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Countering misinformation in the EU: origins, evolution, and prospects

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Appendix

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Annex A: Chapter 2 Interviews Table (author's table)

The table below lists semi-structured interviews conducted by the author between 2019 and 2020 in Brussels and London.

Reference	Organisation/Institution	Seniority
Interview 1	European Endowment for Democracy	medium
Interview 2	EU Institute for Security Studies	medium
Interview 3	EU Institute for Security Studies	medium
Interview 4	EU Institute for Security Studies	high
Interview 5	EU Institute for Security Studies	high
Interview 6	General Secretariat of the Council	high
Interview 7	Council of the EU, COREPER II	high
Interview 8	Council of the EU, PSC	medium
Interview 9	Council of the EU, COEST	medium
Interview 10	Council of the EU, COEST	medium
Interview 11	Latvian Permanent Representation	medium
Interview 12	Latvian Permanent Representation	high
Interview 13	EEAS	high
Interview 14	EEAS	medium
Interview 15	EEAS	medium
Interview 16	EEAS, Advisor	high
Interview 17	EEAS, Advisor	medium
Interview 18	EEAS, CSDP & Crisis Response	high
Interview 19	EEAS, CSDP & Crisis Response	medium
Interview 20	EEAS, Strategic Communications	low
Interview 21	EEAS, Strategic Communications	low
Interview 22	EEAS, Strategic Communications	low
Interview 23	EEAS, Strategic Communications	low
Interview 24	EEAS, Europe & Central Asia	high
Interview 25	EEAS, Europe & Central Asia	medium
Interview 26	European Commission, DG NEAR	medium
Interview 27	European Commission, DG NEAR	medium
Interview 28	European Commission, DG NEAR	low
Interview 29	European Commission, General Secretariat	medium
Interview 30	European Commission, General Secretariat	low

The organisation/institution and the level of seniority refer to the actors' occupation that is relevant for the present study, whether this position is held currently or was held between 2015 and 2019. 'Low' refers to positions of programme officer or below, 'medium' to positions such as head of unit/division and advisor, and 'high' to positions such as director or higher.

Annex B: Code Book (author's table)

The table below is the Code Book extracted from the NVivo file used to analyse empirical data collected from interviews. Thirty interview transcripts and two key policy documents were uploaded on NVivo and coded as per the key themes and questions indicated below, chosen based on the Multiple Stream Model as well as subjects which came up during interviews.

Name	Description	Files	References
<i>Problem Stream</i>			
awareness	awareness-raising efforts regarding pro-Kremlin disinformation	15	47
persuasion	persuasion efforts regarding the need of a response to pro-Kremlin disinformation	6	20
disinfo cases	specific cases and events which increased the recognition of the problem	22	43
progressive build-up	progressiveness of the recognition of the problem	15	21
rules & values	rules and values that pro-Kremlin disinformation broke	8	15
securitization	framing pro-Kremlin disinformation as a security issue for Europe	13	33
Ukraine crisis	link between the Ukraine crisis and recognition of the problem of pro-Kremlin disinformation	21	76
<i>Politics Stream</i>			
bargain-compromise	dynamics governing EU MS negotiations	16	36
driving MSs	MSs which supported measures	19	70
Latvia	specific role of Latvia in negotiations	5	15
opposing MSs	MSs which opposed measures	11	20
Commission	role of the EC in the creation/development of the ESTF and further development of EU StratCom	16	53
Council	role of the Council in the creation/development of the ESTF and further development of EU StratCom	3	4
European Council	role of the EUCO in the creation/development of the ESTF and further development of EU StratCom	4	5
European Parliament	role of the EP in the creation/development of the ESTF and further development of EU StratCom	7	17
HRVP	role of the HRVP in the creation/development of the ESTF and further development of EU StratCom	7	14
ESTF tensions	tensions regarding the creation/development of the ESTF	11	50
public opinion	role of public opinion in increasing receptivity	7	9
<i>Policy Stream</i>			
expertise	impact and usefulness of specific expertise	5	7
learning by doing	'learning by doing' dynamic governing the development of EU StratCom policies	6	13

Name	Description	Files	References
policy entrepreneurs	role of policy entrepreneurs in developing, promoting, and pushing for policy proposals	11	73
policy-making process	overall policy-making process leading to the creation of the ESTF	14	47
proposals	specific proposals made by policy entrepreneurs	7	20
why EEAS	explanations as to why the response was placed within the EEAS	6	10
why EU level	explanations as to why the response was developed at the EU level	5	7
<i>Other</i>			
spillover	spillover effects generated by the creation and development of the ESTF	15	55
EED cooperation	cooperation of the ESTF with EED	2	3
EUISS cooperation	cooperation of the ESTF with the EUISS	1	2
ESTF work	current work and priorities of the ESTF	2	10
quotes	particularly surprising quotes	13	23

Examples:

