

ACT RESPONSE TO THE EUROPEAN DEMOCRACY SHIELD CONSULTATION

1. FOREIGN INFORMATION MANIPULATION AND INTERFERENCE AND DISINFORMATION

Definitions

- **FIMI:** A pattern of behaviour threatening or potentially negatively impacting democratic values, procedures, and political processes. It is manipulative, intentional, and coordinated, by state or non-state actors or their proxies.
- **Disinformation:** False or misleading content spread with intent to deceive or gain economic/political advantage, possibly causing public harm.

1.1 Perception of Risks (Tick the appropriate boxes)

Technique	Very high	High	Neutral	Low	Very low	Don't know
Foreign information manipulation and interference and disinformation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inauthentic use of social media (e.g. fake accounts, bots, algorithmic amplification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Covert funding of political activity (parties, campaigns, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Interference in research and academia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Threats and attacks against political actors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Threats and attacks against the media and journalists	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Corruption, fraud, etc. in politics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments (optional):

(3500 character limit)

The European Democracy Shield (EDS) comes at a critical moment for democratic discourse. Recent events have demonstrated the vulnerability of democratic processes to **manipulation, disinformation and interference**; the initiative's importance cannot be overstated. While a geopolitical approach is important, the fundamental challenge to democratic resilience lies in the growing influence and behavior of online platforms over public discourse, often to the detriment of responsible editorial media. These platforms have gained unprecedented power to shape democratic processes while simultaneously contributing to the erosion of sustainable media models. This can have real social and economic consequences, as demonstrated by the World Economic Forum's 2025 Global Risk Report, which ranks disinformation as the top risk for the 2027 horizon.

ACT has long advocated for stronger oversight and accountability in this space. As a member of its Sounding Board for the Code of Practice on Disinformation, we have consistently called for a more robust approach when it comes to the fight against online disinformation —anchored in binding enforcement, clear sanctions, systematic monitoring, and independent regulatory oversight.

We welcome the transition to a Code of Conduct under the DSA. However, key weaknesses persist: platforms still select commitments à la carte and may withdraw at any time; data on bots and account suspensions remains incomplete and lacks granularity; and ranking and moderation systems remain opaque. This lack of accountability allows the continued **inauthentic use of social media**—through bots, fake accounts, and algorithmic amplification—which remains a critical systemic risk.

The European Democracy Shield is an opportunity to finally switch gears and turn the code of conduct on disinformation into a more significant tool.

Additionally, growing **threats to media and journalists**—ranging from harassment and violence to disproportionate regulatory pressure—contribute to the erosion of democratic discourse. In some EU Member States, ACT members face discriminatory and politically motivated regulatory measures. We hope that the European Media Freedom Act will help curtail these.

Another concern the implementation of the EMFA will address is unlawful surveillance of journalists, including the use of spyware and other intrusive technologies. Ultimately, to ensure the safety of journalists, we encourage the Commission to reinforce its support to Member States: (1) in implementing the 2021 Recommendation, and (2) in promoting national frameworks that deliver immediate results, e.g. safety programmes led by media companies and mechanism to strengthen mandatory flows from big tech to regulators with regard to growing use of online threats (including DDoS attacks).

Other (please explain):
(1500 character limit)

Commented [SB1]: This language is based on arguments the European Federation of Journalists (EFJ) is likely to include in its response to the consultation. In my view, the points are not controversial and address important concerns.

1.2 Measures to Combat FIMI and Disinformation (Rank 1–5, where 1 = most important)

Measure	1	2	3	4	5
Information sharing/cooperation among Member States	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cooperation between MS and EU institutions	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Collaboration between government and non-government stakeholders	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dedicated EU-level structure to detect and respond to threats	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reinforcement of national authorities' capacity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support for fact-checkers, researchers, civil society	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Monitoring/enforcement of existing rules	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Awareness-raising and resilience building	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support for pluralistic platform landscape	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Addressing economic incentives behind manipulation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promoting algorithmic and platform transparency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Supporting AI-based detection technologies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Transparency on AI use in political content	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Empowering media (training journalists, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Involvement of multidisciplinary experts (IT, AI, socio-political)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Commented [CG2]: Rather 4

