

Public survey for European Democracy Action plan

Fields marked with * are mandatory.

Introduction

The Commission's Political Guidelines announced a European Democracy Action Plan under the headline ambition of a new push for European Democracy. The Commission intends to present the Action Plan towards the end of 2020.

The aim of the European Democracy Action Plan is to ensure that citizens are able to participate in the democratic system through informed decision-making free from interference and manipulation affecting elections and the democratic debate.

The Commission has started the preparation of the European Democracy Action Plan and would like to consult the public on three key themes:

- Election integrity and how to ensure electoral systems are free and fair;
- Strengthening media freedom and media pluralism;
- Tackling disinformation.

In addition, the consultation also covers the crosscutting issue of supporting civil society and active citizenship.

When providing your contribution, you may opt to fill in one or more of the four sections, according to their relevance to your areas of interest. Please note that a specific public consultation on the Digital Services Act package is open until 8 September 2020 and covers also elements relevant in the context of the European Democracy Action Plan.[1]

[1] <https://ec.europa.eu/digital-single-market/en/news/consultation-digital-services-act-package>

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish

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

* I am giving my contribution as

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

* First name

Owen

* Surname

Bennett

* Email (this won't be published)

obennett@mozilla.com

* Organisation name

255 character(s) maximum

Mozilla Corporation

* 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.

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* Country of origin

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

- | | | | |
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| <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

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| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
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| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena Ascension and Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

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

Questions on election integrity and political advertising

Fair democratic debates and electoral campaigns as well as free and fair elections in all Member States are at the core of our democracies. The space for public debate and electoral campaigns has evolved rapidly and fundamentally, with many activities taking place online. This brings opportunities for the democratic process, public participation and citizen outreach but also challenges, inter alia concerning the transparency of political advertising online and possible threats to the integrity of elections. Ahead of the 2024 European Parliament elections, changes to the role of European political parties might also be considered.

(i) Transparency of political advertising

Q1 Have you ever been targeted^[2] with online content that related to political or social issues, political parties (European or national), political programmes, candidates, or ideas within or outside electoral periods ('targeted political content')?

[2] Paid for ads and any form of personalised content promoted to the user

- 1. No, never
- 2. Yes, once
- 3. Yes, several times
- 4. I don't know

Q2. If you receive such targeted political content, are you checking who is behind it, who paid for it and why you are seeing it?

- 1. No, I am not interested
- 2. I don't know how to do it
- 3. Yes, occasionally
- 4. Yes, all the time
- 5. I don't receive targeted political content

Q3. To what extent do you agree with the following statements related to targeted political content you have seen online?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
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1. Targeted content was labelled in a clear manner	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. It was easy to distinguish paid for targeted content from organic content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. It was easy to identify the party or the candidate behind the content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. The content included information on who paid for it	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. The information provided with the content included targeting criteria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. The ad was linked to a database of targeted political content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. The targeted political content offered the possibility to report it to the platform	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q4. Which of the following initiatives/actions would be important for you as a target of political content?

	Not at all	A little	Neither a lot nor a little	A lot	Absolutely	Don't know
1. Disclosure rules (transparency on the origin of political content)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/>
6. Prohibit online targeted political content altogether	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

Q5. Online targeted political content may make use of micro-targeting techniques allowing advertisers to target with high precision people living in a specific location, of a certain age, ethnicity, sexual orientation or with very specific interests. Do you think that:

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Micro-targeting is acceptable for online political content and it should not be limited	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" 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 checked="" type="radio"/>
4. Micro-targeting criteria should be banned	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

We view highly sophisticated microtargeting and personalisation as an important contributor to the spread and impact of disinformation. Indeed, a key factor that allows disinformation to be effective in the online ecosystem is that it can be targeted to those populations most susceptible to its messages. For instance, disinformation aimed at suppressing the vote for a specific candidate is most problematic when targeted at individuals who intend to vote for said candidate (see for instance, this research that concerns voter suppression disinformation aimed at African Americans in the US).

