



CENTER FOR
THE STUDY OF
DEMOCRACY

Countering Kremlin's Media Influence in Europe

Patterns of Anti-Democratic
Messaging, Disinformation
Responses, and
Resilience Assets

COUNTERING KREMLIN'S MEDIA INFLUENCE IN EUROPE

PATTERNS OF ANTI-DEMOCRATIC
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A confluence of challenges has endangered democracy in Europe, including the rise of domestic extremism and populism, the penetration of social media, artificial intelligence and other digital technologies, and the proliferation of authoritarian-state driven influence operations. The report illuminates the patterns of Kremlin anti-democratic disinformation messaging in Bulgaria, the Czech Republic, Germany, and Poland. The disinformation resilience capacity of the four EU member states is additionally evaluated along three main levels: governance and policy-making; civil society action; participation in and contribution to international initiatives. The study puts forward a policy agenda of multi-stakeholder action for protecting EU's democratic discourse and digital information ecosystem from Russian media influence activities.

The comprehensive analysis was the result of an interdisciplinary effort of a CSD team led by the authors Dr. Rumena Filipova, Research Fellow, and Ruslan Stefanov, Director at the Economic Program.

Perspectives on the various dimensions of Russian media influence were provided by country contributors Veronika Krátka Špalková, Analyst, Kremlin Watch Program, European Values Center for Security Policy (Czech Republic), Marta Kowalska, President of the Board, Center for Propaganda and Disinformation Analysis (Poland), and Dr. Stefan Meister, Associate Fellow, German Council on Foreign Relations.

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LIST OF ABBREVIATIONS

AfD	Alternative für Deutschland (Germany)
AI	Artificial Intelligence
ARD	Association of Public Broadcasting Corporations in the Federal Republic of Germany
BBC	British Broadcasting Corporation
BIS	Security Information Service (Czech Republic)
BNR	Bulgarian National Radio
BNT	Bulgarian National Television
BSP	Bulgarian Socialist Party
BSTV	Bulgarian Free Television
BTA	Bulgarian News Agency
ČT24	Czech Television 24
CEE	Central and Eastern Europe
CEM	Council for Electronic Media (Bulgaria)
CIS	Commonwealth of Independent States
CNN	Cable News Network (United States of America)
CSO	Civil Society Organization
DG	Directorate-General (European Commission)
DG NEAR	Directorate-General for Neighbourhood and Enlargement Negotiations (European Commission)
DSA	Digital Services Act
DW	Deutsche Welle (Germany)
EC	European Commission
EDAP	European Democracy Action Plan
EP	European Parliament
EU	European Union
FB	Facebook
G7	Group of Seven
GDPR	General Data Protection Regulation (European Union)
GDR	German Democratic Republic
GRU	Russian military intelligence agency
IMF	International Monetary Fund
KRRiT	National Broadcasting Council (Poland)
KSČM	Communist Party of Bohemia and Moravia (Czech Republic)
LGBT	Lesbian, Gay, Bisexual or Transgender
LNG	Liquefied Natural Gas
MENA	Middle East and North Africa
MEP	Member of the European Parliament
MIA	International News Agency (Russia)
MP	Member of Parliament
NABU	Nature and Biodiversity Conservation Union (Germany)
NASK	Research and Academic Computer Network (Poland)
NATO	North Atlantic Treaty Organization
NetzDG	Network Enforcement Act (Germany)
NGO	Non-Governmental Organization
NYC	New York City

OECD	Organization for Economic Cooperation and Development
PAP	Polish Press Agency
PEGIDA	Patriotic Europeans against the Islamization of the Occident (Germany)
PiS	Law and Justice party (Poland)
PM	Prime Minister
RMN	National Media Council (Poland)
Roskomnadzor	Federal Service for Supervision of Communications, Information Technology and Mass Media (Russia)
RRTV	Council for Radio and Television Broadcasting (Czech Republic)
RT	Russia Today
SCAD	State Capture Assessment Diagnostic
SLAPP	Strategic Lawsuits against Public Participation
SPD	Social Democratic Party (Germany); Freedom and Direct Democracy party (Czech Republic)
Stratcom	Strategic Communication
TAP	Trans Adriatic Pipeline
TTIP	Transatlantic Trade and Investment Partnership
TVP	Polish Television
UK	United Kingdom
UKE	Office of Electronic Communications (Poland)
UN	United Nations
UNICEF	United Nations Children's Emergency Fund
UPA	Ukrainian Insurgent Army
US(A)	United States (of America)
USSR	Union of Soviet Socialist Republics
VMRO	Bulgarian National Movement
ZDF	Second German Television

EXECUTIVE SUMMARY

Democracy in Europe has encountered a wide array of internal and external challenges in recent years. The continuing rule of law problems and democratic backsliding, the rise of domestic right-wing populism and extremism, transnationally revolutionary digital and technological developments, and authoritarian-state-driven influence operations have undermined democratic governance on the continent. At the same time, the difficulty of crafting a coordinated European response has exacerbated these challenges and further emboldened disruptive international actors. **Europe's rule of law crisis** undermines the cohesion of development and implementation of new policies and ensures ample entry opportunities for foreign malign powers. This has been particularly true for the EU's Eastern flank, which has attracted the most malign media interference and geopolitical attention from global adversaries, such as Russia and China. Russia, in particular, has posited conservatism and authoritarianism as an ideological and strategic alternative to liberal democracy, forging ties to right-wing or extremist politicians and movements across Europe. A major component of the Kremlin's toolbox for the exercise of its sharp power and state capture influence has been to push nationalist, anti-migrant, misogynist, and economically illiberal messaging into European information spaces and thus erode the publics' commitment to democratic values.

The current report illuminates the **core features of the Russian discursive challenge to democracy in Europe** by zooming in on four EU member states: Bulgaria, the Czech Republic, Germany, and Poland. The comparative examination, combining both content analysis and automated diagnostics, reveals the key patterns in the topics, narratives, and styles of Kremlin anti-democratic disinformation messaging. The study additionally evaluates the **disinformation resilience capacity** of the four states along three main levels of (1) governance and policy-making; (2) civil societal action; (3) participation in and contribution to EU/international institutional initiatives. The identification of best practices and gaps in dealing with disinformation on these levels serves to draw comparative lessons for cross-European learning and detailing the main resilience assets that a country should ideally possess in order to effectively tackle threats to its digital information ecosystem. Ultimately, a **policy agenda for multi-stakeholder engagement** is put forward, whereby the collaborative division of responsibilities among national governments, civil society, and EU actors informs a whole-of-government and whole-of-society approach for a coordinated response to foreign malign influence in Europe.

In its drive towards global power competition, **the Kremlin has revived and deployed in Europe an influence mix**, ranging from the more traditional elements of its hard power, such as aggressive military and political posturing, to covert operations or "active measures", to propaganda and media influence. The Kremlin has been cultivating ties – both official and unofficial – with European political parties, in a bid to challenge the existing European order from within. These include known engagements with opposition extremist parties, as well as with anti-establishment, anti-European governing parties.

Russia has also aggressively promoted its strategic gas projects in Europe, Nord Stream II, and Turk Stream, by providing lucrative jobs on the boards of Russian state-owned and private companies to top European political leaders and by offering exclusive business deals and access to its markets among European majors.

This military-political-economic-media aggressiveness has been accompanied by constant intimidation by the Kremlin and its foreign ministry. Their favorite targets have been the EU, NATO, and European institutions.

The Kremlin's anti-democratic discursive confrontation in Europe is characterized by **overarching commonalities of disinformation narratives** claiming, among others, that:

- The resurgence of nationalist sentiments and practices in Europe is accompanied by growing fascist tendencies (to which only Russia can provide an adequate judgement).
- Sovereignty (the Russian way) is the ultimate safeguard of national identity from external influences – unlike the EU's supra-nationalism (hence Russia engages with member states and aims to denigrate EU institutions).
- The Russian ethnic model exemplifies peaceful coexistence between Christians and Muslims (which is in stark contrast with the EU's migration crisis failure).
- The EU aggressively disseminates gender ideology, while Russia is a defender of traditional family values across Europe and globally.
- The Russian-led large-scale (gas) energy projects are economically beneficial to Europe and are not informed by political calculations, unlike US shale gas interests.
- It is paramount for Europe to build business and economic ties with Russia as a way of propping up national sovereignty and interests against the rapaciousness of "globalists" (global capital and the US in particular).

Differentiations in the content and style of Kremlin anti-democratic message transmission are observed as a function of the degree of political, economic, and ideological distance of a given outlet to (pro)Russian groups and interests:

- The **news sources directly owned by Russia** (such as Russia Beyond, Sputnik, and RT) spread Kremlin-sponsored narratives in the most straightforward and undeviating manner. They rarely focus on nationally relevant perspectives and developments.
- **Partisan outlets** (published by a domestic political party with strong links to the Kremlin) relate pro-Kremlin messages through a distinctive partisan spin shaped by the ideological and interest-based positions of the given party.
- **Broader dailies** feature more varied discussions that are not solely focused on the Russian perspective in order to appeal to the mix of views of a wider audience. Often these and the previous category of outlets could be influenced by national governments' stances, depending on the level of media freedom and government financial backing.
- In contrast to the above three types of pro-Russian outlets, **mainstream outlets that do not maintain connections to Russian interests** are guided by a more impartial treatment of Russia-related topics.

Besides the differentiation in narration, Russia has deployed varied levels of intensity in its (dis)information focus on countries in Europe. Such variation can be traced both in relation to the types of media outlets engaged, as well as to the target countries. Overall, the Kremlin's strategy has been to **blanket the whole of Europe with pro-Russian white noise** through (online) media directly owned or controlled by Moscow, while at the same time focusing different levels of intensity and types of media presence within the different countries. Russia has also underpinned its media footprint in Europe with differing levels of online diplomatic presence.

In addition to the similar patterns of Russian anti-democratic disinformation that are shared in Bulgaria, the Czech Republic, Germany, and Poland, alike, there are national specificities in terms of **degrees of vulnerability to Kremlin influence activities**, as well as overall disinformation resilience capacity.

Bulgaria is subject to wide-ranging Russian influence, enabled by cultural proximity, historical ties and the Kremlin's deeply entrenched political and economic leverage in the country. In addition, Bulgaria has struggled continuously with building an independent judiciary and reigning in corruption, and has ranked consistently last in the EU on media freedom. The confluence of these factors further facilitates a considerable Russian media foothold exercised through local oligarchic proxies. The latter are financially and politically related to Russia, but also to local political elites in power, and (formally or informally) influence the editorial policy and ownership structures of national media outlets. Bulgaria has moreover demonstrated limited effectiveness in combating information threats. Its governance framework has been shaped by relative inaction and an insufficient recognition of the challenges posed by (pro-Kremlin) disinformation devoid of a comprehensive assessment of national vulnerabilities. It has therefore been up to civil society to chart out responses to disinformation, evident in the development of media literacy tools and their introduction in the school curriculum as well as journalistic advocacy.

The historical animosity of **Poland** towards Moscow conditions acute vigilance of the Kremlin's political and economic initiatives. The permeation of Russian anti-democratic narratives into the Polish media landscape is therefore not primarily the product of a deliberate local strategy and public demand for Russia-originating information. There is, hence, a coincidence of narratives, whereby pro-Kremlin messages are able to enjoy larger traction to the extent that they overlap with the domestic Polish conservative discourse and political priorities (e.g., anti-EU, extremist messaging). On top of that, the political context in the country has not been conducive to prioritizing a policy focus on information security threats. Serious concerns about government-sought control on the judiciary and public media, in particular, abound. Legal provisions in the sphere of the media primarily deal with the problem of cybersecurity, whereas legislative regulations in relation to online propaganda and disinformation are lacking. Overall, disinformation-related endeavors in Poland have remained compartmentalized, dealing with specific aspects of the problem rather than advancing a wholesale solution. Collaboration among government, civil society, and EU institutional actors remains circumscribed.

The Czech Republic has been an important real estate and business transmission country of Russian interests in the European Union. Many of the country's richest and most influential business people have had deep rela-

tions to Kremlin-controlled business circles and contracts. Entrenched Euroskepticism and beliefs that the Czech Republic does not properly belong to either the West nor the East additionally represent key societal conduits of Russian disinformation influence promoting pan-Slavism. Certain individual high-level politicians, political parties, NGOs, and paramilitary organizations amplify and instrumentalize such societal dispositions in order to advance closer cooperation with the Kremlin. In addition, the Czech media sector has had issues with the lack of final beneficial ownership transparency, making the tracing of foreign malign influence difficult. Nevertheless, there has been political acknowledgment of the threat posed by Russian disinformation. The establishment of the Centre Against Terrorism and Hybrid Threats within the Ministry of the Interior has represented an important step and a good practice in dealing with propagandist content. The Czech security service BIS has served as a model institutional effort for preventative action.

In **Germany**, Kremlin disinformation targets the political and economic influence of *Putinverstehers* and the lingering anti-American/anti-globalist attitudes in German society. Germany has remained entrenched in Russian business interests with many intractable conflicts of interest appearing continuously as issues for key former and current political figures. The Russian geopolitical Nord Stream II project continues to consume enormous political energy and is a critical entry point for Kremlin interference operations, including disinformation. In this respect, the prevalent disinformation narrative in pro-Russian outlets claims that globalization and liberalism are economically threatening and anti-national, serving the interests of American capital. The disinformation response capacity of Germany is mostly entrusted to the state level. The Network Enforcement Act (NetzDG) was the first of its kind in Europe, detailing regulatory measures for tackling unlawful content disseminated on the largest social media platforms. The German federal government has also pioneered initiatives in strategic communications, fact-checking, and media literacy. However, the main challenge ahead of Germany to forging an effective response to Russian disinformation is the limited cooperation between government and civil society. There are also discrepancies between the federal level and the regional states' level. Legal fragmentation, competition over the scope of authority in the application of media regulations, and enforcement capacity undermined by under-resourcing at the regional level represent persistent problems. Germany continues to be a major roadblock to joint financial action on the EU level, curtailing the capacity of the EC to act in the common European interest.

The building of sustained resilience to state-sponsored anti-democratic disinformation, in general, and foreign authoritarian malign media operations, in particular, requires coordination among the plethora of national government, civil society, and international institutional actors. An **integrated, multi-stakeholder approach** to tackling the threats to the informational ecosystem would thus be based on cooperation among these actors, while nevertheless maintaining their distinctive scope of activity.

National governance framework:

- Address **rule of law deficits** as identified in the EU Rule of Law report through comprehensive annual action plans. Adopt independent govern-

ance vulnerabilities monitoring mechanisms, such as the *State Capture Assessment Diagnostic (SCAD)*.

- National governments need to conduct regular comprehensive risk assessments regarding national vulnerabilities to (foreign, state-sponsored) disinformation. The prevention and countering of malign media influence activities should be enshrined as a policy priority in strategic documents.
 - Adopting a **whole-of-government, cross-thematic approach** to dealing with influence operations will foster coordination among government agencies and tackle cybersecurity as well as the political-economic aspects of foreign disinformation activities.
- **Legislation** should be devised in such a way as to clearly define the boundaries between and permissibility of different forms of offensive discourse (such as hate speech but also deceptive and manipulative statements). It should level the playing field between traditional and social media.
- **Transparency of ownership** ought to be ensured through the compulsory registration of media owners in accessible national registries. Strict monitoring of the origin and concentration of the assets of media owners should be implemented in order to reveal the potential presence of illicit money flows, particularly related to foreign authoritarian state capital.
 - Devote particular attention and resources to tracking and investigating the ownership structures of (anonymous) websites and **media with unclear ownership** that proliferate Russian disinformation.
- It is paramount to strengthen **the administrative and professional capacity of national media regulatory bodies**. Their independence from political pressures should be asserted, for instance, through appeals to and support from EU institutions and international journalistic associations.
 - The financial and operational independence of the **national public broadcasters** from political interference should be enshrined in legislation and practice. National governments should ensure the resources to continuously strengthen public media's online presence and stimulate the development of specific national and EU disinformation capabilities.
- The populist-nationalist-extremist threat to individual rights and freedoms has to be countered by strengthening **political commitment to inclusive policies**.
 - Compile and disseminate an anti-discrimination and diversity covenant cataloging and debunking stereotypical representations (of women, ethnic minorities) as well as detailing rights to non-discrimination.
 - Hold social media accountable on allowing and failing to moderate extremist language and messaging.

Civil society:

- CSOs need to develop **cross-European networks**, which combine: research excellence in assessing and exposing Russian disinformation in relation to its overall geopolitical, security, and economic goals; big data and online algorithm capabilities for monitoring online disinformation trends in near real-time; and advocacy skills.
- CSOs should contribute to stemming the flow of anti-democratic messaging, sponsored by foreign authoritarian regimes, by, for instance:
 - Building up **internal capacity** for online media monitoring and successful outreach on the basis of EU/international multilateral exchange programs (such as technology and media corps).

- Developing a set of **counter-narratives** that reassert the values of tolerance and inclusivity.
- Recognizing, bringing attention to, and comprehensively investigating **the psychological mechanisms** that facilitate the consumption of disinformation (such as cognitive bias and predisposition to belief confirmation; cognitive laziness). Disseminate guidelines for a self-reflexive selection and reception of news.
- Active citizen engagement should be fostered through **the establishment of deliberative councils**, where issues subject to deep societal polarization – and related polarized media representation, are discussed and bridges are therefore built across opposing political views. CSOs should seek to raise the authoritarian state-sponsored disinformation debate and provide workable solutions within the **Conference on the Future of Europe**.
- Encourage the introduction of **media literacy classes** in the school curricula, particularly at the high school level.
- Create multi-citizen stakeholder **fact-checking platforms** uniting the efforts of expert-led debunking and citizen volunteers who track and expose disinformation. Continuously educate and engage with citizens on social and traditional media about the patterns and tactics of authoritarian state-sponsored disinformation.

The EU

- The first line of defense of the EU should be inward-looking, focusing on **closing rule of law gaps** in member states in relation to judicial independence, media freedom, civil society development, and the digital information ecosystem. The EU needs to build its capacity to deliver change in the member states on its recommendations concerning good governance contained in the annual Rule of Law report and the country-specific recommendations under the European Semester.
- The EU's ongoing legal push to regulate social media platforms (particularly through the *Digital Services Act* and the *Digital Markets Act*) could be further fine-tuned in a number of directions:
 - Provide a **clearer definition of "illegal content"** that spells out and reconciles the different understandings and definitions of the concept as enshrined in member states' law. Expand the scope of regulated content to include disinformation.
 - Introduce **must-carry rules for online platforms** guaranteeing accessibility to and visibility of public service media.
 - Ensure a fair balance between swiftness of content moderation (i.e., before a piece of disinformation goes viral) and observance of individual rights to freedom of speech (as hasty decisions may lead to the removal of legitimate content) requires underscoring the importance of building content moderation capacity.
- A multi-faceted approach to dealing with disinformation and influence operations should include the **investigation of illicit flows of authoritarian-state capital** channeled into the dissemination of Russia- and China-favorable media coverage (such as through funding news outlets operating in European countries). In addition, Europe needs to reconsider and reduce the exposure of European companies to corrosive, large-scale, Russian state-driven deals, which lock powerful socio-economic elites to Kremlin strategic projects (e.g., Nord Stream II and Turk Stream).

- The **European Parliament**, through its Special Committee on Foreign Interference in all Democratic Processes in the European Union, including Disinformation should lead the way in creating an integrated EU policy response capability. The EP needs to **strengthen and integrate the different tools for countering Russian interference** into a comprehensive response system (e.g., the Security Union Strategy) including but not limited to disinformation monitoring (East Stratcom), investment monitoring, competition enforcement in relation to critical sectors, such as energy and telecommunications, anti-money laundering, corporate transparency, and final beneficial owner transparency, etc. It should bring together different EC bodies to deliver on such a response system, including Europol, the EU Agency for Cybersecurity, the European Digital Media Observatory, and its regional hubs.
- Build **funding instruments** to support the priorities of the European Democracy Action Plan by pooling and coordinating financial streams from different EU sources, including the research program Horizon Europe, DG Connect, DG Just, DG Home, as well as DG Regio (member states' capacity building) and DG NEAR (capacity building for the Western Balkans, the Eastern and Southern neighborhoods).
- Forge a **transatlantic approach to media and technology-related issues as part of the overall democracy vs. authoritarianism debate**: an effective defense against social media manipulation can only be achieved by overcoming the divide on this matter on both sides of the Atlantic, as well as internationally with G7 democracies. This warrants an urgent policy reckoning in order to preserve freedom of speech standards and reliable public information, while preventing the use of these platforms to stoke division and mistrust.

INTRODUCTION

Democracy in Europe has come under continued pressure and challenges over the past decade. The rise of populist movements across the continent accompanied by conservative-traditionalist rhetoric – frequently empowered through political action, has dented the inclusive and tolerant nature of the liberal democratic achievements across the continent. Populism has further undermined the democratic process, in particular in Central and Eastern Europe, which continues to struggle with **persistent governance vulnerabilities and institutional rule of law deficiencies**.¹ The succession of crises, which has hit the European Union (EU) after 2008 (Eurozone near-collapse, migration pressure, Brexit, and COVID-19) has exacerbated such deficits, reducing growth and cohesion between and within countries, and increasing economic inequality and the gap between citizens' expectations and policy reality. The EU's gravity on its Eastern Neighborhood, the Western Balkans,² and MENA countries has weakened, worsening, in turn, the democratic aspirations and prospects in these societies.

The **dissemination and entrenchment of anti-democratic attitudes and practices** across Europe have been aggravated by two crucial factors: digital-technological developments and authoritarian-state interference in the information ecosystems of European countries. Online social media and technological platforms have exponentially increased opportunities for the expression of opinion, reception of information, and civil society's self-organization. However, simultaneously, this new, unknown and unregulated online space has exerted a severe impact on democratic discourse by reducing the quality, accuracy, and civility of the deliberation process essential to any democracy through the quick, interactive, clickable, and sensationalist dissemination of superficial, "fake" information and propagandist slogans. Indeed, the latter trend has been reinforced by rampant technological advances still posing challenges to policy-makers and regulators, including the use of obscure algorithms and the storing and commercialization of large amounts of personal data. Global economic developments have worked in favor of explosive digital advertising growth dominated by corporate giants, like Facebook and Google, which have gained unprecedented outreach, exercising an inordinate power on public discourse, yet remaining outside the reach of public scrutiny.

At the same time, in a **renewed global power competition**, authoritarian states have sought to tighten political-economic control of technologies and a wide variety of online and print news outlets and to crackdown on freedom of expression and trustworthiness of information circulating in the public sphere, both at home and abroad. States like Russia, China, and Iran, following a similar playbook, have sought to exploit rapid technological

¹ Shentov, O., Stefanov, R., and Vladimirov, M., *The Russian Economic Grip on Central and Eastern Europe*, Routledge, 2018.

² Filipova, R. et al., *Tackling Kremlin's Media Capture in Southeast Europe*, Sofia: Center for the Study of Democracy, 2021.

change and political-economic enmeshment in the ownership and editorial content of news outlets across Europe to subvert online spaces for the free exchange of ideas and erode the democratic norms and geopolitical lynchpins in the West.

Hence, this complex mix of domestic governance vulnerabilities, technological processes, global economic developments, corporate practices, and authoritarian state intent has **negatively affected democratic discourse** by furthering polarizations and empowering populist narratives in Europe. In this way, democracy is undermined both procedurally (e.g., in terms of the ability to receive transparent and reliable information) as well as substantively (through undercutting norms of equality, tolerance, non-discrimination).

The current report contributes to the **understanding of the anti-democratic challenge in Europe** through a comparative focus on the main Russian-sponsored disinformation messages and the corresponding ability to tackle authoritarian state-driven disinformation in four European countries: Bulgaria, Poland, the Czech Republic, and Germany. The study singles out the patterns of pro-Kremlin, anti-democratic messaging as informed by the similarities and differences in the topics, lines of narration, and journalistic-stylistic techniques of transmission of nationalist, anti-migrant, misogynist, and economically illiberal views since the intensification of Russia's informational warfare in 2014. It also evaluates the disinformation response capacity of these countries on the three main levels of government, civil society, and international institutions, further detailing key resilience assets and liabilities. Using CSD's established *Kremlin Playbook*³ and *state capture methodological framework*⁴ the report proposes policy and practical recommendations for **capture proofing Europe's digital information ecosystem**. It adds to the debate on the European Democracy Action Plan, the Future of Europe Conference, the United States' Summit for Democracy, and the G7's shared efforts to defend democratic systems and open societies from foreign malign activities.

The existing academic and policy literature does not tend to offer **comparative analyses of the content and responses to Russian disinformation** across the different sub-regions of Europe. The majority of studies examine trends of Russia's anti-democratic propaganda by focusing on Central Europe (primarily the Visegrad states of Poland, the Czech Republic, Hungary, Slovakia) or Western Europe (particularly Germany and France). Moreover, emphasis is placed on specific facets of the Kremlin's media strategy for fomenting populist sentiments, whereas the current report sets out to link and detail the underlying reasons for the similarities and differences in the dissemination of Kremlin-sponsored narratives, as well as the corresponding institutional and cultural factors shaping the resilience of responses to foreign disinformation across national contexts. Comparative studies of Central Europe thus variously focus on Russian-sponsored anti-migration narratives;⁵ the right-wing

³ Shentov, O., Stefanov, R., and Vladimirov, M., *The Kremlin Playbook in Europe*, Sofia: Center for the Study of Democracy, 2020.

⁴ Stoyanov, A., Gerganov, A., and Yalamov, T., *State Capture Assessment Diagnostics*, Sofia: Center for the Study of Democracy, 2019.

⁵ Šuplata, M., and Nič, M., *Russia's Information War in Central Europe: New Trends and Counter-Measures*, GLOBSEC, 2016; Sawiris, M. et al., *European Elections in Central Europe: Information Operations and Disinformation Campaigns*, GLOBSEC, 2019.

groups and news outlets that enable Russian influence,⁶ and best practices in responding to such threats.⁷ Research on Western European countries similarly singles out the right-wing actors and media sources that the Kremlin deploys to further its conservative, anti-democratic agenda and the institutional barriers to Russian disinformation, especially by drawing on the experience of France⁸ and Germany.⁹ A number of examinations present reviews of best practices and gaps in dealing with the threats to the maintenance of a healthy information ecosystem particularly across Europe.¹⁰

The current study's analytical lens focusing on the challenges and responses to Russian disinformation as impacting the European digital information ecosystem has been implemented on the basis of **methodological guidelines**¹¹ applicable to each of the four case study countries of Bulgaria, Poland, the Czech Republic, and Germany:

- The content analysis of Kremlin-sponsored anti-democratic messaging is based on the investigation of four types of online news outlets, which exhibit differentiated political-economic enmeshment – and hence different degrees of distance, from Russia: (1) outlets that are **directly owned by the Kremlin**, such as RT, Sputnik, and Russia Beyond; (2) **partisan outlets** linked to (or published by) a domestic political party with strong ties to or publicly announced preference for the Kremlin; (3) **broader** (more widely circulated or read) **dailies** with less formal (including cognitive or editorial-ideological) ties to (pro)Russia groups and interests; (4) **mainstream (“control”) outlets** characterized by the greatest distance from Russia with no political-economic ties to (pro)Russian groups and interests.
- The content analysis of the **key topics, lines of narration, and stylistic means of message transmission** was carried out on the basis of a sample of 500 articles per case country (i.e., 2000 articles in total) with respect to four main anti-democratic themes informed by nationalist, anti-migrant,

⁶ Wenerski, L., *The Visegrad Countries and ‘Post-Truth’. Who Is Responsible for Delivering the Kremlin’s Narrative to the Czech Republic, Hungary, Slovakia and Poland?*, Institute of Public Affairs/Bertelsmann Stiftung, 2017; Vejvodová, P., Janda, J., and Vichová, V., *The Russian Connections of Far-Right and Paramilitary Organizations in the Czech Republic*, Political Capital, 2017.

⁷ Chyzhova, O., *Disinformation Resilience in Central and Eastern Europe*, ed. Andrei Yeliseyev and Volha Damarad (Stratpol, 2018); Metodieva, A., *Disinformation as a Cyber Threat in the V4: Capabilities and Reactions to Russian Campaigns*, Stratpol, 2018.

⁸ Conley, H., and Jeangène Vilmer, J.-B. J., *Successfully Countering Russian Electoral Interference*, Center for Strategic and International Studies, 2018; Rosenberger, L., and Fly, J., “Lessons from France for Fighting Russian Interference in Democracy,” *Alliance for Securing Democracy*, July 17, 2017.

⁹ Spahn, S., *Russische Medien in Deutschland. Wie Der Russische Informationskrieg Und Desinformation Einfluss Auf Deutschland Ausüben* [Russian Media in Germany. How the Russian Information Warfare and Disinformation Influence Germany], Friedrich Naumann Foundation, 2020; Stelzenmüller, C., “The Impact of Russian Interference on Germany’s 2017 Elections,” *Brookings*, June 28, 2017; Snegovaya, M., “Russian Propaganda In Germany: More Effective Than You Think,” *American Interest*, October 17, 2017; Kampfner, J., *Russia and China in Germany*, Royal United Services Institute, no. Occasional Paper, 2020; Decker, Ph. “Immigrants Are Big Fans of Germany’s Anti-Immigrant Party,” *Foreign Policy*, January 15, 2020.

¹⁰ Taylor, M., “Combating Disinformation and Foreign Interference in Democracies: Lessons from Europe,” *Brookings*, July 31, 2019; Minority staff report prepared for the use of the Committee on Foreign Relations United States Senate, *Putin’s Asymmetric Assault on Democracy in Russia and Europe: Implications for U.S. National Security*, US Government Publishing Office, 2018, pp. 65–153; Robinson, O., Coleman, A., and Sardarizadeh, Sh., *A Report of Anti-Disinformation Initiatives*, Oxford Technology & Elections Commission/Oxford Internet Institute, 2019; Hellman, M., and Wagnsson, Ch., *How Can European States Respond to Russian Information Warfare? An Analytical Framework*, *European Security* 26, no. 2, 2017, pp. 153-170.

¹¹ For more information on the methodology, see the Annex.

misogynist and economic illiberal narratives. The timeframe of the content analysis covers the period since 2014 – the year in which Moscow's annexation of Crimea and military offensive in eastern Ukraine marked the intensification of Russia's standoff with the West and the acceleration of the informational warfare waged on liberal democracies.

- The regional comparative content analysis is complemented with **quantitative diagnostics**. It is based on the weighted volume of articles published in the four types of online media outlets devoted to Russia-sensitive disinformation topics. In addition, the report looks into the level of activity of popular Russia-related social media pages, including state institutions, such as Russian embassies and consulates' pages.¹²
- The identification of best practices and gaps in dealing with disinformation is informed by a review of the debates and actions undertaken on the governmental, civil society, and international institutional level.

The overall effectiveness of a country's capacity to deal with challenges to the information ecosystem is therefore dependent on the timeliness, implementation, and coordination of legislative measures, civil society campaigns, and international institutional endeavors. Conversely, the presence of legal loopholes, deficiencies in the conceptualization and implementation of the relevant laws, a feeble civil society, and lack of enforcement of EU policies represent hindrances to the ability to combat disinformation.

¹² The quantitative analysis is based on the use of big data analytics company Sensika.com's SaaS content tracking tool and CrowdTangle.

THE ANTI-DEMOCRATIC TURN: KEY TRENDS

Democracy in retreat has come to challenge the conceptual and policy paradigm of democratic transition and consolidation predominant for much of post-1989 European politics. The rise of right-wing populism since the 2008 financial crisis – driven by a combination of economic grievances, disenchantment with political elites, and resurgence of conservative national traditions, has represented a fundamental challenge to democratic arrangements. Despite the diversity of populist conceptions rooted in specific national historical experiences,¹³ a number of shared overarching features have emerged. Most prominent is the focus on popular sovereignty understood as the exercise of majoritarian power as opposed to the liberal constitutional checks guaranteeing individual rights. The “people” tend to be represented in narrow confines encompassing a mono-ethnic community and its (ostensibly monolithic) traditions of cultural and national homogeneity, conservative stipulation of gender roles, and a sovereign nation-state in contrast to progressive principles of multiculturalism, gender equality, and supra-nationalism.¹⁴ For instance, although originating from a French intellectual and cultural background, the Identitarian Movement has attracted a pan-European following. A key ideological postulate centers on ‘ethno-pluralism’, according to which people of different ethnicities should not live in the same society and should be excluded from democratic participation.¹⁵

Populist ideas have therefore undermined democratic norms as well as institutional arrangements since populist leaders have been found to curtail freedom of the press, civil liberties, and political rights, once elected to office.¹⁶ It is, in particular, the liberal aspect of democracy that has come under fire as right-wing populists place a premium on the interests of a self-designated majority against the observance of the individual rights of minorities. In this vein, the ascendancy of illiberal democracy – initially envisaged to be a form of governance that would take root outside of the Western world, has come to characterize developments across European countries. Most recently, the coronavirus crisis has exacerbated processes of democratic backsliding and infringement on civil rights, exposing long-standing governance deficits and being itself exploited for the introduction of measures restricting fundamental freedoms, especially press independence.¹⁷

¹³ For instance, for the historical antecedents of right-wing populism in Britain, France and Germany see Crewe, Iv., and Sanders, D., *Authoritarian Populism and Liberal Democracy*, Palgrave Macmillan, 2019; Zúquete, H. P., *The Identitarians: The Movement against Globalism and Islam in Europe*, University of Notre Dame Press, 2018; Havertz, R., *Radical Right Populism in Germany AfD, Pegida, and the Identitarian Movement*, Routledge, 2021.

¹⁴ Mammone, A., Godin, E., and Jenkins, B., *Mapping the Extreme Right in Contemporary Europe: From Local to Transnational*, Routledge, 2012, pp. 22-24.

¹⁵ Stuchbery, M., “Should Germany Be Worried about the Far-Right ‘Identitarian Movement?’” *The Local*, July 12, 2019.

¹⁶ These conclusions are drawn from a comprehensive review of 46 populist leaders or political parties in power across 33 countries since 1990: Mounk, Y., and Kyle, J., “What Populists Do to Democracies,” *The Atlantic*, December 26, 2018.

¹⁷ Filipova, R., *The Shrinking Space for Media Freedom in Southeast Europe in the Midst of COVID-19 Pandemic and State of Emergency*, Sofia: Center for the Study of Democracy/Konrad-Adenauer-Stiftung Media Programme South East Europe, 2020.

Technological developments have become an inseparable part of the processes that both promote and undermine democracy.¹⁸ The main concerns raised by technology can be grouped into two interrelated categories. The first is related to **market monopolization practices**, whereby some of the largest technology companies, such as Facebook, Google, and Amazon, are wielding disproportionate economic influence and extracting what some have come to term behavioral surplus, commercializing the human (including the democratic) experience.¹⁹ The increasing prominence of anti-trust investigations launched by the European Commission²⁰ represents the legal and regulatory response to cases in which technology companies are utilizing their dominant digital infrastructure, access to huge amounts of consumer data, and corresponding deployment of targeted advertising to gain bargaining power and conduct unfair practices that bloc competition from start-ups or restrict opportunities for business users. Debates over digital tax further underscore concerns that tech giants are able to accumulate profits by aggressive tax optimization practices and not paying taxes in the countries in which they operate and create value.²¹

The second category refers to **the socio-political impact of technology** exerted through its outsized capacity to disseminate ideas, shape (voter) preferences, and provide opportunities for digital activism. Populist ideas have gained large traction on social media and a growing body of research²² has shown that conservative-minded users in a range of European countries and the US are much more likely than liberals to follow and engage with accounts and posts that spread (Russia-sponsored) disinformation. Hence, reining in the circulation of disinformation and moderating content has featured as a central concern in debates about the (self)regulation of social media platforms. Uncertainties however remain as to what content should be moderated, how this should be done, and where it should take place.

The type and scope of speech that is to be monitored represents a constantly evolving definitional process. As far as the technological platforms are concerned, Facebook and Twitter have gradually come to incorporate into their policies a greater array of content that should fall under the purview of

¹⁸ For overviews of the impact of technology on different spheres of social, economic and political life see Woolley, S., *The Reality Game: How the Next Wave of Technology Will Break the Truth*, Public Affairs, 2020; Ghosh, D., *Terms of Disservice: How Silicon Valley Is Destructive by Design*, Brookings Institution Press, 2020; Deibert, R., *Reset: Reclaiming the Internet for Civil Society*, House of Anansi Press Ltd, 2020.

¹⁹ Zuboff, S., *The Age of Surveillance Capitalism*, Public Affairs, 2019.

²⁰ The European Commission has so far launched a number of investigations against Amazon, Google, Apple, Facebook for misuse of personal data, unfairly making sellers use company logistics, tax avoidance: Scott, M., and Dorpe, S.V. "EU Charges Amazon with Misusing Data, Opens New Probe over Buy Box," *Politico*, November 10, 2020.

²¹ The European Commission's proposal for the introduction of digital tax lays down rules for taxing digital businesses without a significant physical presence and including user engagement and interaction as a distinct activity in the process of value creation: European Commission, *Proposal for a Council Directive Laying down Rules Relating to the Corporate Taxation of a Significant Digital Presence*, 2018.

²² Hjorth, F., and Adler-Nissen, R., "Ideological Asymmetry in the Reach of Pro-Russian Digital Disinformation to United States Audiences," *Journal of Communication* 69, no. 2, 2019, pp. 168-192; Badawy, A., Ferrara, E., and Lerman, K. "Analyzing the Digital Traces of Political Manipulation: The 2016 Russian Interference Twitter Campaign," *IEEE/ACM International Conference on Advances in Social Networks Analysis and Mining*, 2018, 258-265.; Apuzzo, M., and Satariano, A., "Russia Is Targeting Europe's Elections. So Are Far-Right Copycats," *New York Times*, May 12, 2019.

moderation – including Holocaust denial,²³ the QAnon conspiracy theory,²⁴ allegations of election rigging, and premature claims to victory (in the run-up to the 2020 US Presidential elections),²⁵ ads that scapegoat minorities, immigrants, racial and other groups,²⁶ white nationalism, and separatism.²⁷ As regards to EU-level initiatives, the most recent regulatory push embodied in the *European Digital Services Act* places a focus on “illegal content” (this primarily refers to strictly prohibited hate speech, terrorist, discriminatory, and pornographic material). The Act shies away from enlarging the regulatory scope to the wider phenomenon of disinformation, which can sway opinion in a manipulative and deceptive manner that distorts facts and opinions but refrains from outright lies and explicit extremist, hate statements. Instead, disinformation is left to the observance of voluntary codes of conduct.²⁸

The most effective means through which content moderation is to be achieved have also yet to be determined, particularly in terms of the division of responsibilities between human moderators and artificial intelligence (AI) methods. Shortages in human personnel may not be compensated for by automation as the latter has been shown to be deficient in recognizing disinformation. Most starkly, the increase in the utilization of AI during the coronavirus pandemic did not lead to a qualitative change in the detection of harmful material. Rather, dangerous and illegal content was omitted, while legitimate accounts were closed down.²⁹ These developments are echoed in an emerging academic and policy concern with the accuracy and ethical implications of the use of AI. A major problem consists in the fact that AI cannot recognize content and therefore the implicit meaning and stylistic techniques of message transmission that impart particular connotations. The quality and comprehensiveness of the datasets employed for training AI also directly influence and skew the effectiveness of automatic monitoring on the basis of incomplete input, in-built bias (for instance towards underrepresented groups), and focus on the most widely spoken languages. From an ethical point of view, AI can violate the right to free speech by taking down legitimate content. This further raises the issue of the appropriateness of instituting the presumption of prior censorship without adequate oversight and due process.³⁰ Hence, European regulations now stipulate that online platforms shall ensure that content moderation decisions are not solely taken on the basis of automated means, and the latter’s

²³ Metamorphosis Foundation, “Facebook to Include Holocaust Denial in Its Definition of Banned Hate Speech,” *Global Voices*, October 14, 2020.

²⁴ Hendel, J., “Facebook Broadens Crackdown on QAnon,” *Politico*, June 10, 2020.

²⁵ Hern, A., “Twitter and Google Join Facebook in Tightening Rules on US Election Claims,” *Guardian*, September 11, 2020.

²⁶ Fung, B., “Facebook Will Label More Controversial Content and Tighten Advertising Policies,” *CNN*, June 26, 2020.

²⁷ Beckett, L., “Facebook to Ban White Nationalism and Separatism Content,” *Guardian*, March 27, 2019.

For more on how right-wing nationalists weaponize social media see Schradie, J., *The Revolution That Wasn't: How Digital Activism Favors Conservatives*, Harvard University Press, 2019.

