



PRIORITIES & POLICY RECOMMENDATIONS

FOR THE 2024 - 2029 MANDATE

Updated Version (April 2025)

Europe is at a turning point. Democracy is under unprecedented pressure: international tensions are escalating and disinformation is eroding trust. Besides, latest tech innovations, such as generative AI, are becoming tools for manipulation as well as for democratic progress. The resilience of democratic systems is facing more and more challenges and needs to be strengthened urgently.

The ability of democratic institutions to build social cohesion and long-term political and economic agreements is strongly put into question. Therefore, disinformation and anti-democratic interference not only **put our democratic systems** at risk, but also pose a **significant challenge to our security**. By appealing to our worst primary impulses, disinformation exploits divisions and fears, ultimately leading to the **suppression of empathy and solidarity**, and often portraying those who are or think differently as enemies. Internal and external anti-democratic interferences aim to erode public trust in elected institutions and undermine actions that serve general interest.

Accelerated by the newest technological innovations, such as generative AI and algorithms, this challenge transcends borders and **EU action is necessary to coordinate a response from EU Member States, media and online platforms**. Already now, the EU is leading ambitious initiatives to counter disinformation and foreign information manipulation (FIMI).

The proposal by the President of the EU Commission to create a **European Democracy Shield**¹ is very much welcomed as it would provide the necessary forum to engage all interested parties and create the required momentum to carry on the fight against this growing plague.

This paper consolidates the Democratic Shield Task Force's views on the fight against disinformation and proposes a number of innovations and policy actions that could support the design of the next European Democracy Shield.

Members of the Democratic Shield Task force:



¹ https://neighbourhood-enlargement.ec.europa.eu/news/statement-european-parliament-plenary-president-t-ursula-vonder-leven-candidate-second-mandate-2024-2024-07-18_en

DISINFORMATION & NEW TECHNOLOGIES

Technological innovation brings great value to society by simplifying our lives, supporting human endeavours, and leaving a positive impact across various fields. This also counts for democracy: **technology, including artificial intelligence, can accelerate democratic processes** by providing better access to information and facilitating other advancements, such as a more direct dialogue between citizens and institutions.

However, there is evidence that technology has also been misused² against democratic institutions and processes, leading to issues such as election interference and information manipulation³. The World Economic Forum's 2024 Risk Report ranked the **information threat**, reinforced by artificial intelligence (AI), as the greatest global risk for the next years⁴.

AI-generated disinformation will make it more difficult to **discern truth from falsehood**. A disbelieving society in which individuals live in their own reality based on disinformation that confirms their prejudices would be a society without a common fact-based truth, a society incapable of coexisting in diversity, with **weakened democratic governance**.

LEGACY

In light of these challenges, the **Democratic Shield initiative was created in December 2023**, consolidating a list of ten actions aimed at safeguarding the security and integrity of European elections in 2024. **Many of these measures have been implemented**, including revised guidelines on the Digital Services Act (DSA), efforts by the European Council, numerous workshops and webinars, enhanced monitoring, code of conducts, and more⁵. Our task force consists of diverse actors working at the intersection of democracy and technology, including civil society organisations, researchers, and practitioners.

PROPOSALS TO COMBAT DISINFORMATION

The fight against disinformation is a complex, dynamic and multifaceted challenge that requires the implementation of a range of different political, social and technological measures. As specialists in democracy, research and technology, the Democratic Shield Task Force proposes **18 policy recommendations along five different policy tracks** (Monitoring; Solutions; Governance; Pluralism; Participation) that could inform the EU's forthcoming work on combating disinformation and the next European Democracy Shield.

² <https://ceeddw.org/wp-content/uploads/2024/04/ThingsToWatchFor.pdf>

³ https://www.eeas.europa.eu/eeas/2nd-eeas-report-foreign-information-manipulation-and-interference-threats_en

⁴ https://www3.weforum.org/docs/WEF_The_Global_Risks_Report_2024.pdf

⁵ <https://about.make.org/articles-en/election-protection-on-the-eu-agenda-the-democratic-shield-initiative>

TRACK 1: MONITORING

One of the central objectives of the proposed European Democratic Shield must be to **increase situational awareness** by detecting, analysing and proactively combating disinformation and manipulation of information.