Commented [SB3R2]: 🇵🇸

Measure	1	2	3	4	5
Sanctions for actors involved in disinformation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reinforced EU cooperation with international organisations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Stronger diplomatic exposure of perpetrators	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments (optional):

(3500 character limit)

Members alerted us on the difficulties faced in handling the overwhelming presence of deepfakes on social media. The identification of deepfakes has made fact-checking more challenging, putting a burden on our editorial processes. To date, platform actions to monitor, detect, and remove harmful AI-generated content have fallen short. We have taken note of recent voluntary commitments by several actors (e.g. AI Elections Tech [Accord](#)).

Any action in this space—particularly the development and use of watermarking standards for deepfakes—is welcome. However, past voluntary initiatives by online platforms, especially in the area of disinformation, have shown limited results and do not inspire confidence that this effort alone will be effective. There is no reason to believe, based on their track records, that self-regulation is sufficient.

It is essential to prioritise platform obligations that directly target the viral spread of disinformation. This includes **promoting algorithmic and platform transparency, supporting the development and deployment of AI-based detection technologies, and ensuring transparency in the use of AI for news and political content**. The European Democracy Shield should contribute to this by being the start of a new enforcement approach.

The most effective way to ensure meaningful platform responsibility and provide a real incentive for compliance is through the introduction of a credible sanctions regime for actors involved in disinformation. While other entities in the value chain—such as sponsors or intermediaries—may contribute, it is the platforms that control the systems of distribution, amplification, and monetisation. They must therefore bear primary accountability and legal liability.

Other (please explain):

(1500 character limit)

1.3 Awareness of Key Policies

Regulation/Policy	Well aware	Somewhat aware	Unaware
Transparency and targeting of political advertising regulation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Digital Services Act (DSA)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Artificial Intelligence Act (AI Act)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Code of Practice on Disinformation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ethical commitments by political parties	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Ethical standards by campaign organisers and other actors	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Regulation/Policy	Well aware	Somewhat aware	Unaware
Policies on digital/media literacy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
National policies to address FIMI and disinformation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Platform policies (terms, guidelines)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1.4 Further Measures to Reinforce the EU Framework

(1500 character limit)

Three key pillars to guide measures:

1. Enforcement of digital rules that support Europe's Information Ecosystem
2. An advertising market supporting media that invests in information and culture
3. Introduce Media Impact Assessments in EU Regulation

More details outlined below (section 2.3) and in the attached document.

We would also draw attention to Proposal 13 of the French *États Généraux de l'information*, which recommends introducing an obligation for VLOPs and VLOSEs to display information content. The objective is to prevent these platforms from rendering news websites invisible or de-referencing them, thereby safeguarding continued access to quality journalism. While platforms would not be held liable for the content itself, they would be required to display news content in a non-discriminatory manner. This obligation, which relates to systemic risks as defined under Articles 34 and 35 of the DSA, would apply exclusively to VLOPs and VLOSEs.

Expanding these national initiatives would contribute to the objectives of the Democracy Shield by ensuring the visibility of reliable news content, combatting disinformation, protecting media pluralism and strengthening the integrity of the online information space. It could also address instances where news publishers opting out of search services have experienced dereferencing or removal from search results, e.g. [Google news Spain](#).

1.5 Measures to Support a Healthy Democratic Information Space (Rank 1–5)

Measure	1	2	3	4	5
Media/digital literacy and critical thinking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Free, plural, and independent media support	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Trusted, impartial, and open-source information support	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support for scientific research on disinformation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Use of scientific advice in anti-disinformation efforts	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support for fact-checkers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Support for civil society organisations	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Measures against manipulative dissemination online	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Structures for safe and transparent online debates	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

(3500 character limit)

We fully support measures to strengthen the information space, which we believe is essential for healthy democracies. In 2023, most of the respondents to the Eurobarometer on Media & News

Survey reported TV as one of their most-used news sources in recent days, and it remains one of the most trusted - a stark contrast to the level of trust placed in video-sharing platforms¹. The gap clearly shows the value added audiences place on broadcasters' editorial responsibility, impartiality, and rigorous content standards. Audiences trust broadcasters to present information honestly, fairly, and independently.

