

Recommendations of the fact-checkers regarding the EU's system for tackling disinformation¹

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Abstract

The main research problem addressed in this article is disinformation and countering it in the European Union. The text discusses the EU's system for tackling disinformation. In the analysis, the authors focused primarily on assessment, opinions and recommendations of Polish fact-checkers regarding the actions that the European Union is taking for tackling disinformation. The data collected in in-depth interviews allowed to identify several significant problems that reduce the effectiveness of the EU's actions. These problems include: the system's reliance on self-regulation and "soft" solutions, the lack of a leading entity responsible for tackling disinformation that would comprehensively coordinate the work of other bodies, and the deficit of the Union's cooperation with non-governmental organisations involved in fact-checking process.

Keywords: European Union (EU), disinformation, EU's system for tackling disinformation, fact-checkers, challenges in the field of tackling disinformation, recommendations for tackling disinformation

Rekomendacje fact-checkerów dotyczące unijnego systemu zwalczania dezinformacji

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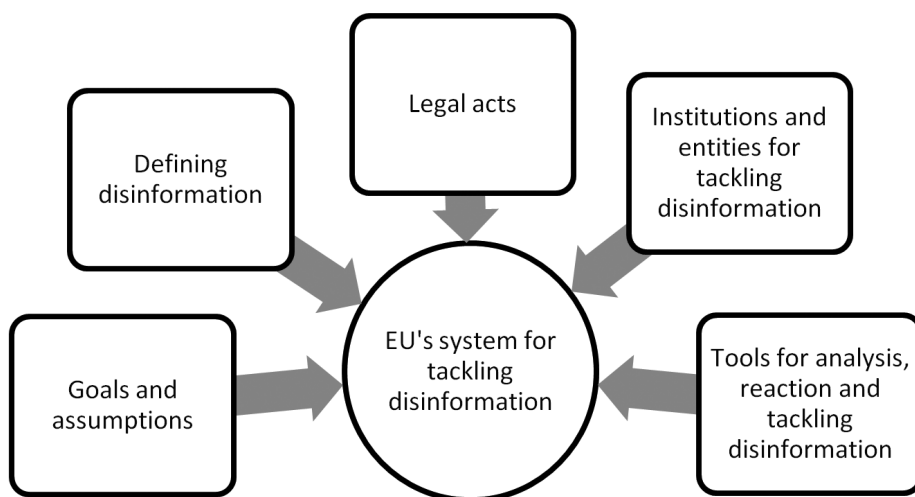
Streszczenie

Głównym problemem badawczym podjętym w artykule jest zwalczanie dezinformacji w Unii Europejskiej. W tekście omówiono unijny system zwalczania dezinformacji. Autorki w analizie skoncentrowały się przede wszystkim na poznaniu opinii, ocen i rekomendacji polskich fact-checkerów odnośnie działań, które Unia Europejska podejmuje w celu zwalczania dezinformacji. Zebrane w wywiadach pogłębionych dane pozwoliły na zidentyfikowanie kilku istotnych problemów, obniżających skuteczność działań. Wymienione przez respondentów problemy m.in. zawierają: oparcie systemu na samoregulacji i „miękkich” rozwiązaniach, brak wiodącego podmiotu odpowiadającego za zwalczanie dezinformacji, który w kompleksowy sposób koordynowałby prace pozostałych organów, jak też deficyt współpracy Unii z organizacjami pozarządowymi zajmującymi się weryfikacją faktów.

Słowa kluczowe: Unia Europejska (UE), dezinformacja, unijny system zwalczania dezinformacji, fact-checkerzy, wyzwania w obszarze zwalczania dezinformacji, rekomendacje dotyczące zwalczania dezinformacji

Disinformation is a serious internal problem for the entire European Union (EU) and its Member States (Wenerski 2017: p. 2–4). Recognising it as a real threat, the EU has taken actions to increase social resilience to this phenomenon and its negative consequences. These actions helped to build the EU's system for tackling disinformation. It consists of the following elements: defining the phenomenon of disinformation, goals and assumptions of the policy in the field of tackling disinformation, legal acts and political documents, new and existing institutions and entities whose competences include counteracting disinformation, as well as tools to implement the assumptions of the EU's policy in this area (see: *Figure 1*).

Figure 1: EU's system for tackling disinformation



Source: authors' own elaboration.

The main research problem addressed in the article is disinformation and tackling it in the EU. The analysis is focused on learning the opinions, assessments and recommendations of Polish fact-checkers regarding the actions that the European Union is taking to tackle disinformation. The authors use a methodology based on interpretivist theory, which is reflected in the choice of individual in-depth interviews as the main research method. The article begins from a presentation of the elements of the EU's system for tackling disinformation: the legal framework, entities responsible for implementing policy in this area, and the tools used. The next part presents the methodological assumptions of the study. However, the main part of the article is the presentation of the results of in-depth interviews with Polish fact-checkers, carried out in 2023. The next parts of the text discuss the challenges identified in the field of tackling disinformation, fact-checkers' knowledge about the EU's system for tackling disinformation, their assessment and opinions regarding this system, and recommendations for changes in the system that would improve it and increase the EU's resilience to disinformation.

