

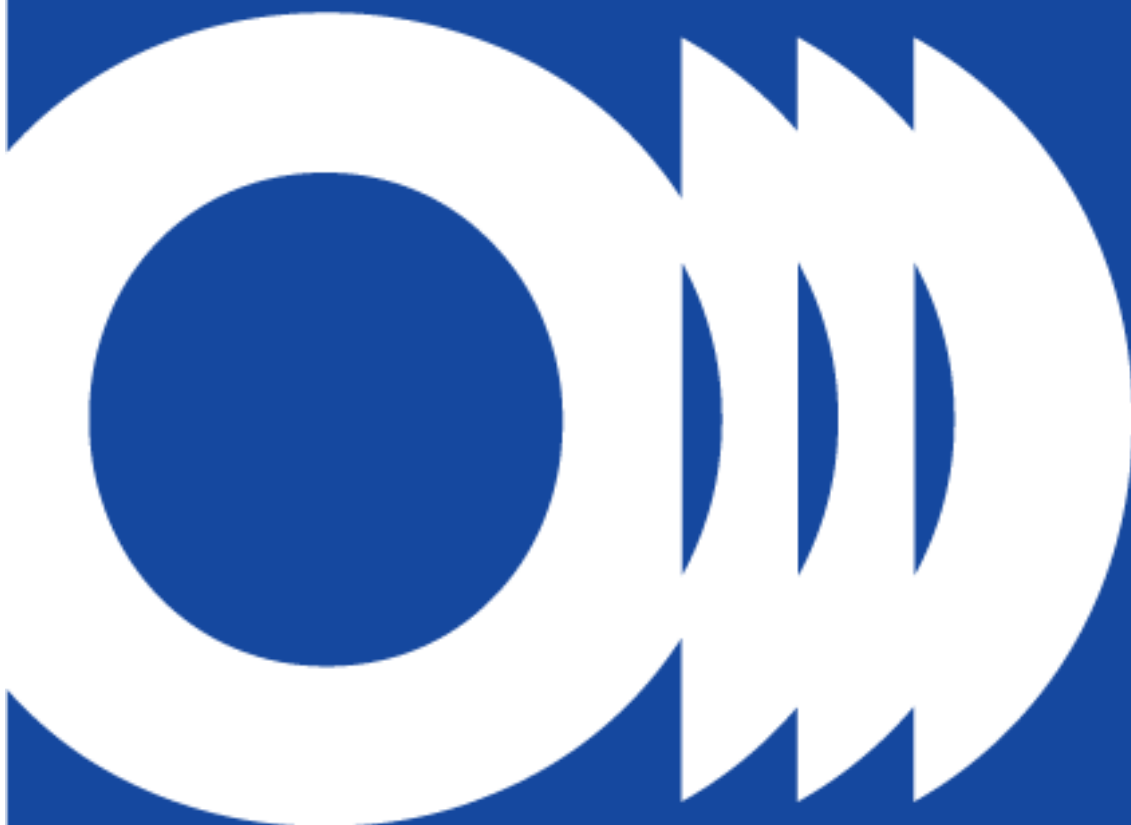
EBU

OPERATING EUROVISION AND EURORADIO

POSITION PAPER

EBU response to the European Commission's public consultation on the European Democracy Action Plan

15 SEPTEMBER 2020



Public survey for European Democracy Action plan

Fields marked with * are mandatory.

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

- Dutch
- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Isabelle

* Surname

DOCHY

* Email (this won't be published)

dochy@ebu.ch

* Organisation name

255 character(s) maximum

European Broadcasting Union

* 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.

93288301615-56

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|--------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |

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

- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria

- Burkina Faso
- Burundi

- Cambodia

- Cameroon

- Canada
- Cape Verde
- Cayman Islands

- Central African Republic
- Chad
- Chile
- China

- Christmas Island
- Clipperton

- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica

- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue

- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru

- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo

- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

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

* 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.

I agree with the [personal data protection provisions](#)

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 content

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
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1. Targeted content was labelled in a clear manner	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. It was easy to distinguish paid for targeted content from organic content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. It was easy to identify the party or the candidate behind the content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. The content included information on who paid for it	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. The information provided with the content included targeting criteria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. The ad was linked to a database of targeted political content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. The targeted political content offered the possibility to report it to the platform	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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
1. Disclosure rules (transparency on the origin of political content)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Limitation of micro-targeting of political content, including based on sensitive criteria, and in respect of data protection rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Political parties to disclose their campaign finances broken down by media outlet	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Prohibit foreign online targeted political content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Prohibit online targeted political content altogether	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Rules limiting targeted political content on the election day and just before	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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
1. Micro-targeting is acceptable for online political content and it should not be limited	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Criteria for micro-targeting of political content should be publicly disclosed in a clear and transparent way for every ad	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Micro-targeting criteria should be strictly limited	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Micro-targeting criteria should be banned	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

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

The strict requirements imposed on broadcasters are indeed in stark contrast to the lack of rules in relation to online platforms. This situation no longer reflects citizens' opinion-forming processes or online platform's impact on society, particularly in crucial times of elections.

While a great proportion of the population continues to inform itself about elections and follows election coverage on TV, citizens, in particular young users aged between 18 and 24, increasingly access news via social media networks (see Reuters Institute Digital News Report 2020, p. 10/11, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf).