“Initially, there was quite, quite a reluctance coming from EU institutions. Lack of knowledge about the phenomenon, lack of awareness, and it's not so easy because it's very cross-cutting. You don't have one responsible DG. Also, they say that StratCom Task Force is located in the EEAS, so, initially people were trying to view it as something concerning our partner countries, rather than the EU itself. Now, everyone has seen that actually, this is something where you need to work on resilience to protect our democratic processes, not only outside of the EU but also within the EU.” — coded for awareness

“I think she probably had the ambition of widening the project to not geographically contain an issue that would be geared toward one particular hostile country. Therefore, she supported the idea of having a multi-polar strategic communication unit that would look also at what happened in the Arab world etc. Whereas probably the originator of the side of demand, the group of MS, who very strongly supported this start of activities, was clearly aiming at Russia at that time and did not see a reason to balance this with a other efforts into other geopolitical directions.” — coded for HRVP

“Russians mingling with President Macron's election campaign. That was a big game-changer. France became a very active advocate that we need to do something about disinformation. That was it. Then, everyone saw that nobody is protected from that. They finished "oh small Baltic states having an issue with Russia", everybody realised that actually, no, it could happen with France, then there were also cases in the US with President candidate Clinton's e-mails, so... everyone saw that it's much broader.” — coded for disinfo cases

“The opportunity came up, it was good timing.” — coded for quotes

Annex C: Chapter 4 Interviews Table (author's table)

The table below lists semi-structured interviews conducted by the author in 2024 in Brussels, The Hague, and Oslo.

Reference	Organisation/Institution	Seniority
Interview 1	Netherlands, Foreign Affairs Ministry	low
Interview 2	Netherlands, Ministry of Media, Culture and Science	high
Interview 3	Reporters Without Borders	high
Interview 4	Norway, Foreign Affairs Ministry	high
Interview 5	Norway, Ministry of Culture and Equality	medium
Interview 6	Comité Diderot	high
Interview 7	Dutch Union of Journalists	high
Interview 8	Netherlands, Foreign Affairs Ministry	low
Interview 9	Council of the EU, National Representative	low
Interview 10	Council of the EU, National Representative	medium
Interview 11	Belgium, Flemish Government	high
Interview 12	Council of the EU, National Representative	medium
Interview 13	Council of the EU, General Secretariat	medium
Interview 14	Council of the EU, National Representative	low
Interview 15	Council of the EU, National Representative	low
Interview 16	Council of the EU, National Representative	high
Interview 17	Council of the EU, National Representative	medium
Interview 18	European Regulators Group for Audiovisual Media Services	high
Interview 19	Council of the EU, General Secretariat	high
Interview 20	European Commission	high

The organisation/institution and the level of seniority refer to the actors' occupation that is relevant for the present study, whether this position is held currently or was held between 2015 and 2022. 'Low' refers to positions of programme officer or below, 'medium' to positions such as head of unit/division and advisor, and 'high' to positions such as director or higher.

Annex D: Code Book (author's table)

The data below is extracted from the Atlas file used to analyse transcripts from interviews. Sixteen files were uploaded and coded as per the key research questions, refined as subjects came up during conversations.

Name	References
Actors	153
Council of Europe	6
Council of the EU	34
Court of Justice of the EU	2
EEAS	13
European Commission	46
European Council	4
European Parliament	0
Media Regulators	11
NATO	0
NGOs	2
Opposing/Criticising the ban	19
Supporting the ban	49
Arguments	121
Consensus	12
Emergency	22
Exceptionalism	23
Fear of effect on public sphere	10
Foreign policy battle/Information war	18
Growing awareness about disinformation/FIMI	14
Hate speech	4
Media attention	1
Political pressure	15
Political stability/Territorial integrity	7
Solidarity	7
Concerns	107
Balance between interests	11
Dialogue	1
End/Limits of the Ban	11
Fundamental Freedoms	24
Information space/ecosystem	10
Insignificant reach of <i>RT/Sputnik</i>	3
Legal basis	18
Limited effectiveness	13
Political interference	12
Precedent set by the ban	19
Top-Down process/Issues of competences	9

Annex E: Template Interview Information Sheet

PARTICIPANT INFORMATION SHEET

Version 1 – Date: 22/03/2024

Title of study:

Exploring the development of counter-disinformation policies and measures in the EU

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We would like to invite you to take part in a research study. Before you decide, it is important for you to understand why the research is being done and what it will involve. Please take the time to read this carefully. Please do not hesitate to contact us if you have any question.

What is the purpose of the research?

This study explores European Union (EU) policies developed in response to disinformation in Europe, in particular the suspension of broadcasting activities of *RT* and *Sputnik* introduced in March 2022 as part of a package of restrictive measures following Russia's war of aggression towards Ukraine. It focuses on exploring the context that surrounded this policy development to explain its seeming contradictions with fundamental rights (e.g. freedom of speech, access to information).

Why have I been invited to take part?

You have been invited to take part in this research project because of your valuable knowledge of the policy-making process under study, its legality, and/or of its impact on society. We will be recruiting up to 20 participants in this study.

