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# European Democracy Shield - Open public consultation

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#### Introduction

Democracy, the rule of law and fundamental rights are founding values of the European Union. They underpin EU's achievements in fostering peace, prosperity, economic competitiveness, social cohesion and stability. The essence of democracy is that citizens can freely express their views and participate in democratic life, choose their political representatives, and have a say in their future. Citizens should be able to form their own opinions in a public space where they have access to reliable information from a plurality of sources, where different views can be expressed, where they have a right to disagree and to cast their votes in elections that are free from interference, either foreign or domestic.

In the <u>2024 Flash EB 550 survey</u>, out of a list of ten threats to democracy, growing distrust and scepticism towards democratic institutions (36%) and false and/or misleading information in general circulating online and offline (34%) were the two greatest threats mentioned. The <u>Standard EB 102</u> also showed that 82% of Europeans agree that the existence of news or information that misrepresent reality or is even false is a problem for democracy in general.

The EU has taken significant steps to address pressing threats to European democracy under the European Democracy Action Plan (2020) and the Defence of Democracy Package (2023). But recent experience has shown an intensification and wider spread of these threats. The methods used are now harder to track, more damaging and easier to deploy using digital tools and social media. This reflects a deep change in the information space, shifting from editorial media sources to user-generated content mediated on platforms and pushed by algorithms. This enables new freedoms and opportunities but also makes it easier for hostile actors, both internal and foreign, to manipulate information and step up information warfare. This new information landscape also poses challenges to equal opportunities for political participation and to European security to democracy more broadly.

Recent developments, including during electoral processes in Europe, show that the threat landscape is increasingly complex, with interference and distortions in the information space, as well as hybrid threats, attempting to both impact on election results as well as lower public trust in democratic processes. This highlights the need to ensure an efficient toolbox to help withstand such challenges. They also underline the need for better cooperation to effectively address the new realities affecting democratic processes, including in the online sphere. This means improving the overall situational awareness and the capacity to respond to threats and manage crisis situations, as well as promoting democratic resilience across the EU.

That is why the Commission is preparing the European Democracy Shield, as announced in the

Commission's Political Guidelines for 2024-2029. It will provide a strategic framework to better protect and promote democracy in the EU, underpinned by concrete initiatives, ensuring respect for democratic values and fundamental rights, including the EU's enduring commitment to preserving and promoting freedom of expression.

The Commission would like to consult the general public and stakeholders on the key issues that the Shield should address, structured around four themes:

- Countering disinformation and foreign information manipulation and interference (FIMI);
- Ensuring the fairness and integrity of elections and the strengthening of democratic frameworks and checks and balances, including media and civil society organisations;
- Strengthening societal resilience and preparedness;
- Fostering citizens' participation and engagement.

Stakeholders likely to be interested in this initiative include:

- individual citizens
- Member States' national authorities
- EU institutions and bodies, including the European Parliament, the Council, the European Economic and Social Committee, the European Committee of the Regions
- international organisations, such as the Council of Europe, OSCE-ODIHR, the OECD, and NATO
- European and national political parties
- relevant EU-level networks
- civil society organisations (including youth organisations) and human rights defenders
- representatives of academia and researchers
- media representatives, journalists and their federations
- online platforms
- online communities
- influencers

### 1. Foreign information manipulation and interference and disinformation

Democracies within the EU are confronted with increasing threats, arising both from within and from outside the Union, driven by various hostile actors that aim to erode social cohesion and to undermine citizens' trust in democracy and democratic institutions. These threats can take various forms, including foreign information manipulation and interference (FIMI), disinformation and other forms of hybrid threats.

FIMI refers to a pattern of behaviour that threatens or has the potential to negatively impact values, procedures and political processes. Such activity is manipulative in character, conducted in an intentional and coordinated manner. Actors of such activity can be state or non-state actors, including their proxies inside and outside of their own territory[1].

Disinformation refers to false or misleading content that is spread with an intention to deceive or secure economic or political gain, and which may cause public harm[2].

