinfo.eu/publications/the-few-faces-of-disinformation

B. Guaranteeing the physical and psychological well-being of those tackling disinformation

Producing disinformation is cheap, but tackling it is expensive.[2] Debunking disinformation through research, investigations and advocacy campaigns exposes staff to real threats, both physical and psychological, online and offline. For organisations working on disinformation, financial and physical security go hand in hand, therefore the EDAP, and any accompanying funding, must account for the risks involved in working in such a sensitive field.

C. Setting standards on data-access and enforcing consistent definitions for platforms to respond to cases of information manipulation

On tackling disinformation, the Commission should apply the lessons learned from the implementation and assessment of the Code of Practice.[3] In particular, **standards should be set regarding access to data from the online platforms, as well as consistent definitions and processes such as a mechanism for online platforms to respond to reported cases of information manipulation**. Regarding consumer protection, users should be notified in cases where they have been exposed to dis or misinformation. This should be accompanied by a clear oversight mechanism and possible sanctioning powers for the regulator.

D. Defining best practices for political campaigning and a clear distinction between disinformation and strategic communications

Disinformation should not become a regular political campaigning strategy. Political candidates should commit to respecting best practices for online campaigning and funding should be conditioned on fair and transparent online campaigning.[4] Finally, the present roadmap conflatates action against disinformation with strategic communications. Countering disinformation narratives and strategies must be separated from the overall fight against disinformation. Mixing the two, or even politicising the fight against disinformation, sets a dangerous precedent for the rule of law in Europe.[5]

---

[2] https://www.nbcnews.com/tech/social-media/these-disinformation-researchers-saw-coronavirus-infodemic-coming-n1206911
[3] https://ec.europa.eu/digital-single-market/en/news/study-assessment-implementation-code-practice-disinformation
[4] https://electionpledge.org/
[5] https://www.disinfo.eu/wp-content/uploads/2020/06/20200610_EU-DisinfoLab-statement-on-the-joint-comm-on-COVID19-disinformation.pdf