Do I have to take part?

No. It is up to you to decide if you want to take part in this research project. We will describe the study and go through this information sheet with you to answer any questions you may have. If you agree to participate, we will ask you to sign a consent form and will give you a copy to keep. However, you would still be free to withdraw from the study at any time, without giving a reason and without penalty, by advising the researcher or their supervisor(s) of this decision. This would not affect your legal rights.

What will happen to me if I take part?

Should you agree to take part in the study, you will be asked to meet with the researcher for a semi-structured interview of approximately 45 minutes.

Practical details: The location and time of the meeting should be determined at your earliest convenience together with the researcher. The researcher will be available to speak online (Zoom) or in The Hague, Brussels, or Oslo from April to June 2024.

Procedure: The meeting will start by going through the study procedure and give you chance to ask any question you may have. If you are happy to take part in the interview, you will be asked to sign a consent form. We will ask for your agreement with the use of direct quotes in direct publications and with the audio recording of the interview, through the consent form.

Recording: For practical reasons, it is in the researcher's interest to record the interview. You will be asked at the beginning of the interview whether or not you feel comfortable with an audio recording of the interview. If you wish the interview not to be recorded, or if you wish the recording to stop at any time during the interview, please let the researcher know.

Confidentiality: Unless otherwise agreed, the interview will remain fully anonymous. At no point in this study will your name be mentioned. Any information given during the interview will be attributed to a description of your professional position in a way that protects your anonymity, to be determined jointly with the researcher during your interview. Reference to your institution and unit/division may be made for contextual purposes.

Follow-up: The researcher may contact you following the meeting to clarify any doubts regarding the content of the interview or ask for any recommendations of participants in this study.

What happens to the data provided?

The information you provide as part of the study is the **research data**. Any research data from which you can be identified known as **personal data**. It does not include research data where the identity has been removed, the **anonymous data**.

Accessibility: Unless otherwise agreed, the research data will be anonymised before being included in the study. Any personal data will be accessible by the researcher only.

Storage and use of data: Data collected will be safely stored in facilities provided by the University of Leiden (online or on site) for a minimum of 3 years after publication or until no longer useful for the current research project. Digital data will be encrypted when stored. We will make sure that any data transfer is done securely and with the adequate level of data protection required under European law.

What will happen if I don't want to carry on with the study?

Even after you have signed the consent form, you are free to withdraw from the study without giving any reason and without your legal rights being affected. In that case, research and personal data will be destroyed. If you wish to withdraw from the study, please inform the researcher before 1 September 2024.

Who will know that I am taking part in this research?

All information collected about you during this research will be kept strictly confidential and secure as per the procedure described in points 4 and 5 of this information sheet. Designated individuals of the University of Leiden may be given access to data for monitoring and/or audit of the study to ensure we are complying with guidelines.

What will happen to the results of the research?

The research project will be written up as an article in the framework of a Doctoral (PhD) Thesis and may be published as a separate piece in a scientific journal. On successful submission of the thesis, it will be deposited both in print and online in the University archives, to facilitate its use in future research. The thesis will be published open access.

Who is organising and funding the research?

The researcher is organising and funding the research in their own capacity, with the support of the University.

What if something goes wrong?

If you have a concern about any aspect of this study, please speak to the researcher or their supervisor(s), who will do their best to answer your query. The researcher should acknowledge your concern within 10 working days and give you an indication of how they intend to deal with it. If you remain unhappy or wish to make a formal complaint, please contact the Chair of the Ethics Review Committee in Social Sciences of Leiden University, Erik Bähre (ebaehre@fsw.leidenuniv.nl), who will seek to resolve the matter in a reasonably expeditious manner.

Contact Details

If you would like to discuss the research with someone beforehand (or if you have questions afterwards), please contact:

Sophie L. Vériter
Doctoral (PhD) Researcher
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Annex F: Template Interview Participation Consent Form

PARTICIPANT CONSENT FORM

Title of Study: Exploring the development of counter-misinformation policies and measures in the EU

Researcher: Sophie L. Vériter, Leiden University (s.l.veriter@fgga.leidenuniv.nl)

*Please check each
box*

- | | |
|---|--------------------------|
| 1. I confirm that I have read and understand the information sheet version _____ dated _____ for the above study. I have had the opportunity to consider the information carefully, ask questions and have had these questions answered satisfactorily. | ☐ |
| 2. I understand that my participation is voluntary and that I am free to withdraw at any time, without giving any reason, and without any adverse consequences or academic penalty. | ☐ |
| 3. I understand who will have access to data provided, how the data will be stored, and what will happen to the data at the end of the project. | ☐ |
| 4. I understand that any data shared will be fully anonymised so that I cannot be identified. | ☐ |
| 5. I agree with the use of anonymised direct quotes in research publications. | ☐ |
| 6. I agree with the audio recording of the interview, which may be stopped at any time during the interview. The recording will be accessible to the researcher only. | ☐ |
| 7. I understand how this research will be written up and published. | ☐ |
| 8. I understand how to raise a concern or make a complaint. | ☐ |
| 9. I agree to take part in the study. | ☐ |

_____	dd / mm / yyyy	_____
Name of Participant	Date	Signature

Annex G: Overview of EU Counter-Misinformation Measures

Above 400 documents were consulted in this research project. They were organised by institution and theme and are accessible via the following OneDrive link: https://leidenuniv1-my.sharepoint.com/:f:/g/personal/veritersl_vuw_leidenuniv_nl/EocxZyBm5UZDlbYiRQIusfgBMs5v5fPUREdbfuogfzW7SQ?e=lBCdSP

The key policy documents relevant for this dissertation are listed and summarised in the table below.