Definition of the disinformation phenomenon and EU's goals

Experts appointed by the EU identified the most important reasons for spreading disinformation: cultural and socio-economic changes, society's lack of trust in public institutions, transformation of the media sector and the popularity of online platforms, as well as high effectiveness combined with low costs of conducting disinformation campaigns on the Internet (European Commission 2018c). Disinformation itself has been characterised broadly by the EU 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" (European Commission 2018a: p. 3–4). Public harm was defined as "threats to democratic political and policy-making processes as well as public goods such as the protection of EU citizens' health, the environment or security" (European Commission 2018a: p. 4). Satire, parody, flagged biased news or comments, and reporting errors are not considered as disinformation.

Making societies and citizens more resilient to disinformation is a strategic goal of the EU. Activities in this area are intended to protect common values (see: European Commission 2018a). Operational and tactical objectives are set out in *Codes of Practice on Disinformation* (European Commission 2018b; 2022) and in other EU documents related to disinformation in specific contexts, e.g. political elections (European Commission 2020, W/W/W) or the COVID-19 pandemic (Joint Communication 2020).

The catalogue of objectives includes:

- increasing the transparency of information – its origins, financing and dissemination, in order to enable citizens to assess the content on the Internet for themselves and to reveal possible manipulation attempts;
- promoting diversity of information to enable citizens to make decisions based on the principles of critical thinking, by supporting high-quality journalism and media literacy;

- supporting credible information by indicating whether it can be trusted with the help of trusted whistleblowers (verified platforms) and by authenticating influential information providers (European Commission 2018a: p. 6);
- support for citizens in electoral process – media literacy, ensuring the transparency of political advertising (marking sponsors, information about the budget) (see also: Babraj 2018);
- developing long-term solutions to increase knowledge, stakeholder engagement and cooperation between “public authorities, online platforms, advertisers, trusted flaggers, journalists and media groups” (European Commission 2018a: p. 6);
- consumer protection, limiting the possibility of benefiting from advertising using disinformation – demonetisation (European Commission 2022: p. 5);
- limiting manipulative behaviour, including creating fake accounts, using bots (European Commission 2022: p. 16);
- support for scientists, including the field of disinformation research and data sharing (Joint Communication 2020; European Commission 2022: p. 26);
- support for the fact-checking community, cooperation of platforms with entities verifying the information (European Commission 2022: p. 31).

Legal framework

The rapid development of regulatory instruments and tools for tackling disinformation, which most often took the form of reports, strategic decisions and soft law acts, occurred in the years 2015–2020 (see: *Table 1*). The approach proposed therein was comprehensive – the main attention was paid to the complexity of the phenomenon, as well as objectives, entities and policy tools for counteracting disinformation were indicated (e.g. European Council 2015).

Table 1: The most important EU documents regarding the phenomenon of disinformation (2015–2023)

DOCUMENT	DATE	MAIN POSTULATES, OBJECTIVES
<i>Council conclusions of the European Council meeting</i> , EUCO 11/15 (see: European Council 2015)	19–20 III 2015	<ul style="list-style-type: none"> – emphasising the need to challenge disinformation campaigns; – inviting the High Representative of the Union for Foreign Affairs and Security Policy, in cooperation with EU institutions and Member States, to prepare an action plan on strategic communication.

