



European
Partnership for
Democracy

Reviewing progress on the European Democracy Action Plan

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Table of Contents

Introduction	3
Overall assessment	4
1. Protecting election integrity and promoting democratic participation	6
Transparent political campaigning	6
European elections and civic participation	8
Regulation on the statute and funding of European political parties	8
Right to vote and stand as candidates in European and municipal elections	9
Joint mechanism for electoral resilience	10
Civic participation	11
2. Strengthening media freedom and media pluralism	12
Anti-SLAPP	12
Safety of journalists	14
Journalistic partnerships and standards	15
Additional measures to support media pluralism	16
3. Countering disinformation	18
Improving EU and Member State capacity to counter disinformation	18
More obligations and accountability for online platforms	19
Empowering citizens to make informed decisions	21
Conclusions	22

Introduction

On 3 December 2020 the European Commission [published](#) the **European Democracy Action Plan (EDAP)**, a strategy composed of several legislative and non-legislative initiatives aiming at supporting citizens and democracies across the EU by promoting free and fair elections; strengthening media freedom; and countering disinformation.

Three years later, **many actions have been completed or started**, even though delays on different initiatives have significantly slowed down the overall implementation of the strategy. Of the **30 measures envisaged by the European Commission, 20 have been completed, 7 are still ongoing, and 3 have not yet been started.**

At the same time, the Commission will publish a review of the status of the actions of the EDAP as part of the publication of the **Defence of Democracy package** (DoD) in December 2023. The package will also include a legislative proposal establishing harmonised requirements in the internal market on transparency of interest representation activities carried out on behalf of third countries; a Recommendation on an inclusive and resilient electoral processes in the Union and enhancing the European nature and efficient conduct of the 2024 elections to the European Parliament; and a recommendation on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes.

EPD has followed and [reviewed](#) the EDAP files very closely over the last few years. Against the background of the three-year adoption of the action plan, this paper provides an **overall assessment and insights into the state of implementation of the EDAP** by analysing the three pillars, assessing progress on each commitment and then drawing conclusions based on this analysis.

Overall assessment

Accomplishments	Shortcomings
<ul style="list-style-type: none"> • The first EU strategy solely focused on strengthening democracy. • The Commission has been initially very fast in putting forward initiatives after the publication of the EDAP. • The Commission went further in some cases with initiatives that were not included in the original plan (EMFA, Right to vote and stand as candidates in European and municipal elections). 	<ul style="list-style-type: none"> • Significant delays made it impossible for many rules to become applicable before the 2024 EU elections. • Work on several initiatives has significantly slowed down resulting in many actions not being completed. • Not enough progress on issues such as participation, e-voting. • Lack of transparency in several procedures (e.g. Media Literacy Expert Group, toolbox for countering foreign interference). • Ad hoc involvement of civil society with no inter-institutional agreement on civil dialogue.

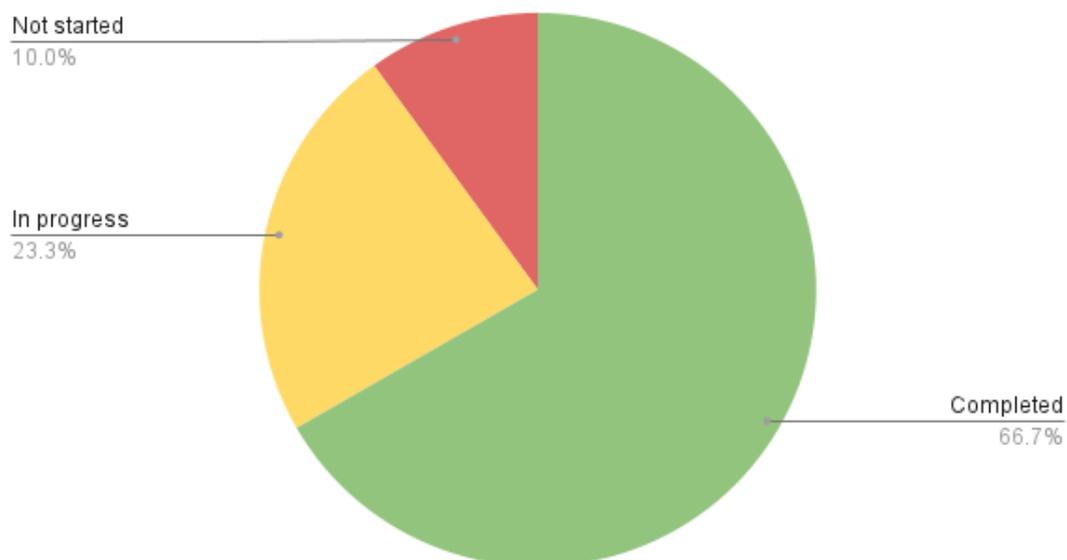
As EPD, we welcome that the EDAP was the first policy document to **focus exclusively on strengthening democracy** within the EU, which underlines the current Commission's ambition to put democracy firmly on its agenda.

