

# Public survey for European Democracy Action plan

Fields marked with \* are mandatory.

## Introduction

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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

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### \* 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

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\* Surname

Niklasson

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\* Organisation name

*255 character(s) maximum*

Nordvision

\* 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.

2296515955-67

\* 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

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

(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

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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

In a Scandinavian context, aggression, hateful comments and even illegal hate speech has mostly taken place online, increasing the risk of a progressively unsafe environment for journalists. A Swedish survey from the Gothenburg University published in August 2019 found that 30% of journalists received threats during the previous 12 months, showing how widespread these unacceptable incidents are. In addition, it displayed that many journalists in Sweden have considered retreating from social media in the face of threats and abuse they receive there.

Everyone has the right to be protected from threats and violence. These principles are fundamental to long-standing legislation in the Nordic countries. On social networks and online platforms however, these laws are harder to enforce, but of growing importance. Threats and violence against journalists are not only serious crimes against a person and media freedom but can have an impact on democracy and the rule of law.

It is essential that the police and judicial systems within the EU are equipped to handle the abuse and threats that we now see in a world of digital communication and social media. To date, the impression among many media representatives is that the judicial systems are lagging when it comes to investigating and acting on reported threats, which is a challenge that affects the whole of Europe.

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

It has proven difficult to investigate attacks of journalists online, often with lengthy processes before conviction, if convictions are ever made. Many journalists therefore make the assessment that it is not worth the long and stressful judicial process to try and fight the case. Even in cases of physical attacks on journalists, perpetrators are rarely convicted. The latest figures record convictions for only one in ten cases.

(<https://cpj.org/reports/2019/10/getting-away-with-murder-killed-justice/>). The risk is that attacks go unreported, especially since penalties for the threats generally can be perceived as relatively inconsequential. The Swedish government has recently launched an inquiry to investigate the question of tougher penalties for crimes against journalists, such as threats online. (<https://www.regeringen.se/pressmeddelanden/2020/05/ett-forstarkt-strafrattsligt-skydd-for-vissa-samhallsnyttiga-funktioner/>) We are concerned about any threat to freedom of expression, right to information as well as media pluralism and media freedom, as guaranteed by Article 11 of the European Charter of Fundamental Rights. Improvement of legislative consequences for crimes against journalists can have an impact on media freedom in Europe and on the citizens' fundamental rights to receive and impart information.

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

Q3. In your opinion, on which SLAPP related aspects should the European Union-level action be taken (multiple answers possible):

- 1. Regular monitoring of SLAPP cases in the European Union
- 2. Financial support for journalists facing SLAPP lawsuits
- 3. Rules on legal aid for journalists facing SLAPP lawsuits
- 4. Cross-border cooperation to raise awareness and share strategies and good practices in fighting SLAPP lawsuits
- 5. EU rules on cross-border jurisdiction and applicable law
- 6. None of the above
- 7. Other – please specify

Please explain your answer

Q4. Do you think that the EU should act to strengthen safety of journalists and other media actors / improve conditions for journalistic activities?

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

Please explain your answer

Attacks, threats and intimidations against journalists can have a chilling effect on the freedom of expression and the watchdog role the media. The safety and integrity of journalists is crucial for PSM and their ability to produce investigative reporting and to provide independent, high quality news and current affairs programmes which are trusted by the public.

The safety of journalists has substantially declined over the last few years in Europe. The Media Pluralism Monitor 2020 states an increase in physical attacks against journalists in the European Union. In addition, the number of arrests, detentions and charges brought against journalists, as well as verbal and physical attacks against media workers, have increased.

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 Media Pluralism Monitor 2020 further report how independence of media organisations in some European countries is also being endangered.

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

In some of the Nordic countries, protection of sources is secured through constitutional law. This provides an important and necessary safeguard. Nonetheless, source protection demands vigilance, and requires media companies to be active in reporting incidents.

As an example, last autumn, one of Swedish Radio's reporters was at a school in a small city to talk with a few unhappy students. A school official shoved him into a corner, tried to take his notes and equipment by force – material containing information on the journalist's sources. Swedish Radio reported the incident, and the official was convicted by the District Court for threatening a journalist.

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. Free and independent media should be considered a core value.

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.