²⁸ European Commission, Proposal for a Regulation of the European Parliament and of the Council on a Single Market For Digital Services (Digital Services Act) and Amending Directive 2000/31/EC, 2020, pp. 21, 35-36.

²⁹ Scott, M., and Kayali, L., “What Happened When Humans Stopped Managing Social Media Content,” *Politico*, October 21, 2020.

³⁰ Llasó, E. et al., *Artificial Intelligence, Content Moderation, and Freedom of Expression*, Transatlantic Working Group, 2020, pp. 8-9.

precise purposes, indicators of accuracy, and accompanying safeguards should be clearly detailed.³¹

The geographical diffusion and applicability of rules on the operation of social media platforms has represented another unresolved issue since these rules have been confined above all to Europe and America. Given that regulatory pressure and initiatives mostly emanate from European capitals and increasingly – Washington D.C., it is likely that outside of the West technological giants will continue to operate in environments that are either too restrictive of freedom of speech, attempt to replace and ban Western technological companies altogether (such as Russia and China), or environments that are too lax in imposing regulations for content moderation.³²

Moreover, the question about the type of views and statements that are allowable on social media is additionally complicated by the specific features of technological companies' digital infrastructure, especially as related to data storage and the functioning of algorithms. Tech giants' privileged access to and retention of personal information raise significant privacy concerns, whereby the employment of such information for audience profiling contributes to targeted (political) advertising, manipulated reviews,³³ and hence a subliminal shaping of preferences. Algorithms and recommender systems³⁴ are themselves fed with personal data used to further refine targeting, display pre-selected information and even reinforce racial and gender biases.³⁵

Europe's rule of law crisis³⁶ exacerbates these democratic and technological challenges by undermining the cohesion of development and implementation of new policies and ensuring ample entry opportunities for foreign malign powers. This has been particularly true for the EU's Eastern flank, which has attracted the most malign media interference and geopolitical attention from global adversaries, such as Russia and China. Early market democracy reform champions, such as Poland and Hungary have seen a continuous deterioration of rule of law standards and attacks on the judiciary and the quality and freedom of media coming directly from elected governments. Bulgaria and Romania, on the other hand, have not yet graduated their pre-accession status with their judiciary reforms, still remaining under special EU supervision through the Cooperation and Verification Mechanism.³⁷ Democratic deficits have also been visible in other European countries.³⁸

³¹ According to Article 17, 5.; Article 23 1. (c) of the Digital Services Act.

³² Wong, J. C., "The Debate over Facebook's Political Ads Ignores 90% of Its Global Users," *Guardian*, November 1, 2019.

³³ DiResta, R., "How Amazon's Algorithms Curated a Dystopian Bookstore," *Wired*, May 3, 2019.

³⁴ For overviews of the functioning and socio-political effects of algorithms see DiResta, R., "Free Speech in the Age of Algorithmic Megaphones," *Wired*, December 10, 2018; DiResta, R., "Computational Propaganda: If You Make It Trend, You Make It True," *The Yale Review* 106, no. 4, 2018, pp. 12-29; Maréchal, N., and Biddle, E. R., *It's Not Just the Content, It's the Business Model: Democracy's Online Speech Challenge*, Open Technology Institute, 2020.

³⁵ Noble, S. U., "Algorithms of Oppression: How Search Engines Reinforce Racism", *New York University Press*, 2018.

³⁶ Keleman, R. D., "Europe's quiet crisis", *Encompass*, April 2021.

³⁷ The mechanism was set up upon Bulgaria and Romania's entry into the EU to monitor their progress on judicial reform and anti-corruption. It produced *Annual Progress Reports* and is still in force as of the beginning of May 2021.

³⁸ Alliance of Democracies, *Democracy Perception Index Report 2021*, Latana.com, 2021.

The European Union itself has found it difficult to introduce binding good governance rules, scrapping its anti-corruption report introduced in 2014 only after one edition.³⁹ The Commission has since integrated the report in the European Semester mechanism, though its recommendations have lacked binding enforcement. In 2020, as part of the *European Democracy Action Plan*, the European Commission introduced the Rule of Law report and mechanism, linking governance reforms to EU funding for member states. The report looks into judicial system performance, media, civil society, and other democratic checks and balances, and is the European Commission's response to reign in democratic deficits across the continent. The rule of law mechanism's principles have also been introduced into the EU's enlargement and neighborhood policies, striving to strengthen European democratic values along the EU's fringes in the face of rising Russian and Chinese interference. But it has yet to demonstrate its effectiveness in delivering change on the ground.

By exploiting technological (social media), societal, and rule of law vulnerabilities in Europe **authoritarian states** have contributed to the democratic backsliding across the continent through launching active interference measures, leveraging a variety of tools and instruments – including political-economic influence⁴⁰ and disinformation.⁴¹ In some of the most vulnerable countries such interference has resulted in **media capture**.⁴² The post-1989 hope following the collapse of communism that all ideological alternatives to democracy had been exhausted⁴³ and states needed to be democratic (even only as a matter of rhetoric) to be legitimate in international relations has been gradually weakened. Authoritarian states have explicitly attempted to justify the ostensible virtues of autocratic governance. Russia, in particular, has posited 'conservatism' as an ideational and strategic challenge to Western liberal democracy. According to the Russian point of view, Russia has retained and embodies what are presented by the Kremlin as the "best" of European traditions of the 19th century animated by strong state authority, patriotism, family values, religion, and the conduct of international relations on the basis of the balance of power and spheres of influence.⁴⁴ These postulates thus negate progressive European principles of individual liberties, multiculturalism, multilateralism, and economic interdependence, instead seeking allies in conservative, right-wing political groupings in European societies.

³⁹ The *EU Anticorruption Report* has had only one edition. Its second edition, planned for 2016 was never released, following opposition from member states.

⁴⁰ For a pioneering analysis on Russia's political-economic influence in Europe see Shentov, O., ed., *The Russian Economic Grip on Central and Eastern Europe*, Routledge, 2018; Conley, H. et al., *The Kremlin Playbook. Understanding Russian Influence in Central and Eastern Europe*, Rowman & Littlefield, 2016.

⁴¹ Filipova, R., and Galev, T., *Russian Influence in the Media Sectors of the Black Sea Countries: Tools, Narratives and Policy Options for Building Resilience*, Sofia: Center for the Study of Democracy, 2018; Kliman, D. et al., *Dangerous Synergies Countering Chinese and Russian Digital Influence Operations*, Center for a New American Security, 2020.

⁴² Filipova, R. et al., *Tackling Kremlin's Media Capture in Southeast Europe*, Sofia: Center for the Study of Democracy, 2021.

⁴³ Most conspicuously expressed in Fukuyama, F., "End of History?," in *National Interest*, Center for the National Interest, Summer 1989.

⁴⁴ Some of the first political expositions of these ideas can be gleaned from Rossiyskaya Gazeta, "Выступление Владимира Путина на заседании клуба 'Валдай'" [Address by Vladimir Putin at the Meeting of the Valdai Club], September 19, 2013; Izvestiya, "Минкультуры изложило "Основы государственной культурной политики"" [The Ministry of Culture Put Forward 'The Bases of State Cultural Policies'], April 10, 2014.

In its drive towards a global power competition, **the Kremlin has revived and deployed in Europe an influence mix**, ranging from the more traditional elements of its hard power, such as aggressive military and political posturing, to covert operations or “active measures”,⁴⁵ to propaganda and media influence. The Kremlin has been cultivating ties – both official and unofficial – with European political parties, in a bid to challenge the existing European order from within. These include known engagements with opposition extremist parties in Germany and France, as well as with anti-establishment, anti-European governing parties in Austria, Italy, Bulgaria, and Serbia. But there are likely many more unknown connections. Indeed, the Ibiza affair or (sting) operation on the then Austrian vice-chancellor demonstrated how vulnerable Europe’s political core is.⁴⁶ Russia has also promoted aggressively its strategic gas projects in Europe, Nord Stream II, and TurkStream, by providing lucrative jobs on the boards of Russian state-owned and private companies to top European political leaders and by offering exclusive business deals and access to its markets among European majors.

This military-political-economic-media aggressiveness has been accompanied by constant intimidation from the Kremlin. Their targets have been the EU, NATO, and European institutions. Most recently, Russia’s foreign minister has undertaken a very intent and pointed campaign to denigrate and delegitimize the European Union institutions, insisting on directly negotiating only with nation states.⁴⁷

A growing body of literature has documented the ideological and interest-based ties that the Kremlin has forged with right-wing politicians and parties in Europe, whereby anti-migrant narratives, in particular, have been instrumentalized to challenge the inclusive, tolerant, multicultural European model, sow distrust in the ability of European institutions to cope with migration pressures and simultaneously boost the domestic appeal of right-wing populists.⁴⁸ The convergence of anti-migrant – and more generally anti-liberal and anti-Western, discourses between Russia and its European populist allies has been additionally solidified through Moscow’s financial backing, reinforcement of personal connections, and media engagement. Regarding the latter, the Kremlin has made a concerted effort to push its disinformation messages onto pro-Russian outlets operated by right-wing activists as well as give prominence on its own channels (such as RT) to right-wing European populists as supposedly legitimate and authoritative commentators that criticize the negative trends in Western societies.⁴⁹

⁴⁵ A term used by Soviet and Russian security services to denote covert operations intended to disrupt or shape events in other countries. Such operations can also be executed under diplomatic cover: see Prothero, M., “Unit 29155: Putin’s Assassination Squad – Suspected of Killings All over Europe – Received Diplomatic Cover from the Russian Mission in Switzerland,” *Business Insider*, March 16, 2020. The revelations about the actions of this unit continue in 2021 with the most recent discovery of Czech security services about the demolition of explosives in Vrbovec.

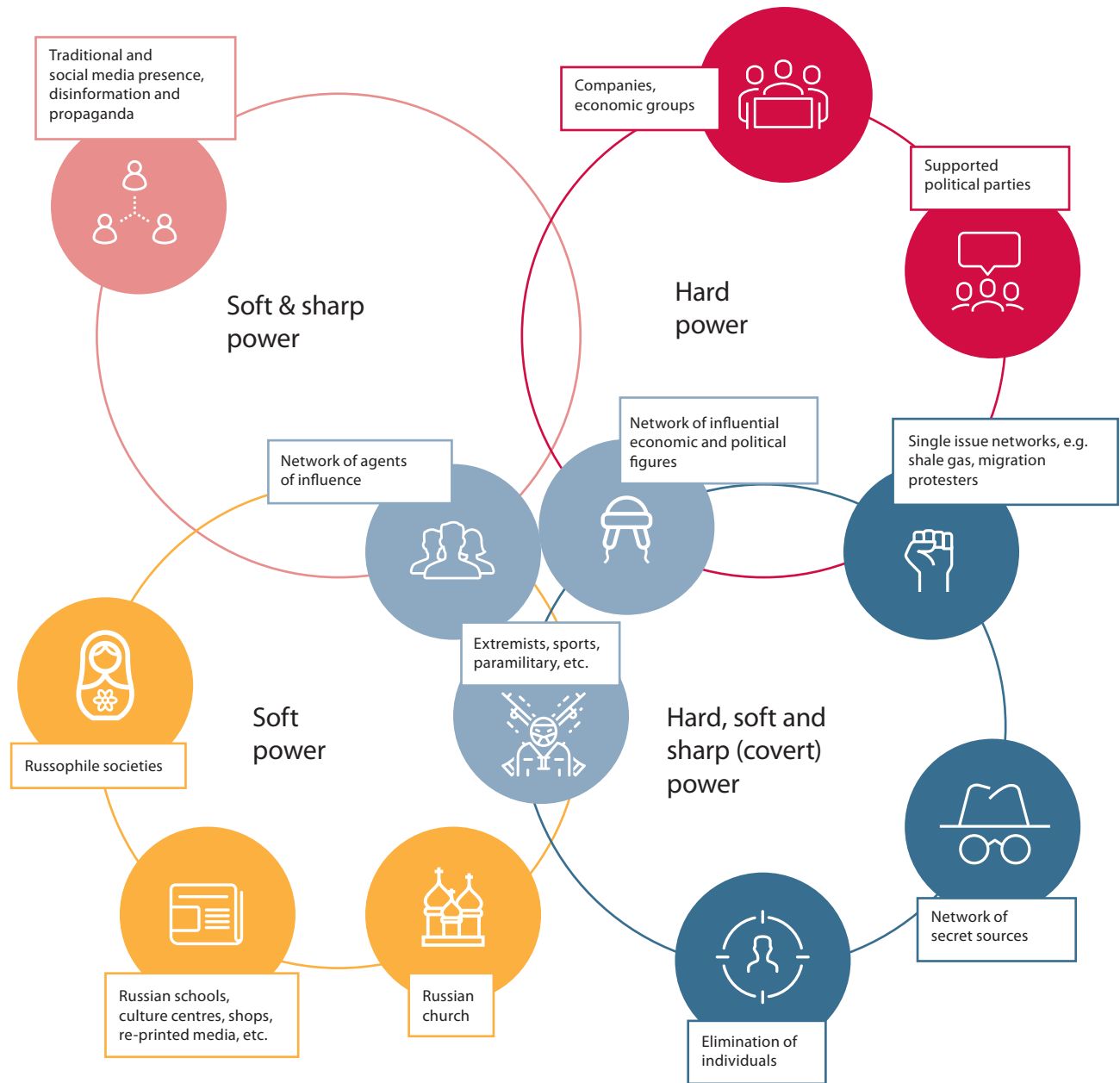
⁴⁶ Center for the Study of Democracy, *The Kremlin Playbook: The Movie*, CSD Policy Brief No. 85, 2019.

⁴⁷ Reuters, “Lavrov blames EU for demise of its Russia ties,” February 15, 2021.

⁴⁸ Braghiroli, S., and Makarychev, A., “Redefining Europe: Russia and the 2015 Refugee Crisis,” *Geopolitics* 23, no. 4, 2018, pp. 823-848; Juhász, A., and Szicherle, P., *The Political Effects of Migration-Related Fake News, Disinformation and Conspiracy Theories in Europe*, Political Capital/Friedrich Ebert Stiftung, 2017.

⁴⁹ See for instance Klapsis, A., “An Unholy Alliance. The European Far Right and Putin’s Russia,” *Martens Centre*, June 1, 2015; Rohac, D., Zgut, E., and Györi, L., *Populism in Europe and Its Russian Love Affair*, American Enterprise Institute, 2017.

Figure 1. Kremlin's influence power mix in Europe



Source: Shentov, Stefanov and Vladimirov, *The Kremlin Playbook in Europe*, Sofia: Center for the Study of Democracy, 2020.

As against the background of the variety of challenges afflicting the state of democracy in Europe, the assertion of a **commonly forged European response** to counteract these challenges continues to be plagued by uncertainties. The plethora of recently announced and forthcoming EU initiatives (most prominent among which are the *European Democracy Action Plan*, the *Digital Services Act*, and the *Digital Market Act*) demonstrate the growing recognition of the major steps that need to be taken to improve the health of the democratic information ecosystem: (co)regulation of technological platforms (especially in terms of reining in harmful content), creating rules for ensuring equitable digital markets, safeguarding data privacy, promoting cybersecurity and responding to external authoritarian challenges.

However, the main problem that EU policy initiatives grapple with is linked to *legal fragmentation*,⁵⁰ whereby member states follow national laws and institutional practices, and retain competencies in dealing with information threats. The proposed solution is focused on greater harmonization of national legislations and vesting more powers in the Union in order to forge more effective coordinated action, which could also underwrite Europe's stated ambitions for "strategic autonomy", "technological sovereignty"⁵¹ and "data localization"⁵² (respectively envisaging getting ahead in the global digital race by promoting home-grown technological industries and restricting the flow of data outside of the EU). Yet, the achievement of harmonization and effective EU-wide enforcement is likely to continue to be hindered by member states' reluctance to pool powers to Brussels, as well as by the fact that the proposed EU documents themselves shy away from claiming more authority. For instance, the *Digital Services Act* stipulates that the task of ensuring the oversight and enforcement of the obligations under the Act are attributed to member states,⁵³ while the impression is left that the European Commission will get involved as a last resort – based on its own discretion or upon request from the relevant advisory group and national Digital Services Coordinators.⁵⁴

Democratic backsliding throughout Europe is therefore shaped by a confluence of internal and external factors – including internal rule of law and institutional deficits, the rise of domestic right-wing populism, transnationally impactful technological developments, and authoritarian-state-driven influence operations, additionally exacerbated by the difficulty of crafting a coordinated European response.

The current study contributes to the illumination of this complex mix of perils to democracy through four analytical dimensions. It provides a **cross-country comparative perspective** by zooming in on Bulgaria, Poland, the Czech Republic, and Germany, which all share the similarity of being EU member states. But they also differ in their respective belonging to the three historically shaped sub-regions of Southeast, Central, and Western Europe – characterized by different levels of rootedness of democratic traditions, as well as in their political-economic and cultural closeness to Russia. The comparative perspective thus allows an in-depth analysis of the patterns of the dissemination of Russian-sponsored and promoted anti-democratic messages in order to gain a comprehensive, nationally context-sensitive understanding of **the core features of the pro-Kremlin discursive challenge to Europe**.

The ability to withstand this challenge is then examined on the basis of the **evaluation of the resilience capacity** of the four country cases as informed by the progress made and/or deficiencies experienced in dealing with (Russian) disinformation on the governmental, civil society, and international institutional level.

⁵⁰ As explicitly stated for instance in European Commission, *Proposal for a Regulation of the European Parliament and of the Council on a Single Market For Digital Services (Digital Services Act) and Amending Directive 2000/31/EC*, 2020, pp. 7-8, 11-12, 18-19.; European Commission, *Proposal for a Regulation of the European Parliament and of the Council on Contestable and Fair Markets in the Digital Sector (Digital Markets Act)*, 2020, p. 2.

⁵¹ European Commission, *Shaping Europe's Digital Future: Op-Ed by Ursula von Der Leyen, President of the European Commission*, 2020.

⁵² Manancourt, V., and Heikkilä, M., "EU Eyes Tighter Grip on Data in 'Tech Sovereignty Push,'" *Politico*, October 29, 2020.

⁵³ According to (72) of the Digital Services Act.

⁵⁴ According to (87), (96), (97) of the Digital Services Act.

PATTERNS OF RUSSIAN ANTI-DEMOCRATIC DISINFORMATION

The dissemination of pro-Kremlin anti-democratic messaging is characterized by a commonality of covered topics, the content of promoted narratives, and the styles utilized for message transmission, as stemming from the pro-Russian tilt of the domestic outlets that spread Kremlin disinformation. At the same time, the differences in pro-Russian anti-democratic messaging follow a pattern conditioned by a news outlet's degree of political, economic, and ideological connections to Russia, including the ownership structure's economic dependencies, in/formal political ties, and the ideologically-tinged lines of editorial policy. An overall regularity in the spread of pro-Kremlin narratives consists in the fact that the more closely political and economically enmeshed a given news source is with (pro)Russian groups and interests, then the more straightforwardly, undeviatingly and in a more explicitly biased way the Russian discursive agenda is advanced.⁵⁵

Yet, on top of the patterns of regularized similarities and differences in the conveyance of Moscow's propagandist slogans observable across types of news outlets, national distinctions further impart specific features to the trends of pro-Kremlin anti-democratic disinformation. Current political-strategic priorities and economic dependencies, cultural-historical proximity to Russia, and the peculiar characteristics of national populist-conservative traditions shape the intensity and scope of pro-Russian messaging that can permeate national media landscapes.

Commonalities of pro-Russian narration

The pro-Russian news outlets converge on a number of recurring lines of messaging. With respect to the overall theme of nationalism, a main shared narrative discusses **the resurgence of nationalist sentiments and practices in the West**, which are claimed to be accompanied by growing fascist tendencies. Particularly negative portrayals are reserved for Ukraine, depicted as a country engulfed by militant right-wing extremism both politically and socially. In contrast, Russia is presented as the staunchest anti-fascist stalwart in world politics. The binary opposition thus constructed between an ostensibly neo-Nazi Europe and fascist-resistant Russia is consistent with the Russian regime's elevation of the memory of World War II to the level of ideological state policy. Its goal is aimed at unifying Russian society around symbols of patriotism and sacrifice in the name of the preservation of the state, as well as justifying Russia's European and global power ambitions – through the Kremlin's (self-ascribed) role as a sole savior of Europe motivated by the adherence to statist and patriotic principles.⁵⁶

⁵⁵ Filipova and Galev, *Russian Influence in the Media Sectors of the Black Sea Countries. Tools, Narratives and Policy Options for Building Resilience*, Center for the Study of Democracy, 2018.

⁵⁶ For an elaboration of the Russian framing of World War II see for instance: President of Russia, "Reception for Heads of State Invited to Military Parade to Mark 75th Anniversary of Victory in Great Patriotic War," June 24, 2020. Any criticism or alternative interpretations of the history of the War has also been legally codified as the denial of Nazi crimes and

A related strand of narration extolls the supposed virtues of **Russia's espousal of "traditional" values** as juxtaposed to the West's unbridled liberalism. Pro-Kremlin disinformation messages focus attention on seeming liberal deficiencies in both cultural, economic, and informational terms. Moral decadence and degeneration are claimed to be the result of the erosion of conservative values (stipulated as encompassing above all the traditional family and strong state authority), stemming from liberal social attitudes in the West. Liberal economic policies manifested in free trade and globalization more generally are couched as serving the ulterior motives of a few dominant Western (especially American) business interests to the detriment of national economic activity. In turn, it is argued that the (West) European "mainstream" media legitimates the corrupting effects of liberal cultural and economic trends, suppressing diversity and alternative, conservative expressions of identity.

The international political implications of the advancement of traditional values are manifested in the presentation of **sovereignty as the ultimate safeguard of national identity from external influences** and a major guidepost for maintaining an independent stance in international relations. The European Union model – based on pooling national sovereignty and taking on supranational functions, is derided as dictatorial, undemocratic, and bureaucratic, which undermines national traditions. Such a depiction falls in line with Russia's attempt to appeal to the conservative-nationalist layers of European societies as a form of leverage for derailing support for common European stances. In this way, the Kremlin not only mounts an ideological challenge to the liberal European order but also enables Russia's preferred strategy of dealing with European states in bilateral terms rather than participating in multilateral European fora (that also diminishes Russian bargaining power).

With respect to **migration**, the pro-Russian outlets in Bulgaria, Poland, the Czech Republic, and Germany similarly converge on a number of shared disinformation narratives. Migrants are uniformly presented as attempting to reach Europe in search of economic opportunities. The argument that migrants are refugees who flee from war-torn areas is dismissed. Migration is additionally conveyed to be **a major security, cultural, and economic threat** to the host European societies. Particular emphasis is placed on the multitude of crimes supposedly committed by migrants. It is also argued that the reception of migrants should cease as they adhere to cultural and religious norms that are incompatible with European values. The claim is further raised that migrants push local populations out of the labor market so that state authorities are unable to protect their own citizens and are complicit in the EU's imposition of migration policy. The resettlement of migrants on a quota principle is denigrated as a most notorious example of domineering, anti-national practices pushed onto (weaker) EU member states.

Migration is, thus, ultimately claimed to be a grave challenge to the cultural foundations and very survival of European civilization. The policy of multiculturalism is ostensibly unmasked as a betrayal of national traditions and the expression of "depraved" Western political correctness. Instead, the sug-

distortion of the Soviet Union's role has been criminalized: Anishchuk, A., "Russia's Putin Outlaws Denial of Nazi Crimes," *Reuters*, May 5, 2014.; Bogush, G., and Nuzov, I., "Russia's Supreme Court Rewrites History of the Second World War," *Blog of the European Journal of International Law*, October 28, 2016.

gested remedy is said to be found in the **Russian ethnic model**, which seemingly exemplifies peaceful coexistence between Christians and Muslims and promotes a distinctive, “common sense” perspective on the integration of different ethnicities within the same polity. According to this perspective, although the rights and habits of ethnic minorities should be observed, they cannot be allowed to constrain or take precedence over the leading role, interests, and cultural practices of the nation-forming ethnos (i.e., the ethnic Russians).⁵⁷

As regards gender, pro-Kremlin messaging draws a distinction between the West (said to be disseminating gender ideology) and Russia as a defender of traditional (husband – wife) family values. The framing of gender as an “ideology” – rather than as a concept reflecting the socially constructed and negotiated roles and relations between the sexes, instills a perception of a politically engineered malign intent aimed at undermining moral principles (particularly the married heterosexual family) as well as promoting a hidden agenda through the implementation of “quota” policy. Women and the LGBT community, whose rights and identities are the primary subject of gender discussions, are therefore groups in society singled out as posing a threat to conservatism. Feminism is denounced as a significant challenge to demography and the reproduction of the national community. In turn, the defense of LGBT rights is depicted as amounting to gay totalitarianism, which is claimed to be especially pernicious to children as “gay propaganda” makes its way into the school curriculum.

Russia is overall posited as embodying the ideals of traditional femininity and masculinity, whereby extensive acknowledgment of the rightful place that women have taken in a wide array of economic activities is belied by the primacy that Russian propagandist slogans place on the confinement of women to the private rather than public (particularly political) sphere. Such a discursive positioning also entails international implications. A gendered rank ordering of states on the world’s civilizational map is justified by the disinformation narrative focused on “Gayropa”, which draws a distinction between ostensibly “normal/traditional/dominant” Russian masculinity and “abnormal/homosexual/effeminate” Western masculinity. Moreover, Russia’s return to great power status is legitimated as a project of “re-masculinizing” Russia and “de-masculinizing” the West, whose “sexual deviancy” is presented as an outcome of democracy.⁵⁸

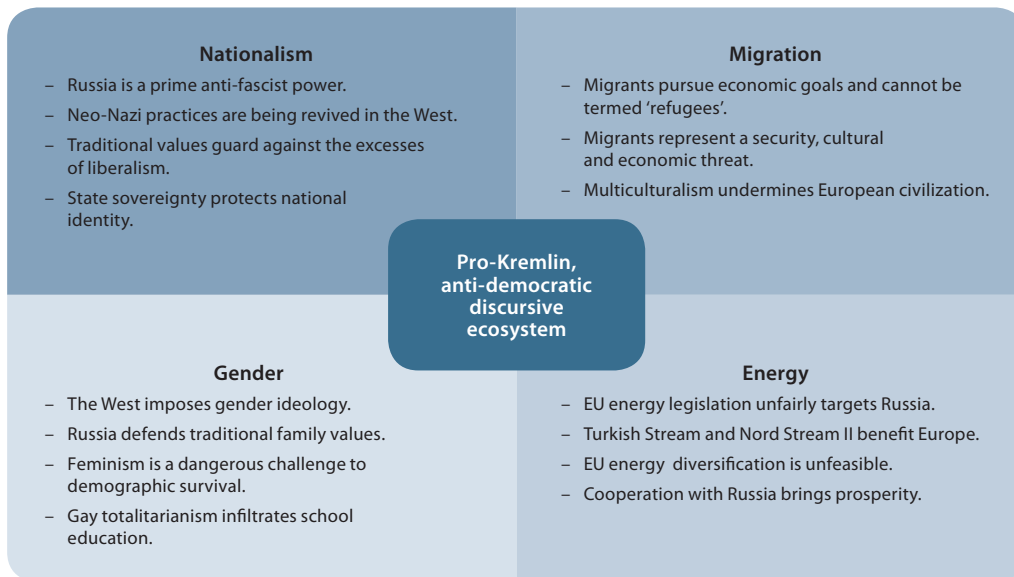
Finally, the pro-Russian outlets extol the benefits of energy cooperation with the Kremlin. Relations between the European Commission and Gazprom in the context of the latter’s breach of Union energy rules (e.g., anti-trust provisions against the conclusion of financially disadvantageous gas-pricing contracts) are couched through a prism whereby the Russian company unjustifiably finds itself at the receiving end of politically-motivated and US-incited legislative manipulations. The **Russian-led large-scale energy projects** (the

⁵⁷ For an elaboration of this view see for instance Izvestiya, “[Минкультуры изложило “Основы государственной культурной политики”](#)” [The Ministry of Culture Put Forward ‘The Bases of State Cultural Policies’], April 10, 2014.

⁵⁸ Riabov, O., and Riabova, T., “[The Remasculinization of Russia? Gender, Nationalism, and the Legitimation of Power Under Vladimir Putin](#),” *Problems of Post-Communism* 61, no. 2, 2014, pp. 23-35; Riabov, O., and Riabova, T., “[The Decline of Gayropa? How Russia Intends to Save the World](#),” *Eurozine*, February 5, 2014.

now-defunct South Stream, Turk Stream, and Nord Stream II) are advanced through the argumentation that they are economically beneficial to Europe and are not informed by political calculations. Yet, the projects are said to be undercut as a result of the self-serving designs of the US, wanting to further its own energy interests (especially through the supply of liquefied gas to Europe). European plans for **energy diversification** are invariably presented as economically unviable and unsustainable as alternative suppliers lack substantial gas reserves. Overall, claims of the feasibility of energy cooperation with Moscow result in an overlapping narrative that argues for **the importance of building business and economic ties with Russia** as a way of propping up national sovereignty and interests against the rapaciousness of Western economic “globalists”.

Figure 2. Pro-Kremlin anti-democratic discursive ecosystem in Europe



Source: CSD.

Differentiations in pro-Russian narration

On the whole, the totality of pro-Kremlin narratives make up an **anti-democratic conservative discursive ecosystem** targeting right-wing audiences throughout Europe and consisting of a number of key messaging lynchpins. Russian narratives generally incite distrust in democratic institutions and within societies in member states and the European Union, stoking divisions and polarizations and seeking to position the Kremlin point of view within national and European political debates. This essentially amounts to a pernicious, continuous interference with internal national and EU affairs unrelated to Russia.

In addition to the shared disinformation narratives that are commonly disseminated as part of the pro-Kremlin anti-democratic conservative discourse, differentiations in the **content and style of message transmission** are observed as a function of the degree of political, economic, and ideological distance of a given outlet to (pro)Russian groups and interests. The **news sources directly owned by Russia** (such as RT, Russia Beyond, and

Sputnik) spread Kremlin-sponsored narratives in the most straightforward and undeviating manner and much more rarely focus on nationally relevant perspectives and developments. The employment of explicitly biased stylistic means is ubiquitous, whereby manipulative coverage is informed by such methods as binary distinctions, moral opprobrium, exaggeration, sarcasm, unjustified historical and analytical parallels, promotion of conspiracies and impending threats, generalizations extrapolated from local situations, and single opinions. Message transmission can occasionally appear to be neutral, which is belied however by the employment of implicit attitude-shaping, including for instance distorted citations of Western experts (by taking their statements out of context) and emotionally-colored headlines that frame the impression of an otherwise neutral body of text. A clear distinction between news pieces and commentaries is not generally maintained as different types of articles advance a biased viewpoint as opposed to objective reporting.

Partisan outlets relate pro-Kremlin messages through a distinctive partisan spin shaped by the ideological and interest-based positions of the given domestic political party. The differentiation between news articles and commentaries tends to be formalistic (i.e., primarily in terms of format and length). Yet, ideological postulates abound in all types of reporting, which is especially evident in sweeping generalization extrapolated from singular occurrences or opinions and unjustified historical analogies.

Broader dailies feature more varied discussions that are not solely focused on the Russian perspective in order to appeal to the mix of views of a wider audience. There is a more neutral-formal format of news reporting, distinguished by some apparently neutral portrayals, which are nuanced with implicit bias, whereas commentaries are explicitly biased.

In contrast to the preceding three types of outlets, which differentially convey Kremlin-sponsored narratives but nevertheless retain an overall pro-Russian stance, the content and style of **outlets that are not linked to Russian interests** provide more impartial reporting of Russia-related topics. Coverage is balanced in terms of presenting a wider range of views, including critical consideration of Russian statements and actions through the provision of context and assessment of the merits of different arguments. The separation between news pieces and commentaries is clearly maintained.

Intensity of narration of Russian-owned online and social media

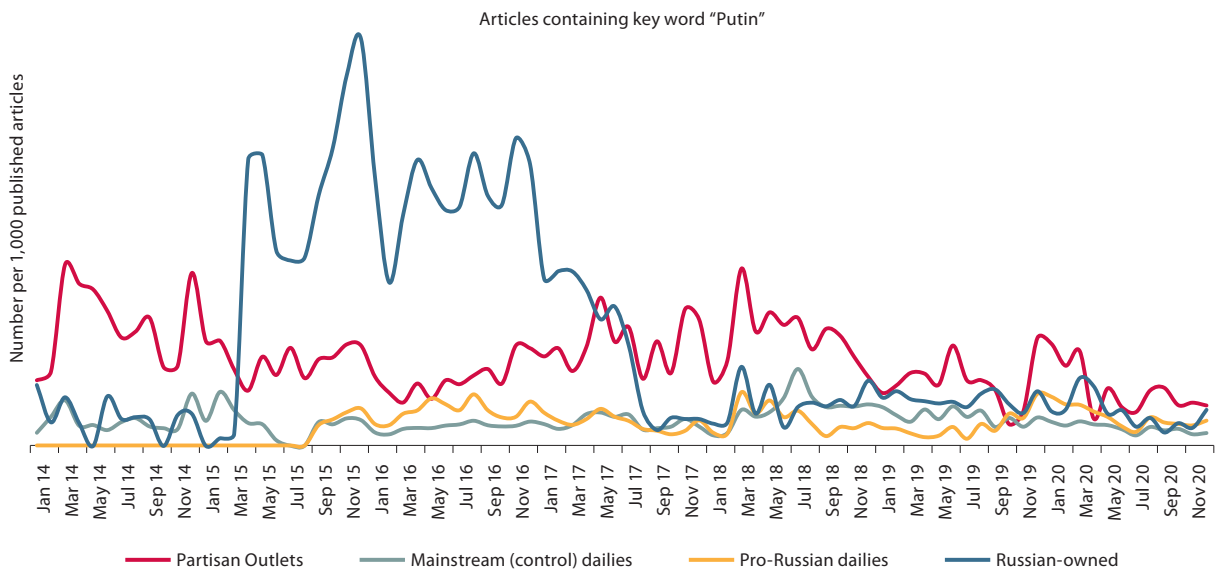
Besides the differentiation in narration, Russia has deployed varied levels of intensity in its (dis)information focus on countries in Europe. Such variation can be traced both in relation to the types of media outlets engaged, as well as to the target countries. Overall, Kremlin's strategy has been to **blanket the whole of Europe with pro-Russian white noise** through (online) media directly owned or controlled by Moscow, while at the same time focusing different levels of intensity and types of media presence within the different countries. Russia has also underpinned its media footprint in Europe with differing levels of online diplomatic presence.

Russian-owned media in Europe are **religiously focused on spreading the official Kremlin view** of the world. They have been particularly active in promoting President Putin's views and actions in the years between the illegal

Russian annexation of Crimea in 2014 and the last presidential elections in the country at the beginning of 2018. Russian-owned media have been on average 3-4 times less prolific (according to the number of online articles published per day) than pro-Russian or mainstream (“control”) dailies in Europe. Yet, Russian-owned media have covered Kremlin topics, identified, for example, by the frequency of their use of the keyword “Putin”, in a much higher share of their articles. Estimates show that the volume of Kremlin-related articles in Russian-owned outlets often reaches 90% of their content.⁵⁹ They can, thus, ensure a higher and constant inflow of online news reflecting the Kremlin’s viewpoint in Europe’s information space. Online media aggregation algorithms and social media echo-chambers could then further channel such messages to Kremlin-supportive audiences on the continent, amplifying their impact.

Next, Kremlin’s viewpoints are most often circulated in Europe through pro-Russian partisan outlets, which seek to define their political orientation and gain votes at home by reflecting the positions expressed by Putin, for example, on divisive issues, such as migration, gender, family values, etc. These views are also mainstreamed by pro-Russian dailies across Europe, as well as by mainstream (“control”) dailies, which following best media standards often feel compelled to provide also the Kremlin’s side to any issues they cover. In this way, the **Kremlin might be able to gain an unfair advantage**, ensuring its messages and narratives in particular on foreign policy issues concerning Russia, reach European citizens with higher intensity than even Brussels-honed views.

Figure 3. Intensity of coverage of President Putin in selected online media in Bulgaria, Poland, Czech Republic, and Germany



Note: Number of articles per 1000 containing the key word “Putin”.

Source: CSD based on Sensika SaaS media monitoring tool.

The Kremlin pursues a varied presence of Russian-owned outlets in the different European countries depending on political, cultural, economic, and

⁵⁹ Filipova, R. et al., *Tackling Kremlin’s Media Capture in Southeast Europe*, Sofia: Center for the Study of Democracy, 2021.

other proximity factors to Russia. The outlets also follow **different content and dissemination strategies**. Russia Beyond is primarily focused on promoting Russia, its culture, and way of life, thus creating goodwill and admiration for Russia in Europe. It does not necessarily follow current events and does not pursue aggressive disinformation. The outlet rather weaves Russia-positive narratives in its content and nudges users to the Kremlin's point of view by pointedly providing only coverage that supports it. RT and its offshoots are much more proactive and aggressive in their pro-Russian stance, by focusing primarily on political, economic, and social problems in the West, besides promoting Kremlin propaganda. In addition, RT claims to seek to challenge the viewpoint and dominance of Western global networks, such as CNN and BBC. Sputnik is much more forthright in its disinformation articles and in spreading Kremlin narratives. Besides, these official channels, Russia also utilizes a multitude of additional outlets, with unclear ownership but apparent close alignment with the Kremlin. These are the most outright in their propaganda and resort to blatant mis- and disinformation in favor of the Kremlin, a prime example being News Front.

The presence of Russian-owned outlets in social media, such as Facebook provides a glimpse into the Kremlin's differentiated media strategy and the outlet's local acceptance in Europe. In the Kremlin-friendly, culturally close, and economically dependent **Bulgaria**, which is an EU and NATO member, Russia relies on softer official presence, such as Russia Beyond and Russia Segodnia, as well as on its most provoking (hence clickable) and propagandist outlet, News Front. The latter though does not have a Facebook profile, most probably because of the too explicit nature of its disinformation narratives. Russia Segodnia has a Facebook page but marginal followership and impact. Yet, Bulgaria is the only country, in which this outlet has an offline presence, mainly catering to Soviet-nostalgic older generations, who read Russian but are not present on the Internet. Tellingly, Bulgaria's Russia Beyond outlet has the highest per capita followership and interaction with its Facebook page.

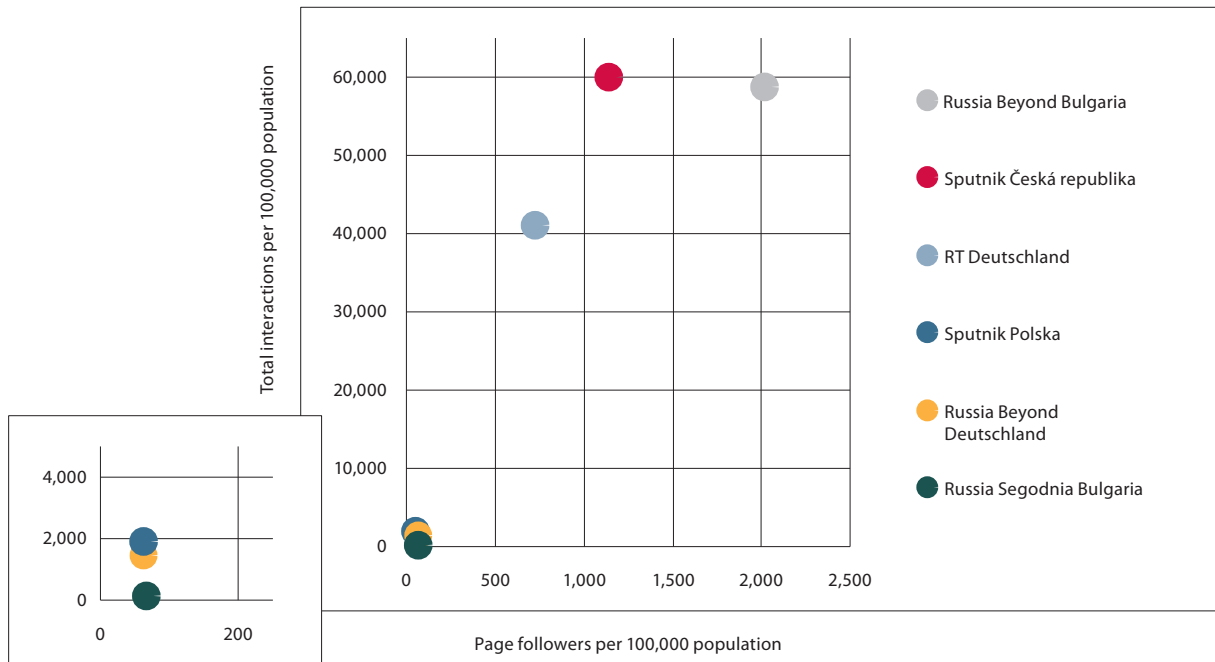
In the **Czech Republic**, which is economically and politically close to Russia, though its population is one of the most Russia-skeptic in Europe, Sputnik's Facebook presence has managed to achieve similar levels of interaction if not followership.