Self-regulatory initiatives or voluntary measures like the Code of Practice on Disinformation no longer suffice to ensure that citizens are properly informed about the sponsors and reasons why they see political commercial messages (see Kirk/Culloty/Casey/Teeling/Park/Kearns/Suiter, Elect Check 2019, pp.38-40, https://www.bai.ie/en/media/sites/2/dlm_uploads/2019/09/20190913_Elect-Check-2019-Report_Interactive-PDF_Final_DMB.pdf and ERGA Report on Disinformation, pp.18-19, <https://erga-online.eu/wp-content/uploads/2020/05/ERGA-2019-report-published-2020-LQ.pdf>).

Disinformation coupled with hidden methods to target the electorate with political advertisements can have a devastating effect on elections' impartiality and integrity. This should not be tolerated.

Binding minimum standards for political advertising displayed on online platforms should be established. It must be ensured that Member States can impose stricter standards in their territories, given the significance of elections for democratic societies. At the very least, online platforms should clearly separate editorial from commercial content, allowing users to quickly identify political advertisements. Political advertisements should thus be presented as readily recognisable paid-for communication or labelled as such. In addition, online platforms should be transparent about the identity of the sponsor and possibly disclose the amounts spent. Importantly, the EU's minimum set of rules should be without prejudice to existing national rules, in particular those applicable to broadcast media, which facilitate the pluralistic expression of opinions during electoral campaigns, the very motor of democratic societies.

(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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Intimidation of political opposition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Micro-targeting of political messages, that is messages targeted to you or a narrowly defined group	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Information suppression, that is the purposeful lack of information on a topic	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Disinformation or fake accounts run by governments, including foreign governments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Divisive content, that is content created to divide society on an issue	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. The amplification of content that makes it difficult for you to encounter differing voices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Intimidation of women candidates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. I or someone I know has been targeted based on sensitive criteria such as gender, ethnicity or sexual orientation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10. Content where I could not easily determine whether it was an advertisement or a news post	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11. Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

[IF Q1=11: Please define]

Q1.1 IF Q1=YES for any answer option

- 1. Have you felt personally intimidated/threatened by targeted political content?
- 2. Could you tell us more about your experience?

Please explain your answer

(iii) European Political Parties:

Q1. Is there scope to further give a stronger European component to the future campaigns for EU elections? Please list initiatives important to you in this regard

	Not at all	A little	Neither a lot nor a little	A lot	Absolutely	Don't know
1. 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. More transparency on financing (e.g. information about how much national parties contribute yearly to the European Political Parties budgets)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Bigger budgets for European Political Parties	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. Strengthening the European campaigns by European Political Parties in Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Better explaining the role of European Political Parties in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

(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

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

- 1. Strengthened sharing of information and monitoring activity across borders and between authorities
- 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

Increasingly, journalists become victims of aggression, hateful comments or even illegal hate speech (see Media Pluralism Monitor 2020, <https://cmpf.eui.eu/mpm2020-results/>).

Since the beginning of this year, the EBU has posted several alerts on the Platform of the Council of Europe to Promote the Protection of Journalism and the Safety of Journalists (see: <https://www.coe.int/en/web/media-freedom/home>) – some of which are still pending at the time of writing. These alerts concern journalists intimidated, assaulted, and/or arrested in the course of their duties.

Attempts to interfere with the independence of our member organisations have also been described, as well as intimations by public figures. These attacks, threats and intimidation have a chilling effect on the freedom of expression and the watchdog role the media, particularly public service media (PSM), play in our societies. The safety and integrity of journalists is crucial for PSM to provide independent, high quality news and current affairs programmes which are trusted by the public, and is also crucial for their ability to produce investigative reporting.

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

The 2020 Annual Report by the partner organisations to the Council of Europe Platform to Promote the Protection of Journalism and Safety of Journalists (see: <https://rm.coe.int/annual-report-final-en/16809f03a9> and <https://www.coe.int/en/web/media-freedom/home>) underlines that several alerts (e.g. in Malta, Croatia, Belgium, UK and France) were activated in 2019 to report legal actions seeking to intimidate journalists in Europe.

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

The EBU is concerned about any threat to freedom of expression and the right to information as well as media pluralism and media freedom, guaranteed by Article 11 of the European Charter of Fundamental Rights, read in light of Art. 10 European Convention of Human Rights. Unfounded lawsuits of vexatious nature aimed at silencing or intimidating journalists and activists have a negative impact on media freedom in Europe and on the citizens' fundamental rights to receive and impart information and must therefore be taken seriously.

The monitoring of and the exchange of information on SLAPP lawsuits is crucial to understand the dynamic behind these legal proceedings. It allows journalists and media organisations to take appropriate measures and adopt strategic approaches to reduce the risks associated therewith and better defend their interests in subsequent legal proceedings. In particular, the EU should encourage initiatives which foster discussions and raise awareness on the issue of SLAPPs.

Particularly in case of freelance journalists, financial support would be useful.