By contrast, online platforms fail to provide a safe or transparent framework for democratic discussion. They rely on opaque content moderation policies, lack transparency in their algorithms, and face limited accountability for the content they amplify. This imbalance not only distorts competition but also undermines public trust and the viability of responsible editorial media.

We challenge the claim that social networks and video-sharing platforms do not exercise editorial control. In reality, they do so indirectly (e.g. via algorithmic control) without bearing any editorial responsibility. Despite their growing importance as information sources, many platforms use advanced AI-driven systems that significantly influence content visibility and virality through algorithmic decisions – let alone that the respective content is monetised. This constitutes *de facto* a form of “editorial control” that must be recognised, albeit fundamentally different from the editorial responsibility long held by broadcasters and VoD services.

The European Democracy Shield must recognise and tackle the structural imbalance between platforms and regulated media. Ensuring platforms offer safe, transparent, and pluralistic spaces for democratic debate—while adhering to the principles of fairness, accuracy, and accountability expected from traditional media—should be central to this initiative.

Other (please explain):
(1500 character limit)

2. FAIRNESS AND INTEGRITY OF ELECTIONS AND STRENGTHENING DEMOCRATIC FRAMEWORKS

2.1 Measures to Strengthen Electoral Fairness and Integrity (Rank 1–5)

Measure	1	2	3	4	5
Sharing of good practices among Member State authorities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increased cooperation between MS and EU institutions on election integrity, including during crises	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
European repository of good electoral practices	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EU standards or rules on political activity funding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reinforced national frameworks ensuring equal opportunities for parties/candidates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Protection measures for political candidates and representatives (online/offline threats)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Responsible use of AI in democratic processes (e.g. campaigns, voting)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cybersecurity and protection of election-related critical infrastructure	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ethical frameworks and voluntary commitments by political actors	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Measures to protect voters from online manipulation and disinformation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

¹ <https://europa.eu/eurobarometer/surveys/detail/3153>

Measure	1	2	3	4	5
Involvement of trustworthy independent experts (IT, AI, socio-political, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

(3500 character limit)

Commercial broadcasters operate under strict and well-established regulations at both European and national levels. Frameworks such as the AVMS Directive and the recent European Media Freedom Act, combined with national laws, impose clear obligations on broadcasters to maintain impartiality, political pluralism, editorial responsibility, transparency, and accountability. National regulatory authorities enforce these obligations, applying significant sanctions for non-compliance.

The legally binding and rigorously enforced democratic safeguards that apply to broadcasting are largely absent in the online space. This regulatory gap not only undermines the effectiveness of the strict obligations imposed on broadcasters but also distorts competition, weakening investment in trustworthy information.

Key regulatory obligations on broadcasters:

- **Limitations to political advertising:** Paid political advertising is prohibited on television in most European markets. Where permitted, broadcasters must ensure equal access for all political parties, offering identical pricing, airtime, and placement conditions. Where allowed, political advertising is subject to stringent transparency rules, requiring public disclosure of sponsors and funding sources.
- **Editorial fairness:** Broadcasters must adhere to strict airtime allocation rules, ensuring balanced representation of political parties, with weekly reporting during election periods. Content that could influence voters—such as candidate interviews or partisan commentary—is often restricted immediately before and during election periods. For instance, in some countries, “electoral silence” is imposed shortly before an election, prohibiting political advertising through any medium. However, this rule is often disregarded online, where politicians use social media to disseminate last-minute messages. Some jurisdictions also require broadcasters to produce and air specific balanced programming, such as debates or voter education segments. To meet these requirements, networks invest in compliance staff and specialised software to monitor and verify fair coverage.
- **Compliance & enforcement:** broadcasters must submit detailed reports on political ad expenditures and airtime allocations to regulatory bodies. Violations—such as biased coverage or undeclared sponsorships—can result in severe penalties, including six-figure fines, license revocation, or even court-ordered election reruns. National regulators conduct regular audits and require ongoing compliance filings to ensure adherence.
- **Compliance demands substantial resources:** major broadcasters employ dedicated teams specifically tasked with compliance on these specific issues and often hire additional full-time staff during election periods. Broadcasters also invest in costly tracking systems to meet regulatory requirements. These rules also impose opportunity costs, as networks must sometimes replace revenue-generating content with mandated political programming during critical campaign periods.