Furthermore, in some cases the **EU went beyond the measures outlined in the EDAP** by responding to civil society's demands for more EU integration, e.g. with regard to elections, which was taken into account in the dossier on the right to vote and stand as a candidate in European and local elections. Broader dossiers such as the Media Freedom Act (EMFA) or the Digital Services Act (DSA) were also linked to the EDAP in order to fulfil the need for an integrated approach in various policy areas.

Additionally, **most of the actions have been either completed, or at least**

started and at an advanced procedural stage. Other actions were **repeatedly delayed**, making it impossible for the new rules to become applicable before the 2024 EU elections. Some examples are the Transparency and Targeting of Political Advertising Regulation and the Regulation on the statute and funding of European political parties and European political foundations. More specifically, **out of the 30 actions foreseen by the European Commission, 20 have been completed, 7 are still in progress, and 3 have not been started yet**, as illustrated in the chart below.

Status of EDAP initiatives



While much has been achieved, indicating that the current Commission is clearly prioritising democracy issues, **this second part of the implementation represents a slowdown compared to the initial progress**, as in the first year the Commission completed 13 actions and made progress on 11 actions, while in the two subsequent years it completed only 7 more actions and made progress on 4 others. After the initial implementation of the measures, which was quite rapid, many dossiers have been delayed or are currently stuck in trilogue negotiations, slowing down the overall progress of the plan. For this reason, the continued implementation of the EDAP in 2024 - and more generally the EU's ambitions on democracy in the next election year - will be crucial for the legitimacy, resilience and unity of the EU.

Many procedures also often **lacked transparency**, making it difficult to assess progress on several crucial areas, including the EU toolbox for countering foreign interference and influence operations and the work of the Media Literacy Expert Group.

Some positive initiatives were taken to increase the inclusiveness of European elections, like measures to advance gender equality in European political parties and to ease access to the right to vote for EU citizens residing in other Member States. However, some **major hurdles to inclusive elections have not been addressed**. In particular, the disenfranchisement of voting for the 800.000 European citizens with a disability, as little progress has been made on issues such as e-voting.

Finally, the Commission's **civil society engagement remained *ad hoc* and varied greatly across DGs**, with no movement on calls for an inter-institutional agreement on civil dialogue, except for some [wording](#) addressed at the Commission on civil society involvement in decision-making in the March 2023 Council Conclusions on Civic Space. Despite the EDAP's positive prose regarding civil society's important role in the rule of law reporting, the implementation of the strategy was marked by very short deadlines for consultations and opaque stakeholder consultation processes.

1. Protecting election integrity and promoting democratic participation

Transparent political campaigning

The European Commission issued a proposal for a [Regulation on the transparency and targeting of political advertising](#) (TTPA) in November 2021. The proposal was put forward to address the way **political advertising online can disproportionately polarise voters** and influence elections with targeting and amplification techniques.

The Regulation is a set of proposed new rules to **enhance transparency requirements for political ads** by obliging political advertising services to display certain information to the viewer of the ad, in the ad, and in a transparency notice, for example: that the ad is political; who is the sponsor; who paid for it and how much; to which elections or referenda it is linked. The Regulation also includes rules on information about targeting and amplification as well as guidelines for Member States to help them define dissuasive and proportionate sanctions.

EPD [reacted](#) to the publication highlighting its strengths and weaknesses and followed the legislative process with a [series](#) of articles on the main aspects of the Regulation and regular interactions with the policy-makers involved. While EPD has welcomed the objectives of the proposal

from the beginning, we regret that in many cases the rules **do not go further than the Digital Services Act**, in particular in the areas of data protection and transparency. EPD has focused in particular on **restricting the broad definition of political advertising**, which risked including any sort of political expression, including by CSOs. An additional crucial point was the **protection of personal data**, on which EPD recommended to ban the use of observed and inferred data. To have more clarity around political advertising campaigns EPD also proposed to include a provision in the text for an **ad repository**, to be established 24 months after the entry into force. Finally, the proposal laid the foundations for a solid enforcement and sanctions regime, but it will take each and every Member State to ensure **coordination across different authorities**, to introduce dissuasive sanctions and staff and fund data protection authorities appropriately to ensure the effectiveness of the Regulation.