Russia has focused its heavyweight resource RT on **Germany**, which is Moscow's largest economic partner on the continent. Its FB page has been able to elicit 40,000 interactions per 100,000 of the German population, which is comparable to the presence in Bulgaria and Czech Republic. Yet, as the only TV channel, RT is much more potent in its reach and shows where the core focus of the Kremlin's influence ambitions lies.

In Russia-critical **Poland**, Moscow has unsuccessfully tried a similar approach as in Czech Republic, through relying on Sputnik. Its social media presence though is negligible.

In the Kremlin's media interference toolbox, Russian-owned media narratives take their cue and/or are reinforced through official diplomatic channels, including on social media. In this regard, **the most active diplomatic outpost is in Bulgaria**. The Russian embassy in Sofia has over 10 times more followers and interactions per 100,000 people than the embassies in Prague and Berlin.

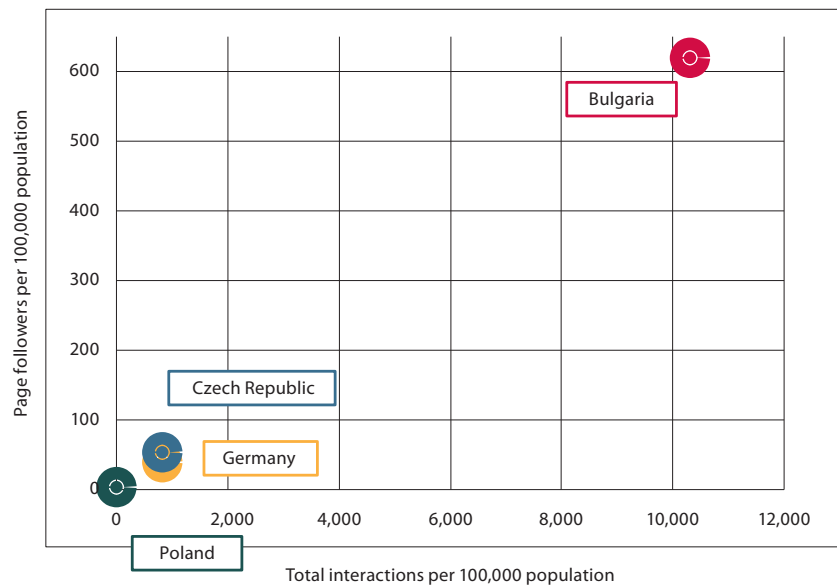
Figure 4. Facebook presence of Russian-owned outlets in Bulgaria, Poland, Czech Republic, and Germany



Source: CSD based on IRI Beacon project Pulsar tool.

The Embassy in Warsaw has a Twitter but no Facebook account. The embassy’s Twitter account has less than seven thousand followers, while the Facebook presence of the Russian Consulate in Warsaw draws almost no followers or interactions whatsoever. It can be concluded that Russia follows the most active (dis)information campaign in Bulgaria, although it has not included the heavier-weight outlets at its disposal – RT and Sputnik. Rather, these have been reserved for German and other Central European audiences.

Figure 5. Official Russian diplomatic missions’ Facebook presence in Bulgaria, Poland, Czech Republic, and Germany



Source: CSD based on IRI Beacon project Pulsar tool.

Box 1. Moscow's media influence toolbox

Media ownership is an auxiliary and supportive mechanism for Moscow to exercise its power at home and abroad [including Europe]. The Kremlin prefers to engage with local tycoons and oligarchs who exert effective media capture in the respective country through controlling whole media groups and having close connections to political leaders, lawmakers, and regulators. In countries where trust in social networks is relatively high, the Kremlin focuses on social media and agents of change. In countries where people have a relatively higher trust in their governments, it focuses on strategic partnerships with them. The major instruments for exerting influence through the media, including Russian public diplomacy and disseminating favorable narratives include:

- Presence of official television channels (RT, Sputnik, Russia Beyond) or satellite outlets servicing the diaspora or Russian tourists through open and transparent investments.
- Providing financial and logistical support to locals who are connected to Russia (family or business relations), for media entrepreneurship, e.g., translation of Russian newspapers or maintenance of mirror websites.
- Content provision, both on a larger scale through the translation of Russian media content into the local language but also through engaging freelance journalists that serve as “agents of influence”, creating content that is credible, but positive or neutral towards the Kremlin. Such individuals would get funded and supplied with access to information and people in critical media-interesting areas under Kremlin's control, such as the war zones in Syria, Donbass, and Crimea. Besides the countries in focus, this study has revealed a high number of content-related firms in the Czech Republic, Germany, and Italy, among others. They would work as subcontractors to TVs, radio stations, and newspapers for local news coverage.
- Multiplier effect: select journalists from trusted media or small online media outlets cite the content provider and feed content to media abroad or other domestic journalists. Thus, the public is made to trust certain news as they are widespread, even though they do not make it to international media. The news might be fake or absurdly real (e.g., a small town in the US has a law, which has never been enforced, that its citizens are obliged to own and wear a gun), but would fit the confirmation bias of the readers.
- Advertising concentrators, which are businesses responsible for media/PR budgets of companies. Typically, they buy large TV ad-slots and thus have very strong media influence, which could allow them to have a say in the selection of news editors and/or in the provision of feature content in programs or live discussions. Large Russian-owned companies in other sectors, such as oil and gas, telecommunications, banks, or tobacco would exert influence through their advertising budgets as well. Legitimate businesses, including foreign companies coming from NATO countries, could be fooled to fuel the power of such brokers without knowing their hidden role. These companies could influence the appointment of editors and could even cancel agreed media appearances or publications.
- Capitalizing on poor journalism: journalists that are not sufficiently paid and therefore unmotivated to engage in rigorous fact-checking are especially vulnerable to manipulation. TASS uses this strategy to replace major Western news agencies as a source of information for events and news originating from the European Union and the US as well. There have been cases, in which media in CEE cite only TASS that a NATO warship had entered the Black Sea to take part in military exercises and none have checked the news with the respective ministry of defense or NATO press-office about the details. Such cases seek the legitimization of Russian news outlets as trustworthy sources of information on the world. A typical scenario works like this: an actual event of potential mass interest domestically in the EU (e.g., violence with the alleged participation of immigrants), in Russia or Eastern Europe (LGBT or faith-related issues) is picked up, it is then shaped (e.g., by including some fake details or not providing the whole story), and disseminated to destroy confidence in EU institutions and morale;⁶⁰ Next, Russian, CIS, and Eastern

⁶⁰ For example, during Europe's migration crisis the private channel Ren-TV, controlled by Irena Lesnevskaya, her son, and Anatoly Chubais, used footage of clashes on Tahrir Square to fake the impression that the footing was actually from Cologne in Germany, and it was invaded by Arab immigrants. Various small media companies in Germany, Italy, UK and the Czech Republic contribute to producing content needed for Kremlin's propaganda. For

European immigrant communities in Germany and other EU countries are mobilized to post, comment, and disseminate faked or altered news related to domestic events and even organize protests. Thus, their relatives and acquaintances living back in their countries would have higher trust towards such news.

Source: Adapted from Todor Yalamov, *Russian Influence, Trust in Media and Media Capture in Shentov, O. et al. The Russian Economic Grip on Central and Eastern Europe*, Routledge, 2018.

National specificities in the dissemination of pro-Russian narratives

There are specific features of the pro-Russian anti-democratic discourse conditioned by national distinctions in the political, economic, cultural context, and susceptibility to Russian influence.

Bulgaria is arguably subject to the most substantial and wide-ranging Russian influence. Cultural proximity and historical ties enable and are themselves reinforced by the Kremlin's economic leverage. Russia's **economic footprint** is most significantly established in Bulgaria of all Central and East European states, reaching 24.4% of the Bulgarian economy in 2014. As of 2020, Bulgaria has an investment stock from Russia higher than those of the Czech Republic and Poland combined.⁶¹ The Kremlin maintains such substantial presence by dominating Bulgarian energy in the oil, gas as well as nuclear sector, by financing political parties and using an opaque network of colluding local officials.⁶² Bulgarian authorities have only recently started to pay attention to such networks, exposing worrying dependencies in the military,⁶³ as well as uncovering evidence that previously thought of as accidental explosions in military ammunition production halls could have been the result of the work of Russian secret services on Bulgarian territory.⁶⁴ This deeply entrenched political and economic impact also conditions a considerable Russian media foothold exercised through **local oligarchic proxies**, who are financially and politically related to Russia, and (formally or informally) control the editorial policy and ownership structures of influential national media. In addition, the cultivation of a larger community of content creators and providers loyal to or dependent on the Kremlin (such as small and medium-sized online news platforms, journalists, bloggers, social-media opinion-makers) ensures the reinforced dissemination of Russian messages.⁶⁵ Yet, Bulgaria's member-

instance, AENews (positioning itself as an independent Czech-Slovak-Dutch-American-Russian news agency) faked news that German Chancellor Angela Merkel negotiated with Facebook and Twitter to filter negative news towards immigrants. The Kremlin used extremist media such as *Liberio* (*Liberio Quotidiano*) in Italy to publish fake news (including citing non-existent journalists from the *Financial Times*) that would stir anti-EU tensions (i.e. the case with a fake ban on baptizing kids) among Orthodox Christians. Later, those news are cited by somewhat credible online media and people start sharing it without doubt in the first source. In Hungary, such media are *hidfo.net* (which redirects to *hidfo.ru*, *kuruc.info* and *alfahir.hu*). Then various other small medias repost/cite them (e.g., in *Bulgaria komentator.bg*).

⁶¹ Shentov, Stefanov and Vladimirov, *The Kremlin Playbook in Europe*, Sofia: Center for the Study of Democracy, 2020.

⁶² Vladimirov and Stefanov, "Bulgaria: State Capture Unplugged," in *The Russian Economic Grip on Central and Eastern Europe*, ed. Ognian Shentov, Routledge, 2018.

⁶³ Radio Free Europe/Radio Liberty, "Bulgaria Says It Has Broken Up Spy Ring Suspected Of Working For Russia", March 19, 2021.

⁶⁴ The Guardian, "Bulgarian prosecutors allege Russian links to arms depot explosions", April 28, 2021.

⁶⁵ Filipova and Galev, "Bulgaria," in *Russian Influence in the Media Sectors of the Black Sea Countries. Tools, Narratives and Policy Options for Building Resilience*, Sofia: Center for the Study of Democracy, 2018, pp. 49-56.

ship in the EU and NATO dampens the ubiquitous dissemination of Russian narratives as participation in the European policy and discursive sphere informs the national media agenda.

In contrast to the extent and depth of Bulgaria's susceptibility to Russian influence, **Poland** stands out as a country, whose historical animosity to Moscow conditions acute vigilance of the Kremlin's political and economic initiatives.⁶⁶ Despite being a large European economy, Poland has four times less Russian investment stock than the Czech Republic. The country has sought to deliberately wean itself out of Russian economic dependence, most notably in energy. Poland has become the most vocal opponent of the German – Russian grand energy project Nord Stream II. The permeation of Russian anti-democratic narratives into the Polish media landscape is not the product of a deliberate local strategy and public demand for Russia-originating information. It is only fringe political actors and far-right/far-left audiences that openly proclaim pro-Russian positions.⁶⁷ Instead, there is a **coincidence of narratives**, whereby pro-Kremlin messages are able to enjoy larger traction to the extent that they overlap with the domestic Polish conservative discourse and political priorities.⁶⁸ Russian objectives to undermine liberal democracy and foment extreme nationalism in Poland are thus leveraged most effectively in conjunction with Poland-internal political and ideological goals based on curbing women's reproductive rights, instilling anti-gay sentiments, and presenting the EU as a threat to national identity, sovereignty, and traditional morality. Poland's fall out with Brussels over the continuous eroding of judicial⁶⁹ and media⁷⁰ independence in the country in recent years has increased the opportunities for Kremlin disinformation to seek to insert itself in these appearing cracks.

Moreover, the problem-laden history of Poland's relations with Ukraine and Germany still agitates conservative layers of Polish society and represents an opportunity for the Kremlin to sow division within Europe. Lingering Polish grievances against the crimes committed by the Ukrainians during World War II (particularly the Volhynia massacre of Poles carried out by Ukrainian nationalists in German-occupied Polish territories) yield themselves to media representations of Ukrainians as fascists, who pose a contemporary threat to Poland. Such depictions fuel and support an assertive official political stance towards Ukraine and derail the conduct of Eastern policy based on the promotion of the democratization and Europeanization of Poland's eastern neighbors (Ukraine, Belarus) through European integration.

⁶⁶ Poland's efforts to wean itself off of energy dependence on Russia have been especially noteworthy:

Shotter, J., "Poland Aims to Break Dependence on Russian Gas," *Financial Times*, January 27, 2019; Gotev, G., "Russian Gas Transit via Poland Has Almost Halted," *Euractiv*, May 26, 2020; AP News, "Poland Fines Russia's Gazprom \$7.6 Billion over Pipeline," October 7, 2020.

⁶⁷ For further information on the domestic Polish promoters and recipients of Russian disinformation see Lucas, E., and Pomeranzev, P., *Winning the Information War Techniques and Counter-Strategies to Russian Propaganda in Central and Eastern Europe*, Center for European Policy Analysis, 2016, p. 35.

⁶⁸ On how the political priorities of Polish actors serve Russian goals see Kowalczyk, M., "Realizują Scenariusz Putina. Rosyjska Partia w Polsce. Kto w Niej Jest" [The Realization of the Putin Scenario. The Russian Party in Poland. Who is Part of It], *Newsweek Polska*, November 29, 2020.

⁶⁹ Burchard, H., "Poland's system for disciplining judges violates EU law, says advocate general", *Politico*, May 6, 2020.

⁷⁰ Ash, T. G., "Under cover of Covid, Poland is stifling free media – and all Europe should be worried", *The Guardian*, April 8, 2021.

Similarly, remaining historically-informed grievances against Germany find expression in the propagation of anti-German narratives that depict Berlin as a hegemon within the EU acting against the sovereign interests of member states. With regard to the construction of Nord Stream II, the German role in the pipeline project is presented as being much more pernicious than Russia's in cementing the Kremlin's energy influence in Europe. The proliferation of anti-German messaging therefore undermines the post-1989 Polish-German reconciliation process and intensive political-economic cooperation established within the frame of the EU. In the media sphere, political rhetoric and action against foreign media influence are particularly directed against German companies and have resulted in their takeover by Polish media owners.⁷¹ High-ranking German politicians have not helped by continuing to insist on the construction of Nord Stream II, despite its clear non-economic, political, and geostrategic relevance to Moscow, including through invoking as justification national guilt vis-à-vis Russia from the actions of Nazi Germany in the Second World War.⁷²

In the **Czech Republic**, long-running and entrenched Euroskepticism represents a vital conduit that enables Russian influence. Informed by historical narratives of the victimization of the Czech nation by the great European powers aiming to suppress Czech national uniqueness, instrumentalized by contemporary domestic political actors, and fueled even further by the post-2015 migration crisis couched as a civilizational threat, Euroskeptic attitudes have found expression in an unfavorable assessment of the EU. In comparison to their counterparts from the rest of the member states, Czechs have consistently scored some of the lowest levels of approval of Union membership,⁷³ positive evaluation of the benefits it offers,⁷⁴ and Brussels' capacity to deal with the issue of migration.⁷⁵ Such EU-critical stances and the conviction that the Czech Republic does not properly belong to either the West nor the East enable the prominence of pan-Slavic discourse and acceptance of pro-Russian positions as a way to balance out Prague's orientation to the West. The Czech Republic also has sizable economic connections to Russia, including many obscure political-economic networks that run to the highest level in the country.⁷⁶ Czech security services have always been wary of Russia's diplomatic and intelligence presence in Prague⁷⁷ but relations have taken a steep turn downward, following the revelations in April 2021 by national authorities of the Kremlin's participation in the demolition of the military depot in Vrbitice.⁷⁸

⁷¹ Ptak, A., and Koper, A., "Poland Uses State-Owned Refiner to Buy Regional Media Firm," *Reuters*, December 7, 2020.

⁷² UNIAN Information Agency, "Poland's PM hits back at German president over Nord Stream 2 remarks", February 12, 2021.

⁷³ Czechs are only behind Austrians in expressing the view that their country could better face the future outside of the EU: EC, Directorate-General for Communication, *Standard Eurobarometer: Public Opinion in the European Union No. 93*, 2020, p. 104.

⁷⁴ 66% of polled Czechs have a positive attitude toward the EU, which, albeit a high percentage, represents the third lowest score in the EU-28 included in the poll: EC, Directorate-General for Communication, *Special Eurobarometer No 479: Future of Europe*, 2018, p. 13.

⁷⁵ Czechs single out migration issues as the main challenge to the EU: EC, Directorate-General for Communication, *Special Eurobarometer No 479: Future of Europe*, 2018, pp. 26-27.

⁷⁶ Shentov, Stefanov and Vladimirov, *The Kremlin Playbook in Europe*, Sofia: Center for the Study of Democracy, 2020.

⁷⁷ Conley, H. et al., *The Kremlin Playbook 2: The Enablers*, Rowman & Littlefield, 2019.

⁷⁸ DW, "Russia Issue Splits Czech Republic", April 27, 2021.

Accordingly, the high-level political support for the maintenance of extensive political-economic ties between the Czech Republic and Russia, the presence of political parties that openly proclaim pro-Kremlin and anti-Western views, Russia-friendly NGOs, and paramilitary organizations facilitate a political and social scene receptive to Russian disinformation messages.⁷⁹ The latter are most conspicuously spread by a web of mostly anonymous websites, whose political and financial connections to Moscow cannot however be easily traced and verified. These hard-to-detect ties leave unconstrained the ability to propagate pro-Kremlin disinformation narratives, resulting in **significant overlaps in the disseminated content** across different websites as well as at least three further features stemming from the specificities of the Czech informational, political, and social landscape. There is, in particular, an overwhelming focus on migration represented as a grave threat to the Czech nation; a proliferation of narratives entertaining the possibility of ‘Czexit’ (whereas narratives about leaving the EU are not identified in Bulgaria and Germany but are present to some extent in Poland); and historically rooted associations that compare the EU to Hitler’s political, social, and economic organization of Nazi Germany.

In **Germany** historical and contemporary social, political, and business strands condition a favorable disposition towards Russia, which enables the Kremlin’s initiatives within the country. The tendency to search for common policy ground with Moscow has been most vividly embodied in the phenomenon of ‘Putinverstehers’,⁸⁰ made up of individuals who promote collaboration with Russia and who can be found in both mainstream and fringe sections of German business and politics. Moreover, the anti-American undercurrent⁸¹ in German society descends from the culturally elitist critiques of American democratic development of the late 19th century and includes present-day accusations of ‘imperialistic’ and ‘militaristic’ American foreign policy, pointing instead to the need to forge an independent European political stance informed by the commonalities of Europe’s values and culture. In the economic sphere, the more statist and socially-oriented German form of capitalism is juxtaposed to the minimal-state, individualistic American capitalist system. Germany is the largest Russian business partner in Europe, with considerable Russian investments, their stock surpassing more than twice those in France. Germany is also the number one goal of Russian disinformation, as Moscow views the country as critical in its relations to Europe.⁸²

Anti-American attitudes in Germany find concrete expression in disinformation narratives that place an overwhelming focus on the depiction of **globalization and liberalism as economically threatening and anti-national**. Global economic processes are claimed to be instigated and promoted to the benefit of the interests of American capital and to the detriment of the Ger-

⁷⁹ For an overview of the domestic actors that promote closer cooperation with Russia see Lukasz Wenerski, “The Visegrad Countries and ‘Post-Truth’. Who Is Responsible for Delivering the Kremlin’s Narrative to the Czech Republic, Hungary, Slovakia and Poland?,” *Institute of Public Affairs/Bertelsmann Stiftung*, 2017, pp. 5-6; Vejvodová, Janda, and Vichová, *The Russian Connections of Far-Right and Paramilitary Organizations in the Czech Republic*, Political Capital, 2017.

⁸⁰ Wood, S. “‘Understanding’ for Russia in Germany: International Triangle Meets Domestic Politics,” *Cambridge Review of International Affairs*, January 6, 2020.

⁸¹ Nolan, M., “Anti-Americanism and Americanization in Germany,” *Politics & Society*, 33, no. 1, 2005, pp. 88-122.

⁸² DW, “Russian Disinformation Mainly Targets Germany: Report”, March 9, 2021.

man economy. Liberal values are in turn portrayed as corrosive to traditional values whereas the Russian conservative societal model is presented as the most adequate response to the threat of liberalism. Such narratives seem to garner a welcome reception in Germany and throughout Western Europe as citizens perceive the US to be a bigger threat to democracy than Russia.⁸³ It is precisely constituencies like these that Russian disinformation targets.

⁸³ Alliance of Democracies, *Democracy Perception Index Report 2021*, Latana.com, 2021.

WEATHERING THE STORM? BEST PRACTICES AND GAPS IN TACKLING DISINFORMATION

The extent to which the diffusion of Russia’s anti-democratic disinformation discourse in a national media landscape can be countered depends on a country’s disinformation response capacity on the level of government, civil society, and international institutional cooperation, as well as the ability to forge collaborative action across all of these levels. The four case study countries exhibit varying effectiveness in their disinformation response capacity, informed by some example-setting best practices and gaps.

Bulgaria has demonstrated **limited effectiveness** in combating information threats. Its governance framework has been shaped by relative inaction and an insufficient recognition of the challenges posed by (pro-Kremlin) disinformation devoid of a comprehensive assessment of national vulnerabilities within a risk-fraught global informational environment. Moreover, there have been incomplete, inadequately enforced, and misused legislative provisions coupled with controversial legal proposals. Accordingly, EU-level initiatives have been slowly and reluctantly taken up without arousing substantial public debate about their merits and results. Bulgaria’s media environment has deteriorated substantially in the past decade, resulting in the country’s slipping to the last position in most reputable international rankings on media freedom.⁸⁴ As a result, a lot of media outlets in the country have inadvertently spread Russian disinformation seeing it as a way of aligning themselves to the stance of the Bulgarian government of the day, which has for example strongly supported Moscow’s strategic projects, TurkStream and the Belene nuclear power plant.⁸⁵ The government’s (at best) ambiguous support for Russia has strengthened Bulgarian media’s cognitive capture, providing the Kremlin an additional advantage to interfere unnoticed in the Bulgarian and the EU information space.⁸⁶ In contrast, civil society has played a pivotal role in charting out responses to disinformation. It has led the way in the development of media literacy tools and their introduction in the school curriculum. Journalistic advocacy has frequently reversed violations of freedom of speech, while broader collective (i.e., protest) action has shone a light on the deficiencies in the Bulgarian media sphere. Yet, with very few exceptions, civil society and the media’s response also remains both muted and limited due to the lack of financing and cooperation from the government and the business community. Bulgarian media remains overwhelmingly dependent on government and business support, with limited crowd-funding or subscription support. Notably, Bulgaria does not yet have a permanently functioning fact-checking media service.

⁸⁴ See for example, Reporters without Borders, *Bulgaria: Press Freedom Trapped*, part of the organizations latest annual report on press freedom around the world.

⁸⁵ Stefanov and Vladimirov, *The Kremlin Playbook in Southeast Europe*, Sofia: Center for the Study of Democracy, 2020.

⁸⁶ Filipova, R. et al., *Tackling Kremlin’s Media Capture in Southeast Europe*, Sofia: Center for the Study of Democracy, 2021.

Poland has similarly lagged behind in providing a comprehensive, collaborative and forward-looking response to disinformation. The political context in the country has not been conducive to prioritizing a policy focus on information security threats. Political polarization (between the governing Law and Justice party and the oppositional Civic Platform) has resulted in a discursive division as well since news outlets privilege a favorable coverage of the stances of either of the two parties. Government-imposed control over public media (particularly TVP, the largest Polish television network) has raised concerns about encroachments on freedom of speech.⁸⁷ Legal provisions in the sphere of the media primarily deal with the problem of cybersecurity, whereas legislative regulations in relation to online propaganda and disinformation are lacking. EU initiatives have not received large public traction nor have they been the subject of active domestic political contributions. Yet, a case of fast and effective state-supported response to disinformation concerns the launch of the #FakeHunter online program focused on debunking coronavirus-linked falsehoods. The Polish Press Agency (PAP) and the government-led GovTech Polska platform (aimed at introducing technological solutions in the public sector, business, and for wider societal use) cooperated in devising and implementing the program.

Civil society has ultimately played a crucial role in devising and advocating for actions to combat disinformation, as evident in the proliferation of fact-checking initiatives and media literacy campaigns (prominent examples include Demagog, Konkret24, Demaskator24, Stop Fake Polska, ANTYFAKE, Fakenews.pl, OKO.press). Overall, however, disinformation-related endeavors have remained compartmentalized, i.e., dealing with specific aspects of the problem rather than advancing a wholesale solution (that for instance encompasses both fact-checking, media literacy, and legal regulations) with collaboration among government, civil society, and international institutional actors remaining circumscribed.

The Czech Republic has in contrast been able to raise its level of resilience to disinformation on the domestic political, societal and international front. There has been a political acknowledgment of the threat posed by Russian disinformation. The annexation of Crimea proved particularly important in this regard as it galvanized governmental and civil society efforts at combating disinformation. Although legislation concerning information security places an overwhelming emphasis on cybersecurity – as opposed to defining and codifying measures for tackling disinformation, the creation of the Centre Against Terrorism and Hybrid Threats within the Ministry of the Interior has represented an important step in dealing with propagandist content. The effectiveness of the Centre is underlined by its access to wide-ranging information (including intelligence) for assessing disinformation risks and vulnerabilities as well as expanded collaboration opportunities with governmental agencies, civil servants, and NGOs for knowledge exchange, training, and awareness-raising. In February 2021, the Ministry of Defense of the Czech Republic developed the *National Strategy for Combating*

⁸⁷ Schmitz, R., "Poland's Government Tightens Its Control Over Media," *NPR*, January 4, 2021; Ostruszka, L., and Wielowieyska, D., "Podatek Od Reklam, Czyli Bicz Na Wybrane Przez Rząd Media" [Tax on Advertising as a Whip on Media Selected by the Government], *Wyborcza*, February 4, 2021. Poland has marked a steady decline in international press freedom rankings, occupying 62nd place out of 180 countries: Reporters Without Borders, *2020 World Press Freedom Index*, 2020.

Hybrid Action, which further strengthens the Czech strategic context, goals, and their subsequent implementation. In addition, the Czech Republic has had by far the best prepared internal intelligence service (BIS) in Central and Eastern Europe, which has long analyzed and consistently exposed the risks of Russian interference in the country, including the risks in relation to disinformation.⁸⁸

EU initiatives have received a somewhat greater political and public attention boosted by the fact that the Czech Vice President of the European Commission for Values and Transparency, Vera Jourová, has been actively involved in landmark Union legislative documents in the sphere of the media, including the *Digital Services Act* and the *Democracy Action Plan*. Civil society has also marked significant progress in contributing to tackling disinformation through media literacy campaigns (such as One World in Schools dating already back to 2001), fact-checking platforms, and research.

The disinformation response capacity of **Germany** is above all underpinned by the preeminent importance of activities taking place on the state level. Especially prominent in the field of media regulation is the *Network Enforcement Act* (NetzDG) – which was the first of its kind in Europe (and among the first globally) detailing regulatory measures for tackling unlawful (hate-speech) content disseminated on the largest social media platforms, as well as the recently adopted reform of the competition law aimed at curbing the market dominance of technological platform companies. Moreover, the government has led the way in pioneering initiatives in relation to strategic communications, fact-checking carried out by influential public media such as ARD, and media literacy education facilitated by the Federal Agency for Civic Education.

The German government is also active in setting and directing the EU agenda on media and technology-linked policy issues not least through the example of its own national legislative thrust. Yet, the uptake and discussion of Brussels' legislative proposals do not necessarily receive attention in domestic politics (as evidenced in the lack of significant political and public debate surrounding the EU's *Digital Services Act* and *Democracy Action Plan*). The less than enthusiastic German approach to coordinated European action on digital tax further underscores that Berlin's policy preferences can occasionally be served through extra-European collaboration, particularly with the US.

Civil society has additionally contributed to Germany's disinformation resilience through the conduct of media literacy campaigns (such as the Lie Detectors initiative) and the establishment of fact-checking platforms. Overall, however, cooperation between government and civil society organizations remains limited. Moreover, the effectiveness of responses to disinformation is hampered by discrepancies between the Federal (national) level and the Bundesländer (regional states). Legal fragmentation, competition over the scope of authority in the application of media regulations, and enforcement capacity undermined by under-resourcing at the regional

⁸⁸ Conley, H. et al., *The Kremlin Playbook 2: The Enablers*, Rowman & Littlefield, 2019. The report acknowledges the Security Information Service (BIS) as an institutional best practice in tackling Russian influence in Europe.

level all represent persistent problems. The recently adopted Interstate Media Treaty – which introduces rules on the regulation of the online media space in line with the EU's *Audiovisual Services Directive*, exemplifies this problem by raising questions about the proper remit of the regional states' legislative competencies and their related ability to enforce rules on content, algorithmic recommendations and advertising on vastly more powerful technological companies.

Box 2. Germany's first mover attempt to regulate technology platforms and online market competition: NetzDG and competition law

The **Network Enforcement Act** (NetzDG) has been in force since 2017 and aims to ensure more stringent regulatory conditions (as opposed to reliance on self-regulation) to hold social media companies accountable for illegal content (hate speech) disseminated by their users. The law requires technological platforms to publish transparency reports and delete unlawful content, as defined by the criminal code, within 24 hours. The law has been hailed as one of the first such regulatory attempts aimed to break the rule of algorithms and the negative effects (echo-chambers, radicalization, polarization, etc.) of social media platforms with considerable market power. In any case, its application has served as a basis for studying the effects of such regulations and for developing similar efforts, such as in France or the EU's *Digital Services Act*. The law sets an important precedent, which marks the beginning of regulatory efforts to bring the social media domain and the online information space into conformity with the requirements of democratic discourse and market competition.

Yet, the first impressions from the application of the law have raised concerns about its limited impact and potential unintended side effects. Platforms for individual communication such as WhatsApp and Telegram are excluded from NetzDG and the law cannot, therefore, regulate illegal content on such channels (and to which users can quickly transition as recently shown by the far-right exodus from Twitter to Parler and then Telegram following the storming of the Capitol in the US in January 2021). Hence, the exclusion of certain social media platforms from legal obligations on the grounds of their size is a deficiency, also contained in the EU's *Digital Services Act*. This could actually lead to further encapsulation and fragmentation of the digital democratic discussion space. The law has also been criticized for pre-empting EU efforts in this domain and not coordinating work on the European level.

Significant concerns also linger about the effective implementation of the Act. Since its entry into force, about 1,300 fine proceedings have been initiated but only one fine has been issued. Facebook was ordered to pay 2 million euros for providing incomplete information on the number of complaints received as part of its reporting obligations under the law, yet the company has appealed the decision. Notwithstanding these, in May 2021 the German government has pushed for further reforms by introducing new changes into the NetzDG, strengthening protection for social media platform consumers, increasing reporting requirements on the part of the networks, and allowing for detailed researcher access to network decisions, anonymized data, and algorithm training.

On January 14, 2021, the German Parliament approved a **reform of the competition law**, which is intended to better prevent digital companies from being able to exploit their market power. According to the new requirements of the law, the antitrust authorities can take preventive action, i.e., intervene in markets which the Big Tech companies do not yet dominate. The new texts also mandate that, in the future, corporations share data with competitors and, when presenting search results, they should not treat offers from competitors worse than their own products. Users should be able to take their data with them to other platforms more easily. In order to avoid drawn-out antitrust proceedings and to better enforce claims for damages, the legal process will be shortened. Disputes will be handed over directly to the jurisdiction of the Federal Court of Justice.

The competition law changes have also caused concerns:

- Preventive interventions could be harmful in terms of thwarting innovation and economic growth for fear of legal proceedings.
- The shortening of the legal process via the Federal Court of Justice might be unconstitutional and the reform could be incompatible with EU jurisdiction because it is in a gray zone between regulation and competition law.
- The reform represents a unilateral national effort, developing in parallel with the EU Commission's recently presented *Digital Markets Act*, a similar framework.

Source: CSD.

The comparative examination of the practices and gaps in the ways in which Bulgaria, Poland, the Czech Republic, and Germany tackle the challenge of disinformation allows for an extrapolation of **resilience assets** that a country could ideally possess to successfully counter liabilities in its informational ecosystem into an aggregated list:

- Strong governance framework;
- Vibrant civil society and media associations;
- Coordinated EU/international action.

Table 1. Core resilience assets for successfully tackling (Russian) disinformation

Governance framework	Civil Society	EU
Political recognition of the problem of disinformation and comprehensive threat assessment	Active NGO sector	Establishing partnerships and fostering consensus among member states on media-related policy issues
Legislative initiative; well-defined and timely legal provisions in the sphere of media regulation	Well-organized journalistic advocacy	Ensuring fair opportunities for member states to put forward their policy initiatives on the EU level
Well-resourced and independent media regulatory bodies	Public awareness of the problem of disinformation	Increasing the competencies of the EU; creating more binding legal provisions
Enforcement capacity	Building of cross-cutting horizontal links among civil society actors engaged in combating disinformation	Effective communication of EU policy proposals; increasing Rule of Law enforcement capacity

Source: CSD.

The presence of these resilience assets should additionally be based on a **collaborative division of responsibilities** among government, civil society, and EU-level actors so that the most optimal scope of activity of each of them can be ensured. For instance, state authorities' role is best fulfilled in relation to charting out a political direction, risk assessment, and legislation carried out through wide-ranging public consultations and expert input. On the other hand, state institutions should not securitize the challenges of propaganda to an extent that makes the issue impervious to scrutiny by civil society. The domain of media literacy, fact-checking, and awareness-raising can in turn be effectively led by civil society organizations and taken up by the educa-

tion-specializing authorities for introducing relevant changes in the school curriculum and further dissemination to the public. Issue areas in which national governments lack sufficient bargaining and enforcement power, such as regulating the technological platforms, can be most effectively tackled on a larger, EU scale via multi-stakeholder, cross-national engagement. Conversely, insufficient cooperative coordination of activities can result in incomplete measures that may, for example, privilege media literacy (as in Bulgaria where civil society takes a leading role in disinformation-related action) or regulation primarily led by the state (as in Germany where greater governance capacity is reflected in the prominence of state action), but which do not ultimately contribute to a wholesale solution to the challenge of disinformation.

Box 3. French best practices for tackling disinformation

France has pioneered a number of best practices for tackling disinformation that can inform cross-European learning, including by sharing the controversies surrounding the introduction of new regulations, such as the hate speech law.

Election monitoring

In consultation with British, Belgian, and French partners (newsrooms, technology, and academic institutes), the **Cross Check France online verification initiative** was launched by Google and FirstDraft in order to report false and misleading claims circulating online in the ten weeks preceding the French Presidential Election in 2017. The platform combined fact-checking, raising the media literacy skills of voters, and collaboration with journalists. The website was financed by Google News Lab, which trained the partners and placed 12 students of journalism in the partners' newsroom for 8 weeks. An important part of the initiative was to provide an analysis of the nature of fake news going beyond the traditional dichotomous and misleading aspect of "fake" and "true" news in order to better understand the underlying techniques and tools of disinformation.

A new monitoring operation was started again ahead of the March 2020 municipal elections. The second monitoring period revealed a significant evolution of disinformation strategies such as improved coordination of disinformation networks, the use of satire, text-on-picture, or memes, and more subtle misrepresentations as opposed to the use of outright fabrication across a broader (including non-Western) set of social media platforms, e.g., Telegram, VKontakte, etc. A collaborative and innovative initiative was, therefore, able to successfully track and identify disinformation trends in the run-up to key elections.

Media ownership

In 2018, the **ownership structure of Le Monde** – one of France's most influential newspapers, underwent changes as Czech billionaire Daniel Kretinsky acquired 49% of Matthieu Pigasse's stake (who – together with Pierre Bergé and Xavier Niel, possessed majority shares). Le Monde's journalists expressed grave concern about their editorial freedom suspecting that as a businessman heavily investing in coal and fossil fuels (particularly through owning a stake in Slovakia's Eustream pipeline, carrying Russian gas to Europe) Kretinsky would block them from reporting on climate change.

Le Monde's Independency Group, a body made up of employees, journalists, and readers which owns 25% of the group, took concerted action asking the shareholders to sign guarantees of compliance with the values and rules of media independence governing the organization. Xavier Niel also proposed the creation of a foundation in order to safeguard the independence of the editorial offices. After a year of negotiations, the

crisis was resolved when Kretinsky and Pigasse agreed on signing a revised pact that allows the Independence Group to veto the approval of a new controlling shareholder.

This represents an example of how journalists and readership through collective action can assert the values of an independent press against business-motivated ownership changes.

Regulating technological platforms

The French *Law on online hate speech* is modeled on Germany's NetzDG. The legislation aims at tackling discriminatory, terrorist, and pornographic content disseminated in the online space. In homage to the legislator who promoted the law, Laetitia Avia, it is also known as "Law Avia". In June 2020, most of the provisions in the initially proposed law were struck down by France's Constitutional Council, just weeks after its adoption by the National Assembly. Some of the criticisms of the law, which touch upon the inherent tensions between regulation and freedom of expression, and which could inform such initiatives in Europe, include:

- The law would have granted social media companies a high level of discretion to judge which content should be considered disinformation and which not, without the involvement of the French judiciary, potentially harming freedom of expression.
- The same applies to the extremely short timeframes given to companies to delete content and the lack of independent review of the content, which would violate freedom of expression.
- The infringement of the presumption of innocence and the right of defense was deemed an affront to fundamental legal principles.

Source: CSD.

WHAT NEXT FOR THE RESILIENCE OF THE EUROPEAN INFORMATION ECOSYSTEM?

Multiple challenges afflict democracy in Europe – rule of law deficits and state capture vulnerabilities, the increase of inequality within and among European societies, the rise of domestic (extremist) far-right nationalism and populism, and the polarization and commercialization impact of social media platforms on the digital information ecosystem. Taken together they have resulted in a worrying shrinking of media freedom and democratic civic discussion space across the continent, threatening the very foundations of Europe’s market democracy institutions.

Russia (and China) have sought to instrumentalize and further exacerbate such social, economic, and political fissures in Europe through **authoritarian state-driven disinformation**. The well-documented COVID-19 disinformation wave coming from these and other foreign authoritarian actors together with the rise in cyber-security breaches and threats have demonstrated their intent to challenge global democratic development.

Responding to those threats requires a specific whole-of-government and whole-of-society course of action that embodies the collaborative division of responsibilities on the governmental, civil society, and EU level, building on the best practices already identified and charting new unexplored policies.

With the inauguration of the new European Parliament and Commission in 2019, the EU stepped up its efforts to better confront and tackle foreign authoritarian (including Russian) interference. It adopted several important strategic documents aimed at closing the most serious governance gaps, which Russia and other authoritarian forces have used to derail European democracies:

- Introducing the **Rule of Law mechanism**, which binds EU cohesion and structural funding to member states’ adherence and upholding of fundamental rights, freedoms, and EU democratic values. It aims to safeguard rule of law through guaranteeing the independence of the judiciary, strong anti-corruption norms and standards, media freedom, and vibrant civil society as some of the core democratic checks and balances. In 2020 the European Commission presented its first Rule of Law report, outlining the status quo and challenges across the 27 member states. In particular, the report noted the deterioration of media freedom across the EU, which has been exacerbated by the introduction of emergency measures following the unfolding of the Covid-19 crisis. Yet, it remains unclear how the report will move forward with achieving specific changes in member states with identified governance issues. The EC seems slow at best in changing the undemocratic behavior of some of its member states as seen in the cases of Poland, Bulgaria, Slovenia, and Hungary.
- Launching the **European Democracy Action Plan** with a specific focus on disinformation, media freedom, and better regulation of social media

platforms' moderation and market power. It aims to build upon the 2018 joint Action Plan against Disinformation and the European External Action Service East Stratcom Task Force on Russian disinformation through strengthening the capacity of the member states and increasing the on-line platforms' accountability on spreading disinformation. In parallel, the European Parliament has also set up a special committee on Foreign Interference in all Democratic Processes in the EU, including Disinformation, which will provide further policy focus on the implementation and the future revisions of the European Democracy Action Plan. The EC has already launched some of the instruments of the plan such as the Rapid Alert System, the European Digital Media Observatory, the Media Monitoring Observatory, and the European News Media Forum. But its main legislative tools, the *Digital Services Act* and the *Digital Market Act* are still in legislative procedure and are expected to come into force after 2022. Initial discussion on the two legislative packages has shown that disinformation, including foreign state-backed disinformation, does not feature prominently enough in comparison to the challenge it could pose.