<p><i>EU Action Plan on Strategic Communication</i> (see: European Commission 2015)</p>	<p>22 VI 2015</p>	<ul style="list-style-type: none"> - establishment of the special task force, the <i>East StratCom Team</i> (see: European Commission 2015), known also as the <i>East StratCom Task Force</i> (see: European Commission 2018a) and operating within the <i>European External Action Service</i> (EEAS).
<p>Joint Communication: <i>Joint Framework on countering hybrid threats – a European Union response</i>, JOIN(2016) 18 final (see: Joint Communication 2016)</p>	<p>6 IV 2016</p>	<ul style="list-style-type: none"> - creating a conceptualisation of systemic resilience; - drawing attention to the need to divide activities between various entities (including the High Representative, the Commission, ENISA, CERT-EU); - establishment of <i>EU Hybrid Fusion Cell</i>; - inviting the Member States to consider establishing a Centre of Excellence for 'countering hybrid threats'.
<p>Commission's communication: <i>Tackling online disinformation: a European approach</i>, COM(2018) 236 final (see: European Commission 2018a)</p>	<p>26 IV 2018</p>	<ul style="list-style-type: none"> - improving the transparency of information; - promotion of information diversity; - fostering credibility of information by providing an indication of its trustworthiness; - developing effective long-term solutions for tackling disinformation.
<p><i>2018 Code of Practice on Disinformation</i> (see: European Commission 2018b)</p>	<p>IX 2018</p>	<ul style="list-style-type: none"> - The commitments of the signatories (internet platforms, technology companies) are related to five areas: - scrutiny of advertisement placements, - political advertising and issue-based advertising, - integrity of services, - transparency of online content for consumers, - support for the research community.
<p>Joint Communication: <i>Action Plan against Disinformation</i>, JOIN(2018) 36 final (see: Joint Communication 2018)</p>	<p>5 XII 2018</p>	<ul style="list-style-type: none"> - improving the capabilities of EU institutions to detect, analyse and expose disinformation; - strengthening coordinated and joint responses to disinformation (establishment of the <i>Rapid Alert System</i>); - mobilising the private sector to tackle disinformation; - raising awareness and improving societal resilience.
<p>Joint Communication: <i>Tackling COVID-19 disinformation – Getting the facts right</i>, JOIN(2020) 8 final (see: Joint Communication 2020)</p>	<p>10 VI 2020</p>	<ul style="list-style-type: none"> - intensifying the EU's support for fact-checkers and researchers; - strengthening the EU's strategic communication; - increasing cooperation with international partners; - development of cooperation within <i>European Digital Media Observatory</i> (EDMO).

Commission's communication: <i>European Democracy Action Plan</i> , COM(2020) 790 final (European Commission 2020; see also: European Commission WWW)	3 XII 2020	<ul style="list-style-type: none"> - improving the EU's methods of tackling disinformation; - developing a common framework for collecting evidence of foreign information interference; - strengthening the <i>2018 Code of Practice on Disinformation</i>; - supporting projects aimed at tackling disinformation.
Strengthened <i>2022 Code of Practice on Disinformation</i> (see: European Commission 2022)	VI 2022	<ul style="list-style-type: none"> - demonetisation of disinformation, - transparency of political advertising, - integrity of services, - user protection, - support for scientists, - support for the fact-checking community.

Source: authors' own elaboration based on documents from the database EUR-Lex.

A holistic treatment of disinformation included the recognition that this phenomenon is of a hybrid nature,² and it causes political risk (European Commission 2020, WWW). Systemic resilience was understood by the EU as the ability and readiness to prevent, respond to and counteract disinformation. According to EU documents and legal acts, the effectiveness of the EU's system for tackling disinformation must result from basing its activity on self-regulation of sectors related to the dissemination of information and cooperation with civil society organisations (European Commission 2018c).

Particularly noteworthy in this context is the *2018 Code of Practice on Disinformation* (see: European Commission 2018b), reinforced by a new version published in June 2022 (see: European Commission 2022), in which the number of commitments was increased from 21 to 44. It was the first *Code* in the world, in which representatives of technology companies, online platforms and entities from the advertising industry agreed to adopt the self-regulatory standards of tackling disinformation.³ The signatories' commitments were focused on five areas: "online advertisements, political advertising, integrity of services, transparency for consumers, and transparency for researchers" (Pamment 2020; see also: Legucka 2019; European Commission 2018b). It is worth adding that the *2018 Code of Practice...* created also the basis for developing appropriate tools to monitor the activities of signatories during the COVID-19 pandemic (European Commission 2020), and the adoption of stronger and more precise regulations in 2022 took place in the face of situation in Ukraine

² The hybrid threats are defined as "the mixture of coercive and subversive activity, conventional and unconventional methods (i.e. diplomatic, military, economic, technological), which can be used in a coordinated manner by state or non-state actors to achieve specific objectives while remaining below the threshold of formally declared warfare" (Joint Communication 2016: p. 2).

³ The Code of Practice on Disinformation was signed by Facebook, Google, Twitter, Microsoft (in 2019), TikTok (in 2020).

(European Commission 2022). The amended *Code*, together with the *Digital Services Act* (DSA, see: Regulation (EU) 2022/2065) and the *Digital Markets Act* (DMA, see: Regulation (EU) 2022/1925), constitute the EU's toolkit to combat disinformation on the Internet (Chłoń 2023). DSA was intended to improve the fight against illegal content and disinformation on the Internet. DMA contains provisions protecting internet users and supporting innovations.

EU's actors and tools for tackling disinformation

Taking into account the complex system of the EU's competences resulting from the treaties and the diverse nature of the phenomenon of disinformation, attention should be paid to the multitude of EU institutions and bodies dealing with this issue, and the importance of cooperation with international organisations should be emphasised, including: UN, NATO, G7, OSCE, African Union, Council of Europe (Joint Communication 2020). As in the case of legal regulations, institutional development took place after 2015.