The **final text of the Regulation was approved during** the interinstitutional negotiations (trilogue) of 6 November. Now, technical talks are ongoing to solve sticking points and clean up the text, which will then be formally approved by both the European Parliament and the Council. After that the final text will have to be signed into law and the rules will be applicable at some point in 2024 - regrettably after the European elections.

Furthermore, according to the EDAP, the proposal was supposed to be **complemented by support measures and guidance for Member States and other actors**, such as national political parties and competent authorities, taking into account the limits of EU competence in this area. While a European Cooperation Network on Elections (ECNE) has been established in 2019 to work, among other topics, on such guidance, there seems to be no progress made yet on the specific issue.

Recommendations for 2024

Even though the main provisions of the TTPA will not enter into force before the 2024 European elections, 2024 will be the year in which implementation begins. In this context, we encourage the relevant institutions, both in the Member States and at EU level, to bring forward implementation as far as possible.

We also call on the European Electoral Cooperation Network to swiftly adopt guidelines for Member States and other stakeholders to support the implementation of the TTPA, preferably before the European elections, as foreseen in the original EDAP.

European elections and civic participation

Regulation on the statute and funding of European political parties

Regarding European elections, in 2021 the Commission proposed a revision of the [Regulation on the statute and funding of European political parties and European political foundations](#). The revision aims to enhance the **transparency of European political parties as well as their funding**, in particular to counter the risks of foreign interference and manipulation. While the initial objective was having the Regulation finalised ahead of the 2024 European elections, the legislative procedure is however **still stuck in the trilogue phase**, the last stage necessary for an agreement between the co-legislators on the final text.

This comes after the Council of EU and European Parliament have already adopted their respective positions with amendments to the original proposal. While the Council of the EU has only [adopted](#) a **partial general approach** on this file, of particular relevance is the **European Parliament's position** as of 15 September 2022. Such a position supports strengthening the role of European political parties and their ability to secure funding, including from parties outside the EU. By **exceeding the Commission's initial proposal** that funding could only be used for campaigns concerning "the implementation of the Treaties", the European Parliament allowed EU funds to be used for national referendum campaigns covering direct EU-related issues. In addition, the law includes a definition of 'political party' that potentially allows parties outside the EU to obtain funding as well as allowing parties to receive donations from member parties or organisations in countries that are part of the Council of Europe. Member parties outside the EU would have to observe the values in Article 2 of the TEU in order to register as a European political party and receive EU funding.

Recommendations for 2024

The Regulation on the statute and funding of European political parties is currently stuck in trilogues, with little information available on the next steps, as the Council has so far only agreed to a partial general approach. While it is unlikely that a final text will be ready before the next European elections, for 2024 it will still be of the utmost importance for co-legislators to swiftly advance the negotiations.

We encourage the next Commission to take over the work on a finalised text and its implementation, as it will be crucial that the rules are in place before the next European elections.

Right to vote and stand as candidates in European and municipal elections

Additionally, a key demand by civil society during the drafting of the EDAP was the **right to vote and stand as candidates in European and municipal elections**. On this matter, the Commission published two proposals recasting the **Directives on the right to vote and stand as candidates in elections to the [European Parliament](#) and [municipal elections](#)** by Union citizens residing in a Member State of which they are not nationals.

The European Parliament adopted two reports on these proposals ([European](#) and [municipal](#) elections) on 14 February 2023 acknowledging that EU citizens residing in a Member State of which they are not nationals face greater obstacles to participation in elections than the nationals of that Member State. These obstacles include, among others, scarce information about voting procedures and language issues. The European Parliament's position - similar for both proposals - contains provisions on legal remedies and on information on electoral rights provided in an official EU language (or also in the native language) that the non-national Union citizen speaks. They also include **provisions on postal, advance, proxy, or electronic voting, which should make it easier for vulnerable groups to exercise their electoral rights**. As a final point, the initiatives ensure that citizens who enter the electoral roll of their Member State of residence for the purpose of European or municipal elections will not be removed from the electoral roll of their home Member State for other types of elections.

While the Parliament has already defined its positions with amendments, the Council of the EU is lagging behind as both proposals are **still being debated** in the General Affairs Council.

Recommendations for 2024

While much progress has been made in Parliament, the two proposals on candidates in European and local elections are still stuck in negotiations with the Council. For this reason, we call on the incoming Belgian Presidency to make the finalisation of the Council's position a priority - but even in this case, the dossier will probably have to be taken over by the next Commission after the European elections.