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

The EU should indeed step up its efforts to strengthen the safety of journalists and other media actors. All attacks, threats and intimidation against journalists have a chilling effect on the freedom of expression and the watchdog role the media, particularly public service media (PSM) have in our societies. Journalists must feel safe when they research and cover current affairs. The safety and integrity of journalists is crucial for PSM to provide independent, high quality news and current affairs programmes which are trusted by the public as well as to produce investigative reporting

The safety of journalists has substantially declined over the last few years. The UNESCO, in its report "Intensified Attacks, New Defences: Developments in the Fight to Protect Journalists and End Impunity" flags an 18% increase worldwide in the killing of journalists compared to the previous five-year period (495 killings compared to 418 from 2009 through 2013) and emphasizes the continued trend of impunity for attacks against journalists (see: <https://unesdoc.unesco.org/ark:/48223/pf0000371487>). The Media Pluralism Monitor 2020 report confirms the assessment for Europe and notes an increase in physical attacks against journalists in the Union (see: <https://cmpf.eui.eu/mpm2020-results/>).

The COVID-19 crisis has further exacerbated existing threats to free, independent and reliable reporting (see the RSF's World Press Freedom Index 2020, <https://rsf.org/en/2020-world-press-freedom-index-entering-decisive-decade-journalism-exacerbated-coronavirus> , COVID-19 addendum to the Annual Report by the partner organisations to the Council of Europe (CoE) Platform to Promote the Protection of Journalism and the safety of Journalists, <https://www.coe.int/en/web/media-freedom/covid-19-addendum>). The Council of Europe has documented disproportionate emergency measures, also in relation to disinformation, in several EU Member States. The number of arrests, detentions and charges brought against journalists, as well as verbal and physical attacks against media workers, have increased as the crisis escalated. Journalists across Europe have also complained about restrictions on access to information (see below question 6 - section II (i)).

Digital threats are also described as a key issue of this decade in UNESCO's and the Media Pluralism Monitor 2020 reports. Both reveal the increased prevalence of digital threats, harassment online (especially towards women journalists) and politicians' hate speech.

The independence of media organisations is also being endangered. The Media Pluralism Monitor 2020 report (see: <https://cmpf.eui.eu/mpm2020-results/>) counts 14 countries recording a high risk of influence over editorial content by commercial and owner interests – often associated with a lack of transparency and accountability of political advertising online (see EBU response to Question 6 in section I (i) of this questionnaire).

Q4.1 If yes, how?

- 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. Other – please specify

Please explain your answer

Freedom and pluralism of the media are fundamental principles within the European Union and beyond. They are protected by the right to freedom of expression and information and are indispensable for the functioning of democracy and for upholding the Rule of Law. In this context, States also have a positive obligation to ensure the safety of journalists, so as to allow them to exercise their profession in a safe environment, free from physical or verbal threats and harassment.

Against the background of the Rule of Law Review Cycle, we welcome the stepping up of cooperation on rule of law issues between the European Commission, the Council of Europe and other international organisations such as the Organisation for Security and Cooperation in Europe.

The monitoring of the rule of Law in all the EU Member States empowers the European Commission to engage with the Members States and the various different stakeholders active in rule of law issues.

When assessing media freedom, media pluralism and the safety of journalists, the experiences of media stakeholders should continue to be taken into account in future annual rule of law reports. The EBU is dedicated to securing and improving the safety and protection of journalists in the EU and approaches the subject through training, networking and institutional relations (for further information, see also <https://www.ebu.ch/public-service-journalism#safety>).

The EBU Academy (see: <https://www.ebu.ch/academy>) offers a series of training programmes and on-site workshops (see: <https://www.ebu.ch/academy/courses?skill=safety>), open to its membership and other media outlets, to provide journalists the necessary skills on safety and security. It helps broadcasters protect their staff and ensure the right safety framework at all stages of the reporter's working life. Since 2004, the EBU Academy has delivered 76 training programmes on Safety & Security and trained 809 journalists from Members and beyond. The Academy also coordinates the international network of security officers – 16 gatherings so far over 8 years –, where vital information on risk assessment is exchanged on a permanent and informal basis. The group promotes a supportive working environment.

The EBU coordinates the Investigative Journalism Network (see: <https://www.ebu.ch/public-service-journalism#investigative-journalism-network>), started in 2017. The project is twofold: the first is a set of project groups where reporters from EBU Members work together to research specific topics, the second is a network of investigative reporters.

EBU is one of the partner organizations of the CoE platform for the Protection of Journalism and the Safety of Journalists (<https://www.coe.int/en/web/media-freedom/home>), where it contributes to denounce threats and attacks against public service broadcasters.

Finally, EBU participates in UNESCO's action plans and initiatives dedicated to the topic (e.g. UN Inter-Agency on the Safety of Journalists and the Issue of Impunity, see: <https://www.ohchr.org/EN/Issues/SafetyOfJournalists/Pages/SafetyOfJournalists.aspx>) and maintains contacts with other organizations such as the Organization for Security and Co-operation in Europe (OSCE, see: <https://www.osce.org/media-freedom-and-development>) and the United Nations Office in Geneva (UNOG, see: <https://www.unog.ch/>). EBU also sits alongside some of its members on the International News Safety Institute (INSI, see: <https://newssafety.org/members/all-insi-members/>) Board of Directors.

Q5. Are you aware of any issues regarding the protection of journalistic sources in your country?

- 1. Yes (please provide concrete examples)
- 2. No
- 3. I do not know

Please explain your answer

The protection of journalistic sources is essential for the freedom of the media. It protects the media's access to valuable information which is necessary for them to fulfil their key role in democratic societies. The protection of journalistic sources is crucial to encourage (anonymous) whistleblowing through the media. Whistleblowers, who report on breaches of law and disclose information that is in the public interest, are an indispensable journalistic source, particularly for public service media's investigative journalism.