The most active EU institutions that took actions for tackling disinformation were:

- the European Commission (EC) – responsible for shaping the overall strategy, submitting legislative proposals, law enforcement and policy implementation;
- European Parliament (EP) – in the field of law-making;
- the European Council, which set the overall policy direction and priorities;
- the Council of the European Union (EU Council), representing the voice of the Member States' governments, adopted EU legal acts and coordinated policies.

The EU's competences in the area of tackling disinformation cover also tasks outside its territory, hence its activity is carried out within the European External Action Service (see: EEAS 2021) by the High Representative for Foreign Policy and Security Policy. Within the EEAS there are task forces responsible for: Eastern Partnership countries – *East StratCom Task Force*⁴ (see more: European Commission 2018a: p. 2, 15; Pamment 2020: p.7–8; Joint Communication 2018, 2020: p. 2); Western Balkans – *Western Balkans Task Force*; the Middle East, North Africa and the Persian Gulf region – *EU Task Force South*. Their tasks include: analysing disinformation trends, explaining and revealing disinformation narratives and reacting to them, as well as raising awareness of the negative impact of propaganda of terrorist organisations and disinformation from Iran, Russia, China and Turkey. All groups are part of the EEAS Strategic Communication Division (SG.STRAT.2), which supports EU institutions in planning communication strategies and tools, provides analytical support to EU diplomatic missions and operations within the *Common Security and Defense Policy*, as well as develops cooperation with partner countries, non-governmental organisations and the private sector (Bryjka 2022).

Also within the EEAS there is the *Hybrid Fusion Cell*, established at the *EU Intelligence and Situation Centre* (EU INTCEN). Civilian and military analysts from the Intelligence Directorate of the EU Military Staff (EUMS) working in the unit, develop reports and analyses of hybrid threats occurring in the EU and beyond. It is additionally supported by the *Computer Emer-*

⁴ In the *EU Action Plan on Strategic Communication*, contained the idea of creation of such unit, it was called *East StratCom Team* (European Commission 2015).

gency Response Team for the EU Institutions (CERT-EU), which is responsible for exchanging information on the technical aspects of conducting disinformation campaigns. The creation of the *Hybrid Fusion Cell* has increased the ability of the Member States and the EU to detect and respond to crises earlier. An example of its action may be the response to disinformation campaigns during the migration crisis caused by Belarus in 2021 on the border with Poland, Lithuania and Latvia. Its activity led to the recognition of the campaign as a hybrid attack, which prevented interpretation divisions between the Member States (Bryjka 2022).

The EU's agencies are also active in tackling disinformation, e.g. the *European Border and Coast Guard Agency* (FRONTEX) and the *EU Agency for Cybersecurity* (ENISA). These entities cooperate closely with other EU bodies to tackle disinformation related to their area and specific activities (Albrycht 2021: p. 12; Joint Communication 2016).

The most well-known tool in the fight against disinformation is the project of the *East StratCom Task Force* called *EUvsDisinfo*, which serves to better predict and respond to Russian disinformation activities. Its most important goal is to increase public awareness of disinformation campaigns and help societies develop resilience to media manipulation (see: *EUvsDisinfo* 2023). The team of *EUvsDisinfo* monitors the media in 15 languages, detects and analyses disinformation, and then collects it in a publicly available database, which in 2023 contained over 16,000 cases (see: *EUvsDisinfo* W/W). Its tasks also include informational and educational activities in the EU institutions, addressed to the governments of the Member States and non-governmental organisations.

An important tool of the EU institutional system for tackling disinformation is the *Rapid Alert System* (RAS). The early warning system is intended to facilitate the exchange of views on disinformation campaigns between EU institutions and Member States, and the coordination of responses (see: EEAS 2019). It was used in response to Chinese and Russian-disinformation activities in 2020 regarding the COVID-19 pandemic and vaccines, aimed against the European Medicines Agency (Bryjka 2022).

The involvement of fact-checking organisations was another element of the EU's system for tackling disinformation. Activity in this area assumes the existence of a network of fact-checking entities that would be responsible for identifying, monitoring and mapping disinformation (its techniques, scale, tools) (European Commission 2018c; European Commission 2020: p. 23) and would be associated with the promotion of cooperation between platforms and fact-checking entities (European Commission 2022). In practical terms, this involved increasing EU support for fact-checkers and scientists, i.e. as a part of the *European Digital Media Observatory* (EDMO), which was to support an independent community (fact-checkers, experts, researchers) dealing with the phenomenon of disinformation (European Commission 2020: p. 20, 24; EDMO W/W).

Methodological assumptions of the research

The aim of this research is to analyse fact-checkers' knowledge of actions undertaken by the EU to tackle disinformation, as well as their assessment and opinions about the EU's activity in this area. The authors use in this article a methodology based on interpretiv-

ist theory. The interpretivist approach "focuses on the meanings that shape actions and institutions, and on the ways in which these actions and institutions are shaped" (Marsh, Stoker 2016: p. 131). The adopted research orientation determined the choice of individual in-depth interviews as the main qualitative research method.⁵ Conducting them enabled the analysis of the research problem from the perspective of practitioners taking actions to tackle disinformation, as well as provided their opinions and recommendations.