[1] <a href="https://www.eeas.europa.eu/eeas/tackling-disinformation-foreign-information-manipulation-interference\_en">https://www.eeas.europa.eu/eeas/tackling-disinformation-foreign-information-manipulation-interference\_en</a>

[2] https://digital-strategy.ec.europa.eu/en/policies/online-disinformation

#### General

#### 1.1. Please indicate your perception of the risks posed by the following techniques:

technique	very high	high	neutral	low	very low	don't know
Foreign information manipulation and interference and disinformation	•	0	0	0	0	0
Inauthentic use of social media by foreign and domestic actors to impact the EU democratic sphere (e.g. through fake accounts, bots, opaque amplification techniques including through exploitation of algorithms, etc.)	•	0	0	0	0	0
Covert funding of political activity (parties, campaigns etc.)	0	•	0	0	0	0
Interference in research and academia	0	•	0	0	0	0
Threats and attacks against political actors	0	0	0	0	0	0
Threats and attacks against the media and journalists	•	0	0	0	0	0
Corruption, fraud, etc. in politics	0	•	0	0	0	0

#### Please comment, if needed:

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European democracy is facing three linked threats: foreign disinformation, social media manipulation, and attacks on the media. We wrote that "Europe's democracy is also undermined: the media sector is fragile and European platforms are absent". Disinformation spreads easily due to weak media structures, polarising debate and confusing citizens. For example, ECPMF in a recent article confirms this, noting that "malicious actors exploit fragmented regulations" to push false narratives.

A platform like 'X', is "a political toy more than a business". Meta, now treats regulation as censorship. Our article in project Syndicate explains how algorithms promote extreme content and make fringe views seem mainstream. Journalists are also under attack, facing lawsuits, harassment, and pressure to self-censor. ECPMF reports a rise in SLAPPs and online threats. Together, these issues create a harmful cycle. Disinformation spreads, algorithms boost it, and journalists are silenced. Strong protections and support for quality media are essential.

All this speaks for media industrial policy and all the creation of European social media platforms.

Europe MédiaLab: https://stars4media.eu/us-blackmail-beyond-trade-citizens-and-advertisers-to-help-eu-build-democracy-infrastructure/

ECPMF: https://www.ecpmf.eu/ecpmf-media-resilience-eu-democracy-shield/

Other (please explain):	
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1.2. Please indicate which of the following measures would in your view be most important to detect and combat foreign information manipulation and interference and disinformation (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Information sharing and cooperation among Member States	0	•	0	0	0
Information sharing and cooperation between Member States and EU institutions	0	•	0	0	0
Gathering of information, knowledge sharing and cooperation between governmental actors (at Member State and EU level) and nongovernment stakeholders (fact-checkers, researchers, civil society organisations)	0	•	0	0	©
Dedicated structure(s) at EU level to better detect these threats and react to them	•	0	0	0	©
Reinforcement of the capacity for national authorities to react to such threats	0	•	0	0	©
Support for non-governmental stakeholders (fact-checkers, researchers, civil society organisations)	•	0	0	0	0
Stronger monitoring and enforcement of existing rules	0	•	0	0	0
Raising awareness and building resilience	•	0	0	0	0
Support to a more pluralistic landscape of online platforms	0	•	0	0	0

Addressing the economic tools and financial incentives behind the spreading of foreign information manipulation and interference and disinformation (e.g. hiring of influencers, manipulation of algorithms, use of bots or fake accounts etc.)	•	0	0	0	0
Promoting the transparency of algorithms and recommender systems (i. e. provision of personalised suggestions to users based on their preferences, behaviors, or other data inputs) on online platforms and more broadly the accountability and transparency of online platforms and other online services	•	0	0	0	0
Supporting the development and use of technologies (such as Artificial Intelligence) to better detect and address these threats	©	•	0	0	0
Increased transparency on the use of new technologies (such as Artificial Intelligence) when disseminating political content online	©	•	0	0	0
Empowering media to respond to such threats (including trainings for journalists etc)	•	0	0	0	0
Reinforced involvement of independent and trustworthy experts and scientists (in Information Technology (IT), Artificial Intelligence (AI), socio-political and other relevant disciplines) to advise on issue impacting the EU democratic sphere	0	•	0	0	0
Sanctions for actors involved in foreign information manipulation and interference and disinformation	0	•	0	0	0
Reinforced EU cooperation with partner countries outside the EU and international organisations (such as NATO, the G7 and others)	•	0	0	0	0
Stronger diplomatic measures (such as politically exposing and calling out the perpetrators, etc.)	©	•	0	0	0