Joint mechanism for electoral resilience

In 2022, the European Commission established a [joint mechanism for electoral resilience](#) aiming for **cooperation among Member States** to ensure resilient electoral processes and mutual support to address threats. The mechanism is organised and coordinated through the [European cooperation network on elections](#) (ECNE) by bringing together representatives of Member States' authorities with competence in electoral matters, facilitating the concrete exchange on topics related to ensuring free and fair elections, including data protection, cyber-security, transparency, and awareness raising. ECNE is presently discussing all these topics in light of the 2024 European Parliament elections. Unfortunately, the information on the topics of discussion and the minutes of the ECNE meetings are only made available by the Commission with a time lag, making it difficult for civil society to follow the meetings and make a valuable contribution unless organisations are explicitly invited to the selected meetings.

The Commission organised a [high-level event on elections](#) on 23 and 24 October 2023 gathering member states and civil society representatives to discuss the main challenges linked to upcoming elections as well as EDAP implementation.

In this context, the EDAP also announced the creation of a [compendium of electronic voting \(e-voting\) practices](#), including on the **accessibility for persons with disabilities and older persons**. A subgroup of the aforementioned network would be established to prepare this compendium. A draft compendium was shared with the ECNE Member States in June 2023.

Recommendations for 2024

We welcome the establishment of the ECNE as a positive initiative to encourage exchange and coordination across Member States on electoral matters. Yet, we regret that the activities within the ECNE often lack transparency and fail to include civil society. It also seems that specific initiatives linked to the ECNE have recently slowed down, as little result has been achieved so far, for example on the compendium on e-voting practices. For this reason, we call for more transparency around the ECNE activities and the possibility for civil society to be frequently consulted, as well as more progress on the topic of e-voting and accessibility for persons with disabilities and older persons.

Civic participation

Regarding civic participation, the EDAP introduced a section on “promoting democratic engagement and active participation beyond elections”. In this context, the [final report](#) of the Conference on the Future of Europe, adopted in May 2022, included, among others, proposals on **strengthening citizens’ participation** at the EU level by improving the effectiveness of existing mechanisms and developing new ones as well as offering digital platforms where citizens can interact with the EU institutions.

A series of [Horizon Europe](#) calls have also enabled the Commission to keep its promise to allocate its own funds to promote young people’s democratic participation and research on deliberative democracy. These calls focus on, among others, deliberative democracy, democracy education, media, inequalities, artificial intelligence (AI), and social media.

Furthermore, the [annual Rule of Law report](#) published by the Commission in July 2023, includes **country assessments on the inclusiveness of the legislative process and the civil society involvement**. However, without dedicating a separate pillar to civil society but rather including it within the pillar on “other institutional checks and balances”.

Lastly, the Commission’s [proposal](#) to **extend the list of EU crimes to include hate speech and hate crime** (Article 83(1) TFEU), has stalled at the Council, which has not reached the unanimity required.

Recommendations for 2024

Other initiatives have also been slowed down and brought little result so far, such as the proposal to extend the list of EU crimes to include hate speech and hate crime, or improving existing mechanisms to strengthen citizens' participation.

When it comes to the rule of law, EPD has repeatedly advocated for including civic space as a separate pillar in the annual Rule of Law Report, so we would welcome such inclusion in the next report in 2024.

On participation, in particular, we would welcome more progress to be done throughout 2024, possibly as part of the Defence of Democracy package.

2. Strengthening media freedom and media pluralism

Anti-SLAPP

On 27 April 2022, the European Commission [published](#) the proposal for a **Directive on protecting persons who engage in public participation from manifestly unfounded or abusive court proceedings** ("Strategic lawsuits against public participation") (Anti-SLAPP Directive). The proposal focuses on cross-border strategic lawsuits against public participation (SLAPPs) and includes safeguards that the Coalition Against SLAPPs in Europe (CASE) has been [advocating](#) for, such as an early dismissal mechanism, a regime of sanctions, and remedial and protective measures.

The [accompanying Recommendation on protecting journalists and human rights defenders who engage in public participation from manifestly unfounded or abusive court proceedings](#) ("Strategic lawsuits against public participation") encourages Member States to address national cases of SLAPPs, make available training and awareness campaigns, and ensure victims of SLAPPs have access to support, such as legal firms specialising in these cases.

The original proposal for the Anti-SLAPP Directive was met with **widespread support of civil society**, journalists and human rights defenders, praising the broad scope of the draft Directive and the included procedural safeguards. However, the Council's position on the file, [adopted](#) in June 2023, has been heavily criticised for watering down the proposal and shrinking its scope. After the Parliament's position was also [adopted](#) in July 2023, the interinstitutional negotiations were started. A provisional agreement between the Council and the Parliament [was reached](#) at a trilogue meeting held on 29 November 2023. After the Directive is formally adopted by both the Council and the Parliament, and is published in the Official Journal, the Member States will have to transpose it into national law within 2 years.