### 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 independence of the media. It protects the media's access to valuable information, necessary to fulfil a key role in democratic societies. The protection of journalistic sources is also a crucial issue for whistleblowers and informants who want to remain anonymous when reporting breaches of law and disclosing information to the media, in the public interest.

The Nordic companies, in cooperation with the EBU, has commented and expressed concerns 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.

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

Yes. Even though the principle of public access to official records is mostly adhered to in Sweden, there are exceptions. This has become evident during the covid-19 crisis, when several media companies have been denied access to official records regarding for example the number of deaths on care homes. A number of municipalities and city councils in Sweden – for example in Örebro, Gällivare and in the town of Västerås – have banned their employees from answering the media’s questions about the pandemic. (<https://www.svt.se/nyheter/lokalt/vastmanland/aven-vasteras-uppmanar-medarbetare-att-inte-tala-med-journalister>). In some cases, they have been able to obtain the documents after a court has judged in their favour. (<https://www.dn.se/debatt/varfor-hindras-medier-att-granska-coronapandemin/>).

(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 checked="" 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

Nordic PSM enjoy some of the highest levels of trust throughout the EU and play a central role in the public's ability to handle different types of crisis and disinformation. This builds on a number of factors – not least their impartial, trustworthy journalism and presence across the Nordic region which ensures they are able to continue to keep the public informed about important incidents regardless of where they occur. This points to the important role platforms can play in helping the public easily find and identify such content, not least when access to sources of reliable, independent and trustworthy news and information can be an essential part of society's ability to handle crises.

Building on our public service remit, we provide content that can help meet the democratic, social and cultural needs of our audience. We do this as part of an independent and diverse media environment that promotes societal participation and an informed public. Guided by strict national and European rules as well as journalistic and editorial principles, the cornerstone of independent PSM is exercising full editorial responsibility over our content. Public trust is built on maintaining this independence. Defining content of societal general interest and enforcement should be within the competence of EU member states. The

definition of independent media must above all relate to independence from political influence over editorial decision making.

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

Independent media can help to increase levels of political knowledge, understanding and even participation. To do so, however, the audience needs to be able to find and engage with the content offered. Digital platforms have become important way of reaching audiences, and recent years have seen a significant development in the role platforms play in this regard. When platforms control if and how content is discovered, through for example community standards, notice-and-action procedures, ranking and recommendation algorithms, it can have far-reaching consequences for the exercise of freedom of expression and pluralism. If content of societal general interest gets harder to find and to identify by brand, consumers risk losing out on the content they trust and rely on.

- We support regulation that guarantees the prominence of content of societal general interest on digital services and platforms and ensures proper and clear attribution of brand to the media company. Clear attribution is important for the audience's ability to identify trustworthy sources, and in turn support the objective of informed citizens.

- Easy access to, and findability of, independent media content of societal general interest must be guaranteed on digital services and platforms.

- Media need access to/return of non-privacy data in a usable form that is generated from making their content available on third party platforms, in line with data protection and privacy rules. This ensures further innovation and enhancement of services for the long-term benefit of audiences.

Our goal as PSM companies is to ensure that content of public value remains widely available, is easily accessed and enjoyed by audiences, and that it is able to play a continued role in stimulating fundamental rights and in supporting media pluralism. In an ever-changing media landscape, media and information literacy (MIL) competencies are crucial. PSM help to increase levels of societal knowledge and participation and play a key role in strengthening societal resistance to manipulation, rumors and disinformation.

Guided by strict national and European rules as well as journalistic and editorial principles, the cornerstone of independent public service media is exercising full editorial responsibility over content. Public trust is built on maintaining this independence. That is why, when digital platforms and social networks are used to make such content of societal general interest available to audiences, it should never be subject to any undue form of secondary control, be taken down, removed or modified. It is crucial that any provisions on platforms' liability do not lead to platforms exercising editorial control over content made available by independent

PSM. Independent and trustworthy media can be a strong counterweight to false information, unsubstantiated rumors and manipulation, and help to increase levels of societal knowledge and participation. In turn, this strengthens democracy and play a key role in strengthening societal resistance. If platform operators for some reason acts to modify or remove content (or considers doing so) belonging to a media company with editorial responsibility, they should immediately provide a full explanation and a contact person for handling the case. If the modification or removal cannot be reasonably justified, the content should be reinstated immediately in unmodified form.