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To protect democracy, algorithm transparency and trust indicators are vital. This would help stop powerful platforms from hiding how they influence users. Our article, co-signed by Paolo Cesarini & Christophe Leclercq, supports this, calling transparency "non-negotiable": "Platforms should be forced to incorporate 'trustworthiness indicators' into their algorithms... This would slow the spread of fake news and boost audiences of quality content. Trust indicates would in turn lead to higher advertising and subscription revenue for publishers and broadcasters". The EU needs to set up systems that can detect disinformation early and respond quickly. ECPMF and EDMO support complementary ideas: an EU-wide centre to monitor and counter online threats.

Civil society must also play a role. Europe MediaLab calls for support for fact-checkers, researchers, and media NGOs. Journalists should get training, legal help, and resources for cross-border work. We suggest creating or supporting two types of hubs to support such efforts:

- i. media innovation hubs, existing in many capitals, surprisingly not yet in Brussels or at EU level;
- ii. hubs to boost the presence of correspondents outside a media's original country.

A pilot project called "Integrating Neighbourhood Correspondents: Strengthening Democracy through

Journalism" is prepared by the European Parliament to benchmark and network such as journalists' houses in different capitals.

This would sustain both media resilience and cross-border coverage/actual understanding between public opinions. Public awareness is equally important. Media-literacy programmes should help people understand how to recognise and resist false information.

Media resilience and democracy resilience, both require democracy infrastructure, otherwise there is no "democracy shield".

Paolo Cesarini/ Christophe Leclercq/ Maria João Rodrigues: https://www.project-syndicate.org/commentary/eu-must-implement-an-industrial-policy-for-media-by-paolo-cesarini-et-al-2024-06?

h=QbUxZxgmDYE8nfDDXw43gjCWksMjl9xCh%2fUZZYr2oXA%3d&

Europe MédiaLab: https://stars4media.eu/us-blackmail-beyond-trade-citizens-and-advertisers-to-help-eubuild-democracy-infrastructure/

ECPMF: https://www.ecpmf.eu/ecpmf-media-resilience-eu-democracy-shield/ EDMO: As submitted by EDMO on the Democracy Shield Consultation, May 2025

#### Other (please explain):

1500 character(s) maximum

Implement finally the platform's old committments to reflect trust indicators in their algorythms (based on independent trust signals, by trut indicator). Providers alike ratings agencies for the bord market.

## 1.3. Are you aware of the following regulations and policies?

regulation/policy	well aware	somewhat aware	unaware
The EU Regulation on the transparency and targeting of political advertising	•	0	0
The EU Digital Services Act (DSA)	•	0	0
The EU Artificial Intelligence Act (Al Act)	•	0	0
The EU Code of Conduct on Disinformation	•	0	0
Self-commitments and ethical standards by political parties	•	0	0
Self-commitments and ethical standards by other political actors (campaign organisers etc.)	•	0	0
EU policies supporting digital and media literacy and critical thinking	•	0	0
National policies and/or measures to prevent, counter and raise awareness of FIMI and disinformation	•	0	0
Platforms' own policies (terms of service/guidelines, etc.)	•	0	0

1.4. What further measures could be considered to reinforce the current EU framework and tools to fight disinformation and information manipulation in the EU, while safeguarding freedom of expression?

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An EU-level Disinformation Observatory should audit algorithms and issue labels to "TIPs": Trust Indicator Providers. This would make platforms more accountable. This Observatory could be an elaboration upon the current EDMO. The Digital Services Act (DSA) should also be strengthened, requiring annual reports and data-sharing with approved researchers. Our article in Project Syndicate stresses that "researchers need access to platform data" to protect democracy. Furthermore, a new industrial policy is required, Paolo Cesarini, Maria João Rodrigues and Christophe Leclercq propose structural tools like an EU-supported platform and a dedicated watchdog: "The next European Commission should mandate a 'media industrial policy'... overseen by a dedicated 'Democracy Commissioner'."