										
0 - CFSP Annual Reports 	0 - COREPER & PSC 	0 - EEAS Annual Reports	0 - EU-NATO Cooper...cuments	0 - European Council...31.12.18	0 - Foreign Affairs Council...18 .12 	0 - General Affairs...1.12.18 .12	0 - Key policy documents 	0 - OPEN Neighbo...uments	0 - Working party on Information 	1 - EC President Speeches
										
1 - EUCO Preside...eches 	1 - HRVP Speeches 	2 - EPSC Publications 	2 - EUISS Publications 	3 - Latvian Presidency	4 - Grey literature 	5 - National StratCo...vidence	6 - Council files CFSP UA 	7 - RT and Sputnik	7 - Speeches Securitization 	2019.03_Action Plan Ag...heet.pdf
										
CEP, 2019 - Policy B...ation.pdf	EC Factsheet - The EU...ation.pdf	EP question on StratCo...cing.pdf	EP_2016.05.19 Analysis...ions.pdf	Official Director...2015.pdf	Official Director...2015.pdf	Official Director...016.pdf	organigramme_D G COMM.pdf	organigramme_D G HOME.pdf	organigramme_D G NEAR.pdf	organigramme_E C GS.pdf 
										
organigramme_EE AS.pdf	organigramme_G S Council.pdf 	Question for written...46 18.pdf	Word Tree (resilience).pdf							

The non-exhaustive table below provides a chronological overview of the EU information governance toolkit, listing key units, policy documents, regulations, budgetary tools, and non-papers emerging between 2006 and 2024. The colour code corresponds to the type of tool.

Entry into Force	Title	Issuing Actor(s)	Type	Field(s)	Description	URL
07/05/2024	European Media Freedom Act	Council of the EU European Commission European Parliament	Regulation	Media	The European Media Freedom Act (EMFA) aims to enhance media independence and pluralism within the EU. It establishes rights and duties for media service providers, ensuring editorial freedom, protecting journalists, and promoting transparency in media ownership. The Act includes provisions to prevent undue interference in editorial decisions and mandates that very large online platforms notify media before removing content. It also creates a new European Board for Media Services to oversee compliance and facilitate cooperation among national media authorities. The EMFA entered into force on May 7, 2024, with full application by August 8, 2025. The European Board for Media Services, established by the EMFA, is tasked to “monitor adherence to self-regulatory initiatives which aim to protect users from harmful content, including disinformation and foreign information manipulation and interference” (p. 108), making it the institution in charge of monitoring the implementation of the Disinformation Code of Practice. Made of representatives from national media authorities and assisted by the Commission’s secretariat, it is set to start operating in February 2025.	http://data.europa.eu/eli/reg/2024/1083/oj
17/02/2024	Digital Services Act	European Commission European Council European Parliament	Regulation	Digital	The Digital Services Act (DSA) is a comprehensive EU regulation aimed at creating a safer online environment. Effective from August 25, 2023, for very large platforms, and fully applicable by February 17, 2024, it mandates online services to remove illegal content, enhance transparency in advertising, and protect user rights. The DSA prohibits targeted advertising based on sensitive data and requires platforms to implement robust content moderation systems. It also establishes accountability measures, including fines of up to 6% of global turnover for non-compliance, ensuring that digital platforms prioritize user safety and fundamental rights. The DSA regulates disinformation by requiring large online platforms to enhance transparency and accountability in content moderation. Platforms must implement robust measures to mitigate disinformation risks, cooperate with "trusted flaggers," and adhere to the Code of Practice on Disinformation, which outlines specific commitments for tackling false information.	http://data.europa.eu/eli/reg/2022/2065/oj