Yet despite this awareness, there is currently a dearth of well-developed policy options - such as ones that would establish the appropriate limits on targeting at some specified level of granularity - that could reasonably address the problem and which provide a clear articulation of the likely benefits and drawbacks of such approaches.

At the very least then, we should aim to establish a clear problem definition and evidence-base on which we can develop policy options. For that reason we suggest to consider including targeting parameters and aggregate audience demographics within the suggested framework for the bulk disclosure of all advertisements that we outline in section 2. We recognize that there can also be unintended consequences as well as business, security and privacy considerations at play here. And, thus, it will be important to navigate this potential option with stakeholders that can ensure that those considerations are part of the debate upfront about the benefits and drawbacks of this possible approach.

At the same time, it should also be underscored that the European Commission already possesses many legislative instruments that could be brought to bear to address harms arising from microtargeting. For instance, effective enforcement of the GDPR across the EU may be fruitful in allaying many of the concerns around collection and use of data for microtargeting of political content.

Ultimately, we welcome the Commission's consideration of the role of microtargeting with respect to political advertising and its contribution to the spread and impact of disinformation. The EDAP provides a crucial opportunity to systematically understand the problem and develop the necessary evidence base for effective policy responses.

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

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

Q1.1 If yes, what kind of issue?

- 1. Lack of proper sanction applied to perpetrators of attacks against journalists– Yes/No
- 2. Abuse of defamation laws or other laws aiming at silencing journalists and news media – Yes/No
- 3. Lack of legal safeguards for journalistic activities – Yes/No
- 4. Lack of institutions to protect journalists – Yes/No
- 5. Online hate speech – Yes/No
- 6. Cyberbullying – Yes/No
- 7. Physical threats – Yes/No
- 8. Other – please specify

Please explain your answer

Q2. Are you familiar with the concept of ‘strategic lawsuits against public participation’ (SLAPPs)?

- 1. Yes
- 2. No
- 3. Don’t know

Q2.1 If yes, are you aware of such lawsuits in your own Member State?

- 1. Yes
- 2. No
- 3. Don’t know

Please explain your answer

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

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

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

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

(ii) Media independence and transparency

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

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

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

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

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

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

Please explain

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

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

Please explain

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

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

Please explain

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

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

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

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.

Q11. Should the role of and cooperation between EU media regulators in overseeing respect for such standards, offline and online, be reinforced?

- 1. Yes
- 2. No
- 3. I don't know

Please explain your reply.

(iii) Cross-border cooperation, media and press councils, self-regulation

Q1. Are you aware of the existence of a press or media council or another media self/co-regulation body supervising journalistic ethical standards and conduct in your country?

- 1. Yes
- 2. No

Q1.1 If yes, what are the main activities of a press or media council or another media self/co-regulation body in your country?

- 1. Please specify
- 2. I do not know

Please explain your answer

Q1.2 Do you think press or media councils should be established in all EU countries?

- 1. Yes (please explain)
- 2. No (please explain)

Please explain

Q1.3 In order to address the challenges in the media sector, which activities should be prioritised by press and media councils or other media self/co-regulation bodies?

- 1. Incentivising exchanges of best practices and promoting journalistic standards, in particular online – Yes/No
- 2. Providing support for journalists in the process of digitalisation of media sector – Yes/No
- 3. Ensuring effective complaints handling mechanisms – Yes/No
- 4. Establishing links between journalists and citizens to increase trust – Yes/No
- 5. Contributing to the fight against disinformation online – Yes/No
- 6. Other - please specify

Please explain your answer

Q2. What role, if any, should the EU play to facilitate cross-border cooperation?

- 1. Provide financial support to media councils or other media self/co-regulation bodies – Yes/No
- 2. Set up an EU-level coordination network – Yes/No
- 3. Promote citizens' awareness about their activities – Yes/No
- 4. Other (please specify)
- 5. No role

Please explain your answer

Questions on tackling disinformation

Designed to intentionally deceive citizens and manipulate our information space, disinformation undermines the ability of citizens to form informed opinions. Disinformation can also be a tool for manipulative interference by external actors.