Also new, EU-backed social media platforms could offer ethics-focused alternatives to non-European ones. We believe that "citizens and companies can fight back" by supporting such tools.

This would be an essential part of industrial strategy for the information ecosystem itself, a key point of sovereign policies. The title of Vice President Virkkunen actually invites such an initiative: Tech Sovereignty, Security and Democracy and the title of Commissioner McGrath is also including democracy "Democracy, Justice, the Rule of Law and Consumer Protection".

1.5. In addition, please indicate which of the following measures would in your view be most important to support a healthy and democratic information space across the EU to (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
More initiatives to support media and digital literacy and critical thinking among the whole population	•	0	0	0	0
More support for free, plural and independent media	•	0	0	0	0
More support for trusted, impartial and open-source information (reliable information)	0	•	0	0	0
More support for scientific research on disinformation and information manipulation	0	•	0	0	0
Involvement of independent and trustworthy scientific advice in the fight against these phenomena	0	•	0	0	0
More support for fact-checkers	0	0	0	0	0
More support for civil society organisations active in fighting disinformation and information manipulation	•	0	0	0	0
Stronger measures to address inauthentic and manipulative dissemination of information on online platforms	0	•	0	0	0
Promote innovative structures for fair, safe and transparent democratic debates, including online	•	0	0	0	0

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We at Europe MédiaLab believe that strong, independent media are essential to protect democracy. Europe must help fund quality journalism and give trustworthy outlets better visibility online. Trust indicators and premium labelling can guide audiences to reliable content.

Media-literacy efforts must reach all age groups, teaching people to think critically. Fact-checkers should be supported and protected from legal threats. Work against disinformation needs funding and cross-border cooperation, and should better leverage the skills of existing media outlets to do so, subject to following fact-checkers guidelines and independent scrutiny.

Support for journalism is core to democratic resilience, as Paolo Cesarini and Christophe Leclercq state in a joint article "A strong media sector is a pillar of any democracy – as the EU's Democracy Action Plan recognises."

Euractiv, Christophe Leclercq: https://www.euractiv.com/section/tech/opinion/time-to-act-against-fake-news/

#### Other (please explain):

1500 character(s) maximum

Call for proposals to create "European trusted platforms", starting with micro-blogging, then moving to competing with ther US dominant platforms.

## 2. Fairness and integrity of elections and strengthening democratic frameworks

#### **Elections**

2.1. Please indicate which of the following measures would in your view be most important to strengthen the fairness and integrity of elections at EU, national, regional and local level (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Sharing of good practices among Member States' authorities	0	•	0	0	0
Increased cooperation among Member States and between them and the EU institutions on the integrity of elections taking place in the EU, including in crisis situations	•	0	0	0	0
A European repository of good electoral practices	0	•	0	0	0
EU standards or rules on the funding of political activities	0	•	0	0	0
Reinforced national rules and frameworks on equality of opportunities for political parties and candidates	0	•	0	0	0

Measures at EU or national level to better protect political candidates and elected representatives against threats and attacks (online and offline)	•	0	0	0	0
Promoting the responsible use of Artificial Intelligence in democratic processes (campaigns, voting, etc.)	•	0	0	0	0
Measures to enhance cyber-security and the protection of critical infrastructure in the context of elections	0	•	0	0	0
Ethical frameworks and voluntary commitments by political actors on integrity	0	•	0	0	0
Measures to protect voters from online manipulation and disinformation campaigns threatening the integrity of the electoral process	0	•	0	0	0
Involvement of independent and trustworthy experts and scientists in IT, AI, socio-political and other relevant disciplines	0	•	0	0	0

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The EU must prevent disinformation during elections. Platforms should perform risk assessments and use trust indicators for political content. A quick response system should alert to proven and viral false content, notably during election periods. The ECPMF calls for "pre-emptive measures" to defend election integrity.