Entry into Force	Title	Issuing Actor(s)	Type	Field(s)	Description	URL
16/06/2022	Strengthened Code of Practice on Disinformation	European Commission	Official Policy Document	Digital	The Strengthened Code of Practice on Disinformation, launched on June 16, 2022, enhances efforts to combat online disinformation through commitments from 34 signatories, including major platforms and advertisers (e.g. Google, Meta, Microsoft, TikTok). This document builds on the 2018 Code while setting more ambitious commitments and measures aimed at countering online disinformation. Key measures include demonetizing disinformation, increasing transparency in political advertising, and empowering users. A robust monitoring framework ensures accountability, with regular reporting and a Transparency Centre. While the Code is technically not binding, the Digital Services Act does require very large online platforms to abide with voluntary codes of practices, making it a <i>de facto</i> binding instrument. A permanent Task Force is tasked with adapting the Code to emerging challenges. This Task Force is made of representatives of signatories, the European Regulators' Group for Audiovisual Media Services, the European Digital Media Observatory, and the European External Action Service, and is chaired by the Commission.	https://digital-strategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation
21/03/2022	A Strategic Compass for Security and Defence	Council of the EU	Official Policy Document	CFSP	The Strategic Compass, adopted in March 2022, is a security and defence strategy that outlines the EU's vision for 2030. Regarding disinformation and propaganda, the Compass emphasizes the need to enhance the EU's ability to detect and respond to hybrid threats, including foreign information manipulation and interference. It calls for strengthening the EU's strategic communication capabilities, improving situational awareness, and developing tools to counter disinformation campaigns. The Compass also stresses the importance of increasing resilience against cyber-attacks and enhancing cooperation with partners to address these challenges. It proposes developing an EU Hybrid Toolbox and Foreign Information Manipulation and Interference Toolbox to combat these threats effectively.	https://www.eas.europa.eu/sites/default/files/documents/strategic_compass_en3_web.pdf
10/03/2022	Special Committee on foreign interference in all democratic	European Parliament	Unit	CFSP	The Special Committee on Foreign Interference (ING2) was a European Parliament body created in March 2022, tasked with analysing threats from foreign interference and protecting the 2024 European elections. It examined EU legislation for loopholes that could be exploited by non-EU countries. Following corruption	https://www.europarl.europa.eu/doceo/document/TA-9-2023-

Entry into Force	Title	Issuing Actor(s)	Type	Field(s)	Description	URL
	processes in the European Union, including disinformation (ING2)				allegations, ING2's mandate was expanded to identify shortcomings in Parliament's rules on transparency, integrity, accountability, and anti-corruption. The committee proposed reforms and presented its final report in July 2023, adopted in plenary with 469 votes for, 71 against and 75 abstentions. ING2's work built on its predecessor (INGE) and collaborated with other parliamentary committees.	0219_EN.htm 1
02/03/2022	Broadcasting Ban on Russian State-sponsored Media	Council of the EU	Regulation	CFSP, Media	The Council Regulation 2022/350 introduces measures against Russia in response to its actions in Ukraine, including a ban on EU operators broadcasting content from sanctioned Russian state-affiliated entities like <i>RT</i> and <i>Sputnik</i>. It prohibits advertising on these outlets, expands asset freezes and travel bans on individuals supporting the Russian government, and strengthens financial sanctions by limiting transactions with certain Russian banks. The regulation states: “1. It shall be prohibited for operators to broadcast or to enable, facilitate or otherwise contribute to broadcast, any content by the legal persons, entities or bodies listed in Annex XV, including through transmission or distribution by any means such as cable, satellite, IP-TV, internet service providers, internet video-sharing platforms or applications, whether new or pre-installed. 2. Any broadcasting licence or authorisation, transmission and distribution arrangement with the legal persons, entities or bodies listed in Annex XV shall be suspended.” These measures should be maintained until the aggression against Ukraine is put to an end, and until the Russian Federation, and its associated media outlets, cease to conduct propaganda actions against the Union and its Member States.”	http://data.europa.eu/eli/reg/2022/350/oj
03/12/2020	Democracy Action Plan	European Commission	Official Policy Document	Digital, Media	The European Democracy Action Plan (EDAP) aims to strengthen democracy across the EU by promoting fair elections, media freedom, and countering disinformation. To combat disinformation, the EDAP focuses on enhancing the EU's Code of Practice on Disinformation, setting clearer commitments for online platforms, advertisers, and fact-checkers. It promotes transparency in political advertising and strengthens cooperation with independent fact-checkers and researchers. The plan also aims to empower citizens with media literacy initiatives and robust tools for identifying false content. Additionally, the EDAP proposes stricter accountability for	https://ec.europa.eu/commis-sion/presscorner/detail/en/ip_20_2250