In contrast, online platforms operate in an environment with little to no rules. Platforms mainly rely on voluntary and inconsistent commitments, leading to an environment ripe with disinformation and manipulation, with great impacts on European democracy.

The European Democracy Shield presents an opportunity to address this imbalance by raising the bar for online platforms and ensuring they meet equivalent standards to those expected of regulated media. Obviously, there are practical differences between different environments and means of distribution. There might be practical reasons for different media types (press, radio, linear, VOD) and other sources of information (i.e. social media) to follow different rules, but there is a need for developing appropriate, balanced minimum standards that uphold democratic principles across all players in the information ecosystem. The European Democracy Shield presents a crucial opportunity to work towards this goal.

Other (please explain):
(1500 character limit)

2.2 Awareness of the European Media Freedom Act (EMFA)

☒ Yes

☐ No

2.3 Measures to Strengthen Media Freedom, Pluralism, and Journalism (Rank 1–5)

Measure	1	2	3	4	5
Promote freedom, pluralism and independence of the media	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Enhance citizens' access to diverse media and reliable information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Support local media and investigative journalism	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Strengthen viability and resilience of professional journalism and media companies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Encourage innovation in the media sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Foster responsible use of technologies by media (e.g. Artificial Intelligence)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Ensure a safe environment for journalists (build on anti-SLAPPs and ethical pressure protections)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

(3500 character limit)

Any meaningful defence of democracy must prioritise reinforcing media plurality and the sustainability of responsible editorial media while curtailing the dominance of big tech. Tangibly, to be successful, the Democracy Shield needs to deliver measures that have real economic impact. Trusted news, thought-provoking documentaries, and informative content come at a price. Advertising and subscriptions are at the heart of this funding mechanism.

The Democracy Shield needs to realign economic incentives to ensure advertising and subscription revenues can be effectively valued and boosted to fund these ecosystems. Without addressing key economic drivers and their erosion in the face of online monopolies and capture, the Democracy Shield will fail to effectively protect our democracies.

ACT's initial views on possible measures for the European Democracy Shield are structured around three key pillars. Some of them are outlined below. See the attached document for more details.

1. Enforcement of digital rules that support Europe's Information Ecosystem

- Designate major connected TV operating systems as gatekeepers in relation to the DMA
 - Require platforms to properly address media pluralism and disinformation risks as part of their DSA compliance obligations, specifically in their risk assessment and mitigation measures
 - Prioritise EMFA enforcement actions addressed to online platforms, focusing on key provisions: media privilege (art. 18), an approach to merger control that fully takes into account the role of online platforms (art. 22, 23), audience measurement (art. 24) and state advertising (art. 25)
2. An advertising market supporting media that invests in information and culture
- Explore ways to incentivise investments in media which fund newsrooms, professional journalism and cultural content, rather than in online platforms bearing no editorial responsibility
 - Expand on national initiatives such as the French *Etats Généraux de l'Information* and Germany's *Initiative 18* to establish a shared "democratic responsibility" (i.e. transparency on advertising spend) to encourage advertising in editorial media. Such measures should be notified to the EU to ensure compliance with internal market rules and the principles of the EMFA.
 - Consider issuing Member State guidelines/recommendations to complement such a framework at national level (e.g. via deductions for advertising spend in editorial media, higher rates for platforms with repeated compliance issues)
3. Introduce Media Impact Assessments in EU Regulation
- Propose a "Media Impact Assessment Test" to be applied to all relevant EU legislative proposals, starting with the AVMSD review and the Digital Fairness Act
 - Apply this approach not only to media-specific legislation, but also to adjacent policy areas with potential media impact, such as competition, data protection, and platform regulation
 - Incorporate this test into the Commission's competitiveness check and amendment assessment methodology

Other (please explain):

(1500 character limit)

More suggestions and details in our [discussion paper](#) on the EUDS.