Close cooperation between Member States and EU bodies is also crucial. Joint legal frameworks and crisisresponse plans to counter hybrid threats are required. Working together will help protect elections across the EU.

Protections of the democracy shield should be extended to candidate countries, as asked by EFJ.

ECPMF: https://www.ecpmf.eu/ecpmf-media-resilience-eu-democracy-shield/

Euractiv Christophe Leclercq: https://www.euractiv.com/section/politics/opinion/20-visions-for-europe-media-across-borders-before-future-eu-elections/

EFJ: https://europeanjournalists.org/wp-content/uploads/2025/03/Joint-Input-for-the-European-Democracy-Shield-v4.pdf

## Other (please explain):

1	500 character(s) maximum	

#### The media and information sphere

2.2. Are you aware of the European Media Freedom Act (EMFA)?

0	Yes
	YPS

O No

2.3. Please indicate which of the following measures would in your view be most important to strengthen media freedom and pluralism and independent journalism in the EU (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Promote media freedom, pluralism and independence of the media	0	0	0	0	0
Enhance citizens' access to diverse media content and reliable information	0	•	0	0	0
Support media sectors of relevance to democracy (such as local media and investigative journalism)	•	0	0	0	0
Support the resilience and viability of professional journalism and media companies	0	•	0	0	0
Enhance innovation in the media sector	•	0	0	0	0
Foster the responsible use of new technologies by the media (e.g. Artificial Intelligence)	0	•	0	0	0
Ensuring a safe and enabling environment for journalists, building on the work done to protect them from abusive lawsuits (SLAPPs) and other acts of pressure and unethical behaviour	•	0	0	0	0

#### Please comment, if needed:

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Europe must support media that serve democracy, especially investigative and local journalism, and especially in countries where press freedom is at risk: selecting a geographic focus. These outlets keep the public informed and expose abuse. We warn that the media sector is weak, cannot be taken for granted, and we highlight the growing risks to journalists.

The EU should expand protections, including fast legal support, safety training, and mental health assistance. Media outlets need funding, editorial independence, and support across Europe.

Pluralism should also be defended, but not by refusing all necessary media consolidation. Several strong and independent media are better for democracy than many small struggling ones. Especially as they need to invest in AI: this sector is moving from variable costs to fixed costs, which inevitably leads to concentration: this should be managed ahead, and not just let happen. Cross-border consolidation can actually enhance pluralism and independence from sovereignty.

Euractiv, Christophe Leclercq: https://www.euractiv.com/section/tech/opinion/media-freedom-a-rebalanced-ecosystem-and-sector-consolidation/

## Other (please explain):

1500 character(s) maximum

Procurement strategy for EU & government communication: privilege media channels for advertising and for event hosting.

## 2.4. What measures could be considered to reinforce the current EU framework and tools to protect free, plural and independent media?

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We argue that the EU must support the media directly, of course with competitive calls, respecting editorial independence. A Media Resilience Fund, could help support local, investigative and cross-border outlets. In addition, InvestEU NEWS should finally be set up and launched, as part of Europe's sovereign approach. The EU domestic funding programme should not stop at a "new Berlin Wall", but be extended to neighbourhood countries, including enlargement candidates. Cooperation between Western and Eastern European media should be promoted through training, and innovation funding support.

Also, platforms and AI engines should share advertising revenue with news outlets, not only with copyright royalties but also by paying (DSA foreseen) regulation fees, extended to funding and carrying independent "Trust indicators". Transparency rules on algorithms will help.

During the previous mandate, in addition to useful regulatory initiatives, there was the Media and Audiovisual Action Plan (MAAP). It includes the NEWS bundle in analogy to the MEDIA programme. However, this is vastly underfunded, and the foreseen NEWS Media Forum has not met for a long time, let alone been consulted in a more constructive way than this online survey (We assume AI-summarized?). MAAP and NEWS remain a good basis, to be leveraged rather than reinvented.