Entry into Force	Title	Issuing Actor(s)	Type	Field(s)	Description	URL
					platforms spreading harmful disinformation while respecting fundamental rights, ensuring a safer, more transparent information environment. This policy document signals a broadening of counter-misinformation measures, which are no longer considered exclusively in the framework of the CFSP or digital policies, but also as part of media policy.	
18/06/2020	Special Committee on Foreign Interference in all Democratic Processes in the European Union, including Disinformation (INGE)	European Parliament	Unit	CFSP	The INGE Committee (Special Committee on Foreign Interference in All Democratic Processes in the European Union, including Disinformation) was established in June 2020 by the European Parliament to investigate threats from foreign actors targeting EU democracy. Its first mandate ended in March 2022, transitioning into the INGE2 Committee. It examined disinformation campaigns, cyberattacks, and other malign tactics, focusing on resilience-building measures. The committee developed recommendations to strengthen electoral integrity, counter disinformation, and safeguard EU democratic processes.	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52022IP0064
01/06/2020	European Digital Media Observatory (EDMO)	European Commission	Project	Digital	The European Digital Media Observatory (EDMO) is an EU-funded initiative established in 2020 to combat disinformation and support media literacy. Coordinated by the European University Institute in Florence, the EDMO fosters cross-border collaboration among fact-checkers, researchers, and media organizations. It provides tools and resources for detecting, analysing, and responding to disinformation while promoting the transparency of online platforms. The EDMO also supports regional hubs across the EU to address local challenges, facilitates training on media literacy, and enhances research into the impact of disinformation.	https://digital-strategy.ec.europa.eu/en/policies/european-digital-media-observatory https://edmo.eu
26/09/2018	EU Code of Practice on Disinformation	European Commission	Official Policy Document	Digital	The 2018 Code of Practice aimed at achieving the objectives set out by the Commission's Communication "Tackling Online Disinformation: A European Approach" presented in April 2018. It set a wide range of commitments, from transparency in political advertising to the closure of fake accounts and demonetization of purveyors of disinformation. It was later strengthened in 2022.	https://digital-strategy.ec.europa.eu/en/news/code-practice-disinformation

Entry into Force	Title	Issuing Actor(s)	Type	Field(s)	Description	URL
05/12/2018	Action Plan against Disinformation	EEAS European Commission	Official Policy Document	CFSP, Digital	In 2018, EU leaders repeatedly urged the European Commission and HRVP to draft an action plan to combat disinformation. As a result, the EEAS and the European Commission's DG CONNECT jointly designed concrete policies. In December 2018, they released the Action Plan against Disinformation, a 13-page document detailing strategy and activities to counter disinformation in and out of the EU's borders. It mentions that the threat posed by Russian propaganda for European elections' integrity is the key reason for stepping up EU StratCom policies (p. 3). The Action Plan put in place the Rapid Alert System facilitating information sharing between Member States and EU institutions, as well as the Code of Practice on Disinformation.	https://www.eas.europa.eu/sites/default/files/action_plan_against_disinformation.pdf
30/04/2018	High-Level Group on fake news and online disinformation	European Commission	Unit	Digital	In January 2018, the European Commission set up a high-level group of experts («the HLEG») to advise on policy initiatives to counter fake news and disinformation spread online. The HLEG was tasked with defining the scope of the phenomenon, identifying the roles and responsibilities of relevant stakeholders, and formulating recommendations. The main deliverable of the HLEG was a report designed to review best practices in the light of fundamental principles, and suitable responses stemming from such principles. The HLEG report defines “disinformation” as including all forms of false, inaccurate, or misleading information designed, presented and promoted to intentionally cause public harm or for profit. It emphasizes transparency in online platforms, media literacy for citizens, and fostering independent fact-checking. The report advocates for stronger collaboration between stakeholders, including governments, civil society, and the private sector. It rejects censorship and highlights the importance of sustainable journalism. The recommendations aim to counter disinformation while upholding democratic values and fundamental rights, including freedom of expression.	https://op.europa.eu/en/publication-detail/-/publication/6ef4df8b-4cea-11e8-bc1d-01aa75ed71a1/language-en
26/04/2018	Tackling online disinformation: a European Approach	European Commission	Official Policy Document	Digital	This Communication from the Commission to the European Parliament, the Council, the Economic and Social Committee, and the Committee of the Regions lays the ground of a common approach to tackling disinformation in the EU's internal market through a more transparent, trustworthy, and accountable online ecosystem (online platforms, fact-checking,) that builds on	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX

Entry into Force	Title	Issuing Actor(s)	Type	Field(s)	Description	URL
					secure and resilient election processes, fostering education and media literacy, support for quality journalism as an essential element of a democratic society, and countering internal and external disinformation threats through strategic communication.	EX:52018DC0236
13/10/2017	StratCom Plus Preparatory Action	European Parliament	Budget	CFSP	Through this Preparatory Action, the European Parliament unlocked a €1.1 million budget to support the work of the East StratCom Task Force. It was aimed to “test how to counter disinformation more systematically, effectively and efficiently”, particularly through fact-checking performed by strategic communication staff of the East StratCom Task Force. It supported the financing of campaigns to raise awareness about disinformation among EU staff, monitoring disinformation activities and data analysis, and dissemination of that analysis. The preparatory action was to be jointly implemented by the Commission (Service for Foreign Policy Instruments) and the European External Action Service.	https://www.europarl.europa.eu/cmsdata/129602/budg2018-doc6-txt-2-en.pdf
07/06/2017	A Strategic Approach to Resilience in the EU's External Action	EEAS European Commission	Official Policy Document	CFSP	This Joint Communication to the European Parliament and the Council laid out a strategic approach to building resilience in EU foreign policy against threats, including disinformation. It mentions: “The EU and some of its partner countries are targeted by external disinformation activities that form part of concerted strategies to discredit the political and social systems that are central to our identity, to our security and stability. In response measures to increase citizens' resilience to hostile disinformation will be further developed by raising awareness, by supporting greater media plurality and professionalism, and by communicating positive narratives and fact-based messages. The EU should strengthen the resources of the East StratCom Task Force and intensify its cooperation with EU institutions, Member States and likeminded partners. Longer term strategic approach and outreach towards Eastern Partnership countries will be further developed, focusing on people-to-people exchanges, and on working with existing civil society networks that already represent a source of community-based resilience. A similar approach will be pursued in the Western Balkans and Turkey, with a reinforced team to deal with strategic communication in candidate countries and potential candidates.” (p.16)	https://data.consilium.europa.eu/doc/document/ST-10184-2017-INIT/en/pdf