The analysis of pro-Russian disinformation in Bulgaria, Poland, the Czech Republic, and Germany shows the many dimensions of the Kremlin's media interference in Europe and its vertically integrated character. Kremlin's state capture power subjugates the division between the public and the private sector and democratic checks and balances, such as the judiciary, the media, and free and independent civil society. This calls for a multifaceted response, uniting different levels and domains in the member states and the EU. The solutions should include all levels (governance, civil society, EU) and all types of media. Given the current high levels of cross-fertilization among TV, radio, online and print newspapers and social media, appropriate measures should be taken in relation to all types of media sources.

National governance framework:

- Address **rule of law deficits** as identified in the EU Rule of Law report through comprehensive annual action plans. Adopt independent governance vulnerabilities monitoring mechanisms, such as the *State Capture Assessment Diagnostic (SCAD)*.⁸⁹
- Introduce an **integrated annual national security threat assessment** in relation to authoritarian regimes, similar to the efforts of the Czech Security Information Service (BIS). It should bring together an assessment of key national governance vulnerabilities, major economic exposure, in particular weaknesses related to critical infrastructure sectors, media, and the cyber economy, and analysis of state-backed disinformation threats.
- Conduct comprehensive **risk assessments** regarding national vulnerabilities to disinformation, in general, and Russian disinformation, in particular. Codify as a policy priority the prevention and countering of malign media influence activities in strategic documents.
 - **Adopt a whole-of-government, cross-thematic approach** to dealing with influence operations that fosters coordination among government agencies and tackles the cybersecurity as well as political-economic aspects of foreign disinformation activities.

⁸⁹ Stoyanov, Gerganov, and Yalamov, *State Capture Assessment Diagnostics*, Sofia: Center for the Study of Democracy, 2019.

- **A strategic communications unit** on the ministerial level should be well-resourced, raising awareness and clarifying government initiatives aimed at combating disinformation in a timely and consistent manner.
- Develop specific **social media capabilities and monitoring capacity** in the national language. Work with major social media platforms and national IT associations to develop mutual understanding and coordinated response to external threats.
- Respond to crises that can lead to the quick and harmful spread of disinformation (as has been the case with the coronavirus pandemic) in a timely manner through pro-active communication efforts focused on the dissemination of accurate information and cooperation with fact-checking organizations. **Improve coordination with EU bodies**, particularly the EU Rapid Alert System and the East Startcom Task Force, for jointly monitoring, reviewing, and raising awareness of newly emerging disinformation threats.⁹⁰ Russia incites both country-specific and EU-common disinformation campaigns, which respectively require both ad hoc as well as concerted strategic responses.
- **Devise legislation** that clearly and comprehensively defines the boundaries between and permissibility of different forms of offensive discourse (such as hate speech but also deceptive and manipulative statements). Carefully craft safeguards for the freedom of speech, which could suffer under rules of moderation, taking down and banning of content. Yet, it seems warranted for recurring pro-Russian disinformation narratives to be targeted more decisively and treated in a similar vein as other criminal online threats. Building a capable, yet abuse-proof framework at the national level in member states which could be informed and benefit from the experience of the German NetzDG, as well as the debates on the *Digital Services Act*.
- **Ensure transparency of ownership** through the compulsory registration of media final beneficial owners in accessible national registries. These need to be united in a joint EU register accessible to public authorities and interested parties. Strict monitoring of the origin and concentration of the assets of media owners should be implemented in order to reveal the potential presence of illicit money flows, particularly related to foreign authoritarian-state capital.
 - Devote particular attention and resources to tracking and investigating the ownership structures of (**anonymous**) **websites** that proliferate Russian disinformation. The emphasis placed on stemming the tide of disinformation on social media may lead to overlooking the importance of regulating the spread of harmful content on websites, as well as effectively preventing such websites' utilization of Facebook and Twitter or search engine algorithms, for example, to gain a wider audience reach.⁹¹
 - Institutional bodies charged with monitoring anti-competitive market practices should exercise and increase **scrutiny of media company buy-ups** that lead to a concentration of media ownership.

⁹⁰ European Commission, [Tackling COVID-19 Disinformation – Getting the Facts Right](#), 2020, p. 7.

⁹¹ A case in point is the fact that although Facebook and Twitter suspended the account of Kremlin-owned NewsFront, the latter created 'mirror site' domains and continued disseminating its disinformation articles on social media: Cerulli, R., and Watts, C., "[Russia's Affront on the News: How NewsFront's Circumvention of Social Media Bans Demonstrates the Need for Vigilance](#)," *Alliance for Securing Democracy*, February 4, 2021.

- Strengthen the administrative and professional capacity of **national media regulatory bodies**. Assert their independence from political pressure, for instance, through appeals to and support from EU institutions and international journalistic associations. Independent regulators should also pay particular attention, publicize and find appropriate reactions to SLAPP (strategic lawsuits against public participation) cases.
- Enshrine the financial and operational independence of the **national public broadcasters** from political interference, strengthen their online presence and stimulate the development of specific national and EU disinformation capabilities.
- State authorities, in particular the public prosecutor's office, should address in a regular and timely manner all **cases of intimidation of journalists**, including harassment taking place on social networks.
- Strengthen political commitment to **inclusive policies**. Compile and disseminate an **anti-discrimination and diversity covenant** cataloging and debunking stereotypical representations (of women, ethnic minorities) as well as detailing rights to non-discrimination. Utilize the covenant for public information campaigns and introduction into the school curriculum.
 - It is imperative that there is **political debate as well clearer policy-level and legal recognition** of the threat posed by far-right extremism, particularly in CEE, where far-right discourse and actions frequently make their way into the political mainstream.
 - **Anti-money laundering authorities** should place under special alert and investigate far-right political and social organizations' financial ties to domestic and foreign entities that sponsor the dissemination of disinformation and the incitement of violent extremism.
- Make **media literacy classes** compulsory in the school curriculum, particularly at the high school level. Introduce textbooks containing the key media competencies and digital skills that students should master and conduct online games-based training.
 - The general public should also be educated and trained on how to recognize biased coverage and obtain reliable information (such as by rigorously checking news sources, references, and author details). Awareness campaigns and widely accessible media literacy toolkits should be created and publicized through cooperation between CSO experts and leading independent media channels.

Civil society:

- CSOs need to develop **cross-European networks**, which combine: research excellence in assessing and exposing Russian disinformation in relation to its overall geopolitical, security, and economic goals; big data and online algorithm capabilities for monitoring online disinformation trends in near real-time; and advocacy skills. CSOs should work in particular with media organizations and the private sector to develop new capabilities and build well-informed policy pressure for action on national and European policy-makers.
- CSOs should build **integrated monitoring tools**, which are able to expose Russia's and other authoritarian states' multi-faceted interference approaches, including state capture power, media influence and disinformation, and soft power tactics.
- CSOs should contribute to **stemming the flow of anti-democratic messaging**, sponsored by foreign authoritarian regimes, by:

- Building up **internal capacity for online media monitoring and successful outreach**, for instance, on the basis of international multilateral exchange programs (such as EC’s DG Connect facilities or US Department of State-led and deployed technology and media corps).
- Facilitating existing and creating new **independent public monitoring tools** (e.g., following the model of the EU Disinformation Review online platform), which consistently highlight, reveal, and challenge Russian propaganda and disinformation, following the rules of impartial news reporting and research. Moreover, the ownership, political, and economic links of media outlets should be traceable and exposed for public scrutiny through these tools.
- Developing a set of **counter-narratives** that reassert the values of tolerance and inclusivity.
- Recognizing, bringing attention to, and comprehensively investigating the **psychological mechanisms** that facilitate the consumption of disinformation (such as cognitive bias and predisposition to belief confirmation; cognitive laziness).⁹² Disseminate guidelines for a self-reflexive selection and reception of news.
- Conducting expert-led videos and podcasts on **gender-related issues**, where the concept of “gender” – frequently exogenous and poorly translated into the local languages in CEE and confined to academic debates, is clearly defined and explained.
- Compiling **factsheets** detailing the downsides of economically illiberal policies, in general, and Russian energy projects, in particular.
- Providing **legal aid and capacity-building** for vulnerable groups (i.e., women, ethnic minorities) who are at increased risk of discrimination.
- Active citizen engagement should be fostered through the establishment of **deliberative councils**, where issues subject to deep societal polarization – and related polarized media representation, are discussed and bridges are therefore built across opposing political views.⁹³ CSOs should seek to raise the authoritarian state-sponsored disinformation debate and provide workable solutions within the **Conference on the Future of Europe**.
- Create multi-citizen stakeholder **fact-checking platforms** uniting the efforts of expert-led debunking and citizen volunteers who track and expose disinformation. The Lithuanian Elves – started by citizen volunteers aiming to expose Russian disinformation and now include thousands of international volunteers, can serve as a guiding example of how self-organized citizen activity can effectively draw attention to foreign disinformation and build links with other civil society and political stakeholders engaged in combatting the dissemination of harmful content.
- Improve the **resilience of journalistic advocacy** by building the resource and network capacity of journalists’ unions (i.e., through better funding and creating transnational links that can provide support in case of political infringements on freedom of speech and attacks on journalists).

⁹² Woolley, S., and Joseff, K., *Demand for Deceit: How the Way We Think Drives Disinformation*, National Endowment for Democracy. The International Forum for Democratic Studies, 2020; Jackson, D., *How Disinformation Impacts Politics and Publics*, National Endowment for Democracy. The International Forum for Democratic Studies, 2018.

⁹³ For more on political polarization as an increasingly global phenomenon see Carothers, T., and O’Donohue, A., eds., *Democracies Divided. The Global Challenge of Political Polarization*, Brookings Institution Press, 2019.

The EU

- The first line of defense of the EU should be inward-looking, focusing on **closing rule of law gaps** in member states in relation to judicial independence, media freedom, civil society development, and the digital information ecosystem. The EU needs to build its capacity to deliver change in the member states on its recommendations concerning good governance contained in the annual Rule of Law report and the country-specific recommendations under the European Semester. Currently, the EC does not use instruments of pressure in-between (the relatively toothless) reporting and (the more nuclear option) suspension of voting rights in the Council. The EC needs to effectively link the availability and level of its cohesion and structural support to member states' performance on rule of law.
- The EU needs to **strengthen and integrate the different tools for countering Russian interference** into a comprehensive response system (e.g., the Security Union Strategy) including but not limited to disinformation monitoring (East Stratcom), investment monitoring, competition enforcement in relation to critical sectors, such as energy and telecommunications, anti-money laundering, corporate transparency, and final beneficial owner transparency, etc. It should bring together different EC bodies to deliver on such as response system, including Europol, the EU Agency for Cybersecurity, the European Digital Media Observatory, and its regional hubs. The remit of the European Parliament Committee on Foreign Interference in all Democratic Processes in the EU, including Disinformation, could serve as an example to follow.
 - The EU should strengthen its capacity to target **strategic corruption and state capture** from authoritarian regimes in its member states by expanding the scope of its "Magnitsky" type legislation to include not just human rights violations but also corruption, like in the US and the UK.
 - The EU should introduce **final beneficial ownership transparency** of corporations active on its territory, and it could pilot it with media. The voluntary Media Ownership Monitor could serve as a starting point but needs to grow into obligatory regulations.
- Build **funding instruments** to support the priorities of the European Democracy Action Plan by coordinating funding from the research program Horizon Europe, DG Connect, DG Just, and DG Home. The EU should specifically consider supporting member states from Central and Eastern Europe, as well as countries from the Western Balkans and the Eastern Neighborhood, who are particularly vulnerable to Russian disinformation and interference. This could happen through dedicated instruments under the EU cohesion and structural funds (DG Regio) and the pre-accession programs under DG NEAR. The instruments should particularly target: (a) twinning for capacity building between member states in support of the Rapid Alert System; (b) CSOs and their networks; and (c) media and media organizations. The EU needs to step up also collaborative work between the public, the private, and the civil society sector across the continent. The EU should seek to support in particular national public media, building upon and spreading the positive models of Germany, France, and others.
- The EU's ongoing legal push to regulate social media platforms (particularly through the *Digital Services Act* and the *Digital Markets Act*) could be further fine-tuned in a number of directions:
 - Provide a **clearer definition of "illegal content"** that spells out and reconciles the different understandings and definitions of the concept

as enshrined in member states' law.⁹⁴ Expand the scope of **regulated content to include disinformation** (as it is still subject to voluntary codes of conduct)⁹⁵ after conducting a debate on the permissible legal limits of propagandist speech, which may not contain outright falsehoods and hate statements but nevertheless attempt to sway views and actions in a harmful manner, in particular those coming from authoritarian state-controlled sources.

- o Reconsider the provision that makes EU stipulations obligatory only for very large platforms.⁹⁶ The EU needs to also develop capabilities to respond to disinformation threats focused on a particular member state and in any of the EU languages. Recent developments have shown that platforms can have fewer users but nevertheless feature a high concentration of extremist content inciting violence.⁹⁷ The exclusion of smaller platforms from legal purview thus (1) leaves it up to the large platforms to decide whether to grant them access to digital infrastructure,⁹⁸ (2) relaxes the urgency to develop sufficient content moderation capacity to deal with an influx of new users, who for instance move away from larger platforms as the latter crackdown on disinformation and hate speech.⁹⁹
- o Introduce **must-carry rules for online platforms** guaranteeing accessibility to and visibility of public service media, which are otherwise facing declining audience reach and competitiveness due to digital gatekeeping that entrenches the popularity of streaming channels such as YouTube and Netflix.¹⁰⁰
- o Ensure a fair balance between swiftness of content moderation (i.e., before a piece of disinformation goes viral) and observance of individual rights to freedom of speech (as hasty decisions may lead to the removal of legitimate content) through underscoring the importance of building **content moderation capacity** – both human and automated, and a streamlined process of decision-making.
- o Political and public controversies over the appropriate mixture between regulatory oversight and responsibility on the part of technology companies are feeding into a priority policy concern.¹⁰¹ The **boundaries**

⁹⁴ Article 2 (g) of the Digital Services Act only generally stipulates that 'illegal content' means any information, which, in itself or by its reference to an activity, including the sale of products or provision of services is not in compliance with Union law or the law of a Member State, irrespective of the precise subject matter or nature of that law'.

⁹⁵ According to provision (68), p. 36 of the *Digital Services Act*.

⁹⁶ Provision (54), p. 32 of the *Digital Services Act* defines a very large platform as having recipients in excess of 45 million – a number equivalent to 10% of the Union population.

⁹⁷ This trend is exemplified for instance by social network Parler.

⁹⁸ As in the case of the suspension of Parler's accounts by tech giants Amazon, Apple: Paczkowski, J., and Mac, R., "Amazon Will Suspend Hosting For Pro-Trump Social Network Parler," *BuzzFeed News*, January 9, 2021.

⁹⁹ Telegram for example has struggled to cope with the rise in violent extremist content after far-right users have migrated from larger platforms that have taken more stringent action: Scott, M., "Telegram Tries, and Fails, to Remove Extremist Content," *Politico*, January 13, 2021.

¹⁰⁰ Barker, A., "Force Online Platforms to Carry Public Service Media, Says EBU Chief," *Financial Times*, January 30, 2021.

¹⁰¹ Twitter's decision to suspend Donald Trump's account starkly demonstrated the extent of such controversies. On the one hand, Twitter was hailed for taking swift action, which has led to the reduction of disinformation and avoidance of potentially violence consequences. Yet, the platform has also been criticized for acting on its own terms, which in the absence of regulation, poses the problems of inconsistency and outsized discretionary power to designate which accounts are to be suspended and when: Dwoskin, E., and Timberg, C., "Misinformation Dropped Dramatically the Week after Twitter Banned Trump and Some Allies," *Washington Post*, January 16, 2021.; Chazan, G., Foy, H., and Murphy, H., "Angela Merkel Attacks Twitter over Trump Ban," *Financial Times*, January 11, 2021.

between legislative regulation, platforms' self-regulation, and co-regulation should therefore continue to be drawn out with regard to persistently thorny issue areas such as recommender systems, accumulation of data, advertising.¹⁰²

- Continue raising the profile of and increase funding available to the **East StratCom Task Force** as the primary EU institutional body that debunks Russian disinformation across European countries and supplies a comprehensive database of analytical resources needed to sensitize and inform the European public about the key methods and narratives of pro-Kremlin disinformation. Link it to the Rapid Alert System and create research and CSO consortia, which can work with the Task Force to better valorize and further operationalize its valuable database of disinformation cases.
- A multi-faceted approach to dealing with disinformation and influence operations, more generally, should also include **the investigation of illicit flows of authoritarian-state capital** channeled into the dissemination of Russia- and China-favorable media coverage (such as through funding news outlets operating in European countries or party media related to political organizations with close ties with Moscow). The European Commission and the European Central Bank should enhance efforts to enforce anti-money laundering legislation and close loopholes in the corporate ownership and foreign direct investment regulatory frameworks. There is a strong need for a dedicated EU anti-money laundering institution that would oversee the cooperation of national institutions and would have the capacity to conduct independent cross-border investigations within Europe.
 - The European Commission should also introduce **more stringent rules** and monitoring in relation to the ways in which national governments allocate **EU funding for communications purposes** and, thus, prevent the flow of these funds to local media tycoons with connections to foreign authoritarian states.
 - Special attention should be paid to **monitoring investments from authoritarian states in the media domain**, as well as providing for special safeguard clauses in free-trade or investment agreements with such countries in relation to the media market. For example, in its investment deal with China, the EU has been seen as unable to achieve reciprocity in the domain of news and information sectors. Thus, public and private news outlets from China, which are known to be tightly controlled by the Chinese state could have gotten disproportionate access to the European media space, despite their non-compliance with EU media standards.
- Forge a **Transatlantic approach to media and technology-related issues**. An effective defense against social media manipulation can only be achieved by overcoming the divide on this matter on both sides of the Atlantic – a divide which only helps the Kremlin. This warrants an urgent

¹⁰² The current legislative focus is placed on opening data and advertisement repositories to public access and research and making recommender systems more clearly understandable as opposed to imposing firmer regulatory conditions on platforms in relation to the collecting/storing of data and construction of algorithms (see for instance provisions (62) and (63) of the Digital Services Act).

Moreover, the extent to which Facebook's Oversight Board can satisfactorily oversee the company's content moderation policies – and as a potential substitute for government regulation, is a further matter of controversy: Dvoskin, E., and Timberg, C., "Facebook's New 'Supreme Court' Overturns Firm in First Rulings," *Washington Post*, January 28, 2021.

policy reckoning in order to preserve freedom of speech standards and reliable public information while preventing the use of these platforms to stoke division and mistrust.¹⁰³

¹⁰³ Shentov, Stefanov, and Vladimirov, *The Kremlin Playbook in Europe*, 2020, p. 35. On the rise of polarization and extremism in American political discourse and their amplification on social media see: Jenkins, B. "Capitol Rioters and Threats to Lawmakers Could Distort the Political Landscape for Years," *THINK*, January 26, 2021. On the importance of reinvigorating global leadership in defense of democracy see Diamond, L., *Ill Winds: Saving Democracy from Russian Rage, Chinese Ambition, and American Complacency*, Penguin Books, 2020.

CENTRAL EUROPE IN THE SPOTLIGHT

Europe's resilience to Russian interference and disinformation rests first and foremost on the capacity and willingness of its member states to identify, understand, and tackle authoritarian hybrid threats. Building such resilience and elevating the EU toward its self-proclaimed desire to become more geopolitically active as a whole Union and stand-up to its authoritarian rivals will depend in equal measures on traditionally "heavyweight" member states, used to assuming political leadership, and the shoring up of geopolitically vulnerable "weak links". In this respect, four countries from Central Europe (Bulgaria, Poland, Czech Republic, and Germany) have stood out as the most representative sample of the commonalities and disparities within the Kremlin Playbook on state capture and disinformation in Europe.

Germany has led the way in devising legislative and other instruments to tackle the twin challenges of social media platform algorithms and authoritarian disinformation offences. It is the EU country most often targeted by Russian disinformation.¹⁰⁴ Russia has sought to incite further polarization on divisive issues for German society, exacerbated in particular through the migration crisis. It has given media and allegedly financial support to the policies and narratives of the extreme political right and left in the country. Russia has also engaged Germany in its largest European geopolitical project – the construction of the Nord Stream II pipeline, which would further cripple the Ukrainian economy and will perpetuate formidable business dependencies of European oil and gas majors on Russian state-owned Gazprom. The pipeline has become a continuous point of contention with EU and Trans-Atlantic partners, as well as a key Kremlin disinformation topic.

Bulgaria is one of Europe's weakest links in terms of Russian influence and the country's resilience to foreign authoritarian influence.¹⁰⁵ The country has continuously struggled to build an independent judiciary capable of tackling rampant corruption and state capture. In the past decade, Russia has blanketed Bulgaria with an unstoppable wave of disinformation. The Kremlin has bullied Bulgaria into its southern geopolitical gas pipeline TurkStream, as well as other inflated projects, which have served to support local pro-Russian oligarchic networks. Bulgarian authorities have been unwilling or slow at best to actively engage with EU resilience and countermeasures in the cyber, media, or disinformation domains.

The Czech Republic has so far been a pragmatic enabler of Russian influence in Europe, with a high Russian investment presence and many business ties.¹⁰⁶ The outsized Russian diplomatic presence in Prague has long been a concern for Czech security services. The Czech President has been one of the

¹⁰⁴ According to the number of cases logged in the East Stratcom's disinformation database.

¹⁰⁵ Conley, H. et al., *The Kremlin Playbook. Understanding Russian Influence in Central and Eastern Europe*, Rowman & Littlefield, 2016.

¹⁰⁶ Conley, H. et al., *The Kremlin Playbook 2: The Enablers*, Rowman and Littlefield, 2019.

staunchest Putin supporters in Europe. Most recently, though, following a major diplomatic spat over the alleged involvement of GRU in the 2014 explosions of an ammunition warehouse in the Czech Republic, Russia has labeled the country as “unfriendly” together only with the US. Czech civil society organizations have often been at the forefront of tackling authoritarian interference and disinformation. But lack of ownership transparency in media has often made the Czech information space vulnerable to unclear business interests.

Poland has been the most consistent opponent of Russia's overreach. Yet, Poland's own rule of law issues at home have threatened the country's resilience and standing in tackling Russian influence operations and disinformation. In 2020, Poland and Bulgaria were subject to special European Parliament debates on the deterioration of judicial independence and media freedom in their countries. Poland, together with Bulgaria and Germany saw its ranking in media freedom decline in 2020.¹⁰⁷ Thus the country has undermined two of its most critical institutions for fending off Russian interference and disinformation. In addition, the country's internal political polarization and its stark opposition to Brussels have opened avenues for the Kremlin's disruption tactics.

¹⁰⁷ As evidenced by Reporters without Borders annual ranking.

BULGARIA

ANTI-DEMOCRATIC NARRATIVES OF RUSSIAN DISINFORMATION

The dissemination of Russian-sponsored anti-democratic messaging has been facilitated by a receptive Bulgarian media landscape. One in which reporting with a nationalist, anti-migrant, misogynist underlying theme is widespread. Both the similarities and the nuances in the content and stylistic means of transmission of anti-democratic narratives are examined across the four different types of news outlets.

Russia Beyond exemplifies an outlet directly owned by Russia. It was launched in 2007 by Russian newspaper *Rossiyskaya Gazeta*, later becoming part of TV-Novosti – an NGO created in 2005 by Russian state-owned news agency RIA Novosti. *Russia Beyond* spreads news about Russian domestic and foreign policy developments in 13 foreign languages, including Bulgarian. The Bulgarian edition of the outlet is connected¹⁰⁸ to the chairman of the Rusofili national movement, who is under investigation for Russian espionage.¹⁰⁹ Following his indictment, he has proceeded with the creation of an openly pro-Russian political party.¹¹⁰

Duma, which has both a print and an online edition, is a news source connected to the Bulgarian Socialist Party (BSP). The party sponsors¹¹¹ the publication of the outlet, which relates a socialist perspective on domestic and international developments. The socialists' tight enmeshment in the ownership and distribution of news

sources featuring pro-Russian content is, for instance, manifested in the fact that the chairman of the Rusofili movement used to be the owner of the company operating the *Duma* newspaper.¹¹²

Epicenter is an online news source claiming to appeal to a broad audience through reporting and analytical commentary on the key internal problems and external phenomena, that impact Bulgaria.¹¹³ The outlet has often promoted pro-Russian views¹¹⁴ and has featured in a range of pro-Russian media channels such as *pogled.info*¹¹⁵ and *BSTV*.¹¹⁶

24 hours is one of the most widely read Bulgarian mainstream dailies (maintaining both a print and online presence).¹¹⁷ *24 hours* covers a wide variety of themes, placing a particular focus on the most topical political and social issues. It aims to promote an even-handed tone in its reporting style, yet maintain a broad coverage of the policies of the incumbent government.¹¹⁸ In contrast to the previous three outlets, which display overt pro-Russian bias, *24 hours* serves as a mainstream “control” source providing more varied coverage of Kremlin-related events and developments.

The key findings of the content analysis confirm the established patterns of dissemination of Russian disinforma-

¹⁰⁸ Faktor, „Руски Дневник – новият рупор на Кремъл у нас“ [Russia Beyond – the New Kremlin Outpost in Bulgaria], June 15, 2015.

¹⁰⁹ Stoilova, Z., and Bosev, R., „Прокуратурата обвини Николай Малинов от ‘Русофили’ – шпионирал за ген. Решетников“ [The Prosecution Charged Nikolay Malinov from Russophili for Spying for General Reshetnikov], *Capital Daily*, September 10, 2019; Malinov, N., „Докладна записка Николая Симеонова Малинова – председателя ‘Национална движения русофилов’ в Републике България“ [Report by Nikolay Simeonov Malinov – Chairman of Russophili National Movement in the Republic of Bulgaria], n.d.

¹¹⁰ Mitov, V., „‘Русофилска партия’. Какво прави Николай Малинов година след обвинението в шпионаж“ [‘A Russophile Party’. What Is Nikolay Malinov Doing a Year after the Espionage Charge], *Svobodna Evropa*, September 24, 2020.

¹¹¹ Staridolska, E., „Наддумване“ [Outtalking], *Capital Daily*, September 29, 2011.

¹¹² According to [Orbis corporate commercial database](#). Further evidence is available in the database of declarations of ownership of printed newspapers submitted to the Bulgarian Ministry of Culture. In particular, in 2010, 2012, 2014, 2015, and 2016, the chairman of Rusofili was the owner of *Duma* through the *Duma EOOD* company.

¹¹³ Epicenter, *За нас* [About Us].

¹¹⁴ Rusofili, „Валерия Велева: Русия не представлява заплаха за националната сигурност на България“ [Valeria Veleva: Russia Does Not Represent a Threat to Bulgaria’s National Security], September 14, 2017.

¹¹⁵ *Pogled.info*, „Колонката на Валерия Велева“ [Valeria Veleva’s Column].

¹¹⁶ *Bstv.bg*, „Не се страхувай“ с Васил Василев, Втора Част, Гост: Валерия Велева, политически наблюдател [‘Don’t Be Afraid with Vassil Vassilev, Part II, Guest: Valeria Veleva, Political Commentator’], January 6, 2020.

¹¹⁷ Piero 97, „Bulgarian Media Map“, 2018.

¹¹⁸ Association of European Journalists – Bulgaria, „24 часа. Исторически преглед и редакционна политика“ [24 Hours. Historical Overview and Editorial Policy], 2019.

mation in Bulgaria.¹¹⁹ Pro-Russian news outlets (Russia Beyond, Duma, and Epicenter) share **commonalities in the topics and narratives conveyed**, as well as similarities in the stylistic means of message transmission as part of their overarching pro-Kremlin orientation. A prominent focus of reporting concerns **the resurgence of nationalism in the West, claimed to be accompanied by growing fascist tendencies, in contrast to which Russia represents the staunchest anti-facist stalwart in the world**. It is asserted that Moscow takes the lead in repeatedly warning against the dangers of neo-Nazism, which is being fueled by the West's falsification of the history of World War II, glorification of the Nazis, and revival of Nazi methods of propaganda and xenophobic suppression of divergent values.¹²⁰ Such a claim is ostensibly justified through unwarranted historical analogies and generalizations about Western countries' consistent support for fascism: seemingly evident in the free reign granted to the neo-Nazis who reappeared in European politics after World War II; the proclamation of communism as more inhumane than fascism after 1989; and the current toleration of neo-fascism as long as it serves the goals of global capital and neo-liberalism.¹²¹ Pro-Russian narration touts the US as the ultimate fascist force, stemming from American unilateralism – which as fascism, does not put up with difference or diversity.¹²² Washington is accused of having appropriated the victory of World War II, without extending gratitude to Moscow for the feat Russia achieved during the war.

The post-2014 events in Ukraine are similarly presented through the prism of resurging neo-fascism. The Maidan is presented as a coup, which brought to power Russophobe neo-Nazis and anti-Semites that immediately embarked upon settling accounts with the ethnic Russians living in Ukraine. The revival of Ukrainian nationalism is said to bear a complete resemblance to its original radical xenophobic form (claimed to be embodied by Stepan Bandera – leader of Ukrainian ultranationalist in the first half of the 20th century), with there being no difference between moderate and radi-

cal strands because all purportedly take on an extremist form.¹²³

Pro-Russian outlets also emphasize the topic of **Russia's adherence to traditional values in juxtaposition to the West's unbridled liberalism**. It is claimed that Russia defends conservative morals and national specificities against Western liberal universalism that tries to erase national distinctions and create a uniform culture dictated by the West.¹²⁴ The neoliberals, who denounce Bolshevism and Stalinism, are ostensibly unmasked as resembling Stalin himself in his belief that nationalism would decline as a force in politics.¹²⁵ However, liberal globalism is announced to be in crisis as the non-Western worldview, including the principle of the authoritarian realization of national distinctiveness, are making a determined resurgence.¹²⁶ Vladimir Putin is leading the anti-globalist resistance, exposing the anti-democratic behavior of the supranational elites and pinpointing how liberal ideology destroys national identity and sovereignty.¹²⁷ Donald Trump and Marine Le Pen follow the trail blazed by Putin, representing a new type of nationalism that is in line with the preferences of majorities, who adhere to traditional values and feel left behind by the liberal political establishment. In contrast, Emmanuel Macron and George Soros attempt to reduce the diversity of European cultures and nations to the unity of a supranational system of governance.¹²⁸ Yet, the Union's imposition of obligatory supranationalism on European nations is claimed to be the subject of a popular backlash since a feeling of belongingness to one's motherland is said to be an eternal, boundless instinct superseding any political alliances.¹²⁹

¹¹⁹ Filipova and Galev, "Bulgaria," in *Russian Influence in the Media Sectors of the Black Sea Countries. Tools, Narratives and Policy Options for Building Resilience*, Center for the Study of Democracy, 2018, pp. 49-56.

¹²⁰ Russia Beyond Bulgaria, „Лавров: Ваксината против фашизъм в Европа изтича“ [Lavrov: The Vaccine against Fascism in Europe Is Running Out], July 23, 2016.

¹²¹ Dobrev, Ch., „Неофашизмът – под крилото на глобализма и неолиберализма“ [Neofascism – under the Wing of Globalism and Neoliberalism], *Duma*, June 9, 2017.

¹²² Baleva, M., „САЩ искат да държат Европа разединена“ [The US Wants to Keep Europe Divided], *Epicenter*, March 25, 2015.

¹²³ Nemenski, O., „Кои са бандеровците?“ [Who Are the Banderites?], *Russia Beyond Bulgaria*, August 21, 2017.

¹²⁴ Russia Beyond Bulgaria, „Le Figaro: Путин стана говорителя на консерваторите в Европа“ [Le Figaro: Putin Has Become European Conservatives' Spokesman], May 23, 2016.

¹²⁵ Krasteva, K., „Акад. Марков: Глобалистите у нас са безродници на хранилка, затова Западът заложил на тях!“ [Academician Markov: The Globalists in Bulgaria Are Placeless, Foreign Financed Individuals, Hence the West's Bet on Them!], *Epicenter*, February 16, 2017.

¹²⁶ Epicenter, „Главният наблюдател на 'Файненшъл Таймс': Западният либерализъм под обсада“ [Financial Times Senior Observer: The Retreat of Western Liberalism], May 14, 2017.

¹²⁷ Russia Beyond Bulgaria, „Взглед: Путин предрече маргинализацията на наднационалните елити [Vzglyad: Putin Predicted the Marginalization of Supranational Elites], October 26, 2016.

¹²⁸ Epicenter, „Руски аналитик: Сорос и Макрон свидетелстват за кризата на западния неолиберализъм“ [Russian Analyst: Soros and Macron Are a Proof of the Crisis of Western Neoliberalism], March 12, 2019.

¹²⁹ Sheitanov, V., „Владимир Шейтанов: Национален суверенитет за евродепутатска употреба“ [Vladimir Sheitanov: National Sovereignty for Euro-Deputy Use], *Epicenter*, November 25, 2018.

A closely related, frequently propagated topic is that of **sovereignty**. Pro-Russian media outlets promote the narrative that Russia and China are truly sovereign nations, supporting each other's ambitions to follow a special national path.¹³⁰ In contrast, the EU's drive to create a supranational organization through pooling sovereignty is qualified as untenable, given the rise in nationalist sentiments in European countries. For its part, Bulgaria is said to have forfeited its sovereignty, particularly by allowing joint policing of its airspace together with NATO member states.¹³¹ The only way for Sofia to reassert its sovereignty vis-à-vis the EU and NATO is judged to be on the basis of cooperation with Russia. The justification for such cooperation rests on the sweeping historical claim that Bulgaria's statehood has always been restored and defended by the Kremlin and those who dispute this are branded as unpatriotic Russophobes or pseudo-Bulgarophiles, pretending to espouse democratic values while in actuality serving foreign interests.¹³² The designation of Russia as a threat to national security is conveyed as a renunciation of national identity, sovereignty, and dignity in the quest to be a vassal of the US.

Pro-Russian outlets similarly converge on a number of key topics and related narratives within the **theme of migration**. The topic of **migration into Europe and the corresponding threat to European civilization** receives the most coverage through a conspiratorial frame that suggests an impending threat. The US is claimed to be fomenting and organizing the migration process (as a fall-out from the wars it waged in Afghanistan, Syria, Iraq, and Libya) ostensibly because Europe is America's largest economic competitor and American politicians dread the emergence of Europe as an independent geopolitical actor.¹³³ However, the EU and its member states lack sovereign decision-making in order to oppose American policies and it is only through cooperation with Russia that Europe has the chance to solve the migrant issue. But if the illusory battle against Moscow does not cease, Europeans will start to flee to Russia,

¹³⁰ Epicenter, „Китай и Русия ще засилят взаимната си подкрепа по отношение на защитата на суверенитета“ [China and Russia will Increase Mutual Assistance in Relation to the Defense of Sovereignty], September 4, 2016.

¹³¹ Russia Beyond Bulgaria, „РГ“: България се лиши от военновъздушния си суверенитет заради НАТО [Rossiyskaya Gazeta: Bulgaria Has Surrendered Sovereignty over Its Airspace Due to NATO], February 5, 2016.

¹³² Dimov, P., „Българофили ли са днешните русофоби и антикомунисти?“ [Are Contemporary Russophobes and Anti-Communists Bulgaria-Philes?], *Duma*, March 18, 2015.

¹³³ Angelov, Iv., „Масовото преселение към Европа – причини и следствия“ [Mass Migration towards Europe – Reasons and Consequences], *Duma*, March 8, 2016.

seeking a safe haven from the collapse of Western civilization¹³⁴ as the unobstructed influx of migrants is predicted to apocalyptically lead to an Islamized, barbarized and impoverished Europe, indistinguishable from large swathes of North Africa and the Middle East.¹³⁵ Russia on the other hand is portrayed as a successful model of state organization, which provides security and stability capable of stymieing the oncoming tides of migrants.

Another recurring narrative of pro-Russian disinformation in Bulgaria is related to **gender issues**. Particular emphasis is laid on the topic of **the West as a disseminator of “gender ideology”**, which is contravened by **Russia as a defender of traditional family values**. Gender is presented as part of the process of globalization and extreme liberalism in the West driven by the supposed aim to create a new person without a state, nation, identity, and sex. “Gender ideology” is asserted to be advanced across the EU by “pseudo-liberals”, who behave in a totalitarian manner, akin to Bolshevism, as they exercise heavy pressure on member states to align with their extremist views promoting same-sex marriage.¹³⁶ Gender “propaganda” is said to have an especially pernicious effect on children since they are encouraged to become transsexual.¹³⁷ Moreover, a major disinformation message claims that the West is conducting a hybrid war against Russia, which is preparing the ground for a military offensive, with the insidious goal being to undermine the spiritual foundations of the country – its religious faith, support for traditional family values and opposition to “gender ideology”.¹³⁸ Yet, at the same time it is claimed that the American model of gender will not ultimately be imposed because of the resilience and conservative defenses of Russian society.

¹³⁴ Russia Beyond Bulgaria, „Полски медии предвиждат масова емиграция на европейци в Русия“ [Polish Media Predict Mass Emigration of Europeans to Russia], September 11, 2015.

¹³⁵ Epicenter, „Миграцията е на ръба да разруши Европа“ [Migration Is on the Verge of Destroying Europe], November 8, 2015.

¹³⁶ Borisov, Iv., „ДЖЕНДЪР политиката и МУЛТИКУЛТУРАЛИЗМЪТ унищожават западната цивилизация“ [GENDER Politics and MULTICULTURALISM Are Destroying Western Civilization], Epicenter, February 28, 2018; Epicenter, „Ангел Джамбазки: Проповедниците на джендър идеологията са най-агресивните либерални фашисти“ [Angel Dzhambazski: The Proponents of Gender Ideology Are the Most Aggressive Liberal Fascists], October 23, 2018.

¹³⁷ Hristova, V., „Добре дошли в лудницата“ [Welcome to the Psychiatry], *Duma*, February 14, 2018.

¹³⁸ Russia Beyond Bulgaria, „Решетников: Нападат Русия, защото искат да унищожат нейния дух и вяра“ [Reshetnikov: An Attack Is Carried out against Russia to Destroy Its Spirit and Faith], June 14, 2016.

Another set of interrelated, frequently covered topics concerns **the juxtaposition between biological and social sex and the consequent erosion of traditional femininity and masculinity** that Western distinctions (between sex and gender) generate. It is maintained that gender represents an attempt at social engineering that plots to destroy the sexual identity of men and women on the argumentation that socially constructed gender should be thought of as independent of biological sex since performativity and self-ascription are all that matters.¹³⁹ In this way, sex is portrayed in an essentialist manner, as a biological given rather than a matter of choice or habit, thus gender is accused of going against the ostensibly, completely “natural”, rootedness of maleness and femaleness. Feminists are depicted as a threat because they have seemingly waged war on marriage, family, and children, wanting complete sexual deregulation and devaluing men. The feminist cause of the 19th and 20th century is claimed to have been overtaken.^{140, 141}

A popular batch of commonly conveyed pro-Russian topics and narratives in Bulgaria relate to the theme of **energy**. Significant emphasis is placed on coverage of the **relations between the European Commission and Gazprom** in the context of the latter's breach of the Union's energy and competition rules. Pro-Russian outlets promote the Kremlin narrative that the Commission's antitrust investigation into the Russian giant's abuse of its monopoly position and its conclusion of financially disadvantageous contracts, particularly with CEE countries, was based on unsubstantiated claims.¹⁴² Gazprom is, in turn, depicted as taking an amicable and dialogical stance, which has contributed to settling the dispute, deftly avoiding heavy fines for the violation of EU rules.¹⁴³ Yet, the scale of concessions that Gazprom agreed to make to avoid such fines, such as

¹³⁹ Dachkov, Y., „Д-р Николай Михайлов: Истанбулската конвенция – не сме объркани в превода. В клопка сме!“ [Dr. Nikolay Mihailov: The Istanbul Convention – We Are Not Lost in Translation. We Are Trapped!], *Epicenter*, January 18, 2018.