2.4 Additional Measures to Strengthen Media Freedom Frameworks

3. SOCIETAL RESILIENCE AND PREPAREDNESS

3.1 Measures to Support Societal Resilience (Rank 1–5)

Measure	1	2	3	4	5
Enhance digital/media literacy and critical thinking from early age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Exchange of best practices among media literacy communities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support EU-wide media literacy initiatives	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support for civic education	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promote transparent and accountable public administration	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Raise awareness on disinformation narratives and manipulation techniques	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Promote use of responsible and independent scientific advice	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Media literacy and, more broadly, educating viewers is crucial to countering disinformation and enhancing democratic resilience. ACT members are involved in initiatives be it on a voluntary basis, or in order to meet their obligations or commitments to regulators. These range from dedicated debunking programmes, targeted educational initiatives, and engagement in strategic partnerships with educational bodies, civil society, and public institutions (see below).

Examples include:

- **TF1** employs 70 fact-checkers across its news departments (Economics, Politics, Society, etc.). TF1 has set up “*Les Vérificateurs*”, a unit dedicated to fact-checking and combating misinformation: debunking viral fake news and verifying trending online claims. Viewers can also contact this unit directly to react to an article, report a piece of information or submit suggestions for journalists to check (e.g. a political statement heard during a programme, a figure shared on social networks or images whose veracity seems doubtful).
- **Mediaset** launched “*Io non la bevo!*” in April 2021 to fight fake news. The campaign includes TV spots, a website with educational resources, social media quizzes, and a documentary (*Dietro la notizia*) on the impact of misinformation. Mediaset also partners with the Osservatorio Permanente Giovani-Editori (OPGE) on the *Doubt and Debate* initiative, promoting media literacy and critical thinking among youth.
- In **RTL Group**, verification teams across the Group bundle their expertise, e.g. through meticulous source and data vetting, reducing reliance on unverified or anonymous content. The verification team of RTL Deutschland did ca. 1700 researches in 2024, as well as giving workshops and training for colleagues, cooperating along the Content Alliance (Stern, G&J), RTL United and ENEX. In addition, dedicated formats to educate viewers about disinformation, linear and non-linear, have been introduced (ntv Faktenzeichen) to reach wider audiences.

Other (please explain):

4. CITIZENS’ PARTICIPATION AND ENGAGEMENT

4.1 Measures to Support Participation and Engagement (Rank 1–5)

Measure	1	2	3	4	5
Reinforce frameworks for citizens’ participation in policymaking	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Build capacity of public authorities to engage with citizens	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increase communication on participation opportunities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Foster political awareness and knowledge from early age	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promote lifelong democratic engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support training and education on citizenship and democratic participation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reinforce public trust in democratic institutions and political processes	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promote EU citizenship and associated rights	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

(3500 character limit)

ACT members play a pivotal role in promoting media literacy across Europe through news and other specialised formats. We therefore support broader initiatives to advance media literacy. However, we believe that disinformation is most effectively addressed upstream, by targeting the incentives and mechanisms that drive the creation and dissemination of such content. This approach could particularly help in supporting participation and democratic engagement.

Other (please explain):

(1500 character limit)

CONCLUDING REMARKS

If you wish to provide further comments within the scope of this consultation:

(1500 character limit)

Upload supporting document (optional, 1 document, max 15 pages):

ACT [discussion paper](#) on the EUDS (Only accepted file types: pdf, txt, doc, docx, odt, rtf)