Entry into Force	Title	Issuing Actor(s)	Type	Field(s)	Description	URL
23/11/2016	EU strategic communication to counteract propaganda against it by third parties	European Parliament	Official Policy Document	CFSP	European Parliament resolution calling on the EU to do more to tackle anti-EU propaganda and disinformation.	https://www.europarl.europa.eu/doceo/document/TA-8-2016-0441_EN.pdf?redirect
14/10/2016	Report on EU strategic communication to counteract propaganda against it by third parties	European Parliament	Non-Papers and Reports	CFSP	Report drafted by the European Parliament's Foreign Affairs Committee calling on the EU to do more to counter anti-EU propaganda. It "welcomes the initiatives and achievements of the Latvian Presidency in this regard" (p. 9).	https://www.europarl.europa.eu/doceo/document/A-8-2016-0290_EN.pdf
28/06/2016	EU Global Strategy: Shared Vision, Common Action: A Stronger Europe	EEAS	Official Policy Document	CFSP	The EU Global Strategy of 2016 outlines the EU's foreign and security policy, focusing on security, resilience, and global governance. It emphasizes addressing terrorism, hybrid threats, and cybersecurity while strengthening states and societies in the EU's neighbourhoods. The strategy promotes "principled pragmatism," balancing idealism with realism, and advocates for strategic autonomy in defence matters. It calls for a comprehensive approach that integrates various EU policies and emphasizes partnerships with NATO and other international actors to effectively manage crises and adapt to evolving challenges.	https://eeas.europa.eu/archives/docs/top_stories/pdf/eugs_review_web.pdf
06/04/2016	Joint Framework on Countering Hybrid Threats	EEAS European Commission	Official Policy Document	CFSP	This Joint Communication to the European Parliament and the Council outlines EU responses to hybrid threats (EU Hybrid Fusion Cell, Strategic Communication, Centre of Excellence on Countering Hybrid Threats) with the objective of building resilience to foreign interference including disinformation and propaganda, radicalisation, and violent extremism, as well as prevent and respond to crises and conflict.	https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A52016JC0018
22/06/2015	Action Plan on Strategic Communication	EEAS	Official Policy Document	CFSP	The Action Plan on Strategic Communication constitutes the basis of the East StratCom Task Force's mandate. In mentions: "The overall objectives that will guide the measures contained in this Action Plan can be summarised as: 1. Effective communication and promotion of EU policies and values towards the Eastern neighbourhood;	https://www.eas.europa.eu/sites/default/files/action_plan_on_strategic_communica

Entry into Force	Title	Issuing Actor(s)	Type	Field(s)	Description	URL
					2. Strengthening of the overall media environment including support for independent media; 3. Increased public awareness of disinformation activities by external actors, and improved EU capacity to anticipate and respond to such activities.” (p. 1)	tion.docx_eea_s_web.pdf
01/06/2015	East StratCom Task Force	EEAS	Unit	CFSP	The East StratCom Task Force is a team of experts dedicated to countering Russian disinformation campaigns. Based in the EEAS in Brussels, it analyses and exposes disinformation, particularly but not exclusively in the EU's Eastern Neighbourhood. It develops communication products and campaigns to explain EU policies and create a positive EU narrative. The team maintains the EUvsDisinfo website and database, which contains over 17,000 samples of pro-Kremlin disinformation. The task force also supports media freedom and collaborates with EU institutions, member states, and international partners to strengthen resilience against foreign information manipulation and interference.	https://euvsdisinfo.eu/about/
20/03/2015	European Council Conclusions	European Council	Official Policy Document	CFSP	The European Council conclusions of 20 March 2015 gave the impetus for a joint EU response against misinformation and the creation of the East StratCom Task Force. It mentions: “The European Council stressed the need to challenge Russia's ongoing disinformation campaigns and invited the High Representative, in cooperation with Member States and EU institutions, to prepare by June an action plan on strategic communication. The establishment of a communication team is a first step in this regard.” (p. 5).	https://www.consilium.europa.eu/media/21888/european-council-conclusions-19-20-march-2015-en.pdf
29/01/2015	Foreign Affairs Council Conclusions on Ukraine	Council of the EU	Official Policy Document	CFSP	The Foreign Affairs Council conclusions of 29 January 2015 gave the first signal of willingness of a joint EU response to misinformation. It mentions: “The Council tasks the High Representative / Vice President to step up efforts, in cooperation with Member States and EU institutions, to further improve strategic communication in support of EU policies and to explore options for the establishment of a dedicated communication team to lead these actions. Such efforts should include proactive communication of EU policies, correcting misinformation when it appears, and support for the further development of independent media throughout the region.”.	https://www.consilium.europa.eu/en/press/press-releases/2015/01/29/council-conclusions-ukraine/