The EBU is concerned about the impact of the European Commission's proposal for a Regulation on European production and preservation orders for electronic evidence in criminal matters (COM (2018) 225 final) may have on the protection of journalistic sources in the European Union. The EBU, together with other European media associations and journalists, already voiced their concerns on the draft regulation and called EU decision-makers to ensure protection of the European media sector and its contribution to democratic societies (see our 2018 statement: <https://www.ebu.ch/publications/position-papers/2018/joint-statement-to-eu-institutions-on-e-evidence> and our 2020 statement: <https://www.ebu.ch/publications/position-paper/open/by-year/2020/ebuposition-papereu-e-evidence-regulation-29012020>).

Q6. Are you aware of any difficulties that journalists are facing when they need access information / documents held by public authorities and bodies in your country?

- 1. Yes (please provide concrete examples)
- 2. No
- 3. I do not know

Please explain your answer

The COVID-19 crisis has led some governments to adopt emergency measures with a negative impact on access to information and media freedom. Across Europe, journalists have complained about restrictions on access to information.

Amid the pandemic in April 2020, International Press Freedom Organisations working together in the new EU funded Media Freedom Rapid Response (see: <https://www.mfrr.eu>) identified and listed governments' measures restricting access to information for journalists (see: <https://ipi.media/media-freedom-violations-in-the-eu-under-covid-19/>)

(ii) Media independence and transparency

Q1. How would you characterise the situation with regards to independence of media and journalism in your country?

	Not at all	To a limited extent	To a great extent	Don't know
1. The government controls or exerts pressure on media outlets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Powerful commercial actors control or influence editorial policy of media outlets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Journalists are afraid of losing their job or of other consequences and avoid voicing critical opinions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. News media, in particular public broadcasters, provide balanced and representative information, presenting different views, particularly in times of electoral campaigns	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q2. How important is the support for independent journalism (including free lance journalists and bloggers/web journalists) and the protection of the safety of independent journalists to supporting democracy in the EU and internationally?

- 1. Very important
- 2. Important
- 3. Not important
- 4. Don't know

Q3. Do you feel sufficiently informed about the ownership of the media outlets you are consulting?

- 1. Yes
- 2. No (please explain)
- 3. I do not know

Please explain

Q4. Should it be mandatory for all media outlets and companies to publish detailed information about their ownership on their website?

- 1. Yes (please explain)
- 2. No (please explain)
- 3. I do not know

Please explain

Q5. Should content by state-controlled media, where governments have direct control over editorial lines and funding, carry specific labels for citizens?

- 1. Yes (please explain)
- 2. No (please explain)
- 3. I do not know

Please explain

There is a fundamental difference between state-controlled media and public service media. State-controlled media exist to further the interests of governments by countering critical voices and ensuring that the information people receive conforms to the account of events preferred by those holding power.

By contrast, public service media is financed by the public but unlike state-controlled media, public service media organisations are accountable to it. Independent public service media is the cornerstone of a democratic society, providing citizens with distinctive, quality and ethical journalism as a reliable and trustworthy source of information and a public forum where different views can be expressed. Public service media cater to all audiences and provide a diverse range of services/programmes to all societal groups, including the most vulnerable as well as minorities. To ensure that public service media fulfil their obligations vis-a-vis the society they serve, several mechanisms exist that monitor compliance with the public service remit as well as how public money is spent to support their activities.

Public service media are instrumental in helping people build the necessary skills and trust to become informed and active citizens in a multi-platform environment. They provide trusted spaces where people can confidently access media platforms and can critically engage with media. Citizens' trust in public service media and its programmes and services remains high. Its value was recently demonstrated when the COVID-19 crisis escalated in Europe and audiences turned in increasing numbers to public service media for trusted, reliable and evidence-based news content via linear as well as video-on-demand and streaming (see EBU Media Intelligence Service, COVID-19 crisis. PSM Audience Performance, 16 April 2020, <https://www.ebu.ch/publications/research/membersonly/report/covid-19-crisis-psm-audience-performance>).

We support the overall public interest goal to create the right environment and conditions for citizens to make them understand where information and news comes from and to ensure it is easy for citizens to access and to find trusted and accurate content from authentic sources such as public service media. We believe that this entails efforts and commitments that go far beyond simply sticking a label on a piece of content.

Labelling is just one of many tools to reach this overall public objective. Media in Europe have extensive experience in a broad range of measures and systems to help the media user to access, decode and engage with content. Their success very much depends on the degree of transparency and on the involvement and endorsement by all relevant stakeholders themselves.

Without the necessary safeguards to ensure transparency on the applied criteria, without genuine stakeholder engagement and endorsement (e.g. media industry, supervisory authorities and representatives from civil society and the wider public) and without proper ways of redress or defence, we believe the practice of labelling practices risks missing the overall public goal highlighted earlier. Currently, labelling practices by major online global platforms to tackle the challenges related to the disinformation order are too often opaque, unaccountable to the public, and hard to objectively evaluate and oversee. In the absence of these safeguards, the decision to establish a red line between what is state controlled media or what is not is simply too arbitrary to be meaningful.