To effectively address the outlined threats, an EU institution should take a centre role to **coordinate the detection of information manipulation campaigns**. Collaboration between Member States through the exchange of information and best practices will be key to monitoring and countering such damaging disinformation campaigns. Europe needs a comprehensive, exhaustive and politically independent monitoring system that is trusted by the European public actors.

Therefore, we urge the European Commission to establish a **unique, impartial, and highly equipped monitoring team to identify and address information manipulation** as quickly as possible, potentially in real time. The role of EDMOs fact-checkers and the wider ecosystem is critical to ensure that disinformation is identified, attacked and debunked as early as possible. To carry out these tasks, **fact-checkers and relevant actors must be given the necessary resources to increase their capacity**.

Democratic Shield Task Force Examples

- Counter Disinformation Network (Alliance for Europe)⁶

Policy recommendations

- **R1.1:** EU coordination on detection of information manipulation campaigns and the exchange of best practices.
- **R1.2:** Comprehensive monitoring and alert system to identify and address information manipulation in real time.

TRACK 2: SOLUTIONS

Beyond other measures, **action against disinformation urgently needs to leverage digital technologies** for identification, verification, and combat. Fact-checking often fails to reach the European population in its diversity and fact checkers are more and more under pressure. Given that many people do not verify information, it is therefore essential to use technology to label and target disinformation online. Technology to combat disinformation can be effectively used, for example, in the following settings:

- (A) Advanced and speedy **fact-checking tools** to detect and counter disinformation, such as: AI-based systems for pattern and language analysis; data analytics for monitoring media, social network, and messengers; systems to cross-reference information with verified facts; AI systems to autonomously generate fact-checking messages and articles using data from official sources; or a common platform model for fact-checkers (and alike), inspired by EUvsDisinfo; Tools to detect AI-generated political content and automatically label it.
- (B) Tools to **identify actors**, vectors and channels that facilitate disinformation to go viral, such as technologies to identify bots active in creating or sharing disinformation.

⁶ <https://alliance4europe.eu/first-summary-report-of-the-eu-election-network-pre-election-analysis>

- (C) AI systems capable of understanding the **nuances between disinformation and misinformation** with clear and transparent algorithms.
- (D) AI tools to **generate “artificiality scores”** showing (i) the probability that content was created by AI, and (ii) the probability that its virality is due to bots.
- (E) AI tools to help **instill pluralism** in recommendation algorithms.

Through the European Democracy Shield, the EU should prioritise the development of these and other technologies to effectively combat disinformation. **Support for European innovators and academia will be crucial to enhance the capacity to develop, deploy and operate independent technological capabilities** capable of monitoring, detecting and countering disinformation.

Democratic Shield Task Force Examples

- Panoramic.AI (Make.org)⁷
- Massive citizen consultations (Make.org)⁸
- French Academie des Technologies⁹

Policy Recommendations

- **R2.1:** Further support fact-checkers to increase their capacities.
- **R2.2:** Harness digital technologies in the fight against disinformation.
- **R2.3:** Equip fact-checkers with digital tools to detect and counter disinformation, supporting them in tasks such as analysing and verifying information, labeling content or drafting debunking.
- **R2.4:** Design a common, easy-to-use, AI-powered platform for recording and debunking pieces of disinformation.
- **R2.5:** Support Europe's industry and research community to develop and deploy sovereign technological capabilities to fight disinformation, including recommender systems that integrate pluralism objectives.

TRACK 3: GOVERNANCE

The EU has demonstrated that bold regulation can be implemented effectively. The Digital Services Act (DSA) and the AI Act (AIA) are steps in the right direction.

Not to hamper innovation, regulation must be well-considered, yet impactful. The DSA must be enforced in an **open, unbiased, non-politicised way**. A revived 'Defence of Democracy Package' and the AIA should be adjusted to the **latest technological developments**. Building on similar work done in recent years by the European Commission, and following the recommendation of the OECD¹⁰, the elaboration and implementation of **a renewed strategy to combat information manipulation at EU and national level** could be a constructive way forward. This could include limitation of virality of certain content, as well as ways to strengthen pluralism online.