(i) Scope

Q1. The April 2018 Commission Communication on Tackling online disinformation: a European Approach defines disinformation as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm.[4]

Do you think this definition should be broadened and complemented to distinguish between different aspects of the problem?

[4] Public harm includes threats to democratic processes as well as to public goods such as Union citizens' health, environment or security. Disinformation does not include inadvertent errors, satire and parody, or clearly identified partisan news and commentary.

- 1. Yes (please specify)
- 2. No (please specify)
- 3. Don't know

Please explain your answer

Q2. So far, the European Commission has addressed the spread of disinformation through a self-regulatory approach, which has resulted in a Code of Practice on Disinformation being subscribed by major online platforms and trade associations representing the advertising industry. Do you think that this approach should be:[5]

[5] This question complements the questionnaire for the public consultation on the Digital Services Act, which focuses on illegal content

- 1. Continued as it is currently pursued (status quo)
- 2. Pursued but enlarged to a wider range of signatories
- 3. Pursued but combined with a permanent monitoring and reporting programme
- 4. Pursued but on the basis of a substantially reviewed Code of Practice
-

5. Pursued but accompanied by a regulatory framework fixing basic requirements for content moderation, data access and transparency, as well as respective oversight mechanisms
6. Pursued but accompanied by a regulatory package fixing overarching principles applicable to all information society services and establishing more detailed rules for dealing with disinformation under such general principles
7. Replaced by special regulation on disinformation
8. abandoned altogether, as all forms of restriction or control on content posted online by internet users and which is not illegal in nature (e.g. illegal hate speech, incitement to terrorism) could endanger freedom of speech
9. Other (please explain)

Please explain your answer

Mozilla was an original participant in the European Commission High-Level Expert Group on Fake News and Disinformation, and we played a key role in the development of the EU Code of Practice on Disinformation in 2018.

1.1 Taking stock of how far we've come

At the outset it is important to acknowledge that the Code of Practice was a significant policy milestone. It was the first such instrument of its kind globally; it facilitated the exchange of information and best practice between public authorities and private companies on an urgent emerging policy challenge; and ultimately, it contributed to greater security and trust in the 2019 EU elections.

Despite these achievements we have always been clear that, in policy terms, the Code is a starting point. There is considerably more work to be done, both to ensure that the Code's commitments are properly implemented, and to ensure that it is situated within a more coherent general EU policy approach to platform responsibility.

With respect to ensuring effective implementation of the Code's commitments, we note that in many instances implementation has been less successful than we had hoped. This is particularly evident with respect to signatories' commitments around advertising disclosure and empowering the research community. While these issues can be partially addressed in other legislative instruments (for instance, the Digital Services Act) they are key elements of the Code of Practice and should be considered as such. We therefore encourage the Commission to maintain a high-level of diligence in its monitoring implementation of signatories' commitments.

More broadly, we consider that the European Democracy Action Plan can provide an important opportunity to consider how the Code of Practice should fit within the broader EU approach to platform responsibility and content regulation. There are two pressing reasons why this is necessary -- first, the last EU political mandate coincided with a significant fragmentation in the policy approach to platforms and online content; and second, with the Digital Services Act the Commission is preparing a root and branch reform of the key principles of platform responsibility and content regulation.

We believe that the DSA and the Code of Practice can coincide in a coherent and effective regulatory paradigm. In our DSA public consultation submission we advance a vision of procedural accountability, whereby content responsibility should be assessed in terms of the Trust & Safety processes that platforms have in place to address illegal and harmful content on their services. Within a broad regulatory framework, platforms should be obliged to assess the various ways in which their services are at risk of illegal and harmful content, and to put in place commensurate Trust & Safety processes to address that risk. For instance, policy interventions could encourage enhancements to flagging systems or improvements to the means by which content is surfaced to users. This approach ensures interventions happen where they are likely to have the most impact in addressing and mitigating harm, but in a way that does not necessitate companies to unduly interfere with their users' fundamental rights.