The interviews were conducted in April 2023 on a sample of seven fact-checkers working in Polish fact-checking organisations. The selection of the sample was purposeful. The key selection criterion was the employment in fact-checking organisation. The list of the respondents was created on the basis of the method of snowball sampling (Babbie 2013: p. 129–130). The collected empirical material was anonymised. The interview script was semi-structured. During the study there were collected the answers to the main research questions:

- which current challenges related to disinformation in the EU do Polish fact-checkers see?
- what is their knowledge of the EU's activities in this area?
- how do they assess activities related to tackling disinformation in the EU?
- which recommendations would they propose for improving the EU's ability to fight disinformation?

Challenges related to disinformation in the EU

The collected research material allowed us to identify the most important threats related to disinformation for the EU, in the fact-checkers' opinions. In their statements, the respondents of the study pointed to the two biggest challenges: the actions of Russia and China, and anti-EU narratives coming from both outside and within the EU.

According to respondents' opinions, "the EU has for many years been the target of Russian disinformation, and there is an attempt to weaken its position or ridicule it in the international arena" (R6). It was emphasised that Eastern Member States were to some extent immunised to this phenomenon, while in Western countries the awareness of Russia's activities in this area was lower. The reasons for this state of affairs were seen in the influence of Russian media on public opinion in Western Europe, such as *Russia Today* (R2). Respondents also noticed the growing activity of China, which "wants to push through its policy, which it presents as a third way towards, as they call it, American or Russian imperialism, and wants to pursue its own interests in the EU and exert more and more influence here" (R1). Both China and Russia were active to achieve their goals, and one of the most important factors, according to the respondents, was interference "in relations between European countries and the United States [...] in terms of arms exchange, in terms of the presence of American troops in specific countries and in the EU in general" (R5), which was to lead to "disorganisation of the EU" (R2).

⁵ See more about this method: Kvale 2012: p. 39.

Another current threat, mentioned by respondents, was the presence of anti-EU narratives in the public sphere – both those coming from outside and inside the EU. In case of the first type of activities, they were based on creating antagonisms between the Member States by radicalising views, strengthening the polarisation of the political scene, encouraging countries to leave the EU or attempting to interfere in electoral processes (R3, R5). As a result of these actions, the EU can be weakened, and “if we are divided like this, it will be easier to attack us later” (R3). One respondent also pointed to the anti-EU narratives spread in the candidate countries, which may pose a threat to the enlargement policy: “Countries such as Serbia, for example [...]. And this may cause difficulties in EU enlargement in connection with influencing public moods using disinformation” (R5).

However, disinformation does not only come from outside the EU, but is also created within it. The problem indicated by respondents in this context was the limited competences of the EU to combat this type of disinformation. One respondent noted: “The *East StratCom Task Force's* employees can only describe cases of disinformation, generally external [...]. Of course, I understand that describing internal disinformation would raise objections, because suddenly the EU would start reviewing, for example, the governments of the Member States. It tries to avoid this, it is afraid to do that, because it would cause an immediate cry that the EU wants to censor someone. However, this is a big problem, because we have many cases of disinformation that *EUvsDisinfo* cannot write about, as it is an internal matter. The experts can write about Russia or China, but they have no right to write about, for example, what is happening in Poland in the context of TVP. This is a high level of tied hands” (R7). In addition to weakening the cooperation and unity of the Member States, internal disinformation also carries another threat – it may lead to the phenomenon that “we considering the reducing the EU's competences in some topics, such as the judiciary” (R5).

Fact-checkers' knowledge and assessment of the EU's activity in the field of tackling disinformation

The complexity of the institutional structure and the diverse areas of the EU's activity cause that public knowledge about its activities is sometimes limited. In this study, there was a question whether the knowledge gap could also be observed in the case of fact-checkers.

Respondents were asked to indicate the leading EU institution, body or entity acting for tackling disinformation. Most of them correctly indicated the European Commission, which “gives the basic direction” (R5) of activities and is responsible for developing regulations and distributing funds (R1, R6). One respondent also indicated the European Parliament as a body actively participating in shaping the assumptions of the policy for tackling disinformation, but agreed with the opinion that the European Commission is the entity with the greatest competences in this area (R7). According to respondents, the EEAS also plays an important role – “a body that focuses primarily on disinformation that

reaches us from outside" (R1) and the *East StratCom Task Force* operating within EEAS (R5), about which some respondents expressed doubts whether it is an EU entity (R3). Some respondents were unable to name any EU entity (R2), and others believed that there is no institution in the EU that would have a "significant role in the fight against disinformation" (R4).