Entry into Force	Title	Issuing Actor(s)	Type	Field(s)	Description	URL
08/01/2015	EU strategic communication responding to propaganda	Denmark Estonia Lithuania United Kingdom	Non-Papers and Reports	CFSP	This non-paper, presented by the Foreign Affairs Ministers of Denmark, Estonia, Lithuania, and the United Kingdom during the Latvian Presidency of the Council suggests a series of measures to boost EU strategic communications in response to Russian propaganda.	obtained through interviews
01/12/2012	Information and Communication Handbook for EU Delegations in Third Countries and to International Organisations	EEAS European Commission	Official Policy Document	CFSP	A guide for EU delegations laying down the key actors, principles, and resources for EU public diplomacy and strategic communication. Designed by EEAS StratCom and DG DEVCO.	https://eeas.europa.eu/archives/delegations/ghana/documents/press_corner/20121231_en.pdf
10/03/2010	Audiovisual Media Services Directive	Council of the EU European Parliament	Directive	Media	The Audiovisual Media Services Directive (AVMSD), established in 2010 and amended in 2018, regulates audiovisual media across the EU to ensure a cohesive market and protect viewers. It covers both traditional TV broadcasts and on-demand services, mandating accessibility for people with disabilities and prohibiting incitement to hatred. The directive also addresses advertising standards, requiring clear identification of media service providers and restricting harmful content.	https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32010L0013
01/02/2006	White Paper on a European Communication Policy	European Commission	Non-Papers and Reports	Communication	Introducing Strategic Communication as an important policy of the EU and the role of the European public sphere. Focus on key principles (right to information and freedom of expression, inclusiveness, diversity, participation), as well as objectives of empowering citizens and working closely with media and technology sector, in a coherent manner.	https://europa.eu/documents/comm/white_papers/pdf/com2006_35_en.pdf

About the Author

Sophie Laurence V riter has been a PhD candidate in Security and Global Affairs at Leiden University (Campus The Hague) since August 2020. Her research examines the latest developments in misinformation and related policies, in particular in Europe. Sophie is broadly interested in the relationship between information, security, technology, and democracy, and the narratives that surround information governance. Passionate about knowledge-sharing, she has been on the editorial board of *The Hague Journal of Diplomacy* since 2020.



While pursuing her doctoral degree, Sophie co-founded and led “Level Up”, an inter-disciplinary research lab developing an original model to enhance participatory and deliberative democratic processes through gamification. The findings were presented at the Council of Europe’s World Democracy Forum (2023) and at Athens Democracy Forum (2024) organised by the Democracy and Culture Foundation and *The New York Times*. Sophie also contributed, as a research fellow, to the activities of The Hague Program on International Cyber Security and the Global Governance Institute and, as a research assistant, to a project on European narratives led by historian Timothy Garton Ash at the University of Oxford.

Sophie was awarded scholarships from the RENPET and Europaeum networks, allowing her to complete 9 research stays and visits during her doctoral studies, in Oxford, Leuven, Luxembourg, Lisbon, Bologna, Geneva, Helsinki, Berlin, and Oslo. Over the past four years, Sophie spoke at 12 international conferences, including at the International Studies Association Annual Conference, the World Press Institute Annual Conference, the European Parliamentary Research Service, and the Annual Dahrendorf Memorial Lecture at the University of Oxford. She also presented preliminary research findings at several seminars and lectures, including at Leiden University, Maastricht University, and NATO’s Civil-Military Centre of Excellence.

At Leiden University, Sophie supported the Minor in Global Affairs offered by the Institute of Security and Global Affairs (ISGA) by assisting senior lecturers and organising activities for students. She completed all trainings required to obtain the University Teaching Qualification. Between 2022-2024, Sophie acted as Wellbeing, Inclusion, Diversity, and Equity Representative at ISGA, a role in which she developed the Institute’s policy and implemented its strategy related to social and psychological safety in collaboration with senior executives.

Previously, Sophie launched and led a network of now 1700+ young ambassadors for the largest EU public diplomacy campaign, EU OPEN Neighbourhood. Sophie holds a MPhil in Politics (*Merit*) from the University of Oxford (2018-2020) and a BA in International Affairs (*Summa Cum Laude*) from the Brussels School of Governance (2013-2016). She regularly blogs about global affairs, academia, personal development, and travel at www.sophiepomme.com.