¹⁴⁰ Epicenter, „Авторката на джендър-идеологията лесбийката Джудит Бълър: Няма мъже и жени! Полът е фантазия“ [The Author of Gender Ideology Judith Butler: There Are No Men and Women! Sex Is a Fantasy], January 8, 2018.

¹⁴¹ Timofeichev, A., „Перфектният джентълмен: Цветя от руския президент Владимир Путин“ [The Perfect Gentleman: Flowers from Russian President Vladimir Putin], *Russia Beyond Bulgaria*, May 25, 2018.

¹⁴² *Russia Beyond Bulgaria*, „Газпром“ отхвърли като неоснователни обвиненията на ЕК“ [Gazprom Rejects as Unfounded the European Commission's Accusations], April 22, 2015.

¹⁴³ Epicenter, „Газпром‘ избегна плащането на милиарди глоби. Може да намали цените за България!“ [Gazprom Has Averted the Payment of Billions in Fines. It May Decrease Prices for Bulgaria!], May 24, 2018.

allowing the re-export of Russian gas via bilateral contracts, are not discussed. Moreover, the new legislation on the EU energy union, which for instance entails that gas contracts with the Russian company must first be consulted with by the European Commission, is portrayed as a way for Brussels to mount political attacks on Gazprom and codify its “illegal” arguments on anti-monopoly rules, as were drawn upon in the cancellation of the South Stream gas pipeline.¹⁴⁴ The US is singled out as an instigator of these legal changes as it is said to be putting pressure on European countries to prevent them from concluding contracts with Gazprom and thus cement a dominant American position in the EU energy markets.¹⁴⁵

Similar pro-Russian messaging is employed toward **Russia's large-scale pipeline projects**. Turkish Stream, as a replacement of South Stream, together with Nord Stream II are hailed as ensuring the security of gas supplies to Europe without interruptions and at lower prices. At the same time, it is argued transit routes through Russophobic CEE countries, such as Ukraine and Poland, will remain with empty pipelines. It is claimed that there are very few risks associated with the construction of Nord Stream II since the consortium of West European companies participating in the realization of the pipeline will invariably solve the problem, such as a possible indictment by the Polish anti-monopoly authorities.¹⁴⁶ Yet, if European institutions once again create obstacles for Turkish Stream and Nord Stream II – prompted by the US whose liquefied gas exports to Europe are said to be threatened by the Russian pipelines, Europe will ostensibly undermine its own energy security. This is asserted as so on the basis of the Kremlin narrative, which holds that the diversification of energy routes is a more legitimate and feasible form of diversification than the diversification of sources of supply, as extolled by the West.¹⁴⁷

Indeed, a substantial amount of reporting is dedicated to the topic of **European diversification away from**

¹⁴⁴ *Russia Beyond Bulgaria*, „ЕС се опитва да установи контрол върху договорите с „Газпром““ [The EU Is Trying to Establish Control over Contracts with Gazprom], January 26, 2016.

¹⁴⁵ *Russia Beyond Bulgaria*, „Медии: САЩ оказват натиск срещу сделки на „Газпром“ в Европа“ [Media: The US Is Pressuring against Gazprom Contracts in Europe], August 16, 2016.

¹⁴⁶ Kalinina, K., „Може ли през 2019 г. Западна Европа да получава руски газ без посредници?“ [Can Western Europe Receive Russian Gas without Intermediaries in 2019?], *Russia Beyond Bulgaria*, May 17, 2017.

¹⁴⁷ Atanasov, Iv., „Големият брат срина мита за свободния пазар“ [Big Brother Crahsed the Myth of the Free Market], *Duma*, December 20, 2018.

Russian energy supplies, which is dismissed as a matter of political statements, influenced by the ill-intentioned and unfair competition practices of corporations lobbying the European Commission.¹⁴⁸ However, it is claimed that market conditions will prevail and determine the ostensible continuation of and increase in Russian gas supplies to Europe. All forms of diversification, such as the Trans Adriatic Pipeline (TAP) supplied with Azeri gas and the Croatian LNG terminal distributing liquefied American gas, are asserted to be financially unviable and devoid of sufficient gas supply.¹⁴⁹ Overall, pro-Russian messaging reflects the Kremlin's weariness of Europe's ability to wean itself off of Russian energy, suggesting that mutual Russian-European energy dependence is seemingly fundamental and inevitable.¹⁵⁰

Pro-Russian outlets in Bulgaria resemble each other in terms of the employment of **similar stylistic means of message transmission** based on overtly biased reporting that does not conform to standards of evidence-based coverage. These prevalently used techniques can be generally delineated into three types:

- One way of promoting attitude-shaping coverage is through literary figures, which contribute to the emotional coloring of an article, including evaluative epithets and metaphors,¹⁵¹ irony and sarcasm, sowing moral indignation, drawing binary distinctions that paint the world in black-and-white terms.¹⁵²
- Pro-Russian outlets also utilize analytical devices for making seemingly sound arguments and conclusions. This is achieved through generalizations

extrapolated from singular events and opinions,¹⁵³ unjustified historical and analytical parallels, peddling conspiracies,¹⁵⁴ and impending threats.

- Moreover, the type and presence of citations and wider evidence play a further important role in disinformation techniques. For instance, Kremlin-supportive sources make selective citations (i.e., omitting critical opinions or citing a number of experts that share the same view)¹⁵⁵ and frequently cite in an uncritical manner official (Russian) opinion. A broader context, presenting well-rounded and critical arguments in relation to the discussed phenomenon, is usually missing, while unsubstantiated claims and unfounded accusations¹⁵⁶ abound.

Apart from the overarching commonalities among pro-Russian outlets, there are also **differentiations in narration and style**. As established in previous analyses,¹⁵⁷ outlets directly owned by Russia, such as **Russia Beyond** are distinguished by a **very limited coverage of nationally relevant Bulgarian perspectives and developments**. Instead, the bulk of reporting is guided by the Kremlin's political agenda, featuring the most straightforward and explicitly biased conveyance of Russian viewpoints. For instance, significant attention is devoted to the promotion of the Kremlin's stance on the intricacies of Russia's national issues. Countering any discussion of the possibility of session along ethnic lines takes place through an overwhelming form of narration holding that state-

¹⁴⁸ Lossan, Al, „Може ли да бъде изместен „Газпром“ в Европа“ [Can Gazprom Be Displaced from Europe], *Russia Beyond Bulgaria*, July 28, 2015.

¹⁴⁹ Epicenter, „Ведомости: Европа започна да строи газопровод-конкурент на проектите на Газпром“ [Vedomosti: Europe Has Started Building a Pipeline Competing with Gazprom's Projects], May 18, 2016.

¹⁵⁰ Duma, „МАЕ: Европа има нужда от руския газ“ [IEA: Europe Needs Russian Gas], August 26, 2014.

¹⁵¹ For instance, an article in *Russia Beyond Bulgaria* presents the US as predatory by metaphorically comparing its opposition to Nord Stream II as a “démarche of cannibals”. It is impressed upon the reader that the end result of American rapaciousness is to leave the Europeans “hungry” and turn them into vegetarians, ostensibly because Russian gas solely determines subsistence in the West: *Russia Beyond Bulgaria*, „Рогозин за позицията на САЩ по Северен поток: Демарш на канибали“ [Rogozin on the US's Position in Relation to Nord Stream II: A Démarche of Cannibals], June 27, 2017.

¹⁵² For instance, a Duma article draws a binary distinction between the supposed truth available to those who oppose “gender ideology” and the lies seemingly propagated by the “gender ideology” promoters: Duma, „17 страни въстанаха срещу джендър доктрината“ [17 Countries Rebelled against Gender Ideology], March 16, 2018.

¹⁵³ A Duma article draws a generalization about the supposed all-encompassing Russophobia and far-right nationalist character of Ukrainians through three singular occurrences, the arrangements in Independence square (such as flags of the rebel army), “vicious” comments during the parliamentary discussions of law on minority languages and three MPs from far-right party Svoboda: Duma, „Уроците от Крим“ [The Lessons of Crimea], March 20, 2014.

¹⁵⁴ A frequently repeated conspiracy is that migration is being deliberately orchestrated: *Russia Beyond Bulgaria*, „РИСИ: Бежанците са опасно оръжие“ [RISS: Refugees Are a Dangerous Weapon], May 16, 2016.

¹⁵⁵ For instance, the claim that the US is guided by a set of ulterior motives is promoted through the citation of Russian commentators, sharing a similar viewpoint. The cited commentators – Dmitry Demushkin, Evgeny Venediktov, Nikolay Shlyamin (leader of the United Youth Front), all share nationalist, anti-Western positions: Epicenter, „Пентагонът ще проучва „характера на руския национализъм““ [The Pentagon Will Study ‘the Character of Russian Nationalism’], August 23, 2016.

¹⁵⁶ For instance, the EU is accused of condoning fascist tendencies without the presentation of any evidence and solely as a matter of the Union's support for Ukraine: *Russia Beyond Bulgaria*, „Представител на РФ в ООН: ЕС не трябва да се заиграва с неонацизма“ [Russian Federation's UN Representative: The EU Should Not Play Fire with Neo-Nazism], May 10, 2017.

¹⁵⁷ Filipova and Galev, “Bulgaria,” in *Russian Influence in the Media Sectors of the Black Sea Countries: Tools, Narratives and Policy Options for Building Resilience*, 2018, pp. 56-57.

hood and multi-nationality are more important than the ethnic-nationalist claims of the republics of the Russian Federation. The ideal of the “true Russian Muslim”, for instance, is posited as a patriot loyal to the state.¹⁵⁸ Strong leadership embodied by Vladimir Putin, patriotism, rallying around the memory of Russian might in World War II, the Russian language and army are promoted as the core unifying aspects of the multi-national Russian civilization.

Stylistically, such outlets do not offer a clear separation between news pieces and commentaries. The predominant form of reporting is thus conducted through overtly biased means of message transmission. Some coverage can appear as neutral, yet this can actually represent an implicit attitude-shaping technique, whereby the citation of a (Western) actor or institution – usually the target of disinformation claims, supposedly leads to self-exposure. Additional techniques that are used to amplify such ostensible self-exposure include biased headlines (that frame the whole body of the article) and emphasizing particular phrases from citations (this is achieved, for example, via the underlining, boldening, or the use of quotations).¹⁵⁹

Party outlets, such as *Duma* are distinguished by reporting that portrays **the party's domestic and international (pro-Russian) stances in a favorable light**. In this particular case, Bulgaria's partisan leaning blends into a wider leftist ideological framing most conspicuously visible in sweeping historical-geopolitical generalizations and analogies couched as a struggle between socialism and capitalism. Western-imported liberalism in Bulgaria is said to represent an ideological construct concealing the reality in which a minority of the population won out, while the majority of the Bulgarians were reduced to a condition of pauperization.¹⁶⁰ The Bulgarian political elite is presented as treasonous as it does not defend the nation-state based on the shared territory, language, religion, history, and culture of the leading ethnic group (i.e., the Bulgarian ethnos) but liquidates it in favor of an EU federation. It is argued that the duty to defend the nation's

¹⁵⁸ Russia Beyond Bulgaria, „Как Русия гледа на своите мюсюлмани” [How Russia Views Its Muslims], June 1, 2015.

¹⁵⁹ For instance, Russia Beyond cites former Bulgarian President Rossen Plevneliev's statement that the Kremlin is attempting to destabilize the EU. However, the use of quotations for the accusations mounted against Russia sows doubt. Plevneliev is implicitly painted as hypocritical because he blames Moscow for Europe's own problems: Russia Beyond Bulgaria, „Плевнелиев: Кремъл се опитва да дестабилизира ЕС” [Plevneliev: The Kremlin Is Trying to Destabilize the EU], June 8, 2016.

¹⁶⁰ Prodanov, V., „Неолибералната идеология '25 години свободна България'” [The Neoliberal Ideology '25 Years Free Bulgaria'], *Duma*, November 13, 2014.

sovereignty, stand for a Europe of nation-states, and resist Brussels' and Washington's encroachment on the Bulgarian national interest is left solely up to the Bulgarian left-wing. The successful defense of Bulgaria is posited on the basis of strong cooperation with Russia.¹⁶¹ As regards the theme of gender, the BSP's strong opposition to the Istanbul Convention is reflected in *Duma's* reporting on the matter. The Bulgarian politicians, who promote a distinction between gender and sex through the Convention, are characterized as submissive and eager to ingratiate with Brussels. “Gender ideology” is overall proclaimed to be a Western perversion promoted as a global policy, militating against national institutions, rationality, morals, and tradition.¹⁶² The predominance of ideological postulates in the outlet's reporting results in a ubiquitous use of unjustified historical analogies, sweeping generalizations extrapolated from singular occurrences and conspiracies, whose emotional intensity is reinforced through evaluative epithets, rhetorical questions.¹⁶³

In terms of its style of message transmission, the **broad-er daily**, *Epicenter* occasionally maintains a more neutral-formal format of news reporting, distinguished by some seemingly neutral portrayals, laced with implicit bias (such as introductory and concluding statements in an article aiming to sway reader impression; uncritical citation of official opinion; and manipulative headlines).¹⁶⁴ Yet, commentaries are characterized by an overtly biased stylistic means typical of the overall pattern of pro-Russian reporting.

¹⁶¹ Dobrev, Ch., „Модерните измерения на лявата политика” [The Contemporary Dimensions of Leftist Policy], *Duma*, December 30, 2015.

¹⁶² Hristova, V., „Джендърфили” [Gender-Philes], *Duma*, March 16, 2018.; Gitsov, A., „Социалният (Gender) пол в Истанбулската конвенция” [Social (Gender) Sex in the Istanbul Convention], *Duma*, January 23, 2018.

¹⁶³ These techniques for shaping reader attitudes are for instance combined in an article, which denounces Bulgarians with anti-communist views. The use of evaluative epithets such as “wretched preaching” creates a negative impression of those who do not agree with communist positions; conspiracies are promoted through rhetorical questions about the existence of ulterior motives on the part of anti-communist stances; claims to stating the “true facts” are made, which actually rest on unconvincing historical generalizations (the English as prime practitioners of concentration camps) and an off-the-point attempt to prove the difference between communism and fascism on the basis of doctrinal differences rather than similarity in atrocities committed: Ivanov, A., „Има едни специалисти антикомунисти...” [On Anticommunist Specialists...], *Duma*, November 13, 2018.

¹⁶⁴ For instance, an apparently neutral attitude to Bulgarian energy diversification is diluted with an uncritical citation of Boyko Borissov's words that energy diversification is not based on an internal impetus but to please the West: *Epicenter*, „Борисов: България ще гарантира диверсификация на газа с изграждането на интерконектора с Гърция” [Borissov: Bulgaria Will Guarantee Gas Diversification with the Construction of the Interconnector with Greece], May 19, 2019.

As compared to the pattern of differentiated pro-Russian biases, 24 chasa **exemplifies a mainstream (“control”) outlet that provides more balanced coverage.** The newspaper delivers a wider array of views, with opposing and alternative perspectives (on Russia) being represented in the same article, or more frequently, in different articles. The outlet provides a mix of both positive and negative views on Russia spread out across its content rather than a consideration of the broader context in relation to every Kremlin-related statement, event, or development based on counter-arguments and additional evidence within a given news piece. Both Russian and Western sources are quoted, with the latter usually being republished from the Bulgarian News Agency (BTA) as opposed to being cited in the original.

As regards to stylistic means of message transmission, the independent outlet maintains a clear separation between news pieces and commentaries. News articles are characterized by the provision of apparently neutral portrayals, which are however not situated within a wider context and official opinions tend to be uncritically cited.¹⁶⁵ The mixture of presentation of different perspectives thus results in contradictory portrayals. In this vein, Russia can simultaneously appear as a proud, sovereign, and resilient beacon of conservative values, as well as an aggressive and manipulative actor. The techniques of message transmission in commentaries can resemble the reporting style exhibited by pro-Russian outlets, particularly, in terms of the citation of Russian experts and sources,¹⁶⁶ exaggerated depictions,¹⁶⁷ and unjustified analogies.¹⁶⁸

¹⁶⁵ For instance, Energy Minister Temenuzhka Petkova’s implicit equation of national interests (informed by the construction of Turkish Stream) to compliance with European legislation is cited without an inquiry as to whether this parallel is indeed correct: 24 chasa online, „Петкова за ‘Турски поток’: Следваме националния си интерес и законите на ЕС” [Petkova on Turkish Stream: We Follow Our National Interest and the EU’s Laws], December 17, 2018.

¹⁶⁶ As in 24 chasa online, „Известия: Повечето източноевропейци предпочитат политиката на Путин пред тази на Тръмп” [Izvestiya: Most Eastern European Prefers Putin’s Policies to Trump’s], May 28, 2018; 24 chasa online, „Российская Газета: Позициите на Москва и Токио по проблема с мирния договор остават без промяна” [Rossiyskaya Gazeta: The Positions of Moscow and Tokyo on the Problems of the Peace Treaty Remain Unchanged], January 23, 2019.

¹⁶⁷ For instance, the extent to which Putin has been embraced by Western constituencies is propagated through an exaggerated and unsupported claim that the American South’s support for the Russian President is the most amazing political turning point in of the era: Naydenov, V., „Как Путин превзе американския Юг” [How Putin Has Conquered the American South], 24 Chasa, August 24, 2017.

¹⁶⁸ For instance, the newspaper does not question the unjustified analogy made by Putin that Russia won’t allow itself to be dismembered by the West nowadays the way it did not allow Hitler to do so during WWII: 24 hours, „Путин: Русия няма да бъде разчленена” [Putin: Russia Will Not Be Dismembered], December 4, 2014.

BEST PRACTICES AND GAPS IN TACKLING DISINFORMATION

The Bulgarian media scene has received severe domestic and international criticism directed against the entrenchment of negative trends,¹⁶⁹ including ongoing internal violations on freedom of speech and (self) censorship of journalists, as well as foreign authoritarian state interference, primarily conducted by Russia and leading to the dissemination of pro-Kremlin disinformation. However, an effective response to the deterioration of media freedom has not been crafted. There remain significant governance gaps and inaction in relation to forging a credible government-level set of policies for tackling disinformation; EU initiatives with respect to improving the conditions for an independent press in member states have not been fully embraced by Bulgarian authorities so it has been up to civil society to provide a more concerted push for improving media freedom.

Governance framework

In Bulgaria, the governance framework in the sphere of the media has been characterized by **incomplete, inadequately enforced, and misused legislative provisions** coupled with controversial legal proposals, which have exacerbated persistent media problems. The relevant regulatory bodies have been under-resourced and accused of lacking independence.

The main legal provision through which the disclosure of media ownership has been regulated is the *Law on the Mandatory Deposit of Printed and Other Publications* (2009),¹⁷⁰ according to which each publisher of periodical print newspapers is obliged to report beneficial ownership on an annual basis to the Ministry of Culture, which in turn provides this information on its website. In 2014, the Council for Electronic Media created a register for the declaration of ownership of providers of

¹⁶⁹ Reporters Without Borders’ continuous ranking of Bulgaria in the 111/112th place out of 180 countries in its World Press Freedom Index is now a common critical reference point in Bulgarian public discourse:

Reporters Without Borders, “Bulgaria,” 2020 World Press Freedom Index, 2020.

¹⁷⁰ Lex.bg, Закон за задължителното депозиране на печатни и други произведения и за обявяване на разпространителите и доставчиците на медийни услуги [Law on the Mandatory Deposit of Printed and Other Publications and for the Disclosure of Distributors and Suppliers of Media Services], promulgated in SG No. 108 of 29 December 2000, last amended in SG No. 17 of 26 February 2019.

radio and audio-visual services. A recent amendment to the Law of 2009 states that the Ministry of Culture's registry should be upgraded to include a declaration of ownership, sources of public financing, and editorial management of all types of media. The Bulgarian-language online media space remains largely unregulated outside EU-mandated initiatives.

Conceptual and implementation gaps **prevent the complete, transparent, and effective disclosure of beneficial ownership.** *First*, amendments to the *Law on the Mandatory Deposit of Printed and Other Publications* concerning the disclosure of final beneficial ownership were notably introduced on the initiative of media mogul, Delyan Peevski (who, until recently, was estimated to control over 80% of the newspaper distribution business in Bulgaria). The initiative has been criticized as burnishing Peevski's image (in the face of calls for investigations into his monopolization of the media market) and as being selective in targeting owners of smaller media outlets. In particular, the size of fines for non-disclosure of ownership is significant and can lead to the bankruptcy of media outlets with limited resources. Also, the ownership structures that will be most readily revealed are those of smaller media as the owners of big news outlets can provide information on financing through complicated, hard-to-trace ownership structures of chain companies. *Second*, gaps can be identified in the data provided as part of the registration arrangements for disclosing final beneficial ownership. For instance, the Ministry of Culture's system for depositing ownership declarations (active until 2018 and governed by the 2009 Law) does not supply exhaustive information as not all print outlets submit declarations. The upgraded registry (devised to align with the amendment to the 2009 Law) is in its infancy but is similarly incomplete¹⁷¹ in terms of there being missing information about all print and online outlets' ownership structures, with figures on the financing received (by those outlets present in the registry) being typically omitted. The Council on Electronic Media's¹⁷² registry is most readily available for consulting the most current, rather than historical, information on ownership (i.e., it is best for gaining information from the most recent year for which data has been gathered). *Third*, a much more comprehensive disclosure of the ownership structures

of media outlets necessitates the legal codification of an expanded definition of financial and decision-making influence, which includes not only the declaration of final beneficial ownership but also the names of shareholders as well as the (editorial) board members with their particular voting weight.¹⁷³

Moreover, Bulgaria scores some of the highest risk levels within the EU on the indicator of state **regulation of resources to the media sector.** The lack of legislation to ensure fair and transparent rules on the distribution of state advertising to media outlets and the low transparency in relation to allocation criteria, amounts, and beneficiaries of advertising contracts has been revealed to embed favoritism, censorship, and distortion of the media market. Also, direct state subsidies to the Bulgarian public media make the latter excessively dependent on government support,¹⁷⁴ while indirect subsidies (such as tax exemptions or non-collection of tax)¹⁷⁵ can provide financial benefits to selected media.¹⁷⁶ Moreover, the state can exercise further leverage by allocating the communication budgets for publicizing EU programs. Around 58 million leva (~30 million euro) have been distributed since Bulgaria's entry into the Union until 2019 on the basis of direct negotiation with electronic media outlets without a competitive process, which cements direct state influence over the editorial line and financing of Bulgarian media.¹⁷⁷

Legal provisions on journalists' **access to and utilization of information** have been further employed in ways that hamper rather than promote freedom of expression. The transposition of the EU's General Data Protection Regulation (GDPR) into Bulgarian national legislation was criticized for creeping censorship and

¹⁷¹ At the time of writing.

¹⁷² The Council is the media market regulator in Bulgaria. The law stipulates that the Council is an independent body vested with the authority to license, register and monitor the activities of media services providers in order to safeguard pluralism and freedom of speech.

¹⁷³ Association of European Journalists – Bulgaria, „Осветляване на медийната собственост в България: необходимите стъпки“ [Making Transparent Media Ownership in Bulgaria: The Necessary Steps], November 18, 2015.

¹⁷⁴ 94% of the revenue of Bulgarian public media is made up of state subsidies, with highly restrictive rules on advertising for instance limiting advertising time to 15 minutes a day on the Bulgarian National Television: Antonova, V., „Сложното уравнение – пари за обществени медии“ [Complex Equation – Money for Public Media], *Capital Daily*, February 15, 2019.

¹⁷⁵ Yordanova, Ts., „Три четвърти от проверените от НАП печатни медии 'пестят' данъци“ [Three Quarters of Print Media Investigated by the National Revenue Agency 'save' from Tax], *Mediapool*, June 3, 2016.

¹⁷⁶ Brogi, E. et al., „Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2017 in the European Union, FYROM, Serbia & Turkey,“ *European University Institute*, 2018, pp. 51-52.

¹⁷⁷ Svobodna Evropa, „Купуване на медии. Как с пари от еврофондове може да се осигури поръчкова журналистика“ [Buying Media. How Money from the European Funds Can Ensure Favorable Journalistic Portrayal], July 10, 2019.

granting the authorities a wide margin of discretion as to what constitutes an infringement on personal data. According to the GDPR, it is up to national parliaments to decide on the balance between freedom of expression and the right to privacy. In the Bulgarian case, 10 criteria were set for how journalists should work with personal data, including detailed stipulations on the origin of the data, the circumstances requiring disclosure of the data, and the private and public aftermath that would ensue. Although the President vetoed the initial legal bill following a robust civil society campaign, the subsequent version of the law that was passed still retained those criteria albeit with the proviso that they should not be applied cumulatively in every single case, as originally envisaged, but only the most relevant ones are to be taken into consideration.¹⁷⁸ Concerns about the curtailment of the journalistic profession were thus not completely alleviated, as the Commission for Personal Data Protection can still stretch the interpretation of the criteria as an instrument for repression and impose disproportionately high fines.¹⁷⁹ Also, during the coronavirus pandemic, significant restrictions on access to information were introduced as the amount of time for public bodies to respond to Freedom of Information requests was doubled from 30 to 60 days.¹⁸⁰

Legislation with respect to libel and defamation has also been increasingly applied against journalists, who maintain critical stances against public officials.¹⁸¹ The Council of Europe has itself sounded a warning against the chilling effect that this phenomenon has had on investigative journalists, urging the Bulgarian authorities to repeal criminal provisions against defamation offenses and instead deal with such incidents through proportional civil law sanctions.¹⁸² Similar provisions meant to protect the integrity of the financial system have been used in 2014 during a banking crisis in the

country to intimidate the national and regional media. In a similar vein, during the coronavirus pandemic, unwarranted investigations were started under the Bulgarian Penal Code. Article 326 of the Code (envisaging prison sentences and heavy fines for individuals who make unfounded panic-inducing statements) was deployed in an alleged silencing of the release of information on shortages in medications and hospital equipment for dealing with COVID-19.¹⁸³

Apart from existing legislation, recent proposals for **three new legal bills have met with significant controversy**¹⁸⁴ over the motives behind them, the insufficient conduct of substantive legal consultations, and the dim prospect of inducing qualitative change in the media sphere through the suggested revisions. One of the new laws introduces amendments to the Radio and Television Act and primarily aims at restructuring the administrative-institutional environment for the functioning of public media. However, the expert group, which debates and proposes the relevant legal changes, has been criticized for not including specialists in media law. Moreover, the envisaged extension of the term of office of the Director-Generals of the Bulgarian National Radio (BNR) and the Bulgarian National Television (BNT) from 3 to 5 years for a maximum of two consecutive mandates has been suspected of serving the ulterior motive of keeping the current Director-General of BNT (who has been accused of political bias)¹⁸⁵ in his position for a prolonged period of time. The bill also introduces the possibility of discretionary interpretation of what would constitute a “serious violation or systematic lack of performance of professional competencies” on the part of members of the Council for Electronic Media (CEM). The Parliament and President would thus gain extra power over CEM as the ones who appoint and dismiss members of the Council.¹⁸⁶

Another new legislative initiative deals with the revision of existing media legislation in order to align it

¹⁷⁸ Association of European Journalists – Bulgaria, „Президентът Румен Радев да наложи вето на Закона за защита на личните данни” [President Rumen Radev to Veto the Personal Data Protection Act], January 24, 2019.

¹⁷⁹ Association of European Journalists – Bulgaria, „АЕЖ ще следи влиянието на Закона за личните данни върху правото на изразяване” [AEJ Will Be Monitoring the Effect of the Personal Data Protection Act on the Freedom of Expression], February 20, 2019.

¹⁸⁰ Filipova, R., *The Shrinking Space for Media Freedom in Southeast Europe in the Midst of COVID-19 Pandemic and State of Emergency*, Center for the Study of Democracy/Konrad-Adenauer-Stiftung Media Programme South East Europe, 2020, pp. 14, 26.

¹⁸¹ Reporters Without Borders, “Bulgarian Reporter’s Defamation Conviction Sets Dangerous Precedent,” June 7, 2019.

¹⁸² Council of Europe, *Commissioner for Human Rights of the Council of Europe Dunja Mijatović Report Following Her Visit to Bulgaria from 25 to 29 November 2019*, 2020, pp. 2, 28.

¹⁸³ Filipova, R., *The Shrinking Space for Media Freedom in Southeast Europe in the Midst of COVID-19 Pandemic and State of Emergency*, Center for the Study of Democracy/Konrad-Adenauer-Stiftung Media Programme South East Europe, 2020, p. 27.

¹⁸⁴ The first two legislative proposals described in the following paragraphs have been adopted in the beginning of 2021.

¹⁸⁵ Отворено писмо за БНТ като обществена медия и за оставката на генералния директор Емил Кошлуков [Open Letter to BNT as a Public Service Media and the Resignation of Director General Emil Koshlukov], 2020.

¹⁸⁶ Antonova, V., „Кошлуков може да бъде генерален директор на БНТ до 2030 година” [Koshlukov Can Serve as Director General of BNT until 2030], *Capital Daily*, July 13, 2020.

with the EU's Audiovisual Media Services Directive,¹⁸⁷ whereby the Bulgarian Radio and Television Act¹⁸⁸ will be adapted to specifically tackle racial and religious hatred in visual content published online. On the one hand, the transposition of the Directive provides a push for a much-needed update of the Act, which focuses on analog media services provided by radio and television, neglecting the digital space. On the other hand, the question of media ownership remains beyond the Union's remit, exemplified by the fact that the Audiovisual Media Services Directive's instructions on publicizing media ownership arrangements are not binding for member states. Moreover, the Directive does not contain specific provisions on the regulation of websites and cannot, therefore, infuse greater certainty into an ongoing domestic debate about the extent to which websites should be subject to monitoring and supervision (such as through prior approval of registration).¹⁸⁹

During the coronavirus pandemic,¹⁹⁰ one of the parties constituting the ruling coalition government, the nationalist VMRO (Bulgarian National Movement), attempted to pass **excessive regulations against disinformation as part of the emergency legislation**. Accordingly, the declaration of a state of emergency was accompanied by a bid to amend the penal code so that prison sentences and fines could be imposed for the dissemination of coronavirus-related disinformation. Although this legislative initiative was vetoed by the President, a complementary bill called for the suspension of the operation of websites that spread disinformation of all kinds and not simply confined to COVID-19. The proposed bill widened the scope of the Council for Electronic Media's authority, which, hitherto, was only responsible for monitoring radio and television. Now, CEM would decide, without the need for obtaining ju-

dicial resolution, what constitutes a disinformation offense, defined very broadly and vaguely in the bill as a "publication containing false information". Moreover, VMRO's legal proposals came into conflict with key European legislative provisions. The proposed obligatory registration of website owners, social media profiles, blog creators (i.e., all forms of individual usage of the Internet) were justified through the GDPR on the argumentation that the IP address of users represent private data and the owners of the online sources dealing with this information should be publicly disclosed. However, the European regulation does not make a connection between the usage of personal data and liability for spreading disinformation and neither are the administrators handling personal data necessarily equated with the owners of online sources.¹⁹¹

Civil society

Civil society actors have played a leading role in pushing back against encroachments on freedom of speech in Bulgaria by carving out spaces for the reinvigoration of press independence.

Non-governmental organizations (NGOs) take the lead in developing **media literacy tools and initiatives aimed at school children**. The Media Literacy Coalition,¹⁹² comprised of journalists, academics, media, and education specialists, has been working towards the integration of media literacy in the educational process. To this end, it has developed media literacy lessons and textbooks for all school grades (1-12), as well as resources for upgrading teachers' digital skills. These resources are now being utilized as part of the school curriculum since the Ministry of Education and Science officially introduced media literacy lessons for the first time in 2018.¹⁹³ Significant steps towards measuring the effectiveness of these lessons have been made through the creation of a methodology for the development of digital media competences on the basis of the teaching material.¹⁹⁴ Moreover, a national media

¹⁸⁷ Official Journal of the European Union, [Directive \(EU\) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services \(Audiovisual Media Services Directive\) in view of changing market realities](#), 2018.

¹⁸⁸ Lex.bg, [Закон за радиото и телевизията](#) [Law on Radio and Television], promulgated in SG No. 138 of 24 November 1998, last amended in SG No. 20 of 9 March 2021.

¹⁸⁹ Kostova, M., [„CEM очаква парламентът да иницира дискусия за припознаване на интернет сайтовете за електронни медии“](#) [CEM Is Expecting That Parliament Initiate a Discussion about Recognizing Internet Sites as Electronic Media], *BNR*, September 9, 2019.

¹⁹⁰ The analysis in this paragraph is based on Filipova, R., *The Shrinking Space for Media Freedom in Southeast Europe in the Midst of COVID-19 Pandemic and State of Emergency*, Center for the Study of Democracy/Konrad-Adenauer-Stiftung Media Programme South East Europe, 2020, p. 13.

¹⁹¹ Vesselinova, M., [„Проектът на ВМРО за цензурата в интернет противоречи на регламента GDPR“](#) [VMRO's Proposal on Internet Censorship Contradicts the Stipulations of the GDPR], *Capital Daily*, June 18, 2020.

¹⁹² Official webpage of the [Media Literacy Coalition](#).

¹⁹³ National Network for Children, [„Учителите могат да ползват готови ресурси по медийна грамотност“](#) [Teachers Can Use Already Developed Resources on Media Literacy], September 18, 2019.

¹⁹⁴ Bulgarian Safer Internet Centre, [„Учители разработиха занятия за дигитално-медийна грамотност“](#) [Teachers Developed Trainings for Digital-Media Literacy], June 6, 2019.

literacy index for high school students is being compiled. The index is informed by the European Commission's Digital Competence Framework for Citizens and provided to the Ministry of Education and Science, aiming at an all-encompassing measurement and identification of the key capacities for effective media literacy that students need to gain in the high school level of education.¹⁹⁵

A wider set of media literacy activities beyond the school curriculum are additionally being promoted. For instance, in cooperation with UNICEF and the Office of the European Parliament in Bulgaria, the Media Literacy Coalition organizes annual Media Literacy Days, while the Association of European Journalists – Bulgaria calls attention to the problems of disinformation and the need to support the free exercise of the journalistic profession on World Press Freedom Day.¹⁹⁶

Fighting back against violations on freedom of speech has additionally taken place via **self-organized journalist advocacy** as well as broader (i.e., non-media specialist) collective action. A vivid case in point is related to Bulgarian journalists, who came out in defense of their colleague suspended from the Bulgarian National Radio as a result of political interference, followed by an unprecedented removal of the radio station from the airwaves for more than 5 hours. The joint journalistic protest activity and advocacy gained wide publicity putting pressure on BNR to reinstate the dismissed program host and further raised international awareness of the incident by informing the Council of Europe and receiving support from Reporters Without Borders.¹⁹⁷ Moreover, citizens have organized protests in front of the headquarters of media outlets, including the Bulgarian National Television, demanding an end to politically biased reporting on public television.¹⁹⁸ Bulgarian intellectuals have also repeatedly alerted the

public to the problems of disinformation, particularly on social media.¹⁹⁹

EU Cooperation

EU legislative and policy initiatives in relation to the media sector have been taken up slowly and reluctantly on the national level in Bulgaria, which has circumscribed their effectiveness. Similarly, the opportunity to shape the European debate through the active enunciation of domestically devised policy proposals on fighting disinformation has not been pursued.

The Bulgarian authorities have thus demonstrated **low interest in following through on European measures** for tackling key media issues, including disinformation. A key facet of the EU's strategy to combat disinformation is contained in the Action Plan against Disinformation, whereby a coordinated response is aimed to be forged through the operation of disinformation units in member states that report on malign media activities to Brussels. Yet, the establishment of the unit in Bulgaria was marked by a lack of clarity over personnel and its ability to provide technical capacity and expertise.²⁰⁰ Subsequently, it has not publicly recorded significant activity and there is no information on the number of alerts sent to the EU level.²⁰¹

Bulgaria has not been an active participant in EU debates on online technological platforms' regulation, such as the application of a global or EU-wide digital tax. Parliament has taken a stance only when a position needs to be forged with regard to European proposals, while a commitment from the executive tends to be elicited only when common EU initiatives have to be joined in.²⁰² In dissonance with the vociferous discussions taking place in Europe about 5G (as to whether, in particular, Chinese-sourced equipment should be banned for

¹⁹⁵ Ivanova, I., „Индекс и методика за проучване на умения по медийна грамотност за гимназисти“ [Index and Methodology for Researching the Media Literacy Competences of High School Students], *Media Literacy Coalition*, March 29, 2020.

¹⁹⁶ Slavova, P., „За ученици, учители и родители: Кампания за медийна грамотност“ [For Students, Teachers and Parents: 'Campaign for Media Literacy'], *Dnes.Bg*, February 13, 2020; Association of European Journalists – Bulgaria, „Световен ден на свободното слово“ [World Press Freedom Day], May 3, 2019.

¹⁹⁷ Council of Europe, „Suspension of Bulgarian National Radio Broadcasts Points to Vulnerability of Editorial Independence,” *Platform to Promote the Protection of Journalism and Safety of Journalists*, November 14, 2019; Reporters Without Borders, „Grave Threat to Public Media Independence in Bulgaria,” September 20, 2019.

¹⁹⁸ Mediapool, „Две изненадващи блокади на БНТ, станала е бухалка“ [Two Surprise Blockades of the BNT, Which Has Become a Political Instrument], August 21, 2020.

¹⁹⁹ Barzakova, T., „Армии от тролове налагат екстремни позиции'. Послание на стотици български интелектуалци“ [Troll Armies Impose Extreme Positions'. A Message from Hundreds of Bulgarian Intellectuals], *Svobodna Evropa*, May 22, 2019.

²⁰⁰ Angelov, G., „Правителството създава звено за борба с дезинформацията“ [The Government Is Creating a Unit for Combatting Disinformation], *Dnevnik*, February 19, 2019.

²⁰¹ Raunova, P., „Българското звено за борба с дезинформацията 'работи, ако има време'“ [The Bulgarian Unit for Combatting Disinformation 'Works If It Has Time'], *Svobodna Evropa*, July 29, 2019.

²⁰² Infobusiness, „Цифров данък: Парламентът призовава за облагане на технологичните гиганти“ [Digital Tax: Parliament Called for Taxing the Technological Giants], December 11, 2018; Clubz.bg, „Владислав Горанов иска данък от 'Тугъа', 'Амазон' и 'Фейсбук'“ [Vladislav Goranov Wants to Impose Tax on Google, Amazon and Facebook], September 18, 2017.

security reasons), the Bulgarian public agenda has not featured this issue in a salient way. Indicative of this lack of interest is the fact that, until recently, the Communications Regulation Commission, among some of whose responsibilities is the allocation of 5G network frequencies, served under a board whose term had long expired.²⁰³ Further in line with the inactive Bulgarian approach to tackling disinformation, the country is not a member of the EU and NATO's Hybrid Centre of Excellence, whose key objective is to build participating states' capabilities to prevent and counter hybrid threats.

Overall, coordination between the national and the European authorities has not yielded significant results in the fight against disinformation in the case of Bulgaria. The predominantly non-binding character of EU provisions (often leaving substantial room for national discretion in their application) and the absence of a strong oversight mechanism (vividly dem-

onstrated by the ongoing debate about the criteria according to which European funds should be allocated and monitored in relation to the EU rule of law mechanism) means that only a strong national-level commitment can make full use of EU policy measures. Yet, a sustained commitment on the part of the Bulgarian authorities has not been forthcoming. In addition to the general trend of weak cohesion, instances of dissonance between the national governmental and EU legislative provisions have been observed.

On the other hand, initiatives driven by civil society actors have produced some concrete results, including the promotion and study of media literacy and push-back against politically motivated encroachments on freedom of speech. Civil society in Bulgaria has also been more effective in cooperating and exchanging knowledge with European and certain domestic governmental actors.

²⁰³ Granitska, L., „Старият регулатор на новите технологии“ [The Old Regulator of the New Technologies], *Mediapool*, February 13, 2020.

POLAND

ANTI-DEMOCRATIC NARRATIVES OF RUSSIAN DISINFORMATION

Poland's historically inimical relations with Russia, manifested in the conflict-prone contemporary bilateral interactions, significantly hinder the Kremlin's ability to overtly influence the Polish media landscape. Hence, the most common conduits for Russian disinformation messages are coincidence and common overlapping narratives with local right-wing (extremist) discourses. To explore this trend, four types of outlets have been selected to fulfill the categories of a directly Russian-owned outlet, a partisan source, a broader daily and a mainstream ("control") outlet, with the qualification that overt political and financial ties cannot be identified in the case of the latter three categories.

Sputnik Poland is the Polish-language edition of Sputnik, part of the wider Sputnik agency, controlled and owned by the Russian state.