On the topic of the proposed Directive, CASE [published](#) an expert brief and remarked that the proposal was a **crucial first step toward curbing abusive litigation against public watchdogs**. While the Coalition welcomed the proposal, it suggested several improvements that can be made to make the Directive more effective, for example, making sure that the Directive applies not only to manifestly unfounded lawsuits but also to lawsuits which, although having some legal grounds, bear clear hallmarks of abuse of laws or procedural laws. CASE continues to follow the negotiations closely.

Additionally, the **expert group against SLAPPs** [continues](#) to meet, with the last meeting taking place on 21 November 2022. The experts discussed a questionnaire that was created to share expertise and availability and was proposed at an earlier meeting. The experts were invited to share experiences and discuss how to provide technical assistance to national focal points.

Recommendations for 2024

As the negotiations on the proposal for an anti-SLAPP Directive have just come to an end, we advocate for a swift conclusion of the process with clear, coherent, and human-rights centric rules as the core of the file. Once this initiative is adopted, the Commission must ensure that the Directive is swiftly and properly transposed.

Additionally, support, both monetary and procedural, is needed to aid journalists and human rights defenders affected by strategic lawsuits against public participation. Those facing these lawsuits must be able to easily find help and legal guidance in Member States.

Safety of journalists

On 10 November 2022, the **third European News Media Forum (ENMF)** took place. The Forum acts as a platform for the exchange of ideas, best practices, and development. Through these meetings, the European Commission is able to ensure dialogue with stakeholders, including media outlets, academia, regulatory bodies or EU institutions.

While the first ENMF held in 2021 focused on the safety of journalists, **the third ENMF looked at innovation within the media sector**, for example, the key topic of media freedom and independence which includes the use of spyware, adapting to the needs and wants of audiences, and collaborations with other stakeholders.

The next Forum, set to take place on 4 December 2023, will take a detailed look at the preliminary findings of the independent external study on Member States' activities to implement the **Recommendation on the protection, safety, and empowerment of journalists**. This study complements the efforts of the Vice President for Values and Transparency Věra Jourová, who remarked at the **European Journalism Now conference**, organised by the International Press Institute (IPI) on 2 December 2022, that she was in the process of travelling into Member States and assessing the implementation of the Recommendation by the national governments.

Additionally, the Commission continued to co-fund the **Media Rapid Response Mechanism**. In May 2022, the Media Rapid Response Mechanism received € 1 950 000 in funding for the next 18 months to continue its work on defending and supporting media freedom in the EU, candidate countries, and Ukraine. The project was greenlit to continue and secured an additional € 3 100 000 in November 2023. Its aim is to ensure that journalists are protected and, when threatened, receive help in the form of, for example, legal support, shelter, or other forms of assistance.

Article 19 Europe, a member of the coalition managing the Media Rapid Response Mechanism, published the **Directory of initiatives on the safety of journalists in Europe** in May 2022, funded by the European Commission, which maps different actions of Member States regarding the safety of journalists. The Directory aims to help intergovernmental organisations better understand national implementations and provide inspiration to improve related policies.

Recommendations for 2024

The implementation efforts of Member States, when it comes to the Recommendation on the protection, safety and empowerment of journalists, must be adequately analysed and assessed. Based on this, further action must be taken to ensure that the Recommendation is implemented as fully as possible and that the safety of journalists is guaranteed in the Union.

Additionally, adequate funding of programmes will be needed to provide European solutions to the existing threats to safety of journalists in Europe. Journalists must be able to seek and find help if they or their family are in danger.

Journalistic partnerships and standards

In the area of journalistic partnerships and standards, the Commission continues its work mostly through funding opportunities. The **call for proposals for Journalism Partnerships**, [terminated](#) in April 2023, sought to ensure that European media becomes more **sustainable and resilient through cross-border partnerships**. According to the Commission, this contributes to independent and topical news coverage and a balanced democratic debate. € 10 000 000 was available as funding from the Commission which is an increase from 2022 when € 7 500 000 was available. The call was also issued in 2022 and 2021 and is expected to be repeated on a yearly basis.

Under the next Journalism Partnerships initiative, the Commission launched **two separate calls** - one to [support cross-border media collaborations](#) with a total budget of € 6 000 000, and one to [set up dedicated funding schemes in news media areas of special relevance to democracy](#) with a total budget of € 5 000 000. Both calls are open for proposals until February 2024.