An effective way to make the online information space safer and counter the proliferation of disinformation, is to ensure effective prominence of content of general interest. As suggested in our reply to the Commission's Digital Services Act package consultation, prominence measures should sit within the appropriate legal framework, taking due account of the media sector's specificities. New Art. 7a Audiovisual Media Services Directive is an expression of this, recognising Member States' freedom to take measures to ensure the appropriate prominence of audiovisual media services of general interest (see answers to Q8 and 9 under '(ii) Media Independence and Transparency').

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

Yes. The EBU and its Members consider that:

- Online platforms should grant easy access to and prominently display general interest content.
- Independent public service media play a key role in building informed citizenship. A clear brand attribution is instrumental in tackling disinformation. It helps citizens to decide for themselves if they can trust a certain news/source of information. With increased polarisation of societies and increasing levels of online disinformation, the role played by trustworthy independent media is more important than ever.
- Safeguarding editorial freedom and independence is key to safeguard public trust in media and democracy. Allowing global platforms to prevent and/or erroneously remove media content and services when they clash with global platforms' unilateral corporate community standards creates a serious threat for editorial freedom and media pluralism. When media content and services that are already subject to regulation and oversight are offered on major platforms, platform operators shall not subject these services to any form of control or interference. Instead, they should be under a positive obligation to respect such services as conceived by the media services provider.
- Platforms' ability to control what content appears and when, in full opacity, has far-reaching consequences for freedom of expression. Improving algorithmic transparency and accountability as well as transparency of content policies will help media and users to understand why which content appears in the ranking and the news feed and react to it accordingly. Similarly, providing trusted fact-checkers and academia with access to platform data would enable them to better monitor the algorithms' functioning and facilitate independent assessments.
- In addition, media literacy initiatives should be further promoted. They play a key role in helping users of all age groups to have the necessary skills to navigate an ever-changing media landscape. Public service media are at the forefront of offering tools and services that raise awareness of the importance of developing adequate skills, strengthening media literacy.

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

Q8. Do you think that the EU should act to strengthen media independence and transparency 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 independent media 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
- 7. No
- 8. I don't know

Please explain your answer

To strengthen media independence and transparency, the EU should act in the following areas:

- Improving algorithmic transparency and accountability,
- protecting editorial freedom by media providers that are subject to regulation and oversight
- protecting brand attribution,
- ensuring prominence of general interest content.

It is time to address these issues as powerful online operators are penetrating the audiovisual market and place themselves as gatekeepers between audiences and content providers such as public service media. Platform operators have clear business incentives to attract audiences to content (editorial and commercial) that makes them more money.

Online platforms also have a huge societal impact and can be decisive actors in public opinion forming. Through their content policies, they determine what people see/find and what they don't or are unlikely to see/find. They thereby moderate and, to a certain extent, restrict speech online. The non-transparent way these content policies are established is highly problematic and puts at risk general interest objectives like the freedom of expression and the right to information as well as media pluralism and media freedom, all of which are expressly protected by Art. 11 of the EU Charter of Fundamental Rights and cultural diversity, which is inherent in the EU's sui generis nature.

See also Q 9 below and p. 44 of the EBU's response to the DSA consultation, available at https://www.ebu.ch/files/live/sites/ebu/files/Publications/Position_Papers/open/EBU_response_Digital_Services_Act_consultation%2008092020.pdf (see also the Executive Summary under https://www.ebu.ch/files/live/sites/ebu/files/Publications/Position_Papers/open/EBU_DigitalServicesAct__brief_2020_09%20FINAL.pdf).

Q9. If you answered yes to some of the options of the previous question, how should 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

As mentioned in our response to question 8 above, in an audiovisual market where active online platforms have become important gateways (and often even gatekeepers) to citizens' access to audiovisual programmes and services, it becomes indispensable to adopt binding legislation that purports to ensure appropriate prominence of general interest content.

While taking due account of sectoral legislation, which should prevail in case of conflict with horizontal rules, it is time that the Commission addresses this issue in the context of its DSA package. In our response to the Commission's DSA consultation, we underlined that prominence measures are an indispensable antidote to the proliferation of illegal and harmful content, which are some of the underlying problems that characterise the online/digital market. We are convinced that the DSA package should address prominence, alongside other measures improving transparency of platforms' content policies and recommender systems/algorithms whereby platforms organise and commercialise content (see EBU response to DSA package consultation, p. 44, https://www.ebu.ch/files/live/sites/ebu/files/Publications/Position_Papers/open/EBU_response_Digital_Services_Act_consultation%2008092020.pdf , see also the accompanying Executive Summary, [https://www.ebu.ch/files/live/sites/ebu/files/Publications/Position_Papers/open/EBU_DigitalServicesAct__brief_2020_09%20FINAL.pdf]).

Several recent studies underline the importance of prominence, particularly in relation to Connected TV, such as Mediatic's report published by UK's regulator Ofcom (see: https://www.ofcom.org.uk/__data/assets/pdf_file/0019/201493/connected-gateways.pdf). VUB-SMIT have conducted similar research on the Belgian market and the study, which has not yet been published, likewise advocates for a national prominence policy.

Such prominence measures should be placed within the appropriate regulatory framework and take due account of the media's specificities, like the new findability rule applicable to user interfaces introduced in Art. 84 of the German Inter-State Media Treaty (Medienstaatsvertrag).

The German findability rule derives from new Art. 7a Audiovisual Media Services Directive, which recognises Member States' freedom to take measures to ensure appropriate prominence of audiovisual media services of general interest.