The Code of Practice could serve as a concrete manifestation of this broader procedural accountability framework within the domain of disinformation. In theory under the Code, relevant companies assess the content-related problem they face, commit to taking certain steps to address them, and ultimately subject their efforts to oversight and assessment by the European Commission. To be a true manifestation of procedural accountability however, it is important that the efforts companies are making are commensurate to the risks they face, and that their interventions focus on practices and processes, rather than arbitrary 'outputs' (e.g. how much content was taken down in a given period of time). In that context, we again encourage the Commission to maintain diligence in assessing the implementation of commitments under the Code (to ensure they are commensurate) and to encourage companies to focus their efforts on practices and processes (e.g. providing better data access to researchers; providing better user-facing tools; etc).

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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q2. Paid-for content on issues of public interest is promoted on social media platforms both during and outside electoral periods. Due to the special prominence given to such paid-for content in news-feeds and other systems for displaying content online, users may be misled as to its credibility or trustworthiness, irrespective of the veracity of the content. Do you think that issue-based advertising / sponsored content of political context:

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Should be systematically labelled	<input checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>

(iii) Integrity of platforms' services

Q1. Do you think there should be targeted regulation at EU or national level to prohibit deceptive techniques such as the use of spam accounts and fake engagement to boost posts or products?

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

Q1.1 If you replied yes to the previous question, what do you think should be the most appropriate measures to tackle the above-mentioned manipulative techniques and tactics?

			Neither agree			I don't
			agree			

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

Please explain

Careful consideration is required before considering granular regulation aimed at addressing coordinated inauthentic behaviour (e.g. the use of spam accounts). These challenges manifest differently across platforms and continuously evolve in line with technological and product trends. The measures considered below are likely to be effective approaches when deployed by certain platforms, but their effectiveness and suitability requires a case-by-case assessment.

We thus recommend the Commission to focus on establishing general regulatory frameworks for content responsibility, that provide companies with the flexibility and incentives to deploy the particular Trust & Safety measures that are appropriate for their unique situation and threat landscape. Regulatory frameworks pursued under the EDAP should avoid giving rise to overly-perspective one-size-fits-all rules.

(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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Promoting factual content from public authorities (e.g. on election date)	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Demoting content fact-checked as false or misleading	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Labelling content fact-checked as false or misleading without demoting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Which sources do you consider as trustworthy?

Obliging online services to promote 'trustworthy' content can give rise to problematic unintended consequences, particularly with respect to the meaning of trustworthy. Moreover, it is difficult to define how the effort to promote 'trustworthy' content should interact with commercial metrics for content promotion (e.g. 'engagement', 'usefulness', etc). Consequently, we recommend the Commission to proceed cautiously in this regard.

In our view a more practical approach would be to focus on the promotion and amplification of 'factual information' (e.g. election dates, location of polling centers, etc). This approach proved to be an effective means of disseminating critical public health information during the COVID-19 pandemic, and that experience could serve as a template for future efforts by companies

Q2. In your opinion, to what extent, if at all, can the following measures reduce the spread of disinformation?

	No contribution	Minor contribution	Little contribution	Major contribution	Don't know
1. Demotion of posts or messages that have failed a fact-check by journalists or a fact-checking organisation in the newsfeed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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

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

Today our ability to address disinformation as it manifests online is hindered by a lack of insight, and there are a number of areas where enhanced transparency could contribute to improved policy responses to disinformation. One area of particular importance is around ad placement, given that the paid-for advertising content has traditionally served as an important vector for the dissemination and amplification of disinformation.

One methodology to address this would be through the implementation of a framework whereby platforms that operate advertising networks publicly disclose all advertisements on their platforms via ad archive APIs.

If this approach was pursued, it could:

- Apply to all advertising, so as not to be constrained by arbitrary boundary definitions of 'political' or 'issue-based' advertising;
- Potentially include disclosure obligations that concern advertisers' targeting parameters for protected classes as well as aggregate audience demographics, where this makes sense given privacy and other considerations;
- Establish disclosure via publicly-available APIs, such that access is not restricted to specific privileged stakeholders as we have seen in some existing ads transparency efforts.