Additionally, under the **third meeting of the ENMF**, the Commission fostered debate among stakeholders on innovative methods relating to journalistic standards. The discussion centred around the trust in media and how to stop its decline through realistic standards.

The Commission-[supported Journalism Trust Initiative](#), led by Reporters without Borders, was a part of the discussion on journalistic standards at the ENMF. The Initiative is continuing to put together a trust framework

through an independent **mechanism that can be used by the public to ascertain whether a source is reliable**. In September 2022, the Initiative was [given](#) the support of 11 out of 47 signatory states of the Partnership for Information and Democracy, including France, Lithuania and Slovakia. The Initiative [announced](#) in October 2023 that it will work with Microsoft to promote a healthier news ecosystem.

Furthermore, the Commission published, alongside the below-mentioned European Media Freedom Act, the [Recommendation on internal safeguards for editorial independence and ownership transparency in the media sector](#). This Recommendation encourages media service providers to adhere to self-regulatory schemes and journalistic and media industry initiatives promoting editorial standards and standards of trustworthy and ethical journalism.

Recommendations for 2024

The Commission must continue to fund programmes aimed at supporting journalistic partnerships and standards. But monetary aid is not all that is necessary. Concentrated efforts must be undertaken that would foster long-lived and sustainable cooperation between journalists, and give rise to common journalistic standards.

Additional measures to support media pluralism

As of late, a key Commission initiative concerning media freedom is the [proposed European Media Freedom Act \(EMFA\)](#). This proposal, published on 16 September 2022 together with the Commission Recommendation on internal safeguards for editorial independence and ownership transparency in the media sector, is **not a part of the EDAP's goals but is an important precondition of its success**.

The EMFA aims to **increase transparency of state advertising** allocated to media and of media ownership, as well as **protect journalists** and media service providers from spyware, interference into editorial decisions and online content removal. among others. Additionally, the EMFA proposes to **set up the independent European Board of Media Services** that would promote cooperation and the exchange of best practices, and would be able to advise on mergers of media service providers.

The proposal is now in its final stages, undergoing interinstitutional negotiations between the Commission, the Council, and the European Parliament. The EMFA must be adopted before the European elections which are set to take place in June 2024.

In addition to the above-mentioned call for adherence to journalistic standards, the **Recommendation** includes **voluntary measures for media service providers** and encourages them to, for example, ensure data on their ownership is accessible to the public, establish internal rules and mechanisms to protect editorial staff from undue influence, and include their editorial staff in decision-making processes.

In its **Media Pluralism Monitor 2023 (MPM23)**, the Centre for Media Pluralism and Media Freedom stated that more transparent criteria for guaranteeing the independence of media authorities must be established and that a lack of ownership transparency by media service providers must be tackled. **EPD's response to the EMFA proposal** aligned with the findings of MPM23, stating that while EPD welcomes the initiative, the regulation should include binding rules on media ownership transparency and greater safeguards to the independence of national regulatory authorities and public service media.

Apart from the EMFA proposal, the Commission also launched **several calls for proposals aimed at supporting media freedom and pluralism in the EU**. For example, a call for proposals for € 6 000 000, closed in October 2022, aimed to establish European media platforms. This project's goal was to increase the availability of trusted information for EU citizens and improve media pluralism within the block. This call was opened again in 2023. Additionally, the Commission published an initiative entitled "The European Union – the media freedom hub" (for € 3 000 000) to preserve and support a diverse media environment.

Recommendations for 2024

Negotiations are ongoing on the European Media Freedom Act and while EPD would welcome a swift adoption, we also stress that the final text should be up to human-rights standards and ensure coordination with other existing files. Together with the anti-SLAPP Directive, it will provide a policy framework for EU action in the area of media freedom and journalism, but will have to be complemented by adequate funding of programmes that will be needed to tackle existing threats to free media and safety of journalists in Europe.

Not everything can be done by the Commission alone however - the activity of other EU institutions and the cooperation of Member States will be necessary to strengthen and implement the proposed new rules while ensuring the level of journalistic freedom and pluralism remains high. However, this does not absolve the Commission of responsibility. It must ensure thorough implementation and enforcement, even through legal measures, if necessary.

3. Countering disinformation

Improving EU and Member State capacity to counter disinformation

The Commission has worked alongside the EEAS to develop an **EU toolbox for countering foreign interference and influence operations**. The 2022 Strategic Compass [laid](#) the foundation for further enhancing the EU's coherent approach and response to foreign information manipulation and interference in the information domain (FIMI). Building on this, efforts were increased and in April 2022 the work on strengthening the EU Toolbox to counter FIMI started. This included a comprehensive set of instruments, ranging from situational awareness to resilience building, regulatory framework and external actions, including diplomatic responses. This approach was [welcomed](#) by conclusions in July 2022. Discussions between EU institutions and Member States are ongoing in the relevant configurations and the text of the toolbox is not yet public.