⁷ <https://about.make.org/articles-en/citizens-convention-on-end-of-life-with-make-org-the-esec-offers-an-innovative-ai-platform-to-enable-the-general-public-and-parliamentarians-to-take-greater-ownership-of-the-debates-held-by-citizens>

⁸ <https://about.make.org/articles-en/discover-the-final-report-of-the-eurhope-initiative>

⁹ <https://www.academie-technologies.fr/publications/ia-generative-mesinformation/>

¹⁰ [OECD \(2024\), *Facts not Fakes: Tackling Disinformation, Strengthening Information Integrity*, OECD Publishing, Paris, https://doi.org/10.1787/d909ff7a-en.](https://doi.org/10.1787/d909ff7a-en)

At the institutional level, we call the Commission Vice-President in charge of Tech Sovereignty, Security and Democracy to **increase the EU's efforts to deal with disinformation**. Indeed, the Vice-President is tasked with enforcement actions under the DSA to contribute to the work on disinformation, as part of the European Democracy Shield. In that light, DG JUST, but also DG CONNECT and the EEAS, who are main actors of the overall EU efforts, should have a clear mandate and sufficient resources allocated to provide **meaningful action against disinformation and improve citizen participation** in discussions on this key subject. What is more, the European Parliament's special committee on the European Democracy Shield will provide a space to **exchange ideas with civil society** and develop solutions for MEPs working on this topic. Finally, initiatives such as the code of conduct signed by political groups in the European Parliament, could be extrapolated to the national level.

Democratic Shield Task Force Examples

- Publication of ten measures to safeguard the security and integrity of the 2024 EP elections (Democratic Shield, 2023)¹¹
- Political support for the Code of Conduct before the EP elections (Democratic Shield, 2023)¹²

Policy Recommendations

- **R3.1:** Defining a European understanding that balances freedom of expression with the fight against disinformation.
- **R3.2:** Development of education programmes emphasising media literacy and critical thinking.
- **R3.3:** Updated national & EU strategy combating information manipulation.
- **R3.4:** Promote a code of conduct on disinformation and AI among political groups in national parliaments.
- **R3.5:** Promote a code of conduct among influencers, to declare political and electoral content.

TRACK 4: PLURALISM

Disinformation and FIMI are often fuelled by the lack of official data to verify content accuracy. To counteract this, the EU should encourage Member States to **adopt open government strategies**¹³. Increased transparency would strengthen a trust-based relationship between citizens and institutions and provide reliable data for (AI-driven) fact-checking tools.

To counter increasing use of untrustworthy sources, supporting more **democratic narratives, including journalism, local journalism, and fact-checking**, is crucial. Therefore, the EU should continue **encouraging defence of the independence of journalists and support fact-based media**. In contrast, measures should be taken against channels that persistently and manifestly spread disinformation.

In addressing disinformation campaigns, institutions should pay extreme care to protecting fundamental rights. The EU, in the context of the European Democracy Shield, should coordinate with Member States the work on the **definition of a European understanding that**

¹¹ <https://about.make.org/articles-en/raising-the-democratic-shield-safeguarding-the-2024-european-parliament-elections>

¹² <https://about.make.org/articles-en/raising-the-democratic-shield-safeguarding-the-2024-european-parliament-elections>

¹³ <https://www.opengovpartnership.org/strategy-2023-2028/>

balances promoting freedom of speech with combating disinformation and hate speech. The definition of this dividing line will also be instrumental for fact-checking tools in detecting and addressing disinformation campaigns, and reinforce the public trust in fact-checking methodologies.

Young people, as the largest consumers of social media, are particularly vulnerable to disinformation, risking future generations becoming disaffected with democratic structures and practices. In Spain, 86% of the population could not distinguish between true and false information, even though 83% believed they generally could¹⁴. To better equip citizens, the EU should further **promote the development of education programmes** in schools and universities that emphasise **media literacy and critical thinking**. This includes curricula designed to teach students how to assess information sources, identify propaganda and disinformation, and verify facts.

Large television broadcasters in Europe have an obligation under case law by the European Court on Human Rights to provide “impartial and accurate information and a **range of opinion and comment**”.¹⁵ These pluralism obligations are necessary to preserve democratic debate, and their imposition on broadcasters is justified by the “immediate and powerful effect of the broadcast media”.¹⁶ Given that a great part of society now obtain their news principally from social media¹⁷, it should be tested, whether these **pluralism obligations can be transposed to large recommender systems** that feed information to social media users.