Important factors here are further improved business relations and increased transparency between content providers and the respective platform, as well as national contact points and functional reporting mechanism implemented by platforms on national markets.

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

We refer our answer to question 6 above.

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 further in question 6 above, in an audiovisual market where active online platforms have become important gateways to citizens' access to content and services, it is essential to strengthen legislation that ensures appropriate prominence of content of societal general interest.

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 have further underlined that prominence measures are indispensable to the proliferation of illegal and harmful content. We are convinced that the DSA package should address prominence, alongside other measures enhancing transparency of platforms' content policies and recommender systems/algorithms whereby platforms organise and commercialise content (see Nordvision answer to the DSA package consultation).

Defining content of societal general interest and enforcement should be within the competence of EU members states. The definition of independent media must above all relate to independence from political influence over editorial decision-making. 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. It is crucial that any potential regulation does not negatively affect fundamental rights such as freedom of speech.

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.

Guided by strict national and European rules as well as journalistic and editorial principles, the cornerstone of independent public service media is exercising full editorial responsibility over content. Public trust is built on maintaining this independence. That is why, when digital platforms and social networks are used to make such content of societal general interest available to audiences, it should never be subject to any undue form of secondary control, be taken down, removed or modified.

Regardless of platform and guided by the strict regulation applicable to av-content, our editorial policy and principles are the same in all cases should the content be transmitted on television, radio or online. Ensuring the public are able to trust content from Nordic PSM is as important for younger audience groups and children as it is for adults. It is therefore just as much about empowerment and education as protection. It is therefore of utmost importance that the editorial integrity of our content is fully independent, regardless of how and where it is consumed, and that platforms do not exercise or make second editorial decisions on such content, e.g. take-downs, removal or modification.

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

Medieombudsmannen - The Media Ombudsman is an independent self-disciplinary body, handling complaints on the editorial content of newspapers, magazines, broadcast media and their websites and social media. The Media Ombudsman is the investigating authority in the process, handles complaints from individuals who feel unfairly treated by the media. The Media Ombudsman can review printed newspapers and magazines, Swedish broadcast radio and television, as well as some online publications, regarding a Code of Ethics (UC).

The Danish Press Council (Pressenævnet) determines whether the conduct of the media is contrary to sound press ethics. Its decision is based on the "Advisory rules of sound press ethics", but the "sound press ethics" standard keeps pace with developments in determination of what is unethical and adopts standpoints on new situations that arise.

## 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

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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

Today, we operate in an era of increased online disinformation and hate speech. We are worried this can have far-reaching consequences for the general democratic debate and want to be part of the discussion on possible solutions. New initiatives on an EU level must be consistent with, and respect fundamental rights and support pluralism and cultural diversity (e.g. smaller language groups and communities). While disinformation as such should not be regulated, measures to emphasise the importance of secure access to content of societal general interest, pluralism, cultural diversity and equality are called for. Independent media can help to increase levels of political knowledge, understanding and even participation. To do so, however, the audience needs to be able to find and engage with the content offered. Digital platforms have become important way of reaching audiences, and recent years have seen a significant development in the role platforms play in this regard. When platforms control if and how content is discovered, through for example community standards, notice-and-action procedures, ranking and recommendation algorithms, it can have far-reaching consequences for the exercise of freedom of expression and pluralism. If content of societal general interest gets harder to find and to identify by brand, consumers risk losing out on the content they trust and rely on.

- We support regulation that guarantees the prominence of content of societal general interest on digital services and platforms and ensures proper and clear attribution of brand to the media company. Clear attribution is important for the audience's ability to identify trustworthy sources, and in turn support the objective of informed citizens.

- Easy access to, and findability of, independent media content of societal general interest must be guaranteed on digital services and platforms.

- Media need access to/return of non-privacy data in a usable form that is generated from making their content available on third party platforms, in line with data protection and privacy rules. This ensures further innovation and enhancement of services for the long-term benefit of audiences.

Our goal as PSM companies is to ensure that content of public value remains widely available, is easily accessed and enjoyed by audiences, and that it is able to play a continued role in stimulating fundamental rights and in supporting media pluralism. In an ever-changing media landscape, media and information literacy (MIL) competencies are crucial. PSM help to increase levels of societal knowledge and participation and play a key role in strengthening societal resistance to manipulation, rumors and disinformation.