When adopting future legislation protecting prominence of general interest content on online platforms, Member States prerogatives in the fields of culture and media pluralism must be upheld, including, where necessary, in cross-border situations.

To identify general interest content providers, platforms may rely on the machine-readable CEN standard of the Journalism Trust Initiative. The Journalism Trust Initiative is a checklist of commonly agreed criteria for high quality and independent journalism to which media providers may subscribe, ranging from ownership and sources of revenue to the editorial process, including topics like correction policies, labelling of opinion or sponsored content, and ensuring accuracy.

Alternatively, trusted providers may be defined at national level, through a multi-stakeholder dialogue or be determined by the competent national media regulators based on open and transparent criteria.

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.

News and current affairs are at the heart of Public Service Media's programme offering and we invest massively in such content (see EBU Media Intelligence Service, Public Service Media and News, August 2020, <https://www.ebu.ch/publications/research/loginonly/report/public-service-media-and-news>). Informing all audiences with independent, impartial, accurate and relevant news and helping them to better understand the world is the basis of democracy. Public service media news and current affairs content comply with the same editorial standards and values whether offline or online.

The Reuters Institute recently emphasized that while a great proportion of the population continues to inform itself about elections and follows election coverage on TV, citizens, in particular young users aged between 18 and 24, increasingly access news via social media networks, (see Digital News Report 2020, p. 10/11, https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2020-06/DNR_2020_FINAL.pdf).

As already pointed out (see Q6 in the section on 'Transparency of Political Advertising' in the part on 'Election Integrity and Political Advertising'), broadcasters are heavily regulated and subject to stringent rules, particularly those promoting pluralistic expressions during election times. These requirements are in stark contrast to the lack of rules in relation to online platforms. They no longer reflect citizens' opinion-forming processes as well as online platform's impact on society, particularly in crucial times of elections.

In our contribution to the recent consultation on the Digital Services Act, we underlined that self-regulatory initiatives or voluntary measures such as the Code of Practice on Disinformation no longer suffice to ensure that citizens are properly informed about the sponsors and reasons why they see political commercial messages. We therefore believe that the DSA should set out binding minimum standards for political advertising displayed on online platforms. At the very least, online platforms should clearly separate editorial from commercial content, allowing users to quickly identify political advertisements. Political advertisements should be presented in such a way as to be readily recognisable as a paid-for communication or labelled as such. In addition, online platforms should be transparent about the identity of the sponsor and possibly disclose the amounts spent.

This EU minimum set of rules should be without prejudice to existing national rules, in particular those applicable to broadcast media.

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

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)
- 2. Pursued but enlarged to a wider range of signatories
- 3. Pursued but combined with a permanent monitoring and reporting programme
- 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

Relying solely on a self-regulatory approach to tackle disinformation is no longer tenable.

Disinformation is the most visible element in a broader context of the current online information disorder, where a relatively small number of global online platforms have huge influence on people's access to content and information and thus impact opinion-making, free speech and ultimately democracy. These platforms have unprecedented reach and economic power which are coupled with business models based on monetizing visibility and ranking the offer of information and content based on algorithms and "community standards". They are driven by their own global, commercial motivations and this has propelled them to much success. They do not serve citizens in the public interest.

We advocate a holistic approach based on the one hand on measures to address malfunctions of the online information system and on the other hand creating a favourable environment for responsible, independent, quality journalism. The key is to tackle the underlying causes of the problem in a way that supports fundamental European values.

Any new legislation and measures at EU level must be consistent with, and respect fundamental rights and support pluralism and cultural diversity (e.g. smaller language groups and communities). Interventions by public authorities must be proportionate to the threat posed by disinformation, minimizing the chilling effect which such measures can have on freedom of expression. Any adequate response to fight disinformation must also build on close collaboration between the various actors who are in the front-line fighting 'fake news', bringing together their actions.

The areas for which rules are needed include:

1. The dilution of disinformation with quality information by increasing the visibility for quality media content is an effective antidote against disinformation. Therefore, easy access to and prominent display of general interest content must be guaranteed on all relevant platforms. Independent public service media play a key role in building informed citizenship. A clear brand attribution is instrumental in tackling disinformation. It empowers citizens to decide for themselves if they can trust a certain news/source of information. With increased polarisation of societies and increasing levels of online disinformation, the role played by trustworthy independent media has become more important than ever.
2. Safeguarding the editorial freedom and independence is key to safeguard public trust in media and democracy. Allowing global platforms to ban and/or erroneously remove services and content from media providers on the basis that they clash with their unilateral corporate community standards would create a serious threat for editorial freedom, cultural diversity and media pluralism in Europe. That is why, when services and content from media providers that are already subject to regulation and oversight are offered on major platforms, platform operators shall not subject these services to any form of control or interference. Instead, they should be under a positive obligation to respect such services as provided by the media provider.
3. Platforms' ability to control what content appears, when and how, in full opacity, has far-reaching consequences for freedom of expression. Improving algorithmic transparency and accountability as well as transparency of content policies will help media and media users to understand why which content appears in the ranking and the news feed and react to it accordingly. Similarly, providing trusted fact-checkers and academia with access to platform data would enable them to better monitor the algorithms' functioning and facilitate independent assessments.

In addition, Media literacy initiatives should be further promoted. They play a key role in fighting the

information disorder and in helping users of all age groups to have the necessary skills to navigate an ever-changing media landscape. Public service media are at the forefront of offering tools and services that raise awareness of the importance of developing adequate skills, strengthening media literacy.