The European Parliament has [reacted](#) in 2023 to the toolbox with a **report on foreign interference in all democratic processes** in the European Union, which also follows up to the previous 2022 [report](#). The report recommends a “risk-based” approach based on objective criteria, where authorities are willing to identify and name countries that have attempted foreign interference. The report also calls for a whole-of-society strategy for tackling and preventing FIMI, including through the strengthened enforcement of existing measures and implementation of capacity-building actions.

Steps forward were also undertaken to enhance the EEAS strategic communication activities and task forces, with the establishment of a **network of 27 new local agents** and dedicated staff training to guide strategic communication efforts. The EU has also started addressing FIMI by state actors, for instance, as campaigns of foreign actors have

been publicly [called out](#) via EUvsDisinfo.

Recommendations for 2024

On foreign interference it will be important to assess the outcome of the work on the toolbox for countering foreign interference and influence operations and ensure more transparency on the actions taken to empower the EU and Member States to counter disinformation.

More obligations and accountability for online platforms

The EDAP rightly acknowledged the major role online platforms and their recommender systems play in amplifying disinformation and curating people's newsfeeds with tailored recommendations, and revealed that the [Digital Services Act](#) (DSA) would serve as a "co-regulatory backstop" for measures introduced in the Code of Practice on Disinformation.

While the main objective of the DSA is to tackle illegal content online - and not necessarily harmful content such as disinformation - **specific rules on transparency contained in the legislation could also have a positive impact on tackling disinformation by raising accountability of online platforms.** For example, the DSA contains numerous transparency obligations on content moderation, systemic risk assessments (including on freedom of information) and obligations with regard to recommender systems. The DSA also foresees the possibility for Very Large Online Platforms to sign voluntary codes of conduct to tackle specific challenges identified as systemic risks. On the other hand, worrying language in the EDAP - on "trustworthiness indicators" and the prioritisation of "reliable information of public interest" - has not found its way into the DSA. Finally, the data access provisions enhance researchers' access to platforms' data, which will make it easier to identify issues linked to disinformation. While it is too early to say whether the DSA will be effective to tackle disinformation, as the new rules have not been fully implemented yet, the increased transparency and availability of data could indicate the way forward and facilitate new solutions.

On 16 June 2022, a **strengthened version of the Code of Practice on Disinformation** was [published](#) after guidance was [issued](#) by the Commission on how to upgrade the code. The new Code aims to address the [shortcomings](#) of its predecessor, with a focus on demonetising disinformation, amongst others, and includes commitments to a robust monitoring framework with [Key Performance Indicators](#) and [regular reporting](#).

Weekly meetings are held among signatories and in addition, the Commission organises ad hoc stakeholder meetings to update interested stakeholders on the progress of the working group. The last meeting was organised in November 2023 on the structural indicators. The Commission has also significantly increased the number of signatories to the Code with 44 [signatories](#) in 2023, including tech companies, fact checkers and civil society organisations. X, formerly Twitter, [left](#) the Code of Practice in June 2023 following a change of policy on moderation practices in the aftermath of Elon Musk's takeover of the social media company. X will however still be subject to the obligations contained in the DSA.

Finally, the EDAP also committed to advancing data sharing by platforms for public interest research, led by the European Digital Media Observatory (EDMO). In 2020-2023, the EDMO [funded](#) 14 research hubs on disinformation covering all 27 EU member states, as well as Norway. Building on this, EDMO has [set up](#) a **special European elections task force** dedicated to detect early signs of potentially dangerous disinformation campaigns that might spread across the EU and coordinate dedicated media literacy activities.

The Commission also supported the development of the **Code of Professional Integrity for European fact-checkers**, which was [published](#) on 15 September 2022. The Code's standards, which cover matters ranging from quality sourcing to non-partisanship and financial transparency, must be adhered to for fact-checking organisations to become verified members of the European Fact-Checking Standards Network (EFCSN). They are a network of fact-checking organisations operating independently, ethically, and with a commitment to serving the public interest.

However, civil society organisations from across Europe have criticised the EDMO for being disconnected with the reality of fact-checking organisations, with impossible eligibility criteria for funding and a research focus irrelevant to those on the frontline.