According to the respondents' assessment, in the fight against disinformation within the EU, it is not important how many entities take action in this area, but what actions they take and how they react to disinformation. The respondents' assessment of the activity of EU institutions was negative. As noted, there is a lack of the coherent vision of action, which is reflected in the multiplication of entities at the EU level (R5) and the establishment of new entities, without recognising the opportunities offered by existing ones, such as fact-checking organisations (R3, R1, R5).

Respondents were also asked about the EU's documents and regulations regarding disinformation that they know. The vast majority of them mentioned the *Digital Services Act* (R1, R3, R6, R7). They pointed out that in this act the EU regulates "the operation of social media rather than the phenomenon of disinformation" (R7). Several respondents also mentioned the *Code of Practice on Disinformation* and acts on Artificial Intelligence (R6). Some respondents admitted that they did not know any documents or regulations (R2) or believed that they "did not exist" (R4).

When assessing the EU's legislative activity in the field of tackling disinformation, respondents pointed out that it is based on self-regulation. One respondent described it as follows: "We already had two versions of the *Code of Practice on Disinformation*. Yes, we have the one from 2018, and the new 2022 version of the *Code*, it is very good, comprehensive [...]. It is definitely very good attempt. The *Code* will also be an additional document supplementing the DSA for organisations that sign the *Code*. This is important" (R5). It was positively assessed that the EU noticed the problem of disinformation, and that the law was adapted to the changing reality. However, the self-regulatory model chosen by the EU has been criticised. Respondents pointed out the lack of effectiveness of this form of regulation. In support of this conclusion, the following statements can be cited:

- "We sign voluntarily, we comply voluntarily, and then we only report how we comply, but if we do not comply, nothing happens" (R5);
- "I don't believe in self-regulation [...]. It just doesn't work, we can see it at the moment, because this *Code of Practices...* has been in place for a long time" (R7);
- "Social media are profit-oriented corporations, our experience demonstrates that activities even in the framework of the *Code of Practice on Disinformation* are only superficial. They just have to look nice on the outside. However, their effectiveness is very low. And in fact, corporations, unless they are forced to take specific actions, will not do it themselves. They will look for legal loopholes, go around and simply create good PR around their activities" (R1).

The biggest problem related to the approach based on self-regulation is the lack of causative power of the EU, which limits its activity to "someone writing that they are *deeply concerned*, and that's all [...], as it usually happens in the EU" (R5).

The second area of the EU's activity in the fight against disinformation are its different initiatives. Respondents mentioned the following initiatives: *EUvsDisinfo*, EDMO and *European Fact-Checking Standards Network* (EFCSN).⁶ It seems interesting that some of the respondents were not sure whether the projects they mentioned were the EU's initiative. They also indicated as EU's activities something, for which the EU is not responsible, such as *EU Disinfo Lab*⁷ (R1). Some respondents were unable to indicate specific projects: "I know that the EC allocates some money for such activities and regional projects" (R5); "I know for sure that many initiatives were financed, e.g. through Erasmus funds" (R6). Other respondents said that they do not know any EU's initiatives (R2, R4). On the other hand, they supposed that the low level of knowledge about EU's initiatives among fact-checkers may suggest problems with communication between the EU and non-governmental organisations.

The most frequently mentioned initiative was the project *EUvsDisinfo*, and respondents who mentioned it, emphasised that in the context of EU initiatives, this project is "such a main topic" (R7). One respondent who took part in a meeting with people working at *EUvsDisinfo* said: "I had the opportunity to meet these people, and they do very interesting things, also innovative things when it comes to analysing disinformation" (R3). Another respondent believed that EU initiatives are "small things" (R7), which are caused by the EU's limited competences in the field of tackling disinformation: "The EU cannot interfere too much with the competences of the Member States, and it certainly avoids entering into conflict with any Member State" (R7).

One of the tools in the fight against disinformation is financial support provided by the EU to non-governmental organisations. Polish respondents assessed the EU's support provided to fact-checking organisations much better than that provided by Poland (R7). The basic positive differences are the level of financing and the transparency of granting (R6), as well as the fact that these programmes are purposeful and developmental (R5). One respondent assessed the comprehensive system of co-financing from EU funds as follows: "Generally, it is good, because the money flows in appropriate way to various organisations, larger and smaller" (R1). The proposition formulated in this context was to increase the amount of funds allocated for tackling disinformation, including money for fact-checking organisations (R1, R5, R6).

In addition to financing, the EU "is trying to animate and create the network of the fact-checking organisations", and it is acting as an intermediary for cooperation between interested entities (R7). The Union's activity ranges from smaller initiatives, such as "conferences organised with EU funds" (R6), through meetings with EEAS representatives, to larger

⁶ *European Fact-Checking Standards Network* (EFCSN) is an association of fact-checking organisations committed to the standards of independence, transparency and journalistic quality set out in the *European Code of Standards for Independent Fact-Checking Organisations*. This Code was created in 2022 by over 45 organisations from over 30 European countries. Their activities were possible thanks to a project financed by the European Commission (see more on the website <https://efcsn.com/>).