Regarding the 2018 Code of Practice on Disinformation, recent assessments have shown that leaving it solely to platform's voluntary action and processes do not suffice. It is key to work towards a robust framework as online platforms need to be more transparent and accountable to the public. Ultimately, such framework should safeguard and further strengthen the ability of competent national oversight bodies to ensure effective monitoring and enforcement.

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

	Yes	No	Don't know
1. Alerts when attempting to share or publish content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Clear labels above content or sites that have failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Mechanisms allowing you to report disinformation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

(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
1. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and publish them	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Ensure transparency 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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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
1. Should be systematically labelled	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Should be systematically labelled and collected in public, searchable repositories	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Should be subject to the same rules as on political advertising (see above section)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Should not be regulated	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(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
- 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?

			Neither agree			I don't
			agree			

	Fully agree	Somewhat agree	not disagree	Somewhat disagree	Fully disagree	know /No reply
1. Label the content as artificially promoted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Demote the content to decrease its visibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Suspend or remove the content because the use of manipulative techniques is contrary to platforms' terms of service	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Suspend or remove the accounts engaging in manipulative techniques	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Invest in internal intelligence systems to detect manipulative techniques	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Invest in artificial intelligence to detect manipulative techniques	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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
1. Promoting content from trustworthy sources	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Promoting factual content from public authorities (e.g. on election date)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Providing tools to users to flag false or misleading content	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. Demoting content fact-checked as false or misleading	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Labelling content fact-checked as false or misleading without demoting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Platforms should inform users that have been exposed to fact-checked content	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Removing content which is found false or misleading and contrary to terms of service (e.g. threatening health or public safety)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Which sources do you consider as trustworthy?

We consider that independent public service media (PSM) organisations qualify as trustworthy sources. PSM offer a wide range of diverse high-quality content through different distribution means, catering to all segments of society, thereby serving social coherence and mutual understanding of different societal groups.

Public service media organisations exercise full editorial responsibility over their content and are bound by journalistic and editorial principles as well as strict national and European rules compliance of which is overseen by independent regulatory/supervisory authorities/bodies. Public service media's programmes and services are appreciated and trusted by the public. This is why it is so important that digital platforms, when they make PSM content available, respect their editorial freedom and the integrity of their content. Platforms should not interfere with PSM content and should ensure that the source is properly and clearly attributed. Where platforms exercise such secondary control, which occasionally leads to the removal of the content concerned, freedom of expression is unjustifiably undermined, media pluralism is harmed, and online users are deprived of the ability to access general interest content.

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
1. Demotion of posts or messages that have failed a fact-check by journalists or a fact-checking organisation in the newsfeed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Alerts if attempting to share content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Notifications to users who have previously engaged with content that has failed a fact-	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Mechanisms enabling readers to flag content that is misleading	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Mechanisms to block sponsored content from accounts that regularly post disinformation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
7. Closing of fake accounts and removal of automated social media accounts like bots	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
8. Closing of accounts that continuously spread content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
9. Allowing more diversity in suggestion algorithms designed to find videos, posts or sites that you might be interested in	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
10. Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q2.1. IF your answer=10, Please specify:

While some of the measures listed above can be useful in this context, it is key to ensure that they are enshrined in a comprehensive and robust framework including the necessary checks and balances to ensure the measures' effectiveness and to avoid that freedom of expression and information is unjustifiably undermined.

Please see above response to question 2 under section (i) 'Scope'.

One effective measure to fight disinformation would be to increase the visibility for quality media. Therefore, easy access to and prominent display of general interest content must be guaranteed on all relevant platforms. A clear brand attribution is also instrumental in tackling disinformation. It helps citizens to decide for themselves if they can trust a certain news/source of information. With increased polarisation of societies and increasing levels of online disinformation, the role played by trustworthy independent media is becoming more important than ever before.

We also advocate for more algorithmic transparency and accountability, access to data and further promotion of Media literacy initiatives.

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
1. Demotion of posts or messages that have failed a fact-check by journalists or a fact-checking organisation in the newsfeed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Alerts if attempting to share content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Notifications to users who have previously engaged with content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
4. Clear labels above content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Mechanisms enabling readers to flag content that is misleading	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Mechanisms to block sponsored content from accounts that regularly post disinformation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
7. Closing of fake accounts and removal of automated social media accounts like bots	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
8. Closing of accounts that continuously spread content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
9. Allowing more diversity in suggestion algorithms designed to find videos, posts or sites that you might be interested in	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
10. Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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

See answer to question 2.1 above.

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

Public service media (PSM) organisations in Europe bear editorial responsibility for the content they publish and may be held liable for it under national laws. They are regulated by law and subject to independent oversight. While we understand online platforms should act in relation to certain types of content, they should not subject media services and content, for which editorial responsibility is exercised, to any form of control and interference. Any additional control by platforms over media's content that is already subject to oversight would be inappropriate and interfere with the right to freedom of expression and information. To avoid any errors from platforms and protect users' right to information, any decision on suspension or removal of such content should be left to independent courts or other public oversight. Effective and user-friendly redress mechanisms should be provided to allow content providers to contest online platforms' content-related decisions. For public service media and other content providers, it is also essential that online platforms provide a contact point for the national market to clarify for example, the nature of the content and adapt necessary action (e.g. suspension, removal or reinstatement of content).