Recommendations for 2024

The Digital Services Act is expected to evolve in its implementation beyond 2023. First of all, its rules will become applicable to all on-line platforms as of February 2024. Additionally, Very Large Online Platforms already have to perform yearly risk assessment exercises and risk mitigation actions and 2024 might see the Commission preparing more specific guidelines to structure such assessments.

Again, the European institutions' pressure to use the DSA to protect civic space, as well as Member States' adequate implementation will determine the ultimate success of the legislation. Should the implementation of the DSA remain at the national level, then the DSA's success in countering disinformation will depend on Member States' staffing and funding of the enforcement and monitoring agencies, which has been a key problem in the [General Data Protection Regulation](#). Member States will only successfully counter disinformation if they manage to coordinate their policies and [avoid](#) legislative approaches that pose risks to civil and political rights.

The ongoing work on the Code of Practice on Disinformation should continue throughout 2024, with further reporting on compliance with the commitments layed out in the Code. Furthermore, following the entry into application of the new DSA rules, the Code should also be translated into a code of conduct under Article 45 DSA, and as such, monitored by the European Commission and national Digital Services Coordinators.

Empowering citizens to make informed decisions

To promote and support media literacy, the Commission has mostly relied on **funding related projects**. The Commission aims to fight disinformation through an improvement of media literacy by allocation of grants. The funding for media literacy projects has increased substantially since the EDAP was adopted. In October 2023, the Commission [published](#) a call for cross-border Media Literacy projects, with € 2 000 000 of available funds. The initiative aims to enhance media literacy skills of European citizens, support effective cross-border cooperation, and limit the detrimental impact of disinformation. This is a substantial rise from before the adoption of the EDAP, when in 2020, the Commission allocated € 500 000 to the endowment of the Preparatory Action on Media Literacy for All.

Additionally, the Commission [published](#) its **Media Literacy Guidelines** in February 2023. The Guidelines should inform Member States as they fulfil their reporting obligations under the [Audiovisual Media Services Directive](#) and aid with the sharing of best practices among the Member States. The actions of the Commission's [Media Literacy Expert Group](#), which is made up of national authorities, UNESCO, and the Council of Europe, **unfortunately remain unknown**. After three years with no publicly

discernable activity, the Expert Group held two meetings in 2021, but no documents from the discussion are available. The Expert Group has not reconvened since 2021.

The European Parliament's **Report on foreign interference in all democratic processes in the European Union, including disinformation**, [supports](#) media literacy activities of the European Digital Media Observatory (EDMO) and highlights the need for a legal framework in the EU or in Member States to ensure quality fact-checking. The report also calls for a concerted media literacy strategy taking into account different languages and age groups.

Recommendations for 2024

Regarding the expert group on media literacy, while it is unclear what activities have been undertaken so far, it will be important to resume such activities and ensure transparency on the work of the expert group for all stakeholders involved in the fight against online disinformation, including civil society.

Conclusions

Even though numerous EDAP files have been finalised, **there is still much that needs to be progressed in the coming year**, both in terms of finalising specific dossiers and in terms of implementation. After impressive progress on a number of dossiers in the first two years following the adoption of the EDAP, the finalisation of important dossiers has slowed down in 2023 as technical negotiations have dragged on for a long time and the co-legislators have been unable to reach compromises.

However, this should not lead to the conclusion that democracy issues were given less priority than in previous years. Over the course of the year, the Commission has been working on a **Defence of Democracy Package**, which, in addition to the EDAP initiatives, aims to renew its commitment to the protection of European democracies. While EPD welcomes the European Commission's commitment to strengthening democracy at the highest political level, we remain very concerned about the procedures, impact, and focus of the forthcoming proposal on the representation of foreign interests as part of the Defence of Democracy Package.

2024 will be a crucial year for the European institutions to finalise outstanding dossiers and underline their commitment to strengthening Eu-

ropean democracy, not least because of the **European Parliament elections from 6 to 9 June 2024**. These 2024 EU elections will be a milestone for the effectiveness of the Digital Services Act and the Code of Practice on Disinformation and will provide important lessons for the implementation of the Regulation on transparency and targeting in political advertising.

We welcome the commitment of the upcoming Belgian Presidency to finalise the trilogues on the anti-SLAPP proposal and the EMFA, to start work on the measures foreseen in the DoD, and to advance the Council's positions on the financing of political parties and on the right to vote and stand as a candidate in EU and local elections.

In this context, we call on the current Commission and the co-legislators to take forward the work on the outstanding EDAP dossiers and call on the next Commission to **make a strong commitment to democracy in its work programme**, by taking on the outstanding dossiers and moving them forward by putting forward an ambitious agenda to strengthen democracy as a guiding value for all policy initiatives.



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