⁷ *EU Disinfo Lab* is independent non-profit organisation that gathers knowledge about disinformation in Europe (see more on the website <https://www.disinfo.eu>).

projects – EDMO and CEDMO⁸ (R7), as well as EFCSN (R3). The EU's activity in the field of organising conferences, ensuring contacts with the EEAS and *EUvsDisinfo* was positively assessed by respondents, because it created the opportunity to ask "an expert question" (R7). Support in the form of networking of organisations was rated worse: "I had the opportunity to participate in the creation of something like EFCSN, [...] it was not very successful so far, there are no tangible benefits from this cooperation, and I also do not see big achievements of the network in cooperation with platforms, or the possibility of discussion with the EU" (R3). The same respondent also negatively assessed cooperation within EDMO: "The synergy between the world of research and the world of organisation has not worked out [...], for now there are many promises, but too many specific things don't work" (R3).

Recommendations for the EU

The collected research material made it possible to find recommendations in the respondents' statements that would improve the EU's ability to tackle disinformation. They are: improving the coordination of activities (R1, R3, R7), developing cooperation at the local level (R1, R3, R5), mobilising the Member States for tackling disinformation (R7), increasing resources and funds for fact-checking organisations (R1, R3, R4, R5), enforcing requirements for online platforms (R2, R3, R5, R6), supporting media literacy (R3, R5, R6, R7). The recommendations indicated in the interviews often appeared together, e.g. the need of coordination of activities was combined with issues of supporting cooperation at the local level.

According to the respondents' suggestions, the EU should have an entity with broad competences, including: to create a network of links between the Union and fact-checking organisations, and would ultimately lead to the creation of the organisation bringing them together. One respondent justified this idea by common goals: "Most of disinformation that we deal with every day, in its vast majority, overlaps with the EU's areas of activity. However, fact-checking organisations also exist to build an information society, the EU cares about the same issue [...], many of these things are common, and they could certainly benefit, both the EU and fact-checking organisations" (R1).

Cataloguing disinformation also requires the EU's coordination (R1). This goal could be achieved by creating something like "fact-checking repository" (R3) that could be used by fact-checking organisations across the EU. This repository would help to use better the organisations' potential, reducing the time required to verify information that was sometimes verified by several entities (R3). According to respondents, the database maintained within *EUvsDisinfo* is not sufficient, because it is focused only on disinformation coming from outside, and "there are about 20 people involved in monitoring the Internet in EU languages [...], 20 people are not enough for all EU languages" (R7).

⁸ *Central European Digital Media Observatory* (CEDMO) is independent international multidisciplinary consortium supported by the European Commission. The aim of CEDMO is to identify, investigate and prioritise the most significant sources and causes of information disorders in Central Europe, in particular the Czech Republic, Slovakia and Poland (see more on the website <https://cedmohub.eu>).

In addition to publicly available information related to the cataloguing of detected disinformation narratives, fact-checkers would also like to receive information from the EU about undertaken initiatives and projects. This suggestion refers to the coordination of activities by the EU. During the interviews, some respondents noted gaps in their knowledge of the EU's activities (R2, R3, R6, R7) and linked this fact to a problem in the area of communication. One respondent described it as follows: "I don't even receive information about any activities. I always get some information about it from behind-the-scenes, or just from some organisation, but I never hear about it from direct sources" (R3). Fact-checkers see a strong need to coordinate information activities between the EU and non-governmental organisations.

The specific nature of disinformation activities requires the development of systemic solutions related to the adoption of regulations, but also to the support of small local organisations. One respondent summed up his statement in this context as follows: "After all, we do this "dirty work", we verify and monitor disinformation, so the EU funds will go from the top-down, and the knowledge will come from the bottom-up..." (R3). In the direct contact of the EU with fact-checking organisations, the national context should be taken into account (R5), also because disinformation narratives "may vary in different countries and may be adapted to a given country" (R1).

In the opinion of respondents, the system of the EU's support for activities in the field of tackling disinformation also requires improvement. The EU should offer "more grants for non-governmental organisations that will verify content and websites" (R2). "Supporting and financing the development of independent third sector organisations" (R4) should be more important than "building internal teams" (R3) within EU institutions. Respondents also indicated the need to support specific projects related to media education. The EU could not only involve organisations that deal with the topic of digital competences on a daily basis, but also support "specific countries in regulating media education" (R6).

An important recommendation is the one related to the implementation of the DSA provisions (R6) and further regulation of the operation of online platforms that are the largest "carriers of disinformation" (R2). According to respondents, in this area the EU has "causative power" greater than private companies or governments, it is a "big player" (R3). Therefore, the Union should "force" platforms to participate in "third party fact-checking programmes", i.e. cooperation with independent verifiers (R3).