Democratic Shield Task Force Examples

- Journalism Trust Initiative (RSF)¹⁸
- Providing fact-checked and independent information on EU governance (Robert Schuman Foundation)¹⁹
- Think-tank Cercle Pegase (Sopra Steria)²⁰

Policy Recommendations

- **R4.1:** Defending the independence of journalists.
- **R4.2:** Supporting European fact-based media.
- **R4.3:** Encouraging the adoption of Open Government strategies.
- **R4.4:** Encouraging research on how pluralism obligations for television broadcasters could be transposed to large social media recommender systems.

TRACK 5: PARTICIPATION

One of the significant repercussions of disinformation is the growing disconnection between decision-making processes and the citizens they affect. This has fostered a pervasive distrust in public institutions and has exacerbated the gaps between those who govern and those who are governed.

¹⁴ <https://periodismo2030.com/wp-content/uploads/METROSCOPIA-El-periodismo-en-Espana-Anexo-SIN-VOTOCCAA01.pdf>

¹⁵ ECHR, Manole v. Moldova, n° 13936/02, §107.

¹⁶ ECHR, Animal Defenders v. UK, n° 48876, §119.

¹⁷ <https://www.vie-publique.fr/en-bref/296376-actualites-comment-les-jeunes-de-15-30-ans-sinforment-ils>

¹⁸ <https://www.journalismtrustinitiative.org/>

¹⁹ <https://www.robert-schuman.eu/en>

²⁰ <https://www.linkedin.com/company/cercle-p%C3%A9gase/posts/?feedView=all>

To maintain a high level of trust in democratic institutions, it is imperative to sustain ongoing **support for democratic narratives**. This can be achieved by showcasing positive examples of successful engagement in shaping and influencing public decision-making.

Besides, encouraging **meaningful participation** from citizens across various forums on a large scale is essential. European public spaces - both online and offline - must be as open, constructive and safe as possible to ensure that citizens can voice their opinions effectively. Initiatives such as the renewed European Commission "Have Your Say" portal²¹ have already laid important groundwork in this regard.

Yet, the European Commission should strive to **enhance accessibility to these platforms, ensuring they are inclusive of diverse voices**, particularly those from marginalised groups. Achieving **equal access to quality content moderation** across all European languages and communities is crucial for fostering an equitable environment for expression²².

Democratic Shield Task Force Examples

- Online citizen participation (EurHope by Make.org)²³

Policy Recommendations

- **R5.1:** Promotion of democratic narratives.
- **R5.2:** Increase opportunities for citizen engagement (online and offline).

²¹ <https://ec.europa.eu/info/law/better-regulation/have-your-say>

²² https://fra.europa.eu/sites/default/files/fra_uploads/fra-2023-online-content-moderation_en.pdf

²³ <https://about.make.org/articles-en/discover-the-final-report-of-the-eurhope-initiative>

LIST OF POLICY RECOMMENDATIONS

TRACK 1 MONITORING

- **R1.1:** EU coordination on detection of information manipulation campaigns and the exchange of best practices.
- **R1.2:** Comprehensive monitoring and alert system to identify and address information manipulation in real time.

TRACK 2 SOLUTIONS

- **R2.1:** Further support fact-checkers to increase their capacities.
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- **R2.5:** Support Europe's industry and research community to develop and deploy sovereign technological capabilities to fight disinformation, including recommender systems that integrate pluralism objectives.

TRACK 3 GOVERNANCE

- **R3.1:** Defining a European understanding that balances freedom of expression with the fight against disinformation.
- **R3.2:** Development of education programmes emphasising media literacy and critical thinking.
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- **R3.4:** Promote a code of conduct on disinformation and AI among political groups in national parliaments.
- **R3.5:** Promote a code of conduct among influencers, to declare political and electoral content.

TRACK 4 PLURALISM

- **R4.1:** Defending the independence of journalists.
- **R4.2:** Supporting European fact-based media.
- **R4.3:** Encouraging the adoption of Open Government strategies.
- **R4.4:** Encouraging research on how pluralism obligations for television broadcasters could be transposed to large social media recommender systems.

TRACK 5 PARTICIPATION

- **R5.1:** Promotion of democratic narratives.
- **R5.2:** Increase opportunities for citizen engagement (online and offline).