Najwyższy Czas! is an example of a partisan outlet, having both an online version and printed as a weekly magazine. It has been published since 1990 and has always been linked to conservative-leaning movements and/or political parties. The party that is ideologically closest to the outlet is the right-wing conservative Konfederacja. There are no direct political, economic, or financial ties between the Russian state and the website. However, it must be noted that Janusz Korwin-Mikke, magazine's founder and an active politician whose statements and actions are widely covered in *Najwyższy Czas!*, does openly state many pro-Russian, anti-US, anti-Ukraine, and anti-EU views. Both, he and the representatives of the Konfederacja party, regularly agree to give interviews to the Polish version of Sputnik. For instance, before the last elections to the European Parliament in 2019, 5 out of 7 interviews that were given by Polish politicians to Sputnik were from Konfederacja. The vast majority of publications in *Najwyższy Czas!* are anonymous.

Magna Polonia represents a broader daily with conservative leanings. There are no direct political, economic, or financial ties between the Russian state and the website. The vast majority of publications are ano-

nymized. As in the case of *Najwyższy Czas!*, *Magna Polonia* frequently publishes pieces by right-wing commentators such as Stanisław Michalkiewicz. The outlet often cites *Najwyższy Czas!* and other right-wing sources.

Onet is a Polish internet portal established in 1996 by Optimus and since 2012 controlled by Ringier Axel Springer Polska. It is one of the largest and most influential Polish-language websites. Onet complies with journalistic ethics and rules and has conducted many high-quality journalistic investigations. The outlet may at times exhibit pro-opposition and anti-ruling party leanings. However, unlike the other three outlets, Onet strives at balanced coverage, referring to reputable international and national sources (for instance, it has a license to use the content produced by the Polish Press Agency).

As regards to **commonalities of narration**, Sputnik, *Najwyższy Czas!*, and *Magna Polonia* convey the topic of nationalism via the promotion of illiberal conservative standpoints that extol the virtues of national sovereignty and uphold a Europe of nation-states, whereby the EU should be divested of its supranational competencies. Ukrainian nationalism is discussed as a direct threat to Polish society and Polish national interests, a notion commonly couched in the historical narratives favored by right-wing groups in Poland.

A prevalent narrative in Sputnik holds that the EU will disintegrate within a short space of time.²⁰⁴ It is asserted that the EU has reached the stage where it lacks sufficient resources to manage its extensive territories and the interests of elitist EU institutions gradually deviate the Union from the will of national governments and their societies. The extent of Euroskeptic moods in Polish society is exaggerated by creating the impression that the PolEXIT political party created by former Member of the European Parliament (MEP) Stanisław Żółtek possesses a larger appeal than it actually does.²⁰⁵

²⁰⁴ Sputnik, „Kiedy i dlaczego rozpadnie się Unia Europejska?” [When and why will the European Union collapse?], July 11, 2015.

²⁰⁵ Sputnik, „Kto dzieli pieniądze, ten rządzi. PolEXIT wkracza do gry” [Whoever divides the money, rules. PolEXIT enters the game], January 30, 2019.

In a similar vein, *Najwyższy Czas!* claims that the EU resembles the Soviet Union and is going to share its fate in terms of an upcoming imminent collapse.²⁰⁶ *Magna Polonia* likewise refers to the EU's "dictate" limiting Polish sovereignty by daring to discuss the status of judicial independence in the country.²⁰⁷

Sputnik's coverage denigrates the Ukrainians and depicts them as Nazis,²⁰⁸ enthusiastically commemorating UPA's leaders.²⁰⁹ The UPA was a Ukrainian nationalist paramilitary organization particularly active during World War II. Ukraine is also claimed to be a nation without history established as a German protectorate.²¹⁰ Moreover, Sputnik portrays the Ukrainians as the eternal enemies of Poland, conspiring to resurrect practices reminiscent of the Volhynian massacre²¹¹ (when thousands of Poles were killed by the UPA). Ukrainian emigration to Poland is equated with decreasing wages,²¹² bringing in measles,²¹³ the creation of urban "enclaves" or "ghettos",²¹⁴ and refusal for integration within the Polish society. The outlet further tries to incite border-related disputes, alleging that regional authorities in Ukraine's Lviv object²¹⁵ to the current border and instead claim that the Podkarpacie region has been ethnically Ukrain-

ian.²¹⁶ This allegation references the fact that the region had an ethnically-Ukrainian majority in pre-war Poland.

Najwyższy Czas echoes the historically focused disinformation narratives present in Sputnik.²¹⁷ Click-bait articles that foment the idea that the crisis in Ukraine might spiral into a fully-fledged Third World War, primarily instigated by the US, are taken directly from Sputnik.²¹⁸ *Magna Polonia* similarly peddles the narratives that the authorities of Lviv organize a competition for children to commemorate SS Galizien (a German military division during WW2 consisting mostly of ethnic Ukrainian volunteers from the Galicia region),²¹⁹ local governments display UPA flags,²²⁰ and Ukrainian youth are trained in UPA style camps.²²¹

Sputnik conveys the **theme of migration** primarily through the prism of the presence of Ukrainian migrants in Poland. It is claimed that letting the Ukrainians in Poland represents an act of national treason.²²² More generally, the refugees who come to Europe are

²⁰⁶ Nczas, „Liroy miażdży! „Unia Europejska zaczyna przypominać Związek Radziecki. To był Europejski Obszar Gospodarczy i do tego trzeba wrócić” [Liroy crushes! “The European Union is starting to resemble the Soviet Union. It was the European Economic Area and we have to come back to that], January 13, 2019.

²⁰⁷ *Magna Polonia*, „Unia Europejska znów o „praworządności w Polsce” [The European Union again about the “rule of law in Poland”], April 2, 2021.

²⁰⁸ Sputnik, „ONZ poprze inicjatywę Rosji w walce z gloryfikacją nazizmu” [The United Nations will support Russia's initiative in the fight against the glorification of Nazism], November 18, 2016.

²⁰⁹ Sputnik, „Polska – Ukraina: Czy Zelenskiemu uda się naprawić to, co zniszczył poprzedni rząd?” [Poland-Ukraine: Will Zelenskiy manage to repair what the previous government destroyed?], October 11, 2019.

²¹⁰ Sputnik, „Cienki śpiew Ukrainy” [Ukraine's thin singing], September 6, 2018.

²¹¹ Sputnik, „Wytniemy was wszystkich!” – Ukraińcy znowu grożą rzezią wołyńską” [“We will cut you all down!” – The Ukrainians are threatening the Volhynia massacre again], July 8, 2016.

²¹² Sputnik, „Co myślą Polacy o imigrantach zarobkowych z Ukrainy?” [What do Poles think about economic immigrants from Ukraine?], January 16, 2019.

²¹³ Sputnik, „Odra idzie do nas z Ukrainy” [Measles goes to us from Ukraine], November 10, 2018.

²¹⁴ Sputnik, „„Ukraińskie enklawy”: już co piąty mieszkaniec Łodzi to obcokrajowiec” [“Ukrainian enclaves”: every fifth inhabitant of Łódź is a foreigner], June 24, 2019.

²¹⁵ Sputnik, „Podkarpacie to „etniczne tereny ukraińskie” [Podkarpacie is “ethnic Ukrainian territory”], October 10, 2017.

²¹⁶ Sputnik, „Ukraińskie mrzonki terytorialne: to nie jest śmieszne, to jest tragiczne” [Ukrainian territorial dreams: it's not funny, it's tragic], October 21, 2019.

²¹⁷ Nczas, „Ukraina będzie ukrainizować polskie szkoły. Na razie wzięli się za Rosjan” [Ukraine will Ukrainianize Polish schools. So far they have taken on the Russians], October 6, 2019; Nczas, „Koszmar! Ukraina zasypie nas toksycznymi śmieciami. Przywiozą do Polski tysiące ton trujących odpadów, bo sami nie mają ich gdzie przerabiać” [Nightmare! Ukraine will shower us with toxic garbage. They will bring thousands of tons of poisonous waste to Poland, because they have nowhere to process it themselves], December 30, 2018.

²¹⁸ Nczas, „Politolog: Ukraina będzie punktem zapalnym III wojny światowej. „Ingerowanie w sprawy Ukrainy to w istocie atak na Rosję” [Political scientist: Ukraine will be the flashpoint of World War 3. “Interference in the affairs of Ukraine is, in fact, an attack on Russia”], October 26, 2018.

²¹⁹ *Magna Polonia*, „Ukraina: Władze Lwowa organizują konkurs dla młodzieży ku czci esesmanów z dywizji SS Galizien” [Ukraine: Lviv authorities organize a competition for young people in honor of SS men from the SS Galizien division], April 26, 2018.

²²⁰ *Magna Polonia*, „Ukraina: Coraz więcej samorządów decyduje się wywieszać banderowskie flagi” [Ukraine: More and more local governments are deciding to display Bandera flags], May 21, 2018.

²²¹ *Magna Polonia*, „Na Ukrainie powstaje coraz więcej banderowskich obozów dla młodzieży” [More and more Bandera youth camps are being established in Ukraine], August 22, 2019; *Magna Polonia*, „Ukraina: Na terenie obwodu lwowskiego pojawiły się turystyczne tablice z kompromitującymi wpadkami w angielskim tłumaczeniu” [Ukraine: Tourist boards with compromising bloopers], October 12, 2019.

²²² Sputnik, „Warszawski marsz przeciwko imigrantom z Ukrainy;” [Warsaw march against immigrants from Ukraine], March 20, 2017; Sputnik, „Wpuszczanie do Polski rzesz Ukraińców jest działaniem antynarodowym” [“Letting masses of Ukrainians into Poland is an anti-national action”], June 16, 2017; Sputnik, „Wpuszczanie do Polski rzesz Ukraińców jest działaniem antynarodowym” [“Letting masses of Ukrainians into Poland is an anti-national action”], June 16, 2017.

claimed to kill,²²³ instigate brawls,²²⁴ and bite.²²⁵ The outlet criticizes the alleged “absurdity” of the political correctness practiced by Western elites, who welcome migrants despite the social and economic costs of migration and the contribution of migration to civilizational decline.²²⁶ *Najwyższy Czas* and *Magna Polonia* also argue that “illegal migrants” arrive in Europe to destroy Christian civilization,²²⁷ attack²²⁸ and sexually harass white women,²²⁹ and “rape horses” in city parks,²³⁰ all encouraged by Western elites’ political correctness.²³¹

²²³ Sputnik, „Austria: uchodźca z Afganistanu zabił dwie osoby” [Austria: A refugee from Afghanistan killed two people], October 18, 2019.

²²⁴ Sputnik, „Paryż zmagają się ze skutkami kryzysu migracyjnego – pogrom przy stacji metra” [Paris is struggling with the consequences of the migration crisis – a pogrom at a metro station], April 17, 2016.

²²⁵ Sputnik, „Niemcy: uchodźca pogryzł policjanta i psa” [Germany: a refugee bit a policeman and a dog], August 6, 2019.

²²⁶ Sputnik, „Skandal w Kanadzie: Justin Trudeau oskarżony o rasizm z powodu starych zdjęć” [Scandal in Canada: Justin Trudeau accused of racism over old photos], September 21, 2019; Sputnik, „Facebook zablokował profil pisarza, bo krytykował politykę migracyjną UE” [Facebook blocked the writer’s profile because it criticized the EU migration policy], July 10, 2016; Sputnik, „Facebook zablokował profil pisarza, bo krytykował politykę migracyjną UE” [Facebook blocked the writer’s profile because it criticized the EU migration policy], July 10, 2016.

²²⁷ *Nczas*, „Cała prawda o muzułmańskich imigrantach. Syryjski uchodźca mówi wprost: „Chcą zniszczyć chrześcijaństwo i podbić Europę. Niewierni zasługują by ich zabić” [The whole truth about Muslim immigrants. The Syrian refugee says bluntly: “They want to destroy Christianity and conquer Europe. The infidels deserve to be killed”], October 5, 2018.

²²⁸ *Nczas*, „Uchodźca polityczny” Kasenga Mulenga atakuje kobiety w Europie zamiast w Kongu” [Kaseng Muleng’s “political refugee” attacks women in Europe instead of in Congo], December 21, 2019.

²²⁹ *Nczas*, „Ubogacenie kulturowe w Londynie. Imigrant idzie ulicą ze swoim ***** w garści i próbuje nim dotknąć białą kobietę [VIDEO]” [Cultural enrichment in London. The immigrant walks down the street with his ***** in his hand and tries to touch a white woman with it [VIDEO]], August 24, 2019.

²³⁰ *Nczas*, „Berlin w szoku. Imigrant z Syrii zgwałcił kucyka w Görlitzer Park” [Berlin in shock. An immigrant from Syria raped a pony in Görlitzer Park], November 11, 2017.

²³¹ *Magna Polonia*, „Imigranci zgwałcili w Danii pięć młodych dziewczyn. Matka jednego z nich o ich aresztowaniu: to rasizm” [Immigrants raped five young girls in Denmark. One of them mother about their arrest: it’s racism], July 11, 2018; *Magna Polonia*, „W Hamburgu imigrant odciął głowę rocznej dziewczynce i śmiertelnie dźgnął nożem jej matkę – media otrzymały zakaz informowania o tym” [In Hamburg, an immigrant cut off the head of a one-year-old girl and fatally stabbed her mother – the media is not allowed to report it], July 10, 2018; *Magna Polonia*, „Francja: Imigrant zamordował Żydówkę ale zdaniem sądu nie można go karać bo przed zbrodnię palił marihuanę” [France: an immigrant murdered a Jewish woman, but according to the court, he could not be punished because he smoked marijuana], July 19, 2019; *Magna Polonia*, „Producent cukierków Skittles oskarżony o rasizm” [Candy maker Skittles accused of racism], June 18, 2017; *Nczas*, „Obłąd polityczności. Biały komik oskarżony o rasizm, bo... nosi dredy” [The madness of the political correctness. A white comedian accused of racism because ... he wears dreadlocks], January 16, 2019.

Sputnik, *Najwyższy Czas*, and *Magna Polonia* convey **gender-related topics** in analogous ways. *Sputnik* commentators propound the thesis that Russia, Hungary, and Poland have a lot in common and can jointly face the challenge of “neo-Marxist”, “anti-Christian” and “harmful” ideology.²³² Hungarian Prime Minister Viktor Orbán’s decision to remove gender studies from Hungarian universities is highly lauded by *Sputnik*. Gender policy in the West is said to lead to dire consequences, whereby British school boys and girls are ordered to wear the same uniforms²³³ and the national anthem of Canada is to be altered in accordance with “gender requirements”.²³⁴ *Sputnik* claims that the Poles are overwhelmingly against the “propaganda of sexual deviancies”.²³⁵ Some articles try to undermine the legitimacy of organizations that promote sexual tolerance as they are “financed from abroad”.²³⁶

Najwyższy Czas trains its attention on so-called “pseudoscientists” of gender studies, whose seemingly preposterous demands for gender equality amount to a “mutation of communism”.²³⁷ The EU is accused of imposing gender indoctrination in the form of education grants that can be awarded to schools only under the condition of signing “gender liability declarations”.²³⁸ *Najwyższy Czas* accuses the LGBT community of instigating civil wars,²³⁹ promoting deviant

²³² *Sputnik*, „Obecność gender studies na polskich uniwersytetach świadczy o ich upadku” [“The presence of gender studies at Polish universities proves their fall”], September 20, 2018.

²³³ *Sputnik*, „Wielka Brytania: genderowy zawrót głowy” [United Kingdom: Gender Dizziness], July 3, 2017.

²³⁴ *Sputnik*, „Genderowo neutralny hymn Kanady” [Canada’s gender neutral anthem], February 1, 2018.

²³⁵ *Sputnik*, „Radny PiS o LGBT: „Lesbijki, geje, tam bio tam, coś tam” (wideo)” [PiS councilor on LGBT: “Lesbians, gays, bio there, something there” (video)], June 6, 2019; *Sputnik*, „LGBT czy Rosji: kogo bardziej obawiają się Polacy?” [LGBT or Russia: who are Poles more afraid of?], September 25, 2019.

²³⁶ *Sputnik*, „Kto finansuje ruch LGBT w Polsce” [Who finances the LGBT movement in Poland], October 4, 2019.

²³⁷ *Nczas*, „W odmętach genderowego szaleństwa. Uczona feministka nawołuje do zrównania „praw rozrodczych” krów i kobiet oraz zaprzestania molestowania przy dojeniu” [In the depths of gender madness. Scientist feminist calls for the equality of “reproductive rights” of cows and women and to stop harassment during milking], August 17, 2019; *Nczas*, „Ks. Dariusz Oko wprost o działalności LGBT: „Genderyzm to mutacja komunizmu. Mamy szansę wygrać te wojnę!” [Dariusz Oko about LGBT activity: “Genderism is a mutation of communism. We have a chance to win this war!”], July 24, 2019.

²³⁸ *Nczas*, „Unijne granty tylko na gender! „To namawianie nauczycieli do łamania prawa” [EU grants only for gender! “It’s persuading teachers to break the law”], December 10, 2019.

²³⁹ *Nczas*, „Wojna domowa LGBT. Feministki krytykują osoby transseksualne” [LGBT civil war. Feminists criticize transgender people], July 10, 2018.

behaviors,²⁴⁰ and introducing sexual segregation as it organizes separate cultural events.²⁴¹ The outlet also promotes the disinformation narrative that Western conspiracy plots are being realized, whereby organizations that commit anti-LGBT hate crimes receive foreign financing in order to do so.²⁴²

Magna Polonia chimes in with the coverage of Sputnik and Najwyższy Czas arguing that the last hope for preventing the spread of "LGBT ideology" is placed on families.²⁴³ The LGBT community is similarly accused of absurd demands, such as replacing James Bond with a transsexual person.²⁴⁴ Magna Polonia also reprimands the UK for alleged hypocrisy as it was only in 1988 that the legislation penalizing the promotion of homosexuality was lifted and three decades later an era of "rainbow dictatorship" has already been established.

As regards to **energy issues**, the majority of articles in Sputnik commenting on the case of Nord Stream II treat it either with a neutral approach, solely informing on statistics and legal decisions that favor the construction of the pipeline, or they attempt to present it in a positive light, as the project upholding EU interests with the support of EU governments and Western companies.²⁴⁵ Sputnik does not deny the fact that Poland, together with the Baltic states and Ukraine, strongly opposes the construction of the pipeline. However, it

²⁴⁰ Nczas, „To nie mieści się w głowie! Już niedługo w polskich szkołach? Drag Queen podczas zajęć z dziećmi pokazała swoje genitalia [OBRZYDLIWE VIDEO]” [It is out of mind! Soon in Polish schools? Drag Queen showed her genitals during classes with children [DISGUSTING VIDEO], October 30, 2019.

²⁴¹ Nczas, „Tak działa Deklaracja LGBT w Warszawie! W szkole podstawowej organizują mecz siatkówki dla homo. Rodzice oburzeni” [This is how the LGBT Declaration in Warsaw works! In primary school, they organize a homo volleyball match. Parents outraged], May 26, 2019.

²⁴² Nczas, „Kto finansuje ruchy gejowskie?” [Who funds the gay movements?], August 24, 2014.

²⁴³ Magna Polonia, „Donald Trump przyłącza się do „Miesiąca Dumy LGBT”” [Donald Trump joins "LGBT Pride Month"], June 24, 2019; Magna Polonia, „Protest przeciwko propagandzie LGBT w Gdańsku” [Protest against LGBT propaganda in Gdańsk], June 28, 2018; Magna Polonia, „Chorwaci mówią stanowcze NIE dyktatowi LGBT” [Croats say firmly NO to LGBT dictates], December 23, 2019.

²⁴⁴ Magna Polonia, „Środowiska LGBT domagają się by James Bond był transeksualistą” [LGBT communities call for James Bond to be transgender], January 2, 2019.

²⁴⁵ Sputnik, „Rosja zaprasza do udziału w Nord Stream 2” [Russia invites to participate in Nord Stream 2], May 25, 2018; Sputnik, „Nord Stream 2 będzie ubiegać się o odszkodowanie” [Nord Stream 2 will apply for compensation], February 8, 2018; Sputnik, „Krajom UE nie opłaca się rezygnować z Nord Stream 2” [It is not profitable for EU countries to give up Nord Stream 2], October 26, 2019; Sputnik, „Nord Stream 2 w 50% sfinansują zachodnie spółki paliwowe” [50% of Nord Stream 2 will be financed by Western fuel companies], April 24, 2017.

explains this opposition with the Russophobia of the Polish government, acknowledging that Moscow will not be able to change Warsaw's position. The Polish objective to become independent from Russian gas deliveries is derided as motivated by unhealthy and unreasonable ambitions.²⁴⁶ Sputnik also attempts to denigrate Poland's energy initiatives such as the Baltic Pipe to be built between Poland and Denmark.²⁴⁷ It is claimed that private investors do not express an interest in this idea nor will any bank grant a loan. Sputnik additionally dismisses all legitimate criticisms of Nord Stream II, such as those expressed by the Danish government, as an American manipulation motivated by the US goal to gain total control over the EU's energy security.²⁴⁸ Likewise, Najwyższy Czas portrays Nord Stream II in a seemingly neutral way only citing statistics that support the pipelines' feasibility.²⁴⁹

In addition to the similarities of narration identified between Sputnik, Najwyższy Czas, and Magna Polonia, **differentiations in messaging** can also be observed. Sputnik includes reporting that is mostly concerned with advancing the Russian point of view (rather than discussing in detail domestic Polish developments). The outlet also includes some relatively neutral pieces in its attempt to create the appearance of a mainstream source.

Najwyższy Czas, on the other hand, is especially vehement in its negative representation of migrants. The outlet generates a particularly hostile discourse against Germany on which the whole blame for the realization of Nord Stream II is placed. Berlin is accused of deceiving the EU, acting against other member states' interests, and conducting a self-centered policy detrimental to Warsaw.²⁵⁰ The anti-German narrative is so perva-

²⁴⁶ Sputnik, „Puszkow: „Nie ma sensu wychodzić Polsce naprzeciw w kwestii gazu”” [Pushkov: "There is no point in meeting Poland in terms of gas"], January 30, 2018.

²⁴⁷ Sputnik, „Baltic Pipe skazany na niepowodzenie” [The Baltic Pipe is doomed to failure], February 19, 2018.

²⁴⁸ Sputnik, „Nord Stream-2 w Danii: widać tu rękę Amerykanów” [Nord Stream-2 in Denmark: the hand of the Americans is here], September 3, 2017; Sputnik, „Nord Stream 2 – koszmar Ameryki” [Nord Stream 2 – America's nightmare], June 26, 2018.

²⁴⁹ Nczas, „Nord Stream 2 powstanie bez względu na sankcje. Putin poinformował, że Rosja poradzi sobie własnymi siłami” [Nord Stream 2 will be built regardless of the sanctions. Putin announced that Russia would cope with its own resources], December 26, 2019; Nczas, „Szwajcarzy przerwali budowę Nord Stream 2. Rosja prosi Europę o pomoc” [The Swiss have stopped building Nord Stream 2. Russia is asking Europe for help], December 21, 2019.

²⁵⁰ Nczas, „Niemcy chcą oszukać Unię. Rząd Merkel planuje ominąć dyrektywę gazową i wyłączyć Nord Stream 2 spod europejskiej kontroli” [Germany wants to cheat the Union. Merkel's government plans to bypass the gas directive and exempt Nord Stream 2 from European control], November 6, 2019.

sive that even Russians are portrayed as German/GDR secret agents.²⁵¹ In contrast to Sputnik, the idea of the Baltic Pipe is presented in a positive way as being in line with the Polish national interest, which is argued to be the exact opposite of the German interest.²⁵²

In turn, as a broader daily, *Magna Polonia* includes some more balanced narratives. Articles in the outlet do not advance the position of the EU's imminent collapse, nor do they compare it to the USSR, as Sputnik does.²⁵³

Magna Polonia has published articles calling for reconciliation and cooperation between Poland and Ukraine, citing as examples the agreements to ensure that the Polish minority in Ukraine receive Polish language education,²⁵⁴ the Polish Senate expressing solidarity with the victims of Ukrainian Holodomor, and the Ukrainian permission for the Polish side to carry out exhumations related to the Volhynian massacre.²⁵⁵

Additionally, *Magna Polonia* is not squarely focused on promoting the Russian position, regarding Nord Stream II as an energy project that is beneficial to Europe but blames Germany, which is evident in explicitly biased sensationalist headlines: "No one should be surprised. Our western neighbors made us accustomed to their arrogance"²⁵⁶ or "European solidarity does not mean

anything for Germans when national interests enter the game".²⁵⁷ American sanctions are interpreted with satisfaction as an anti-German policy.²⁵⁸ The Danish policy blocking Nord Stream II is positively received as an example of an independent stance that is in line with Polish interests.²⁵⁹ The Baltic Pipe is presented as a good example of improving the Polish energy sector's independence.²⁶⁰

In contrast to Sputnik, *Najwyższy Czas*, and *Magna Polonia*, all of which exhibit some form of pro-Russian biases, although, in differing degrees and issue areas, the mainstream *Onet* provides coverage of a wider array of (frequently opposing) views and contextualizes claims, thus offering more balanced reporting. For instance, the outlet includes polemical articles on Euroskeptical movements treating them as a problem and accusing them of populism that negatively impacts Poland.²⁶¹ The possibility of EU sanctions imposed on the country as a result of Warsaw's violation of the Union's rule of law principles is conveyed in a neutral manner.²⁶²

Onet also provides an alternative perspective that is critical of Polish actions, reporting on hate crimes committed by Poles against Ukrainians in Poland.²⁶³ The outlet introduces the view that any strife between Poland and Ukraine lies in the interests of the Kremlin, hence ongoing media provocations should be prevent-

²⁵¹ *Nczas*, „To żerowisko dla tajnych służb. Byli agenci budują Nord Stream 2. Duński dziennikarz ujawnił, kto stoi za kontrowersyjną inwestycją” [It is a feeding ground for secret services. Former agents are building Nord Stream 2. The Danish journalist revealed who is behind the controversial investment], December 5, 2017.

²⁵² *Nczas*, „Polska rura konkurencją dla Nord Stream 2. Baltic Pipe ominie niemieckie wody” [The Polish pipe will compete with Nord Stream 2. Baltic Pipe will bypass German waters], June 20, 2018.

²⁵³ *Magna Polonia*, „Unia Europejska doprowadzi do wstrzymania przekopu Mierzei Wiślanej?” [The European Union will stop the excavation of the Vistula Spit?], February 20, 2019; *Magna Polonia*, „Unia Europejska znów o „praworządności w Polsce”” [The European Union again about “the rule of law in Poland”], November 12, 2018.

²⁵⁴ *Magna Polonia*, „Ukraina zagwarantuje polskiej mniejszości prawo do nauczania w języku polskim?” [Ukraine will guarantee the right of Polish minority to teach in Polish?], October 25, 2017.

²⁵⁵ *Magna Polonia*, „Polski Senat wyraził solidarność z Ukrainą w związku z rocznicą Wielkiego Głodu” [The Polish Senate expressed solidarity with Ukraine on the anniversary of the Great Famine], November 21, 2018;

Magna Polonia, „Ukraina pozytywnie odpowiedziała na wniosek Polski o pozwolenie na wznowienie poszukiwań i ekshumacji” [Ukraine responded positively to Poland's request for permission to resume exploration and exhumation], September 27, 2019.

²⁵⁶ *Magna Polonia*, „Niemcy odgrają się, że nikt nie przeszkodzi im w budowie Nord Stream 2” [Germany is threatening that no one will prevent them from building Nord Stream 2], January 18, 2019.

²⁵⁷ *Magna Polonia*, „Angela Merkel podtrzymuje swe poparcie dla projektu budowy Nord Stream 2” [Angela Merkel reiterates her support for the Nord Stream 2 project], August 19, 2018.

²⁵⁸ *Magna Polonia*, „Niemcom jest przykro, że USA nałożyło sankcje na Nord Stream 2...” [Germany is sorry that the US has imposed sanctions on Nord Stream 2...], December 22, 2019.

²⁵⁹ *Magna Polonia*, „Dania nie dopuści do przeprowadzenia Nord Stream 2 przez swoje wody” [Denmark will not allow Nord Stream 2 to pass through its waters], March 29, 2019.

²⁶⁰ *Magna Polonia*, „Dania wydała komplet zgód niezbędnych do budowy gazociągu Baltic Pipe” [Denmark has issued a set of approvals necessary for the construction of the Baltic Pipe gas pipeline], October 26, 2019.

²⁶¹ *Onet*, „Problemem populistycznych rządów Europy są ich stolice” [The problem for Europe's populist governments are their capitals], November 5, 2019; *Onet*, „Sondaże: nowy europarlament bez populistycznej rewolucji” [Polls: New European Parliament Without Populist Revolution], May 24, 2019.

²⁶² *Onet*, „Sasin: nie obawiamy się kar ws. relokacji uchodźców” [Sasin: We are not afraid of penalties regarding the relocation of refugees], May 19, 2017.

²⁶³ *Onet*, „Zbezczeszczenie grobów w okolicach Przemyśla. Środowisko ukraińskie komentuje” [Desecration of graves in the vicinity of Przemyśl. The Ukrainian environment comments], November 13, 2019; *Onet*, „„J***ć Bandere, UPA cw**e” – wulgarne hasła na budynku, w którym pracują Ukraińcy” [“J***ć Bandere, UPA cw**e” – vulgar slogans on the building where Ukrainians work], November 28, 2018.

ed and closely monitored.²⁶⁴ The outlet offers alternative angles to historical events that occurred during the Volhynian massacre, for instance, the cases of Ukrainian peasants who saved the lives of Poles.²⁶⁵

Onet also offers much more balanced coverage of migration issues, yet it too exhibits a leaning toward discourses critical of migrants. The reader is left with the impression of living in a “besieged stronghold” as the numbers of migrants and refugees are dramatically rising.²⁶⁶ Their presence is described in terms of inducing chaos,²⁶⁷ burning asylum centers or committing murders.²⁶⁸ Still, the outlet elaborates on the academic distinction between a “migrant” and a “refugee” and tells the story of a migrant from Mali who saved a child close to falling from a balcony.²⁶⁹

In Onet, discrimination against LGBT communities in Poland is recognized as a fact. The establishment of “LGBT-free zones” and attacks on the equality parade in Białystok are portrayed through the citation of commentaries in international media and qualified as scandalous.²⁷⁰ Onet promotes discussions on ongoing LGBT-related disputes in politics, representing governmental (anti-LGBT) as well as oppositional (pro-LGBT) attitudes.²⁷¹

²⁶⁴ Onet, „Andrij Deszczycia: pogorszeniem stosunków między Polską a Ukrainą najbardziej zainteresowana jest Rosja” [Andriy Deszczycia: Russia is most interested in deteriorating relations between Poland and Ukraine], February 2, 2017.

²⁶⁵ Onet, „Ilu Ukraińców ratowało życie Polakom w czasie Rzezi Wołyńskiej?” [How many Ukrainians saved Poles' lives during the Volhynian Massacre?], June 19, 2019.

²⁶⁶ Onet, „Imigranci obierają nowy cel w Europie. Liczba wzrasta” [Immigrants set a new destination in Europe. The number is increasing], July 17, 2018.

²⁶⁷ Onet, „Chaos na dworcu Keleti w Budapeszcie. Tysiące imigrantów wdarły się do środka” [Chaos at the Keleti train station in Budapest. Thousands of immigrants stormed in], September 3, 2015.

²⁶⁸ Onet, „Grecja: imigranci podpalili ośrodek na wyspie Lesbos” [Greece: Immigrants set fire to a resort on the island of Lesbos], September 29, 2019; Onet, „Niemcy: syryjski uchodźca zabił pracownika poradni dla imigrantów” [Germany: A Syrian refugee killed an immigrant counseling worker], June 7, 2017.

²⁶⁹ Onet, „Imigrant czy uchodźca? Czym się różnią?” [Immigrant or refugee? How are they different?], March 17, 2017; Onet, „Imigrant uratował dziecko. Został bohaterem we Francji” [The immigrant saved the child. He became a hero in France], May 28, 2018.

²⁷⁰ Onet, „Samorządy wolne od LGBT. Co to oznacza?” [LGBT free local governments. What does it mean?], July 31, 2019; Onet, „Światowe media reagują na Marsz Równości w Białymstoku” [World media react to the Equality March in Białystok], July 22, 2019.

²⁷¹ Onet, „Europosłowie głoszą nad “strefami wolnymi od LGBT”. Brudziński: w Polsce na wysokich stanowiskach jest wiele osób o odmiennej orientacji” [MEPs vote on “LGBT free zones”. Brudziński: There are many people of different orientation in high positions in Poland], December 18, 2019; Onet, „Śmiszek o

In relation to energy issues, Onet presents Nord Stream II as an overall threat to Poland's security and economy and publishes a large number of articles focused on the possible prevention of its realization. It equally criticizes Russia for inciting tensions in the region and destabilizing CEE, it also criticizes Germany, which strives to realize the pipeline even in the context of the ongoing Ukrainian crisis (which the building of the pipeline would exacerbate).²⁷²

BEST PRACTICES AND GAPS IN TACKLING DISINFORMATION

Governance framework

The key government institutions that play a role in implementing policies related to propaganda and disinformation in Poland include the Ministry of Digitization, the Ministry of Foreign Affairs, the Ministry of the Interior, and Administration and the Ministry of National Defense.

The functioning of the Polish media is supervised by a number of regulators:

- National Broadcasting Council (*Krajowa Rada Radiofonii i Telewizji*, KRRiT) – supervises radio and television broadcasting (both private and public) by granting licenses and analyzing and reviewing the content of programs. The Council has existed since April 1993 and consists of five members (two appointed by the President, three by the Parliament, two by the Sejm, or the lower house, and one by the Senate, or the upper house).
- Office of Electronic Communications (*Urząd Komunikacji Elektronicznej*, UKE) – assigns and controls frequencies regarding the technical possibilities of broadcasting radio and television programs. Some of its main tasks also comprise of analysis, regulation, and control of the telecommunications market and frequency resource management. The President of UKE is appointed and dismissed by the Sejm at the request of the Prime Minister with a term of office extending to 5 years.

zespole ds. równouprawnienia społeczności LGBT: cieszę się, że ten zespół nie stał się areną dyskryminacyjnych wypowiedzi” [Śmiszek on the LGBT Equality Team: I'm glad this team has not become an arena for discriminatory statements], July 25, 2019.

²⁷² Onet, „Die Welt: Polska jeszcze nigdy nie była tak blisko zatrzymania Nord Stream 2” [“Die Welt”: Poland has never been so close to stopping Nord Stream 2], September 8, 2020.

- National Media Council (*Rada Mediów Narodowych*, RMN) – a collective body appointing and dismissing the management and supervisory boards of the Polish Television, the Polish Radio, and the Polish Press Agency. The Council consists of five members (three elected by the Sejm and two appointed by the President).

As regards legislation, there are **no legal regulations regarding online propaganda or disinformation**. This constitutes a significant legislative gap since the dissemination of disinformation is most intensely carried out by (anonymous) websites simulating the work of news agencies, so-called alternative media, blogging platforms, other niche portals, and individual accounts on social media.

Further, it is through such online sources (most prominently Sputnik Poland) that pro-Kremlin messaging makes its way into more mainstream Polish outlets, often unwittingly republished by journalists. Additionally, the website *Niezależny Dziennik Polityczny* conducted a disinformation operation in April 2020 during the Polish Presidential Election. This website has been accused of having connections with Russian intelligence. A forged open letter was published on the hacked Polish War Studies Academy website, its contents were quickly disseminated in various Facebook groups and by private users. The letter appealed to both left and right opponents of the Law and Justice party (PiS) and called upon Polish soldiers to fight against “American occupation”.²⁷³

Notwithstanding the legal gaps in regulating online disinformation, a number of **policy initiatives** have been advanced **for tackling information threats**. Most of these initiatives focus on fact-checking and media literacy and are usually conducted in cooperation between the Ministry of National Education and the NGO sector. As a result, educational programs for elementary and high school students and teachers have been launched. Media literacy is a core component of the Social Capital Development Strategy of Poland 2020 (*Strategia Rozwoju kapitału Ludzkiego 2020*) and the 2030 Long-term National Development Strategy (*Polska 2030 Trzecia fala nowoczesności. Długookresowa Strategia Rozwoju Kraju*). Teachers, seniors, and youths also benefit from the NASK Research and Academic Computer Network (*Naukowa i Akademicka Sieć Komputerowa*), which im-

plements the European Commission program Safer Internet.²⁷⁴

The state-owned Polish Press Agency (PAP) and GovTechPolska (a Task Force responsible for new technologies and digitization, operating at the Chancellery of the Prime Minister) have launched the #FakeHunter initiative. Its objective is to verify the online content published on the coronavirus pandemic.²⁷⁵ #FakeHunter has reviewed more than a thousand articles²⁷⁶ online and created a solid team of “fakehunters” who regularly verify information. The initiative also collaborates with a number of civil society organizations and companies that support its mission.

The Ministry of Digitization has additionally launched public consultations on forging closer cooperation with technology giants. Discussions focused, for instance, on the initiative of Microsoft²⁷⁷ for the creation of a **Digital Geneva Convention** that would protect civilians and companies from cyber-threats. The initiative has been supported in Poland by the Warsaw Office of the German Marshall Fund of the United States. Facebook has also attempted to foster dialogue with state and non-state representatives.

Lastly, the Polish government, NASK has launched the website *bezpiecznowybory.pl*, which targets fake news and disinformation in election campaigns. Although its activities and scope remain limited, the research output of the website has been steadily increasing in recent years, likely due to the rising relevance of disinformation issues in relation to the European parliament elections of 2019 and the national elections in 2020.

Civil society

Civil societal initiatives for countering disinformation similarly focus on the identification of fake news, promotion of fact-checking, critical thinking programs, and media literacy.

There are a number of online portals and civil society initiatives working on fact-checking initiatives:

²⁷⁴ European Commission, *6.8 Media literacy and safe use of new media*, EACEA National Policies Platform, 2019.

²⁷⁵ #FakeHunter, About the Project.

²⁷⁶ As observed on #FakeHunter’s website.

²⁷⁷ Microsoft on the Issues, “The need for a Digital Geneva Convention,” February 14, 2017; Microsoft News, *Creating a Digital Geneva Convention*, Policy recommendation.

²⁷³ Cryst, E., “Poland Presidential Election 2020,” *Stanford Internet Observatory*, May 8, 2020.

List of Polish internet portals, actively working on disinformation

- Polskie Towarzystwo Edukacji Medialnej – <http://ptem.org.pl/>
- Polskie Towarzystwo Technologii i Mediów Edukacyjnych – <http://www.pttime.pl/>
- Demagog – <https://demagog.org.pl/>
- Konkret24 – <https://konkret24.tvn24.pl/>
- Demaskator24 – <https://demaskator24.pl/>
- Stop Fake Polska – <https://www.stopfake.org/pl/strona-glowna/>
- ANTYFAKE – <https://www.antyfake.pl/>
- Fakenews.pl – <https://fakenews.pl/>
- OKO.press – <https://oko.press/>
- Panoptikon Foundation – <https://en.panoptikon.org/about>
- Wojownicy Klawiatury – <https://www.facebook.com/groups/wojownicyklawiatury>.

Source: CSD.

- Demagog,²⁷⁸ the first fact-checking organization in Poland,²⁷⁹ was established as a tool to verify statements made by politicians in 2014. In recent years, it has expanded its scope to encompass disinformation more generally.²⁸⁰ Alongside its fact-checking efforts, Demagog has also launched a media-literacy academy targeting high-school and university students and has developed a gamified disinformation guide that teaches people how to identify false information online.²⁸¹
- The Center for Government Control Foundation²⁸² (akronym OKO, in Polish) was set up by journalists in 2016. OKO is entirely supported by readers' donations and averages 2000 visitors daily.²⁸³ Fact-checking represents one of the portal's core missions, particularly concerning statements made by politicians and senior government officials.
- Demaskator24²⁸⁴ and Konkret24 date from 2018. Similar to the other fact-checking platforms, both initiatives scan online streams, focusing more on social media disinformation. Where they differ, however, is that both websites are part of big, mainstream media organizations: Polska Press in the case of Demaskator24 and the TVN group in the case of Konkret24. With a slightly different approach than the other platforms, Konkret24 publishes reports in

the form of news articles that are addressing previously-circulating disinformation, as opposed to only labeling individual articles or statements as true/false. Demaskator24, on the other hand, does a combination of both labeling and publishing original articles, while their website also features a so-called "Whistleblower Academy" consisting of a series of videos meant to train users on how to sort and verify information online.²⁸⁵

- StopFake Polska²⁸⁶ is a specialized platform for fighting Russian disinformation. First established in Ukraine by academics in 2014, the organization has won international acclaim, winning several awards and receiving praise from the international mainstream media, such as the New York Times, Deutsche Welle, Politico, and the Financial Times. The website has a Polish version, where it aims to expose and thereby sensitize Polish audiences to Kremlin-manipulated news in Russian about other countries, or about other countries in relation to Poland.
- INFO OPS Poland,²⁸⁷ looks at how information about Poland might be manipulated in foreign media. One of its target audiences seems to be professionals and academics in the field, as their reports are often technical in nature. Further activity is conducted through a Twitter account Disinfo Digest, set up in 2015.²⁸⁸ The account provides daily and more easily digestible updates on Kremlin-produced disinformation, as well as fake news from other countries.