It is crucial that any provisions on platforms' liability do not lead to platforms exercising editorial control over content made available by independent PSM. Independent and trustworthy media can be a strong counterweight to false information, unsubstantiated rumours and manipulation, and help to increase levels of societal knowledge and participation. In turn, this strengthens democracy and play a key role in strengthening societal resistance. 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.

### 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"/>					
8. Other	<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"/>					
2. Demote the content to decrease its visibility	<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"/>					
4. Suspend or remove the accounts engaging in manipulative techniques	<input type="radio"/>					
5. Invest in internal intelligence systems to detect manipulative techniques	<input type="radio"/>					
6. Invest in artificial intelligence to detect manipulative techniques	<input type="radio"/>					
7. Other	<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 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 checked="" 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 checked="" 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?

Nordic PSM enjoy some of the highest levels of trust throughout the EU. Building on our public service remit, we provide content that can help meet the democratic, social and cultural needs of our audience. We do this as part of an independent and diverse media environment that promotes societal participation and an informed public. Independent and trustworthy media can be a strong counterweight to false information, unsubstantiated rumours and manipulation, and help to increase levels of societal knowledge and participation.

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

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

Please see our answer to question 2 above.

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.

One effective measure to fight disinformation is to increase the visibility for independent and trustworthy media. 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 source of information. Beyond this, media literacy initiatives will play a key role in fighting this information disorder, with independent media and content producers being in a prime position to strengthen media literacy skills to fight the spread of disinformation.

In an ever-changing media landscape, media and information literacy (MIL) competencies are crucial. It has become a great and determining factor for being able to decode, interpret and evaluate information. The ability to search for information and critically and responsibly analyse and evaluate it, is a prerequisite for

democracy, as is the ability to use media for self-expression and dialogue. Media- and information literacy are essential means of tackling disinformation and increasing levels of digital literacy in Europe. Independent and trustworthy media can be a strong counterweight to false information, unsubstantiated rumours and manipulation, and help to increase levels of societal knowledge and participation. In turn, this strengthens democracy and play a key role in strengthening societal resistance.

All media companies must adapt and change as the media industry undergoes rapid changes due to digitalization, resulting in a changing media logic and a fundamental difference in the way people consume and use media. Readers, viewers and listeners are no longer passive recipients, they engage in dialogue and want to both participate and become publishers themselves.

With an increase of the spread of disinformation, the need for MIL competencies is crucial and trustworthy media can be a strong counterweight to false information, unsubstantiated rumors and propaganda as well as threats and hate speech online. In turn, this can strengthen the critical reading of information and limit the negative impact as well as the spread of disinformation on digital platforms. MIL skills have a crucial role to play in negating the effect of disinformation, without negatively impacting fundamental rights such as freedom of speech and expression, as critical thinking and fact checking are crucial skills to have negotiating the vast amount of information on digital platforms.

Consequently, unbiased, impartial knowledge sharing is more important than ever, and one of the most important competences in the future is to be able to understand and analyze complex contexts. In an increasingly digitalized and fast-moving world, where people take part of a never ending complex and fragmentary stream of information, there is a great need of standing on a solid base of basic knowledge. This becomes a great and determining factor for being able to decode, interpret and evaluate information. Being able to search for information and critically and responsibly analyze and evaluate it, is a prerequisite for democracy, as is the ability to use media for self-expression and dialogue.

### 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 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 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"/>					
5. Mechanisms enabling readers to flag content that is misleading	<input type="radio"/>					
6. Mechanisms to block sponsored content from accounts that regularly post disinformation	<input type="radio"/>					
7. Closing of fake accounts and removal of automated social media accounts like bots	<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"/>					
9. Allowing more diversity in suggestion algorithms designed to find videos, posts or sites that you might be interested in	<input type="radio"/>					
10. Other	<input type="radio"/>					

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

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

Independent media organisations in Europe have editorial responsibility for the content they publish, are subject to independent oversight and may be held liable for it under national laws. 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 already subject to oversight would 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 judicial authorities. Effective and user-friendly redress mechanisms should be provided to allow content providers to contest online platforms' content-related decisions. It is 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,



	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	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"/>					
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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 response to the DSA package consultation the Nordic PSM set out our concerns on platform content policies and how online platform providers determine content policies according to own Terms and Conditions (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 of platforms' content policies and practices in relation to users (including public service media and other content providers) and society at large.

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

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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

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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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