In the recent past, regulatory and co-regulatory initiatives aiming at ad transparency to combat disinformation have generally focused on 'political' advertising. Focusing on purely 'political' advertising (e.g. advertising copy developed by political parties) is too narrow an approach in many instances, and is often considered to be insufficient to capture the complex web of actors involved in politically-motivated disinformation online.

A broad ads disclosure framework could also drive transparency with respect to what is known as 'issue' advertising. Experience has shown how disclosure obligations that include this broader category of political ads put platforms in a challenging position, as the relevance for disclosure purposes of particular issue-based advertising requires platforms to decide what is 'political' in nature, which can vary depending on context, jurisdiction, and time. These problems could potentially be avoided by disclosure of all advertisements. It avoids the risk of under-disclosure (that arises with overly narrow definitions of 'political' advertising); minimises the burden on platforms to make highly-contextual definitional assessments (that arises with definitions of 'issue-based' advertising); and, helps ensure that transparency objectives are resilient in the face of technological and commercial changes (the nature of advertising content and channels evolves constantly).

A thoughtful analysis of how to balance privacy considerations, business considerations, and transparency is necessary for a successful transparency landscape. The inclusion of targeting parameters and aggregate audience demographics can be a significant tool for ensuring that regulators and researchers can understand how disinformation can spread across platforms. For instance, for much of the disinformation that is delivered via advertising on platforms, the content of the advertising provides only a partial - and indeed ancillary - insight into the phenomenon. Rather, it is the fact of what types of individuals those advertisements are aimed at and under what circumstances, that can provide insight into the risks and harms.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

Content moderation practices should be accompanied by meaningful oversight, accountability, and appeal mechanisms. Recommendations on how to ensure that due process can be found in the recently-published Santa Clara Principles (see here: <https://santaclaraprinciples.org/>).

In addition, platforms should publish clear and understandable terms-of-service, that enable users to understand what behaviours and content is likely to be incompatible with the rules of the service, and what sanctions they may expect should they fail to adhere to the rules.

Services that deploy automated content control solutions (e.g. upload filters) should ensure user-facing transparency regarding the fact of these features and their goals. Likewise, services that deploy sophisticated content curation measures as a component of their trust & safety program (e.g. demonetisation; down- and non-ranking; etc) should provide transparency as to the fact of these practices and their objective. Furthermore in all instances where platforms are engaged in content moderation or trust & safety-focused curation, they should provide notice to users who are directly affected and clear and accessible means for individuals to contest decisions.

Beyond companies, public authorities should be subject to clear transparency requirements when they issue content takedown notices to digital services. These transparency requirements should ensure that public authorities provide clarity on what content is requested for removal; the motivation for the removal request; and the legal basis on which the request stands. This transparency is a key means of ensuring trust in public authorities and protecting against arbitrary and unjustified interference with fundamental rights.

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

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

Other: please list

Q5. As a user, when you come across information that you perceive as false or misleading, which options should be available to deal with such content (more than one reply is possible)?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Removing that content from your feed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

Q6. End-to-end encrypted messaging services (such as WhatsApp, Telegram or Signal) can be used to spread false and harmful content. In your view, should such platforms introduce measures to limit the spread of disinformation, with full respect of encryption and data protection law (more than one reply is possible)?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Introduce easy-to-find reporting or flagging system for users	<input checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/>
5. Other (please elaborate)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

Recent experiences in the European Union during the COVID-19 pandemic have demonstrated that the inadvertent spread of both misinformation and disinformation on messaging apps is not a problem limited to

emerging economies.

However, it must be underscored that the spread of disinformation via such platforms is not a consequence of their deployment of e2e encryption. On the contrary, these platforms may be vulnerable to disinformation owing to: gaps in digital literacy, unresponsive product design, and ineffective redress mechanisms. Keeping this context in mind, solutions should focus on these three categories, and not on weakening encryption. We urge the Commission to maintain its commitment, expressed in the questionnaire text, that measures to address disinformation should be developed “with full respect of encryption and data protection law”.