## 3. Societal resilience and preparedness

3.1. Please indicate which of the following measures would in your view be most important to support societal resilience and preparedness (ranking from 1 to 5, 1=most important):

measure		2	3	4	5
Enhancing digital and media literacy and critical thinking for all age categories, starting from an early age	•	0	0	0	©
Fostering exchange of best practices within the media literacy community in the EU	•	0	0	0	©
Support to EU-wide media literacy initiatives	0	•	0	0	0
Support for civic education	0	•	0	0	0
Support for transparent and accountable public administration	0	•	0	0	0
Raising people's awareness about narratives and techniques used in spreading disinformation to enable them to better recognise them and resist to them	•	0	0	0	0
Relying on responsible and independent science advice	0	•	0	0	0

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Media literacy should be taught from a young age. This will help people spot and reject false information. We believe this kind of education is a core part of democracy protection. Informed citizens are the best defence against disinformation.

Public awareness of how disinformation works must also improve. The EU should encourage media experts to share tools and best practices, creating a stronger, shared response across Europe.

The media sector itself should be more of EU strategies. Most publishers are only vaguely aware of most EU regulations in their own field... Instead of creating new legislation, we recommend a Media Action Plan (MAP, not for using on audiovisual this time), which would:

- i. Make sense in practical ways of existing legislations.
- ii. Highlight funding and innovation.
- iii. Encourage management training and cooperation, via the NEWS Media Forum.

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## 4. Citizens' participation and engagement

4.1. Please indicate which of the following measures would in your view be most important to support citizens' participation and engagement (ranking from 1 to 5, 1=most important):

measure		2	3	4	5
Reinforce frameworks for citizens' participation in public policymaking	0	•	0	0	0
Capacity-building for public authorities to engage with citizens on public policymaking	0	•	0	0	©
Increase communication and access to information about possibilities for citizens' participation in public policymaking	•	0	0	0	©
Foster people's interest and knowledge of politics and policymaking, starting at an early age	0	•	0	0	©
Promote the life-long participation in the democratic life and policy-making processes, starting at an early age	0	•	0	0	©
Support training and education on citizenship and democratic participation	•	0	0	0	©
Reinforce citizens' trust in democratic institutions and the political sphere	0	•	0	0	0
Promoting EU citizenship and the rights deriving from it	0	•	0	0	0

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The EU must make it easier for people to take part in policymaking. Public consultations, participatory budgeting and online feedback tools should be promoted. As we mention in an op-ed "citizens and companies can fight back" by supporting democracy and journalism.

People must also be trained in how democracy works. Education and civic workshops will give them the skills and confidence to take part in decisions that affect them. A strong democracy needs active, informed citizens.

Europe MédiaLab: https://stars4media.eu/us-blackmail-beyond-trade-citizens-and-advertisers-to-help-eu-build-democracy-infrastructure/

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## Concluding remarks

If you wish to add further information, within the scope of this consultation, please feel free to do so here.

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Europe faces real threats from foreign interference, social media manipulation, and attacks on journalism. The democracy shield is an essential element of a security and defense strategy, requiring strong cooperation between different institutions and different DGs. "platform oligarchs" and political actors are using trade, defence, and "free speech" arguments to weaken EU enforcement. "X is a political toy more than a business", showing how platforms can spread disinformation by design.

The EU must act on two fronts.

Addressing behaviour: This includes enforcing the DSA and other resolutions, improving algorithm transparency, and funding trustworthy journalism. It must also protect journalists and support media literacy. A resilient democracy depends on well-informed citizens, strong institutions, and safe, independent media. Working with Member States and partners like NATO and the G7 will help the EU defend its values and democratic systems.

Structural actions: Self regulation, and no direct regulation of US platforms clearly has not worked. What is needed now is "European Trusted Platforms". This is the key challenge for this EU Mandate.

Funding: As EFJ suggests, one should increase funding for media considerably.

This calls for comprehensive action: "The European Commission should mandate a 'media industrial policy,' provide related resources, both short term and under MFF."

Author of this position by Europe MédiaLab: Christophe Leclercq, Chairman and founder.

#### Contact

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