An important problem that the EU cannot solve by itself, is the mobilisation of the Member States (R7). The respondent presented this issue using the example of the *Rapid Alert System*: "There is something called the *Rapid Alert System*, which is a system for exchanging information between the Member States on topics related to disinformation. According to the concept, such information should be exchanged there, for example the anti-EU narrative that has been observed, which has the potential to spread to other countries and, therefore, other countries will be able to prepare for it. This system exists, but no one uses it. At least, as I know, it works to a weak extent" (R7). However, the EU's ability to influence the policies of the Member States requires granting it greater competences "so that the EU can even enter in the state space, because practice demonstrates

us that many governments are simply not interested in tackling disinformation" (R7). Countries should realise that disinformation is a global threat that requires cooperation at many levels – this is an essential element in the context of improving the EU's ability to combat it.

Conclusions

In recent years, we have observed intensified activities of the EU and the Member States in the field of identifying and tackling disinformation. These activities are undoubtedly resulted from the perception of the threat posed by disinformation. Both the COVID-19 pandemic and situation in Ukraine have demonstrated the scale and possibilities of disinformation activities, and they have and will have an impact on the intensification of the EU's work to combat this phenomenon. The EU's system for tackling disinformation is being modified and adapted to existing threats. These changes are related to legal regulations, entities responsible for creating and implementing policy in this area, as well as the creation of new tools. The EU's system for tackling disinformation is based mainly on self-regulation and "soft solutions", which affect its effectiveness. It is dynamic and is not a completed concept, but a process.

The dynamic nature of the disinformation phenomenon was noticed by Polish fact-checkers. Among contemporary threats in this area, they identified activities from outside the EU (primarily Russian and Chinese) and disinformation coming from the Member States. In the case of the former, the EU takes many activities, while the latter remains beyond its interest due to the lack of competences. This situation was assessed as dangerous. Both the first and second types of disinformation are aimed at cooperation between Europe and the United States and are intended to weaken the EU.

In this research, we were interested in the knowledge of Polish fact-checkers about the activities undertaken by the EU in the field of tackling disinformation. The knowledge varies depending on their experience. It is worth emphasising that fact-checkers identified a gap in knowledge about the EU's initiatives. This fact suggests problems in communication between the EU and fact-checking organisations. For some respondents, it was difficult to identify EU regulations or entities. It was much easier for them to indicate tools to counteract disinformation (e.g. *EUvsDisinfo*). This situation can be explained by referring to their experience of cooperation or using data from these institutions for their own work. The lack of knowledge may be also resulted from another problem – poor dissemination of information by the EU. Additionally, there is a lack of coordination of the EU's activities and cooperation with non-governmental organisations which, through their experience and knowledge of the local environment, could contribute to increasing the effectiveness of the EU's activity.

In our research, the EU's activity in the field of tackling disinformation was assessed ambiguously by fact-checkers. Positive opinions were expressed regarding the EU's interest in the phenomenon and the implementation of programmes, including financial ones, aimed at achieving the objectives of identifying and counteracting disinformation.

Critical assessments were made regarding the concept of the EU's policy in this area – self-regulation – which was perceived as less efficient and dependent on the determination of entities involved in the sharing information. As a result, according to respondents, the EU has little causative power in the field of tackling disinformation. The same opinion is related to EU's initiatives and projects – respondents positively assessed, among others, the *EUvsDisinfo* or EDMO, but ultimately they considered them as „small things”. Concerns were also raised about the lack of sufficient level of coordination of the EU's policies and projects, which is closely related to the concept of self-regulation in the sector. Despite this, the EU's support for fact-checking organisations was assessed positively, in particular the financing and the transparency of the allocation of funds.

The final research question was related to fact-checkers propositions and recommendations how to improve the EU's ability to tackle disinformation. The collected empirical material allowed for the identification of several most important recommendations:

- 1) improving the coordination of activities by appointing or creating one entity responsible for activities related to tackling disinformation, which can include: creating a network of connections between the EU, fact-checking organisations and other entities, developing an effective communication strategy, in particular between the EU and non-governmental organisations;
- 2) development of cooperation at the local level, primarily with local, national fact-checking organisations;
- 3) increasing resources and funds for fact-checking organisations, thanks to which actions tackling disinformation will be carried out taking into account the local context;
- 4) taking actions in the area of media education, including supporting specific Member States in adopting regulations regarding it;
- 5) enforcing requirements from online platforms through regulations binding and forcing specific actions.

A recommendation that can be repeated in the case of all the above-mentioned recommendations is to change the style and method of providing information about the EU's activities in the field of counteracting disinformation. Without proper communication, it is impossible to ensure an effective EU's system for tackling disinformation.

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