4.1 Digital Literacy

The inadvertent spread of disinformation on e2e platforms is fundamentally a problem of digital literacy and a lack of awareness on how to verify news/information before forwarding it. Different stakeholders, including platforms, governments and media organisations, have a shared responsibility on this front. It is vital that e2e services provide users with sufficient resources on the importance and means of verifying news /information they receive. This could take the form of publicly available resources on websites and other media awareness campaigns.

4.2 Responsive Product Design

Despite many of the clearly recognised concerns with disinformation on e2e messaging services, many service providers have been slow in reforming their products to empower users with tools to combat disinformation while protecting e2e encryption. For example, while provided by some players in the industry, many services are yet to make it easier for users to be able to identify suspicious links and frequently forwarded messages in a user-friendly manner within their applications. As recent examples from other jurisdictions have demonstrated, it is possible to do so without breaking e2e encryption. Another measure that services could make available is allowing users to conveniently search the internet or fact-checking websites with the content of messages to verify their authenticity or be warned of possible harm that may occur from such information.

4.3 Redress Mechanisms

It is currently quite difficult for users to report messages and users to the e2e platform for action (including account suspension) despite overt actions which violate platform conditions and regulations. This should be reformed to enable users to report messages/users as easily as they can forward or delete them. To ensure complete transparency and similar to online backup feature in some services, this act by the user should explicitly state that doing so will mean the message will no longer be encrypted as it will (along with associated metadata) be shared with the platform for reporting and action. All of these measures can be in addition to the meaningful oversight, accountability, and appeal mechanisms mentioned in our response to the questionnaire.

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 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

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.

In 2019, Mozilla, in conjunction with a cohort of disinformation researchers, published recommendations aimed at social media platforms on the kind of data that should be made available through ad archive APIs to facilitate better research into disinformation and its arising harms.

Those recommendations can be read here: <https://blog.mozilla.org/blog/2019/03/27/facebook-and-google-this-is-what-an-effective-ad-archive-api-looks-like/>

See also section 2 of the annex to our consultation submission.

Q13. How should the EU respond to foreign state and non-state actors who interfere in our democratic systems by means of disinformation (multiple answers possible)?

	Yes	No	Don't know
1. Analyse and expose state-backed disinformation campaigns	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Conduct public awareness-raising campaigns	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Support independent media and civil society in third countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Impose costs on state who conduct organised disinformation campaigns	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Develop more effective public outreach and digital communication strategies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Other, (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

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

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

Questions on supporting civil society and active citizenship

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

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

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

If Q1=2 What more could be done?

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

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

Please explain your answer

Q3. Do you think actions should be taken at EU level to strengthen cooperation among civil society actors across borders?

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

Please explain your answer

Q4. Do you think the EU should provide more financial support for civil society (for example under the 'Rights, equalities and citizenship' programme)?

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

Q5. Are you aware of measures to increase media and information literacy/develop media literacy skills? What type of action do you deem to be most efficient/most appropriate in this area:

- 1. Formal education in school/university
- 2. Education online via social media platforms
- 3. Life-long learning
- 4. Exchange of best practices in expert fora
- 5. Don't know

Q6. Do you think that more participatory or deliberative democracy at the European level, with more possibilities for public deliberation and citizen engagement, beyond public consultations, would be:

- 1. A good thing
- 2. Neither good nor bad
- 3. A bad thing
- 4. Don't know

Please explain your reply

Q6.1 If given the opportunity, would you take part in a European participatory or deliberative democracy event?

- 1. Yes, absolutely
- 2. Yes, probably
- 3. Maybe
- 4. Probably not
- 5. No, not at all
- 6. Don't know

Q7. Are you familiar with the European Citizens' Initiative?

- 1. Yes, I have taken part in one before
- 2. Yes, but I have not taken part in one before
- 3. Not sure
- 4. No, I do not know what a European Citizens' Initiative is

Contact

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