Platforms' algorithms used for ranking content can also have far-reaching consequences on users' right to freedom of expression. By their community standards and more practically, through their algorithms, platforms control what content appears, where and when. They do so unilaterally and in full opacity, unaccountable to regulatory authorities and the general public. To promote a flourishing online space where free speech is possible within acceptable limits, it is inevitable to enhance algorithmic transparency and accountability. To reach audiences through online platforms and understand why which content item appears in the ranking or news feed, public service media and other content providers need to understand platforms' content policies (including ranking) and be aware of any changes.

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

	Yes	No	Don't know
1. Better information about the source of the content	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Whether the content is sponsored or not	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Information about the micro-targeting (why the information is addressed to you)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Whether there are advertisements linked to the content	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Liability of the provider for supplying false or misleading information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other: 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
1. Removing that content from your feed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Removing that content from your feed and excluding similar content from being algorithmically promoted in your feed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Flagging the content to the platform for fact-checking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Receiving feed-back about the action taken by the platforms after flagging, including possible demotion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Flagging the content to competent authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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
1. Introduce easy-to-find reporting or flagging system for users	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Limit the possibility to forward the same content to many users	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Limit the amount of people in a discussion group	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. In exceptional cases, proactively contact users about potential disinformation wave or promote authoritative content (e.g. in cases like Covid-19 pandemic)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Other (please elaborate)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please 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
1. If they pay directly the factcheckers or if they work with an external factchecking organisation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. How they decide which posts are factchecked	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. How many posts are factchecked	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. How to flag posts to be factchecked	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Other, (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

More transparency around fact-checking online would be welcome.

In the EBU response to the DSA package consultation we set out our concerns on opaque content policies, through which online platform providers determine content policies (and thus influence access to and the visibility of content) and moderate speech far removed from public scrutiny. We suggested that the DSA needs to improve transparency and accountability of platforms' content policies and practices in relation to users (including public service media and other content providers), society at large as well as academic researchers and regulators.

Effective transparency measures should include:

- Effective notice-and-action procedures with clear deadlines,
- Information about platform and content providers (see below)
- The publication of platforms' content policies,
- The transparency of platforms' content-related decisions in individual cases (e.g. clear and transparent notices including reasoning)
- The publication of reports on activities related to the removal of content,
- The consultation of users and other stakeholders before changes to content policies are made
- Informing content providers before substantial changes to content policies are made,
- The Provision of relevant data to researchers or, as appropriate, competent regulatory authorities (see our answer to questions 20 and 21 in this chapter),
- The submission of regular reports to competent regulatory authorities on the application of content policies, on measures taken to fight illegal and harmful content and on safeguards applied to protect fundamental rights, including on the resources deployed

It is crucial to have full transparency and information available for content and services available on platforms including on the online platform provider and the content provider to include:

1. Information on content provider uploading content (know your (business) customer)

Information obligations should be outlined that enhance transparency of content providers. The E-Commerce Directive's information requirements for information society service providers (Art. 5 ECD) could be broadened and complemented. Information should at least include:

- The name and the address at which they are established (for legal entities, the legal form, the authorized representative),
- Possibly, the name and address of the responsible editor,
- Information that enables quick electronic contact and direct communication, including email and website,

If the service is offered as part of an activity that requires official approval (such as notification), information on the responsible supervisory authority.

2. Information of the responsible person within the online platform

Information about the responsible persons for the blocking and deleting of content, whether the content is illegal or not, must be easily accessible.

3. Clear information about the complaint mechanism and reinstatement:

The complaint mechanism must be easy to handle.

All information in points 1-3 must be

- easily recognizable,
- immediately and readily accessible and
- always available at any time and in the same place.

Q10. Do you think it should be mandatory for online platforms to offer oversight bodies that enable users to seek recourse in case their account has been locked or content they have posted has been deleted?

- 1. Yes
- 2. No
- 3. Don't know

Q11. Do you think it should be mandatory for online platforms to provide points of contact for each Member State in their language?

- 1. Yes
- 2. No
- 3. Don't know

Q12. What kind of data and/or transparency tools do users/researchers/fact-checkers need to be better able to detect and analyse disinformation campaigns, including by foreign state and non-state actors? Please specify.

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
1. Analyse and expose state-backed disinformation campaigns	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Conduct public awareness-raising campaigns	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Support independent media and civil society in third countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Impose costs on state who conduct organised disinformation campaigns	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Develop more effective public outreach and digital communication strategies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Other, (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

Q14. In your opinion, should content by state-controlled media outlets be labelled on social media?

- 1. Yes
- 2. No
- 3. Don't know

Questions on supporting civil society and active citizenship

As a crosscutting issue, civil society faces increasing pressure, but plays a key role in the democratic system, holding those in power to account and stimulating public debate and citizen engagement, as well as in combatting some of the identified threats. In addition to this, participatory and deliberative democracy gives citizens a chance to actively and directly participate in the shaping of planned or future public policies. A major element in the context will be the upcoming Conference on the Future of Europe.

Q1. Do you think civil society is sufficiently involved in shaping EU policies, notably through consultation?

- 1. Yes
- 2. No
- 3. Don't know

If Q1=2 What more could be done?

Q2. Do you think civil society should be more involved in concrete EU-level actions to promote democratic debate?

- 1. Yes
- 2. No
- 3. Don't know

Please explain your 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

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 or 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

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