²⁷⁸ Demagog. [What we do](#).

²⁷⁹ Credibility Association. [Project Demagog](#).

²⁸⁰ Demagog. [Methodology](#).

²⁸¹ Demagog. [It's nice that you know!](#)

²⁸² Fundacja Ośrodek Kontroli Obywatelskiej OKO. [About us](#).

²⁸³ Ukrainian Foreign Policy Council. [Poland: Disinformation and Resilience Index](#).

²⁸⁴ Demaskator24. [About us](#).

²⁸⁵ Demaskator. [Whistleblowing Academy](#).

²⁸⁶ StopFake. [About us](#).

²⁸⁷ INFO OPS Polska.

²⁸⁸ Disinfo Digest. [Twitter account](#).

- The Observatory of Media Freedom is a legal program that was launched by the Helsinki Foundation in collaboration with Article 19 and supported by the European Commission.²⁸⁹ Generally, the program provides legal aid, focusing on issues related to the protection of freedom of expression in traditional media and on the Internet. The program also ran a project in collaboration with the University of Warsaw and the University of Maria Curie-Skłodowska titled “Monitoring of threats to free media in Poland and strengthening the control function of local media”.²⁹⁰ Its goal was to further protect the freedom of expression and independence of Polish media, to stimulate public discussion around these issues, and to engage citizens with educational activities, such as citizen journalism and media monitoring.²⁹¹

Apart from platforms that tackle disinformation directly, a number of media literacy initiatives have also sprung up in Poland. These aim to encourage young people to think critically about the information that they are exposed to online, but also to equip them with more specialized tools for processing information. The Digital Olympiad²⁹² (2002 – 2019) was a yearly event organized by the Modern Poland Foundation (*Nowoczesna Polska Foundation*), whose purpose was to address the lack of media education at the high school level. Funded by the Ministry of Education and Sport and the Ministry of Culture, it targeted both students and teachers in order to bring attention to issues such as online security, critical information analysis, and media ethics. Although it has come to a halt and will most likely not be taking place in the coming years, it provides a good example of civil society and the government working together to address a gap in the country’s secondary level curriculum.

However, a key persistent problem characteristic of civil society initiatives aimed at countering disinformation is linked to the still limited conduct of interdisciplinary media research that examines disinformation within the context of a variety of other hybrid warfare issues.

The EU

EU initiatives, such as the Code of Practice against Disinformation and the Action Plan against Disinformation, have not received wide publicity or policy-level attention in Poland. The relevant institutional changes necessary for the implementation of the Action Plan did not take place in a timely and efficient manner. For instance, the creation of the national contact unit for countering disinformation in Poland was not a broadly discussed topic and the decision that it would be located within the Ministry of Foreign Affairs was made public only after the unit had begun its activity. Similarly, the Polish government’s stance on EU policy debates related to the regulation of the operations of technology platforms has not been clearly enunciated, debated, and consulted with civil societal actors.

The Polish authorities’ relative inaction in relation to the implementation and discussion of EU-level initiatives against disinformation has often been shaped by the incumbent Law and Justice party’s unwillingness to accept **EU centralized harmonization of regulations**. For instance, only two days after the European Commission published its proposal for the *Digital Services Act*, Polish government officials announced plans for a draft internet law aiming to regulate social media platforms’ ability to censor profiles and posts arbitrarily.²⁹³ The draft law came in response to the ban on Donald Trump’s Twitter account on the heels of the storming of the U.S. Capitol on the 6th of January 2021, but the timing of its proposal was indicative of the Polish government’s poor view of EU-wide legislation. One possible way to circumvent the negative fallout of such politically driven frictions within the EU is for the EC to improve its strategic communication and appeal directly to Polish civil society.

There are good examples of best practices in tackling Russian disinformation conducted by the embassies of Poland’s international partners. One of the most active entities is the Embassy of the United States in Warsaw. It has supported many NGO activities, including fact-checking, media literacy, and projects for combating hate speech.

On the whole, the Polish government has shown **limited interest in** supporting, participating in, and establishing broad-based **cooperation with civil society** in the name of combating disinformation. A quantitative

²⁸⁹ Resource Centre on Media Freedom in Europe, *Observatory of Media Freedom (Poland)*.

²⁹⁰ Whatchdog, *Monitoring of threats to free media in Poland and strengthening the control function of local media*, 2014.

²⁹¹ Ukrainian Foreign Policy Council, *Poland: Disinformation and Resilience Index*, 2018.

²⁹² Olimpiadę Cyfrową. [Home page](#).

²⁹³ Balkan Insight, “Poland Pushes Law to Limit ‘Censorship’ by Internet Giants,” January 13, 2021.

increase can indeed be observed in the levels of participation of state institutions in initiatives tackling disinformation. However, as a rule, those activities do not involve a broad spectrum of civil society representatives.

In other words, there are too few initiatives aimed to foster a dialogue with different groups of society and the private media. A partial reason for that is the rising political polarization in Poland. Both the ruling coalition and the opposition parties escalate internal political disputes, which spill over into an entrenched division between pro-government and pro-opposition media. This further hinders coalition building

between actors and outlets engaged in tackling (Russian) disinformation. A further negative trend relates to the fact that the President gave control to the government to appoint broadcasting chiefs and civil service directors.

Strategic communication regarding online disinformation and propaganda needs to be enhanced at the Polish state level, as well as the EU level. The current strategic communication activities are not sufficient to make an impact on Polish society, leaving it vulnerable to information threats and further polarization.

THE CZECH REPUBLIC

ANTI-DEMOCRATIC NARRATIVES OF RUSSIAN DISINFORMATION

The analysis of the key Russian anti-democratic messages disseminated in the Czech digital information space has been conducted in four types of outlets exhibiting differentiated degrees of political, economic, and ideological distance from the Kremlin.

Sputnik is an official Russian propaganda outlet. It is directly owned by the Russian state news agency, MIA Rossiya Segodnya, which was founded in December 2013 by an Executive Order issued by Vladimir Putin.²⁹⁴ Rossiya Segodnya is based in Moscow²⁹⁵ but has several regional offices abroad. It is a Federal State Unitary Enterprise²⁹⁶ which means it is both owned and operated by the Russian state.²⁹⁷ According to former employees, it also receives weekly instructions from the Kremlin.²⁹⁸ The online version of Sputnik has been registered in the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) since November 2014.²⁹⁹

Aeronet is an example of an outlet exhibiting various partisan leanings. Some of the starkest evidence of partisan affinities was provided by Aeronet's endorsement of the Freedom and Direct Democracy (SPD)³⁰⁰ party's candidate, Hynek Blaško,³⁰¹ in the run-up to the

European Parliament elections in 2019. Aeronet was originally registered in 2001 as a platform for aviation amateurs,³⁰² then it was deployed by a group of hackers for sharing information. It started operating as a news portal posting pro-Kremlin³⁰³ and disinformation articles³⁰⁴ after the Russian annexation of Crimea.³⁰⁵ The ownership structure of the outlet is unclear. It claims to be published by American European News based in NYC,³⁰⁶ which moved there from its earlier seat in Eindhoven (in the Netherlands). However, Czech investigative journalists could not contact the organization at its former alleged location in Europe.³⁰⁷ Instead, they uncovered the identity of the outlet's editor-in-chief. He uses a pseudonym on the website, but his actual name is Marek Pešl. The website claims to be funded purely by donations.³⁰⁸

AC24 is an example of a broader daily because, apart from disinformation, it also publishes articles³⁰⁹ that are unbiased³¹⁰ and aims to reach a wider audience.³¹¹ Its pro-Russian reporting became evident after the

²⁹⁴ Kremlin, Official Internet Resources of the President of Russia, [Указ о мерах по повышению эффективности деятельности государственных СМИ](#) [Decree on measures to improve the efficiency of state media], December 9, 2013.

²⁹⁵ Sputnik, [О Проекту](#) [About the Project], 2021.

²⁹⁶ Kremlin, Official Internet Resources of the President of Russia, [Указ о мерах по повышению эффективности деятельности государственных СМИ](#) [Decree on measures to improve the efficiency of state media], December 9, 2013.

²⁹⁷ Kremlin, Official Internet Resources of the President of Russia, [Федеральный закон от 14.11.2002 г. № 161-ФЗ](#) [Federal Law of 14.11.2002 No. 161-FZ].

²⁹⁸ EUvsDiSiNFO, ["Three Things You Should Know About RT and Sputnik,"](#) September 11, 2017.

²⁹⁹ Roskomnadzor, "SPUTNIK".

³⁰⁰ SPD (Freedom and Direct Democracy Party) is a right-wing populist party strongly opposing Islam and migration.

³⁰¹ iDNES, [„Osud generála Blaška: velení armádě, rodinná tragédie, cesta do Bruselu“](#) [The fate of General Blašek: command of the army, family tragedy, trip to Brussels], May 27, 2017.

³⁰² Respekt, [„TAJNÝ ŽIVOT JEDNOHO POKLADNÍKA“](#) [The Secret Life of a Treasurer], March 1, 2020.

³⁰³ AENews, [„Molotovová demokracie a hořké plody násilí“](#) [Molotov democracy and the bitter fruits of violence], June 30, 2014.

³⁰⁴ AENews, [„Stane se Česko kvůli bídě členem Ruské Federace?“](#) [Will Czechia become a member of the Russian Federation due to poverty?], July 1, 2014.

³⁰⁵ AENews, [„Domeček z karet se hroutí: Americký uznávaný novinář získal informace, že americká vláda disponuje satelitními důkazy, že let MH17 sestřelila ukrajinská protiletadlová baterie!“](#) [A house of cards is collapsing: A respected American journalist has learned that the US government has satellite evidence that the MH17 flight was shot down by a Ukrainian anti-aircraft battery!], July 21, 2014.

³⁰⁶ iDNES, [„HlídacíPes: Proruský Aeronet.cz změnil svou adresu. Nově má sídlo v Trumpově mrakodrapu na Wall Street“](#) [Watchdog: Pro-Russian Aeronet.cz has changed its address. It is now based in the Trump skyscraper on Wall Street], July 14, 2017.

³⁰⁷ Respekt, [„TAJNÝ ŽIVOT JEDNOHO POKLADNÍKA“](#) [The Secret Life of a Treasurer], March 1, 2020.

³⁰⁸ AENews, Donate.

³⁰⁹ AC24, [„Prymula a jeho projev k národu: Čekají nás opravdu tři složité a neveselé týdny“](#) [Prymula and his speech to the nation: We have really three difficult and unhappy weeks ahead of us], October 13, 2020.

³¹⁰ AC24, [„V Česku i na Slovensku hrozí povodně. Hladiny řek stoupají“](#) [There is a risk of floods in the Czech Republic and Slovakia. River levels are rising], October 14, 2020.

³¹¹ AC24, [„Greta Thunbergová vyzvala k podpoře Bidena v amerických prezidentských volbách“](#) [Greta Thunberg called for Biden's support in the US presidential election], October 11, 2020.

Russian annexation of Crimea,³¹² featuring many pro-Kremlin articles and narratives.³¹³ AC24 is registered by Ondřej Geršl.³¹⁴ Geršl claimed to have started the website because he wanted people to open their eyes and did not want them to be manipulated by mainstream media.³¹⁵ However, in an interview for Coda Story, he admitted the website is not “the most truthful one or the most trustworthy” but that, regardless, he will maintain the outlet for as long as it is profitable.³¹⁶ It is claimed that AC24 is funded by a combination of donations and advertisements.

ČT24 is a mainstream BBC style news service (both online and on TV) operated by Czech TV, which represents one of the main public media outlets in the Czech Republic, offering objective coverage. Czech TV was founded in 1991 as a legal entity independent of the state. According to the outlet's Annual Report from 2019, license fees constituted over 90% of its income, the rest being made up of advertisement, sponsoring, and product placement.³¹⁷

Significant **commonalities of narration and style** are present in the reporting of the three pro-Russian sources (Sputnik, Aeronet, and AC24). **The topic of migration is particularly widely covered** since the beginning of the European migration crisis, which culminated in 2015. It is falsely claimed that there are ever more migrants going into the Czech Republic and that there is a significant increase in migrants who are detained³¹⁸ in the country in an attempt to reach Germany or another Western state. However, in reality, the number of detained migrants dropped significantly between 2015

³¹² AC24, „Co vám Západní média neřeknou: Za připojení k Rusku hlasovali i Krymští Tataři a Ukrajinci“ [What the Western media will not tell you: Crimean Tatars and Ukrainians also voted in favor of joining Russia], April 26, 2018.

³¹³ AC24, „Putin: Chceme zajistit, aby jiné ani nenapadlo zaútočit na Rusko!“ [Putin: We want to make sure that others don't even think of attacking Russia!], March 3, 2020; AC24, „Svědék v místě sestřelu MH17 viděl vojenská ukrajinská letadla“ [A witness at the site of the downing of MH17 saw Ukrainian military aircraft], September 5, 2020.

³¹⁴ Cz.nic, KATEINA-SCHLEIFER.

³¹⁵ MladýPodnikadel, „Ondřej Geršl: Na AC24.cz píšeme tak, jak nám dovolí naše současná úroveň vědomí“ [Ondřej Geršl: We write on AC24.cz as our current level of consciousness allows], April 18, 2014.

³¹⁶ Brokeš, F., “How to build a disinformation business,” *Coda*, February 26, 2019.

³¹⁷ Česká Televize, *Výroční zpráva o hospodaření České televize v roce 2019* [Annual management report Czech Television in 2019], 2020.

³¹⁸ Sputnik, „Nelegálních migrantů v Česku loni přibylo – Ministerstvo vnitra“ [The number of illegal migrants in the Czech Republic increased last year – the Ministry of the Interior], July 26, 2019.

and 2016,³¹⁹ increasing only marginally in the following years.³²⁰

The three pro-Russian outlets also exhibit a fixation on what they refer to as “no-go zones” because of “violent crimes” ostensibly committed by migrants. Migrant-friendly countries such as Sweden,³²¹ Germany,³²² or the United Kingdom are said to have incurred particular damage.³²³ Even as the migration crisis has subsided, the topic of how migrants devastate cities in asylum countries, threaten the local population,³²⁴ and parasitize on the social system³²⁵ represents a constant focus of disinformation articles. Indeed, Sputnik, Aeronet, and AC24 converge on relaying the same events, developments and narratives related to migration, with an identical communication style that is heavily and explicitly biased against migrants.

The pro-Russian outlets discuss and associate migration with the European Union, which is said to be the primary culprit for the influx of migrants. The EU is depicted as dictatorial,³²⁶ undemocratic, and undermining the national interests of the Czech Republic. The redistribution of migrants according to quotas is particularly vehemently denounced. Some narratives border on conspiracy theories. For example, it is claimed that the coronavirus pandemic was caused and accelerated by the EU, which deliberately³²⁷ let refugees

³¹⁹ From 2,564 detained migrants in 2015 to 606 in 2016. Global Detention Project. [Czech Republic: Overview](#).

³²⁰ From 606 detained immigrants in 2016 to 648 in 2017. Global Detention Project. [Czech Republic: Overview](#).

³²¹ Sputnik, „Švédský politik narozený v Sýrii byl zadržen pro podezření z pašování migrantů. Neuhodnete, proč to dělal!“ [A Swedish Syrian-born politician has been detained on suspicion of smuggling migrants. You can't guess why he did it!], January 10, 2020.

³²² Sputnik, „Afghánský migrant v Německu znásilnil 11letou dívku a byl propuštěn. Poslankyně Maříková klade nepříjemné otázky“ [An Afghan migrant in Germany raped an 11-year-old girl and was released. MEP Maříková asks unpleasant questions], July 30, 2020.

³²³ AENews, „VIDEO: Tyto záběry pusťte Hamáčkovi, mouřenín v Manchesteru po zadržení policií!“ [VIDEO: Release these footage to Hamáček, a mourner in Manchester after being arrested by the police!], October 11, 2019.

³²⁴ Sputnik, „Dva migranti z Afghánistánu znásilnili nezletilou dívku v Sofii“ [Two migrants from Afghanistan raped a minor girl in Sofia], October 21, 2019.

³²⁵ Sputnik, „Podvody a manipulace, to je Česká televize.“ Okamura si podal Václava Moravce“ [“Fraud and manipulation, this is Czech Television.” Okamura handed Václav Moravec], May 23, 2020.

³²⁶ AENews, „VIDEO: Tyto záběry pusťte Hamáčkovi, mouřenín v Manchesteru po zadržení policií!“ [VIDEO: Release these footage to Hamáček, a mourner in Manchester after being arrested by the police!], October 11, 2019.

³²⁷ Sputnik, „Orbán přirovnal nelegální migranty k biologické bombě“ [Orbán likened illegal migrants to a biological bomb], August 7, 2020.

spread³²⁸ the disease in order to get rid of the elderly and alleviate mounting pressures on national social security systems.

Attacks on the EU serve as the crucial connecting link among different topics. Brussels' alleged mishandling and ulterior motives in relation to migration are also presented as part of the scheme to destroy the national identities of EU member states. **Nationalism is praised as vital for the survival of the nation.** Parallels are drawn with the historical experience of the Second World War, whereby the EU is likened to Hitler's Germany.³²⁹ Brussels and Berlin are accused of domination³³⁰ aimed at completely subjugating smaller nations.

At the same time, all three pro-Russian outlets present international politics in such a way as to instill the impression that the belligerent force in crises (e.g. in Ukraine and Syria) does not stem from Russia but the West. Efforts are made to polish the "bad image" of Russia at the expense of the EU by portraying the Union as unwilling to establish cooperation with Moscow, for instance this theme was relayed in discussion of the Greek gas deal.³³¹ Sputnik, Aeronet, and AC24 promote a common narrative of the need for closer ties between Czech businessmen and politicians with Russia, which would be beneficial for Czech interests.³³² Notably, the three sources mention and directly refer to Russian pro-governmental media such as Rossiya 24 or NTV when commenting on Czech domestic matters and international politics.³³³

³²⁸ AC24, „Daniel Novák: Koronavirus má všechny charakteristiky biologické zbraně stupně 4, tedy zbraně hromadného ničení“ [Daniel Novák: Coronavirus has all the characteristics of a biological weapon of level 4, ie weapons of mass destruction], February 24, 2020.

³²⁹ AENews, „Juncker poslal vzkaz Okamurovi a Le Penové: „Ti, kdož prosazují bláhový nacionalismus, za to zaplatí!“ [Juncker sent a message to Okamura and Le Pen: “Those who promote foolish nationalism will pay for it!], May 5, 2019; Sputnik, „Současná EU v lečems navazuje na Hitlerův projekt Nové Evropy.“ Okamura obvinil Merkelovou z překrucování dějin“ [“The current EU is a follow-up to Hitler's New Europe project.” Okamura accused Merkel of distorting history], May 30, 2019.

³³⁰ Sputnik, „Místo tanků ekonomické a propagandistické nástroje. Okamura promluvil o eurofederalistech“ [Instead of tanks economics and propaganda tools. Okamura spoke of the Eurofederalists], December 18, 2018.

³³¹ AC24, „Rusko nabídně Řecku nové půjčky a slevu na plyn“ [Russia will offer Greece new loans and a discount on gas], April 7, 2015.

³³² Sputnik, „Čeští podnikatelé promluví o svých zájmech v Rusku“ [Czech businessmen talked about their interests in Russia], November 20, 2017.

³³³ Aeronet, „VIDEO: Ruská televize varovala, že globalisté usilují Donaldu Trumpovi o život“ [VIDEO: Russian television has warned that globalists are seeking Donald Trump's life], September 16, 2016; Aeronet, „VIDEO: Exkluzivní rozhovor prezidenta Miloše Zemana pro ruskou televizi NTV s českými titulky!“

Overlapping pro-Russian narratives are further propagated with regard to energy issues. AC24 condemns western Russophobia and writes about the hypocritical stance of Greenpeace,³³⁴ which is said to purposefully only protest against Russian nuclear power plants. The accusation of behind-the-scenes plotting and double standards is also leveled by Sputnik, which asserts that the US's anti-Nord Stream “propaganda” is meant to serve American energy interests in Europe. Aeronet additionally condemns America for allegedly trying to overthrow Prime Minister Babis, who opposed US-constructed nuclear power plants in the Czech Republic. AC24 takes a historical view, claiming that Chernobyl was staged by the West, while in more recent times it is the EU and Ukraine who should be blamed for potential energy shortages, not Russia.³³⁵

The three pro-Russian outlets also make an association between energy policies, Czech sovereignty, and the consequent need for self-reliance. The major threat to Czech independence is identified as coming from Western companies, which impose norms on the impermissibility of fossil fuels. This, however, is argued to solely support the West's interests and, actually, harm the Czech economy.³³⁶

In contrast to the intensive reporting on the topics of migration, nationalism, and, to an extent, energy, where disinformation is purposefully created throughout the whole year, **the coverage of gender issues is less popular.** Whenever gender forms the subject of articles in the pro-Russian outlets, it is usually in response to an event or discussions taking place outside of the Czech

[VIDEO: President Milos Zeman's exclusive interview for Russian television NTV with Czech subtitles!], December 10, 2018.

³³⁴ AC24, „Plovoucí Černobyl.“ Greenpeace brojí proti ruské plovoucí jaderné elektrárně“ [Floating Chernobyl.“ Greenpeace rebels against Russia's floating nuclear power plant], June 30, 2019.

³³⁵ AC24, „Černobylská havárie mohl být teroristický útok. Tak trochu jiný příběh, než dokumentární série HBO“ [The Chernobyl accident could be a terrorist attack. A bit different story than the HBO documentary series], June 12, 2019.

³³⁶ Aeronet, „Černý scénář kauzy lithium se naplňuje? Australané přestali komunikovat s českou stranou, hrají mrtvé brouky!“ [Is the black scenario of the lithium case happening? Australians stopped communicating with the Czech side and they are pretending to be dead!], March 2, 2018; Aeronet, „Podraz na občany ČR: Vláda v rámci politiky “greténismu” chystá na podzim zákon o uhlíkové dani pro majitele uhelných a plynových kotlů, které si před lety pořídili za evropské dotace v rámci ekologické výměny za úspornější a k přírodě šetrnější kotle!“ [Trick on the citizens of the Czech Republic: In the framework of the “Gretenism” policy, the government is preparing a carbon tax law for owners of coal and gas boilers, which they acquired years ago for European subsidies as part of ecological exchange for more economical and environmentally friendly boilers!], August 23, 2019.

Republic. Yet, media reporting on this topic often fits the pro-Kremlin disinformation narratives.³³⁷ The Russian Federation is extolled as the savior of traditional values fostering a strongly conservative worldview and supporting any anti-gender and anti-LGBT movements. The dissemination of Russian conservative propaganda chimes in with the heavily conservative views that are prevalent in the Czech disinformation scene.³³⁸

Feminism is identified as something evil that discriminates against men and serves as a biopolitical threat to the nation's population growth as it encourages women to not have children.³³⁹ The three pro-Russian outlets also portray members of the LGBT community in a pejorative light, treating them as something unnatural and deviant. They are claimed to be affiliated with pedophilia,³⁴⁰ and, respectively, to feminism, all of which represents a challenge to the population development. Particular attention, including obscene and shocking material, is devoted to transgender people who are treated as the highest form of "evil". Sputnik, Aeronet, and AC24 agree on the fact that "LGBT/gender propaganda" gradually enters Czech schools and is actually imposed by the ruling elites of the Czech Republic in cooperation with the EU, NGOs, and globalist movements.³⁴¹ This is why Czech traditionalists should take decisive steps for the sake of defending "normality". Otherwise, European and Czech civilization will be destroyed. This task does not seem to be that easy as many activists are persecuted by the terror of political correctness, which serves as the main weapon of people spreading "LGBT/gender propaganda".

As for the **stylistic means of message transmission**, a key commonality among Sputnik, Aeronet, and AC24 is the effort made to create the appearance of a reputable news website and the regular publication of original

³³⁷ Jarkovská, L., "The European Union as a child molester: sex education on pro-Russian websites," *Taylor and Francis*, 2019.

³³⁸ AENews, „Soud v Texasu zabránil matce 7-letého syna v provedení změny pohlaví jejího syna Jamese, ze kterého chce udělat dívku jménem "Luna" a otec se dlouho marně dožadoval spravedlnosti!“ [A Texas court has prevented a 7-year-old mother's mother from re-sexing her son James, whom he wants to turn into a girl named "Luna," and the father has long demanded justice in vain!], October 30, 2019.

³³⁹ AC24, „Markéta Šichtařová: Ženy, nechte si zmrazit vajíčka“ [Markéta Šichtařová: Women, freeze your eggs], September 1, 2017.

³⁴⁰ AC24, „Fiala odpálil nálož: Na Prague Pride byla propagována pedofilie. Policie by měla konat“ [Fiala detonated the charge: Pedophilia was promoted at the Prague Pride. The police should act], August 13, 2019.

³⁴¹ AC24, „Propuštěný učitel uvedl, jak neziskovky převzaly výuku ve škole. Multikulturalismus a džungle“ [The dismissed teacher stated how the NGOs took over the school. Multiculturalism and jungle], July 7, 2019.

articles (i.e. articles which are not republished). Further, shared elements in the editorial policy include a deliberate effort to manipulate information by omitting facts, figures, and sources and selecting topics that fit into the Kremlin's propagandist agenda. Pro-Russian outlets are further united by the objective to foster the impression that "mainstream" and public service media are untrustworthy, deceiving, and withholding vital information from the public.

However, there are also differentiations among the three pro-Russian outlets in terms of the **techniques used for message transmission**, despite the substantial overlaps in content. As regards to Sputnik, in 2019, there were several fundamental changes to the outlet's editorial policy. One is the effort to publish apolitical articles for the probable purpose of improving its credibility and widen its audience reach through the discussion of a wide array of topics concerning social issues. In times of political calm, when nothing of importance is happening in international and domestic politics, Sputnik primarily publishes lifestyle articles. The latter usually contain health advice and gossip about celebrities. It is thus only when the perceptions of Czech citizens have to be influenced with regard to an ongoing political development that Sputnik starts churning out propagandistic pieces.

Sputnik also tries to foster an impression of objectivity by increasing the number of articles that do not contain disinformation, as well as by making the propagandistic claims in the articles that do contain disinformation much more subtle and difficult to detect. Hence, the outlet refrains from using outright falsehoods and instead utilizes implicit techniques for shaping attitudes such as incomplete citation of reputable sources, distorted presentation of facts, figures, and statistics, manipulative headlines that sway the intake of the main body of the articles' text.

Aeronet, on the other hand, is dominated by the propagation of conspiracy theories closely following Kremlin narrative lines. Aeronet publishes only roughly 20 articles per month on average, which is a significant difference compared to Sputnik (which publishes over a thousand articles on average per month) and AC24 (350 articles on average per month). This lesser intensity can be attributed to the fact that the outlet publishes original conspiracies, i.e. ones that are not copied from other sources.

AC24 can in turn be seen as a hybrid between Sputnik and Aeronet. It does not match the extent of content

produced by Sputnik but still puts out more pieces than Aeronet. AC24 both copies and translates articles from other sources and produces its own original content. Like Aeronet, AC24 unwaveringly follows the Kremlin's messaging, yet, as part of a further dimension of similarity, its ties to Russian groups and interests cannot be detected and proven. In contrast to the three pro-Russian outlets, reporting on ČT24 heeds **all standards of objective journalism**. The outlet informs about events and developments as they take place rather than pre-selecting specific topics to fit a disinformation agenda.

As regards the EU, ČT24 acknowledges the beneficial aspects of the Czech Republic's membership, such as economic development.³⁴² At the same time, ČT24 avoids the pro-Russian outlets' reproaches against the Union, i.e., referring to an external dictate or infringed sovereignty. And despite recognizing the phenomenon of growing Euro-skepticism among Czech society,³⁴³ Václav Klaus is criticized, among other politicians, for hypocrisy as he disseminates anti-EU discourse despite himself being one of the key political actors who had initially advocated for Czechia's entry into the EU.³⁴⁴

ČT24 promotes a critical perspective in relation to the internal and foreign policies of the Kremlin. For example, it is argued that Putin is masking the grave socio-economic challenges that the Russians are encountering through old-fashioned patriotism.³⁴⁵ Russian actions are also critically portrayed when it comes to the instigation of the war in the Donbas, the annexation of Crimea, and the support for right-wing parties throughout the EU with the objective to undermine democracy.³⁴⁶ An even-handed perspective is advanced with regard to sanctions, which are, on the one hand, presented as

a necessary punishment for Moscow's aggressive behavior while, on the other hand, also acknowledged as harmful to Europe's own economies.³⁴⁷

In a similar vein, ČT24 provides a polemical platform regarding energy issues. It is the only outlet that actually introduces discourses and perspectives on ecology and sustainability,³⁴⁸ not only when referring to the economic advantages of renewable sources of energy, but also by commenting on the need for transforming social behaviors for the sake of saving the planet.³⁴⁹ At the same time, ČT24 acknowledges that in the current economic conditions there is no possibility for a German-style radical transformation of the Czech energy sector, with nuclear power plants being necessary in order to reduce Czech dependency on imported resources and domestic coal.³⁵⁰

Unlike the three pro-Russian outlets, ČT24 portrays migration issues through an unbiased lens, conveying a variety of opinions. For instance, standpoints supportive of migration are quoted, such as the argument that people who flee from wars deserve assistance from the Czech Republic and the EU. Benefits of multiculturalism are also reported on, such as the enrichment of the daily life of Czechs.³⁵¹ Violence is treated as something that does occur but is committed by everyone, not just migrants (such as violent attacks motivated by racism).³⁵² Moreover, policies introduced by the EU or promoted by NGOs and the UN on the need for supporting refugees are not necessarily associated with curbing sovereignty and independence. The fact that the Czech

³⁴² ČT24, „Česko je díky EU bohatší, shodli se Petříček, Bartoš a Pospíšil. Většina lidí ale nebohatne, tvrdí Okamura“ [Thanks to the EU, the Czech Republic is richer, Petříček, Bartoš and Pospíšil agreed. But most people don't get rich, says Okamura], April 30, 2019.

³⁴³ ČT24, „„Jak měl vztyčenou pravici, nešlo chápat jinak než jako hajlování.“ Odvolací soud potvrdil podmínku,“ [“As he had his right hand raised, it could not be understood other than as a hail.” The Court of Appeal upheld the condition], October 17, 2019.

³⁴⁴ ČT24, „„Byli jsme před Brusel, budeme i po něm.“ Český euroskepticismus má v rodokmenu Habsburky“ [“We were before Brussels, we will be after him.” Czech Euroscepticism has Habsburg family tree], May 2, 2019.

³⁴⁵ ČT24, „Politické školení mužstva se vrací do ruské armády. Putin obnovil funkce politruků“ [Political training of the team returns to the Russian army. Putin resumed the functions of politruks], July 31, 2018.

³⁴⁶ ČT24, „Rusko udělalo jasné rozhodnutí, že chce rozložit EU, míní americký historik Timothy Snyder“ [Russia has made a clear decision that it wants to dismantle the EU, says American historian Timothy Snyder], November 24, 2018.

³⁴⁷ ČT24, „Juncker: Pokud nové americké sankce proti Rusku poškodí EU, Brusel na ně odpoví“ [Juncker: If the new US sanctions against Russia harm the EU, Brussels will answer them], August 2, 2017.

³⁴⁸ ČT24, „S Ruskem musíme vycházet, i když se na všem neshodneme, říká finský velvyslanec v Česku“ [We have to get along with Russia even if we disagree on everything, says the Finnish ambassador to the Czech Republic], July 13, 2019.

³⁴⁹ ČT24, „Vedra i sucha budou intenzivnější, varuje OSN. Země nás uživí, ale musíme se změnit, říká český klimatolog“ [The heat and droughts will be more intense, warns the UN. The country will feed us, but we have to change, says a Czech climatologist], August 8, 2019.

³⁵⁰ ČT24, „Nejhorší by byla úplná závislost Česka na plynu, říká nový vládní zmocněnec pro jadernou energetiku“ [The worst would be the Czech Republic's total dependence on gas, says a new government commissioner for nuclear energy], January 10, 2019.

³⁵¹ ČT24, „Jan Sokol: V řadě věcí mohou být křesťanským hodnotám blíží muslimové než Evropané“ [Jan Sokol: In many ways, Muslim values can be closer to Christian values than Europeans], October 5, 2016.

³⁵² ČT24, „Atentátníka ze švédského Trollhättanu vedly k vraždám rasistické motivy“ [A bomber from Trollhättan, Sweden, was motivated by racist motives], October 23, 2015.

Republic, Slovakia, or Hungary oppose migration quotas is portrayed in a neutral way.

ČT24 further presents a completely different perspective on gender in comparison to Sputnik, Aeronet, and AC24. It assesses the moral and economic benefits of policies leading towards gender equality and the prevention of gender discrimination. ČT24 also widely covers feminist and LGBT activism.³⁵³ It directs attention to the problem of violence motivated by gender prejudices and claims that attacks should be prevented by raising societal awareness.³⁵⁴

ČT24 observes the Czech Television Code,³⁵⁵ which sets out the principles according to which public television should operate. The Code is based on the concept of a public service providing access to information, culture, education, and entertainment for all citizens objectively and neutrally. The code states, for example, that “ČT should create a point of reference for all members of society with its programs and support the cohesion of society and the integration of all individuals, groups, and communities; in particular, it must avoid any form of cultural, sexual, religious or racial discrimination and social segregation”.

BEST PRACTICES AND GAPS IN TACKLING DISINFORMATION

The Czech Republic has been the target of intensive disinformation campaigns as part of the hybrid tactics used by the Russian Federation against Western democracies. The dissemination of Kremlin-friendly messages in the Czech Republic is spearheaded by a plethora of disinformation websites.³⁵⁶ The three most popular of them include Parlamentní listy, Aeronet, and AC24, with 8.5, 2.5, and 1 million visits per month, respectively.³⁵⁷

³⁵³ ČT24, „Praha opět hrdne. Festival LGBT začíná, letos se zaměří na rodinu“ [Prague is proud again. LGBT festival begins, this year will focus on family], August 6, 2018.

³⁵⁴ ČT24, „Sexuologové: Přibývá žáků, kteří mění pohlaví. Školy si s nimi často nevědí rady“ [Sexologists: There are more and more pupils who change sex. Schools often do not know what to do with them], September 30, 2019.

³⁵⁵ ČT24, *Kodex České televize – Preambule a výklad pojmů* [Czech Television Code – Preamble and interpretation of terms], July 2, 2003.

³⁵⁶ European Values, „Fungování českých dezinformačních webů“ [Functioning of Czech disinformation websites], July 26, 2016.

³⁵⁷ iHned, „Dezinformacím se v Česku daří. Proruské internetové zpravodajství ovládá pár hráčů, dohromady se vyrovnají největším serverům v zemi“ [Disinformation is thriving in the Czech Republic. Pro-Russian Internet news is controlled by a few players, and together they compete against largest servers in the country], February 14, 2019.

Although a political consensus has formed in the Czech Republic regarding the threats emanating from Russian propaganda, some political parties, such as SPD, the Communist Party of Bohemia and Moravia (KSČM), and even the current President advocate for authoritarian states, such as Russia, and increasingly, China. Hence, political pushback dilutes the initiatives undertaken at the governance level for tackling foreign disinformation. This means that civil society's efforts and cooperation with the EU represent a vital component to the Czech Republic's ability to deal with influence operations.

Governance framework

The terms “disinformation” and “propaganda” are not defined in Czech legislation. However, the dissemination of disinformation is punishable when it falls within the scope of legislative acts that concern hate speech and defamation.³⁵⁸ Similar to Poland, mutually opposing views have emerged in the Czech Republic regarding the regulation of social media platforms. Most of the mainstream parties see the need for content moderation along the lines of the EC's Digital Services Act. But some right-wing parties have introduced draft legislation to actually punish unwarranted content moderation and exclusion.³⁵⁹

In February 2021, the [Ministry](#) of Defense of the Czech Republic developed the **National Strategy for Combating Hybrid Action**,³⁶⁰ which formulates the starting points, the strategic context, the goals, and their subsequent implementation. Disinformation is discussed in the **2017 Defense Strategy of the Czech Republic**,³⁶¹ which specifically mentions the Russian Federation as a country that carries out “targeted disinformation activities and cyber-attacks” on EU and NATO member states. Moreover, the key document that deals with hybrid threats is the **National Security Audit** published in 2016. The Ministry of the Interior took the lead in coordinating the preparation of the audit, soliciting the expertise of over 100 specialists from ministries, the se-

³⁵⁸ Ministerstvo vnitra ČR, *Trestněprávní úprava*, Centrum proti terorismu a hybridním hrozbám [Ministry of Internal Affairs of Czech Republic, Regulation of criminal law, Center Against Terrorism and Hybrid Threats].

³⁵⁹ Hutt, D., “How the right-wing is fighting back against ‘cancel culture’ in the Czech Republic,” *Euronews*, May 11, 2021.

³⁶⁰ Ministry of Defense, *Národní Strategie pro Členění Hybridnímu Působení* [National Strategy for Combating Hybrid Action], 2021.

³⁶¹ Ministry of Defence of the Czech Republic, *The Defence Strategy of the Czech Republic*, April 2017.

curity forces, and the intelligence services.³⁶² The document singles out information warfare as one of the key security threats that the Czech Republic faces and recommends the establishment of a platform that collects information and identifies hybrid operations.

Based on these recommendations, the **Center Against Terrorism and Hybrid Threats** was set up within the Ministry of the Interior, starting its operations in January 2017. It has the mandate to monitor and analyze threats and disinformation campaigns targeting the domestic security of the Czech Republic. The Center also advises the government on cybersecurity and publicly debunks disinformation connected to threats to internal security.³⁶³ During the first half of 2020, the Center disproved some of the most frequent coronavirus-related disinformation narratives, such as claims that the EU has done nothing to deal with the crisis (and even sabotaged other countries' efforts to help) or the widely disseminated claim about the creation of the virus as a biological weapon.³⁶⁴ The Center has been touted as a success in fighting disinformation within the Czech Republic. It has been enabled by its access to classified information, providing the Center with a much more comprehensive insight into the nature and scope of disinformation. In addition, the Center trains civil servants in order to raise their awareness of disinformation threats, it cooperates with relevant state agencies for information sharing and coordinating policy measures, and it communicates with EU institutions.³⁶⁵

Public television and radio broadcasting is regulated by the **Broadcasting Council (RRTV)**, which is elected by the Parliament.³⁶⁶ The Council monitors content and its compliance with norms of neutrality and the presentation of a plurality of perspectives. It also has the authority to impose sanctions, as well as grant, change, or revoke broadcasting licenses.³⁶⁷

³⁶² Vláda České republiky, *Audit národní bezpečnosti* [Government of Czech Republic, National security audit], December 1, 2016.

³⁶³ Ministerstvo vnitra ČR, *Centrum proti terorismu a hybridním hrozbám* [Ministry of Internal Affairs of Czech Republic, Center Against Terrorism and Hybrid Threats].

³⁶⁴ Ministerstvo vnitra ČR, *Koronavirus: Přehled hlavních dezinformačních sdělení*, Centrum proti terorismu a hybridním hrozbám [Ministry of Internal Affairs of Czech Republic, Coronavirus: overview of main disinformation news, Center Against Terrorism and Hybrid Threats].

³⁶⁵ European Values Center for Security Policy, *Kremlin Watch Report – Comparing Lessons Learned from Countering Russian Disinformation in Georgia and the Czech Republic*, 2019.

³⁶⁶ Ministerstvo kultury ČR, *Rada pro rozhlasové a televizní vysílání* [Ministry of Culture of Czech Republic, Council on radio and TV broadcasting].

³⁶⁷ Rada pro rozhlasové a televizní vysílání, *Poslání Rady* [Council on radio and TV broadcasting, Mission of the Council].

Another noteworthy regulation is the **law on conflict of interest**. It states that public officials cannot be radio or television broadcasters or media publishers.³⁶⁸ The question of the relationship between the occupation of public political posting and media ownership has been extensively discussed in the Czech Republic due to the media entanglements of Prime Minister Andrej Babiš. A very influential media house, MAFRA, is part of his trust funds and his alleged influence on reporting has been investigated.³⁶⁹ After the law was approved in 2017, it was soon challenged by President Miloš Zeman, who said it was discriminatory. Additionally, a group of MPs mainly from Prime Minister Andrej Babiš's party, argued it excessively interfered with the property rights of members of the government and restricted their right to do business. After a three-year legal battle, the Czech Republic's highest court rejected the challenge. The Constitutional Court's decision is final and cannot be appealed.³⁷⁰ Besides that, according to Transparency International, Czech authorities in 2019 found the Prime Minister had a conflict of interest in relation to his media holdings based on the law in question. Babiš appealed and Czech authorities are currently reviewing the case. The European Commission in the meantime also ordered an investigation and a leaked preliminary report stated that Babiš still has great influence over Agrofert (the parent company of MAFRA). In November 2019, all payments from the EU budget to companies directly or indirectly owned by PM Babiš were suspended. The EU Commission's formal investigation has been ongoing since January 2019.³⁷¹ Furthermore, during the course of a fact-finding mission in Prague, members of the European Parliament independently found that a conflict of interest exists. In a resolution, adopted in June 2020 by 510 votes in favor, 53 against, and 101 abstentions, the European Parliament called for potential conflicts of interest to be resolved and for the names of final beneficiaries of EU funds to be declared.³⁷²

³⁶⁸ *Zákony pro lidi, Zákon č. 159/2006 Sb., Zákon o střetu zájmů* [Law on the conflict of interests].

³⁶⁹ iRozhlas, „Přestupek proti střetu zájmů se neprokázal. Přechtěte si rozhodnutí hejtmanství i Černošic o Babišovi“ [The offense against the conflict of interests has not been proven 'Read the decision of the governor's office Černošice about Babiš'], September 30, 2019.

³⁷⁰ Radio Prague International, “Top court rejects challenge to conflict of interest law “targeting Babiš,” February 19, 2020.

³⁷¹ Transparency International, “European Commission confirms Czech prime minister Andrej Babiš has conflict of interest,” June 5, 2019.

³⁷² European Parliament Press Release, “Czech PM: MEPs call for conflicts of interest involving EU funds to be resolved,” June 19, 2020.

The Law on Radio and Television Broadcasting, which defines the role of the Broadcasting Council, also limits cross-ownership in the media landscape. The law states that no nationwide television broadcaster may possess any ownership stake in the business of any other nationwide television broadcaster.³⁷³ The same applies also to radio broadcasters.

Advertising is also regulated. For example, it is forbidden for advertisements to include discrimination of any kind. The supervisory body (in the case of broadcasting, this body is the Council) can order the removal or termination of unlawful advertising.³⁷⁴

Civil society

Media literacy initiatives pioneered by civil society actors took place even prior to the Russian aggression in Ukraine (which represented a watershed moment in the intensification of the information warfare waged by the Kremlin). For instance, the Czech humanitarian organization People in Need launched a campaign called One World in Schools in 2001.³⁷⁵ aiming to raise the media literacy skills of both students and teachers through the distribution of educational projects.

For their part, state authorities should be a lot more active in the sphere of media literacy education. Even though Czech elementary and middle schools have been obliged to offer media literacy courses since 2007, according to a study from 2017,³⁷⁶ most high school students still received fewer than 10 hours of media literacy lessons during their studies. This is because schools are ultimately free to decide on the extent to which media literacy is included in their curricula. Further, the Czech Ministry of Education has not issued any materials or additional support for teachers, many of whom, themselves, never received any education in media literacy. In light of this, the materials provided by the One World campaign are therefore highly appreciated.³⁷⁷

³⁷³ Act No. 231/2001 of 17 May 2001 on Radio and Television Broadcasting Operation and on Amendments to Other Acts.

³⁷⁴ *Zákony pro lidi, Zákon č. 40/1995 Sb., Zákon o regulaci reklamy a o změně a doplnění zákona č. 468/1991 Sb., o provozování rozhlasového a televizního vysílání, ve znění pozdějších předpisů* [Act on the Regulation of Advertising and on Amendments to Act No. 468/1991 on the Operation of Radio and Television Broadcasting].

³⁷⁵ Jeden svět na školách, „Co je to JSNS?“ [What is JSNS?, One world in schools].

³⁷⁶ Stavinohová, A., „Media Literacy in Czech Schools: Healing a Broken Promise“, *University of New York in Prague*, n.d.

³⁷⁷ Aneta Stavinohová, A., „Media Literacy in Czech Schools: Healing a Broken Promise“, *University of New York in Prague*, n.d.

Several other non-governmental organizations are focusing on the issue and are partially able to fill the role that should be played by the education system.³⁷⁸

In 2002, the Prague Security Studies Institute was established to defend and strengthen the individual freedoms and democratic institutions of Central and Eastern European countries, as well as shed light on emerging unconventional threats emanating from authoritarian governments that challenge the transatlantic alliance.³⁷⁹ It regularly publishes newsletters and studies focusing on multiple aspects of security (such as space, energy, or economic security). It also launched projects and initiatives concentrating on Russian influence activities in Central and Eastern Europe. For example, in the run-up to Czech parliamentary and presidential elections, the Institute initiated projects aimed at monitoring articles on disinformation websites during the election campaign.³⁸⁰

Civil society has doubled down on combatting disinformation since Russia's annexation of Crimea in 2014. Many non-governmental initiatives were launched, some of which have since proven effective in tackling disinformation.

The European Values Center for Security Policy launched its Kremlin Watch Program in 2015. It provides fact-checking and regular reports on the spread of disinformation and foreign influence in the Czech Republic. For instance, the Kremlin Watch Strategy from 2019 was co-signed by members of several European institutes, such as the Polish Institute of International Affairs, the Center for Eastern Studies, or STRATPOL (the Strategic Policy Institute).³⁸¹

Another initiative, the Endowment Fund for Independent Journalism was created in 2016. According to its founders, it was established in response to the unfolding “dramatic changes in independent journalism worldwide”.³⁸² Among other projects, it publishes a credibility rating of Czech digital media. This rating composes several benchmarks related to editorial eth-

³⁷⁸ Vinklová, J., „Czech Student Initiatives Focused on Media Literacy“, *ISANS*, May 29, 2020.

³⁷⁹ Prague Security Studies Institute, *Mission Statement*.

³⁸⁰ Prague Security Studies Institute, „Czech Election in the Era of Disinformation“.

³⁸¹ European Values Center for Security Policy, „Kremlin Watch Strategy“, December 3, 2019.

³⁸² Nadační fond nezávislé žurnalistiky, „Proč jsme vznikli?“ [Endowment Fund for Independent Journalism, Why were we created?].

ics, financing, and ownership.³⁸³ It also provides grants for the development of quality journalism.

In October 2016, the Association for International Affairs launched the Czech version of the originally Ukrainian website StopFake.org, which focuses on fact-checking and debunking disinformation related to the situation in Ukraine.³⁸⁴

The Department of Political Science at the Faculty of Social Studies at the Masaryk University prominently executes disinformation-connected projects. These can include videos,³⁸⁵ publications,³⁸⁶ or comments explaining current disinformation campaigns.³⁸⁷ Students from the Masaryk University launched the initiative *zvol.si.info* in 2016, which concentrates on tackling disinformation and media literacy.³⁸⁸ Another similar project is *stuzak.cz*, which organizes workshops on various topics including critical thinking.³⁸⁹

The anti-corruption organization Transparency International Czech Republic has also published articles and visual material about media ownership³⁹⁰ and have further promoted media literacy and counter-disinformation initiatives.³⁹¹

The Nelež civic initiative³⁹² represents an association that brings together professionals who have long been involved in communication, working with data, or dealing with the media. Their aim is to limit the spread of disinformation by suspending their funding avenues. Disinformation sites often draw on advertising revenue.

By cutting off these websites from such sources of revenue, they help prevent disinformation and, conversely, strengthen trust in the media outlets that work professionally and responsibly with information. The association approaches companies that advertise on disinformation sites (often unwittingly) to remove their ads and deprive disinformation sites of their earnings.

The EU

The Czech Republic has demonstrated support for some of the EU's initiatives for tackling disinformation, particularly as a result of the activeness of individual Czech representatives in the EU. Prague was among the countries that actively endorsed the Action Plan against Disinformation. Notably, Věra Jourová, the Czech EU Commissioner for Justice, Consumers, and Gender Equality, took part in the drafting of this Action Plan.³⁹³ Currently, as Vice President of the European Commission for Values and Transparency, Jourová has been actively involved in the creation of the Democracy Action Plan. Additionally, Prague has continuously been represented at the European External Action Service's StratCom.

However, as regards to the EU's Code of Practice on Disinformation, there was no major reaction on the part of the Czech public or the majority of politicians. It was primarily Senator Pavel Fisher who subscribed to the creation of the Code and emphasized its importance.³⁹⁴

The Czech Republic advocates for and supports the EU's proposals for the regulation and digital taxation of technology companies. Prague even introduced its own initiative for taxation in 2019 after discussions of the issue stalled at the European level. The government has agreed on a taxation of up to 5 percent, but the decision has yet to be passed by the Parliament.³⁹⁵ However, the Czech Republic is allegedly prepared to abolish this tax once there is a transnational solution at the OECD level.³⁹⁶

³⁸³ Nadační fond nezávislé žurnalistiky, „Hodnocení médií“ [Ranking of media], April 30, 2020.

³⁸⁴ Asociace pro mezinárodní otázky, „AMO spouští českou verzi webu StopFake“ [Association for International Issues, AMO will release Czech version of StopFake web], October 18, 2016; StopFake, *O nás* [About us].

³⁸⁵ Masarykova univerzita, „Jak fungují dezinformace? Vysvětlí nová videosérie“ [How does the disinformation work? New series will explain], February 14, 2019.

³⁸⁶ Masarykova univerzita, „Informace, dezinformace a informační etika“ [Information, disinformation and informing ethics], November 6, 2018.

³⁸⁷ Masarykova univerzita, „Dezinformace můžou nakazit jako vir. Braňte se jim stejně jako nemocí“ [Disinformation can infect like virus. Defend against it like disease], March 18, 2020.

³⁸⁸ Zvol.si.info, *Kdo jsme* [Who are we].

³⁸⁹ Stuzák, *Workshopy*.

³⁹⁰ Transparency International, „Rozkrývání majetkových struktur médií“ [Revealing financial assets of media structures], December 2, 2019.

³⁹¹ Transparency International, „Téma: Mediální gramotnost a přístup k informacím“ [Topic: Media literacy and access to information].

³⁹² Nelež Website.

³⁹³ Senát Parlamentu ČR, „Akční plán proti dezinformacím“ [Senate of the Parliament of Czech Republic, Action plan against disinformation].

³⁹⁴ Lidovky.cz, „EU vyhlásila válku fake news, přidá se i Česko. Fakta bude ověřovat mezinárodní síť expertů“ [EU declared war against fake news, Czechia will join as well. Facts will be verified by international net of experts], January 28, 2019.

³⁹⁵ „Reuters, Czech coalition agrees 5% digital tax aimed at global internet giants,” June 10, 2020; Yahoo Finance, “U.S. trade chief readies tariffs against six countries over digital taxes,” March 26, 2021.

³⁹⁶ ČT24, „Česko zruší digitální daň, jakmile bude nadnárodní řešení, říká ministerstvo financí“ [Czechia will repeal digital tax as soon as there will be a transnational solution, says the Ministry of Finance], June 3, 2020.

Despite the variety of counter-disinformation activities that have been taken up on the governance, civil society, and EU level, remaining gaps and the need to foster greater coordination among policy-makers, CSOs, and European officials should continue to be addressed. In particular, there should be a much more decisive legislative push providing a clearer definition as to what constitutes disinformation and the legal measures through which its dissemination is regulated. State intelligence services should consistently monitor and prevent disinformation campaigns targeting public service media. This is because public service media is the most trusted form of media in the Czech Republic and therefore represents a key national security asset. The position of the Broadcasting Council could also be strengthened by requiring both applicants and existing holders of broadcasting licenses to provide information about ownership that should be available in a publicly accessible registry.

Moreover, although civil society actors have undertaken robust action for tackling disinformation, wider and better-integrated initiatives are still needed to

counteract the deluge of Russian disinformation on the Czech online space. For instance, it is necessary to expand existing projects, such as *Demagog.cz*, to enable fact-checking on a day-to-day basis.³⁹⁷ The government should additionally increase available funding for civil society initiatives in the sphere of journalism. Media literacy education, for its part, should be taught in a much more comprehensive manner in schools. It is also of paramount importance to investigate and expose the individuals that operate anonymized disinformation websites. Specifically, investigative journalists should regularly work on uncovering the background of disinformation websites.

Given their disproportionate influence on public discussions, technological giants should step up their cooperation with fact-checking organizations. A case in point is Facebook's expansion of its fact-checking program to the Czech Republic. Yet, tech companies need to further increase their monitoring capacities in Czech, as well as all the other minority languages in order to improve their ability to tackle the international issue of disinformation campaigns.

³⁹⁷ Demagog, [O nás](#) [About us]. Demagog.cz is an independent fact-checking organization focusing on factual statements made by politicians.

GERMANY

ANTI-DEMOCRATIC NARRATIVES OF RUSSIAN DISINFORMATION

Germany represents a critical target for Russian disinformation by virtue of its sheer influence in Europe, as well as the country's own political and societal susceptibilities to Kremlin messages and initiatives.³⁹⁸ Despite the overall public trust in and democratic resilience of the German mainstream media, the dissemination of pro-Russian anti-democratic messages is visible in outlets that are related to the Kremlin. Hence, four media sources of differentiated political, economic, and editorial distance from Russia have been selected for content analysis.

Russia Beyond exemplifies an outlet that is directly owned by the Russian state. The German-language edition was initially distributed as a monthly insert in *Süddeutsche Zeitung*, and later in *Handelsblatt*, before starting to operate in a self-standing manner as an online outlet.

Compact magazine is a strong supporter of the right-wing populist party Alternative for Germany (AfD) and anti-Islamic Patriotic Europeans against the Islamization of the Occident (PEGIDA). Jürgen Elsässer, the Editor-in-Chief of the magazine, is a political activist of the New Right (*Neue Rechte*), a far-right movement that promotes ethnic nationalism. Elsässer is an outspoken supporter of Vladimir Putin and his policies. This was especially true during the 2014 annexation of Crimea and Russia's war against Ukraine.³⁹⁹ Elsässer was known as a radical leftist activist linked to the communist league, yet with the foundation of Compact in 2010, he chose to reposition himself in the far-right domain. Compact serves conspiracy theories and has strongly attacked Chancellor Angela Merkel in the context of her migration policy. It has become the mouthpiece of right-wing populists like AfD and PEGIDA, particularly as part of the refugee debate

since 2015.⁴⁰⁰ In cooperation with the Russian House of Science and Culture in Berlin, a nonprofit funded by the Russian foreign service, Compact has organized conferences and book presentations, which bring together pro-Russian actors promoting deeper cooperation between Germany and Russia.⁴⁰¹

NachDenkSeiten represents a broader daily that was founded as a watchblog in 2003 by the former SPD (Social Democratic Party of Germany) politician Albrecht Müller. NachDenkSeiten developed as a platform that favors social democratic and trade unionist positions while criticizing neoliberal economic and culturally conservative trends in mainstream German and European politics and media. The magazine reaches out to the German middle class and unites different circles of German intellectuals. In regard to Russia, NachDenkSeiten traces its ideological roots to the social democratic New Ostpolitik, coined by former German Chancellor Willy Brandt as a policy of "change through rapprochement" with the Soviet Union. Therefore, NachDenkSeiten promotes good relations with Russia, which is accompanied by a skeptical attitude towards the US's role in European politics.

Süddeutsche Zeitung is a representative of the German mainstream media and serves as a "control" outlet in the content analysis. It is one of the major German national newspapers, which represents traditional journalism, providing a variety of journalistic perspectives. It maintains a large cohort of correspondents around the world (including Russia) and is a leading opinion-maker in Germany. *Süddeutsche Zeitung* aims to promote a balanced coverage of developments in Russia with a more critical stance towards the Putin regime, informed by quality analyses.

The three pro-Russian outlets share a number of **commonalities of narration and style**. It is above all claimed that there is widespread "Russophobia" in mainstream Western media, which drives German and EU policy towards Russia, a central Krem-

³⁹⁸ According to a report from the European External Action Service, Germany is the main focus of Russian disinformation in the EU: EUvsDisinfo, „Vilifying Germany, Wooing Germany,” March 9, 2021.

³⁹⁹ Prizkau, A., „Ist halt so, ist die Wahrheit!” [That's just how it is, it's the truth!], *Frankfurter Allgemeine Zeitung*, December 9, 2014.

⁴⁰⁰ Müller-Mertens, M., „AfD schließt sich EU-Reformisten an” [AfD joins EU-reformists], *Compact*, December 6, 2014.

⁴⁰¹ Korn, T., and Umland, A., „Jürgen Elsässer, Kremlpropagandist,” [Jürgen Elsässer, Kremlin Propagandist], *Zeit Online*, July 19, 2014.

lin narrative. This policy is ostensibly fueled by the US, whose ultimate geopolitical aim is to drive a wedge between Europe and Russia. A second narrative, which unites all three outlets, is that it is the US and NATO who always attack Russia and not vice versa. The “evidence” this line of narrative points to is NATO’s deployment of troops close to the Russian border with the Baltic states and Washington’s support for “the fascists” in Kiev.

A third common narrative rails against globalization and the dominance of the US-driven neoliberal economic model. Anti-globalization arguments are linked to antisemitic stereotypes, whereby big capital and George Soros want to own the world.⁴⁰² Moreover, the reasons for the migration crisis are argued to be supposedly caused by the global neoliberal economic model alongside the inability of the EU to control its borders and conduct an independent policy. In general, Russia Beyond reports on how Russia has found a way to live peacefully with its Muslim communities, whereas, according to Compact, the EU, has simply let the “terrorists” in. Therefore, both publications agree that a sovereign nation-state capable of protecting its citizens is needed and that Putin’s Russia provides a model for such a society. All three pro-Russian outlets further extol conservatism, as practiced in Russia. Moscow’s traditionalist-conservative model is presented as the best alternative to Western liberalism economically, socially, and in terms of foreign policy conduct.

In addition to the similarities among the pro-Russian outlets, **distinctions in narration and style** can also be identified. As regards to the theme of nationalism, Compact argues that Russia has the right to protect Russians in Crimea as the Crimeans democratically decided that they want to belong to the Russian Federation.⁴⁰³ Moreover, it is claimed that Moscow has the right to retaliate since the US and NATO are provoking Russia by deploying weapons close to its border.⁴⁰⁴

⁴⁰² Compact, „So geht Demokratie: Bundestag lehnt Petition gegen Migrationspakt ab“ [That’s the democratic way: Bundestag votes down petition on migration pact], October 24, 2018; Homilius, K., „UN-Migrationspakt: Bevölkerungsaustausch in Europa“ [UN migration pact: population exchange in Europe], *Compact*, December 9, 2019.

⁴⁰³ Dassen, M., „3. COMPACT-Konferenz „Frieden mit Russland“ am 22. November 2014“ [Third Compact-Conference “Peace with Russia” on 22 November 2014], *Compact*, November 22, 2014.

⁴⁰⁴ Dassen, M., „3. COMPACT-Konferenz „Frieden mit Russland“ am 22. November 2014“ [Third Compact-Conference “Peace with Russia” on 22 November 2014], *Compact*, November 22, 2014.

NachDenkSeiten places a focus on the supposed deluge of propaganda against Russia in the German mainstream media. A report by Human Rights Watch on Russia is described as Western disinformation.⁴⁰⁵ This is claimed to be evidence of the need for alternative reporting.⁴⁰⁶ A major example of the demonization of Russia is identified in reporting on the Skripal poisoning in the UK,⁴⁰⁷ whereby it was the (then) British Foreign Secretary Boris Johnson and German Foreign Minister Heiko Maas that spread conspiracy theories, not the Russian government.⁴⁰⁸ The negative depictions of Russia during the 2018 Football World Cup are said to be yet another instance of Russophobic reporting.⁴⁰⁹ Overall, it is claimed that there is anti-Russian xenophobia in the mainstream media, which is presented as having a long and uninterrupted tradition in Germany dating back to Nazi times.⁴¹⁰

NachDenkSeiten also maintains the claim that mainstream experts and media in Germany are biased in their reporting on Ukraine.⁴¹¹ The mainstream discourse by politicians and experts is supposedly a binary presentation of a good West vs. an eternally bad Russia.⁴¹² The main Western goal is aimed at regime change, first in Ukraine and then in Russia.⁴¹³ Putin restored Russian

⁴⁰⁵ Riegel, T., „Human Rights Watch: Menschenrechte und Meinungsmache“ [Human Rights Watch: Human rights and opinion-forming], *NachDenkSeiten*, January 18, 2019.

⁴⁰⁶ Berger, J., „Fake-News werden maßlos überschätzt“ [The “case of Lisa” has no end and parts of the media simply don’t learn it], August 1, 2017.

⁴⁰⁷ Berger, J., „Nowitschok, Skripal und eine britische Regierung, die sich immer mehr in Widersprüche verstrickt“ [Novichok, Skripal and a British government that is becoming increasingly entangled in contradictions], *NachDenkSeiten*, March 19, 2018.

⁴⁰⁸ Berger, J., „Fall Skripal – Sanktionen, Lügen, Eskalation und 64 offene Fragen“ [Case Skripal – sanctions, lies, escalation and 64 outstanding issues], *NachDenkSeiten*, April 4, 2018.

⁴⁰⁹ Elsässer, J., „Die heutige Eröffnung der WM: heißer Sommer im Kalten Krieg?“ [Today’s opening of the World Cup: hot summer in the Cold War?], *Compact*, June 14, 2018; *NachDenkSeiten*. „Rote Karte für unsere Medien in ihrem Match gegen Russland? Teil 1: Russland ist ganz anders“ [Red card for our media in their match against Russia? Part 1: Russia is completely different], July 10, 2018.

⁴¹⁰ Müller, A., „Russen-Hass und die Möglichkeit der Aufklärung“ [Hatred of Russians and the Possibility of Enlightenment], *NachDenkSeiten*, December 18, 2014.

⁴¹¹ Korinthe, S., „Ukraine: Der Qualitätsjournalismus versagt“ [Ukraine: Quality journalism fails], *NachDenkSeiten*, January 31, 2014.

⁴¹² Müller, A., „Vom Abbau der Konfrontation in Europa zum Wiederaufbau der Konfrontation. Die Toten von Kiew sind die Opfer dieses Wahnsinns“ [From dismantling the confrontation in Europe to rebuilding the confrontation. The dead in Kiev are the victims of this madness], *NachDenkSeiten*, February 19, 2014.

⁴¹³ Braun, R., and Wernicke, J., „Die Antwort der Münchner Sicherheitskonferenz lautet: Noch mehr Militarismus“ [The answer of the Munich Security Conference: Even more militarism], *NachDenkSeiten*, February 9, 2015.

statehood, he fought oligarchs, and follows a policy of preserving traditional values. Yet, Russia without Putin would descend into chaos.⁴¹⁴ Germany should therefore stand for dialogue with the Kremlin, which, together with China, fights against the hegemonic dominance of the USA, NATO, and the IMF.⁴¹⁵

Russia Beyond forcefully and repeatedly argues that the referendum in Crimea was an expression of the will of the people. Russian interference was a reaction to crimes perpetrated against the Russian-speaking minority in Ukraine.⁴¹⁶ Ukrainian nationalists ignore the country's historical and cultural roots, which are inextricably linked to Russia.⁴¹⁷ The outlet promotes an ever more insistent criticism of German elites, which are described as aggressive neoliberal Atlanticists. In contrast, Moscow promotes international conflict resolution via multilateral cooperation instead of the imposition of sanctions motivated by ill intent. Moscow does not interfere in the domestic affairs of other states, unlike the West, which is meddling in Russia by funding Kremlin-critical NGOs. Hence, the foreign agents law is crucial for Russian security.⁴¹⁸

Russia Beyond further features a significant number of articles, which juxtapose traditional Russian morality and values to Western liberal depravity.⁴¹⁹ The outlet also opposes Western attempts at the ostensible reinterpretation of World War II and defends the sanctity of the memory of Russia's great victory.⁴²⁰

The theme of **migration** is key to Compact magazine's target group of right-wing populists and their sympathizers for whom the migration crisis of 2015 has become a major topic of discussion and director of attempts to exert political influence. The articles in the outlet focus

on denouncing the supposed ever-growing Islamization of Germany (a trend that is said to be particularly visible in the increasing number of women wearing hijabs).⁴²¹ The children of migrants are suspected of retaining their primordial identities and therefore are incapable of becoming true German patriots and fully integrate into German society. Moreover, Compact asserts that the level of education of migrants is low and, hence, the overall standard of intelligence in Germany is going down. The book of Thilo Sarrazin,⁴²² a former SPD politician who publishes about how German society is destroyed by Muslims and migrants because of their level of intelligence, has been very prominently quoted and discussed in several articles in Compact.⁴²³

The conclusion reached by Compact is that the threats posed by migration underscore the need for a homogenous society. The term "lying press" has gained popularity among right-wing populists and is frequently used against the mainstream media.⁴²⁴ The silence imposed on reporting about the Islamization of German society is criticized and it is maintained that the German state has surrendered its duty to protect its own citizens. The "conformist press" thus ultimately supports EU "dictatorship" and US imperialism, whose goal is to deplete the national identity of European nation-states through migration.

A large number of articles additionally focus on the EU's loss of control over the inflow of migrants. The German asylum law is condemned as too lax since supposedly every foreigner who wants to come into the country is invited in and Germans have become second-class citizens in their own country.⁴²⁵ Furthermore, migrants are presented as a security risk,

⁴¹⁴ Ehlers, K., „Was kommt nach Putin?“ [What comes after Putin?], *NachDenkSeiten*, December 2, 2014.

⁴¹⁵ NachDenkSeiten, „Der russische Dämon“ [The Russian demon], March 18, 2016.

⁴¹⁶ Schepelin, I., „Gorbatschow: „Krim-Referendum ist ein freudiges Ereignis““ [Gorbachev: "Crimean referendum is a happy event"], *Russia Beyond*, March 20, 2014.

⁴¹⁷ Litowkin, N., „Vorwurf des Völkermords: Russland verklagt Ukraine“ [Genocide allegations: Russia sues Ukraine], *Russia Beyond*, October 13, 2014.

⁴¹⁸ Jegorow, O., „Lewada-Zentrum: Unabhängige Meinungsforscher zum „Auslandsagenten“ erklärt“ [Lewada Center: Independent pollsters declared „foreign agents“], *Russia Beyond*, September 8, 2016.

⁴¹⁹ Lukjanow, F., „Russland und die EU: Partnerschaft nein, Kooperation ja“ [Russia and the EU: Partnership no, cooperation yes], *Russia Beyond*, February 2, 2016.

⁴²⁰ Timofejtschew, A., „70 Jahre nach dem Sieg: Der Kampf um die Geschichte“ [70 years after the victory: the battle over history], *Russia Beyond*, May 9, 2015.

⁴²¹ Compact, „Deutschland sucht das Superkopftuch: Akif Piriñci hat eine TV-Show erfunden“ [Germany is looking for the super headscarf: Akif Piriñci invented a TV show], September 2, 2020.

⁴²² Sarrazin, T., *Deutschland schafft sich ab: Wie wir unser Land aufs Spiel setzen*, 2010.

⁴²³ Compact, „Wer ist ein Rassist? Ist Christchurch wirklich überall?“ [Who is a racist? Is Christchurch really everywhere?], March 20, 2019; Pföhringer, D., „Gegen Multikulti-Wahn hilft die Sarrazin-Kur: Nach wie vor aktuell!“ [The Sarrazin cure helps against multiculturalism: it's still up to date!], *Compact*, August 7, 2018.

⁴²⁴ Compact, „Skandal um Sarrazin: Islam-Maulkorb für Klartext-Autor“ [Sarrazin scandal: Islam muzzle for plaintext author], July 6, 2018.

⁴²⁵ Compact, „Unterwerfung unter Scharia: Einbürgerung von Polygamisten und Ausweis-Wegschmeißern möglich“ [Submission to Sharia law: naturalization of polygamists and ID-tossers possible], May 6, 2019; Von Appen, K., „Einschränkung von Grundrechten für Deutsche – für Asylbewerber nicht“ [Restriction of basic rights for Germans – not for asylum seekers], *Compact*, May 20, 2020.

as jihadists use them to smuggle their radical ideology and terror into Europe.⁴²⁶ The main culprit for this policy is identified as Chancellor Angela Merkel, who “opened the borders and flooded Germany” with “poor migrants”.⁴²⁷

In line with its social democratic leaning, *NachDenkSeiten* conveys a favorable attitude towards the anti-Islam demonstrations of PEGIDA,⁴²⁸ emphasizing the competition for resources that migration leads to between poor Germans and migrants, who all rely on state support. In addition, the immigration law is criticized because it makes it easier for skilled workers to enter the German labor market, reducing opportunities for educated Germans.⁴²⁹

Russia Beyond conveys the topic of migration through the prism of traditional values. Russia is touted as a country that has sound traditions of dealing with Muslim communities while preserving the rights and supremacy of the cultural habits of the nation-forming Russian majority. For example, wearing a hijab is banned in Russian universities.⁴³⁰ In contrast, the West's flawed policy of multiculturalism leads to insecurity and the dilution of identity and state sovereignty.⁴³¹ Therefore, in Europe, nation-states need to reestablish state sovereignty to protect their citizens, because security and identity are more important than openness and tolerance.⁴³² Russia can offer a viable model from which Europe can learn how to successfully integrate Muslims and what the coexistence of different ethnicities actually means in practice.⁴³³

⁴²⁶ Dettmer, M., „NRW: IS-Terroristen pflanzen, Islamkritiker zu ermorden!“ [NRW: IS terrorists planned to murder critics of Islam], *Compact*, April 15, 2020.

⁴²⁷ Klemm, P., „Merkel lockt weiter Flüchtlinge nach Deutschland! DAS ist ihr fieser Trick“ [Merkel continues to lure refugees to Germany! THAT is their nasty trick], *Compact*, March 22, 2020.

⁴²⁸ *NachDenkSeiten*, „Pegida ist ein Spiegel deutscher Verhältnisse“ [Pegida is a mirror of German conditions], May 27, 2015.

⁴²⁹ Müller, A., „Der Grundwert der westlichen „Werte“ gemeinschaft: Egoismus. Ein neuer Beleg: Fachkräfte-Einwanderungsgesetz“ [The basic value of the Western „values“ community: egoism. A new testament: Skilled workers-Immigration Act], *NachDenkSeiten*, August 17, 2018.

⁴³⁰ Ljubinskaja, D., „Kopftuchverbot an Hochschulen: Wie viel Religion verträgt der Staat?“ [Headscarf ban at universities: how much religion can the state tolerate?], September 17, 2014.

⁴³¹ Sorin, W., „Migration als gemeinsame Aufgabe“ [Migration as a collective task], *Russia Beyond*, October 7, 2015.

⁴³² Koschkin, P., „Andrej Kelin: Russland setzt auf bilaterale Gespräche“ [Andrej Kelin: Russia is counting on bilateral talks], *Russia Beyond*, April 25, 2016.

⁴³³ Litowkin, N., and Sinelschtschikowa, J., „Die Nato breitet sich nach Osten aus: Was bedeutet das für Russland?“ [NATO is expanding eastwards: what does that mean for Russia?], *Russia Beyond*, April 4, 2016.

In terms of the theme of **gender**, *Russia Beyond* overwhelmingly focuses on Russian-related questions of the role of women in politics and economics. The outlet paints a picture of the ideal Russian woman, who owns and successfully operates a business but nevertheless follows strictly traditional family values. Feminism is presented as an ideological movement that is not popular in Russia.⁴³⁴ Coverage of International Women's Day promotes highly gendered stereotypes of the importance of the role of motherhood and domesticity to a woman's value.⁴³⁵

In contrast, *Compact* and *NachDenkSeiten* are oriented on German developments, challenging mainstream policy and societal discourse on gender equality in Germany. *Compact*'s xenophobic, misogynistic, and anti-immigration stances make it more intensely focused on gender issues than *NachDenkSeiten*, whose primary interest is linked to the social roots and economic implications of migration. For *Compact*, it is the current German political elites who destroy German society with the imposition of gender-based quotas and gay marriage.⁴³⁶ For instance, the outlet criticizes the policy of former Minister of Defense Ursula von der Leyen aimed at making the Bundeswehr more family-friendly and open it up to greater numbers of female employees.⁴³⁷ Officials and institutions, who are responsible for promoting a policy of equal opportunities, as well as “gender democracy”, are heavily denounced.

As regards to Russian disinformation messaging on **economic issues**, all three pro-Russian outlets regularly publish anti-globalization articles. *Russia Beyond* describes the populism and success of Donald Trump in the US and Brexit as a reaction to liberal globalization. For its part, *Compact* focuses on attacking the policy of the SPD during Chancellor Gerhard Schröder's term (SPD/Green coalition 1998 – 2005). The outlet accuses Schröder of having betrayed the history of his party on social and economic policy by dismantling the German welfare state and selling German companies to

⁴³⁴ Subatschjowa, K., „Frauen in Führungspositionen: Wie üblich ist es in Russland?“ [Women in management positions: As usual in Russia?], *Russia Beyond*, April 3, 2018.

⁴³⁵ Kirjuchina, J., „Galoppierende Pferde aufhalten“ [Stop galloping horses], *Russia Beyond*, March 8, 2014.

⁴³⁶ Kleine-Hartlage, M., „Alle wollen „Diversity“ (Vielfalt), aber nicht auf politischer Ebene“ [All want „diversity“, but not on the political level], *Compact*, January 1, 2018.

⁴³⁷ Von Appen, K., „Gender-Gaga bei Dienstgraden in der Bundeswehr: Salut, Frau Majornaise!“ [Gender gaga with ranks in the Bundeswehr: Salut, Ms. Majornaise!], *Compact*, September 13, 2020.

Anglo-American businesses.⁴³⁸ Compact thus furthers the position that a “de-Germanization” of the German economy is taking place.⁴³⁹

Additionally, Compact portrays the negotiations on the Transatlantic Trade and Investment Partnership (TTIP) between the EU and the US, which was later scrapped under Donald Trump’s presidency, in a negative light. Although TTIP is denounced on various grounds related to lack of transparency, the alleged rise of agrobusiness as a dominant sector of the economy, the greatest condemnation is reserved for the US and transatlantic relations. It is claimed that Washington is promoting industrial espionage in Germany, which is supported by the German intelligence services.⁴⁴⁰ Free trade agreements are in general depicted as the ultimate form of neoliberalism that destroys democracy through the exploitation of societies. This narrative posits that globalists in German politics have sold national companies to US businesses, which entails a loss of sovereignty for Berlin.⁴⁴¹ A typical target of Compact is the Hungarian-American investor and philanthropist George Soros. The magazine argues that he is a speculator, whose ulterior motive is to tear down national borders, through schemes such as TTIP, to personally reap the financial benefits. The fact that Soros opposes the policies of Hungary’s Prime Minister, Viktor Orbán, further intensifies anti-Soros messaging since Orbán is seen as an ally and a role model of the right-wing populists in Germany.⁴⁴² It is argued that the liberal internationalists want to destroy the sovereignty and economic prosperity of nation-states and that a small rich elitist group focusing on self-enrichment above all dominates the world.

⁴³⁸ Perlick, T., „Wer hat uns verraten? Sozialdemokraten!“ [Who betrayed us? Social Democrats!], *Compact*, November 28, 2017; Agenda 2010 describes the social reform policy under Chancellor Gerhard Schröder which reduced the German welfare state by bringing in more elements of competition. This policy by a social-democratic Chancellor was criticized by many as socially unfair and neoliberal but played an important role in the German economic boom in the years afterward.

⁴³⁹ Elsässer, J., „Die Deutschlandhasser kommen“ [The Germany-haters are coming], *Compact*, June 9, 2020; Lenhoff, R., „HEIMAT TUT GUT | Unser Land, unsere Kultur, unsere Zukunft“ [HOMELAND IS GOOD | Our country, our culture, our future], *Compact*, June 4, 2018.

⁴⁴⁰ Müller-Mertens, M., „Die deutsche Wirtschaft wird ausspioniert“ [The German economy is being spied on], *Compact*, October 5, 2020.

⁴⁴¹ Elsässer, J., „Die Zerstörung der Deutschland AG: Wie Uncle Sam “Made in Germany” den Stecker zieht“ [The destruction of Germany-AG: How Uncle Sam pulls the plug on “Made in Germany”], *Compact*, December 7, 2019.

⁴⁴² Compact, „Soros ist mein Sugardaddy“: Regenbogenkoalition gegen Viktor Orbán“ [“Soros is my Sugardaddy”: Rainbow Coalition against Viktor Orbán], January 18, 2019.

The Nord Stream II pipeline is similarly discussed as a project that would bring Germany more energy security but is undermined by the US’s sanctions policy. According to Compact, the USA’s ulterior objective is to stop the transit of Russian gas into the Union to ensure Europe becomes reliant on the more expensive American liquefied gas.⁴⁴³

According to NachDenkSeiten, globalization and neoliberal economic order is resulting in the democratic crisis of the West. The outlet claims that Western political and economic elites are governing their countries against the will of the majority, while big business and the mainstream media try to manipulate the people, indoctrinating society with neoliberal ideology.⁴⁴⁴ “Neoliberalization” strengthens right-wing populism, while at the same time shrinks the space for leftist ideas or policies that can convincingly respond to the populist threat.⁴⁴⁵

Additionally, NachDenkSeiten criticizes US sanctions against Nord Stream II. In circumventing Ukraine, the pipeline is claimed to be offering a greater degree of gas transit security to Germany. Organizations such as NABU (Nature and Biodiversity Conservation Union) are accused of plotting with the political critics of Nord Stream II to promote the US’ agenda in Germany.⁴⁴⁶ And the core of this US-centered policy is the attempt to create a rift in EU-Russian economic relations and push Moscow out of the European gas market.

Furthermore, NachDenkSeiten extols the Chinese economic model as innovative and just.⁴⁴⁷ Compared to America’s neoliberal policy it is said to be socially inclusive. Moreover, because of Western sanctions in the context of the Ukraine crisis, Russia is creating its own alternative economic model, which is hailed as autar-

⁴⁴³ Compact, „Wirtschaftskrieg gegen Deutschland und Europa – Hilde’s Kommentar zum Samstag, dem 28.12.2019“ [Economic war against Germany and Europe – Hilde’s comment on Saturday, December 28th, 2019], December 28, 2019.

⁴⁴⁴ Lieb, W., „Verbarrikadierte Demokratie – Schafft sich die Politik ab?“ [Barricaded democracy – Is politics abolishing itself?], *NachDenkSeiten*, October 21, 2014.

⁴⁴⁵ Wernicke, J., „Kapitalismus im Kopf“ [Capitalism on the mind], *NachDenkSeiten*, January 8, 2016.

⁴⁴⁶ Berger, J., „NABU vs. NachDenkSeiten – die Umweltschützer schlagen zurück, können dabei aber auch nicht überzeugen“ [NABU vs. NachDenkSeiten – the environmentalists strike back, but are not convincing], *NachDenkSeiten*, February 5, 2018.

⁴⁴⁷ Rügemer, W., „Werner Rügemer: Varianten des Kapitalismus – Ein Vergleich des westlichen mit dem chinesischen Kapitalismus“ [Werner Rügemer: Variants of Capitalism – A Comparison of Western and Chinese Capitalism], *NachDenkSeiten*, October 7, 2017.

tic, promoting less integration in the global economy.⁴⁴⁸ The outlet agrees with Putin that the world needs a new multipolar order, including in the economic sphere.⁴⁴⁹

BEST PRACTICES AND GAPS IN TACKLING DISINFORMATION

Governance framework

There are at least three specific features, which characterize the media regulation landscape in Germany. Given the historical context of the instrumentalization of propaganda and manipulation of the information sphere during Nazi rule (1933-45), German lawmakers, in particular, the Federal Constitutional Court exhibit significant caution about introducing any limitations on freedom of speech. At the same time, everything that is linked to the denial of the Holocaust, hate speech, or defamation of ideological and religious communities represents a punishable offense. Moreover, the state plays a crucial role in media regulation and is a key player in the media sphere via its **public broadcasters** and their online content as well as **state-funded civic education institutions**. Nevertheless, the regulation of the media falls primarily within the scope of the federal states (*Bundesländer*) rather than the federal authorities in Berlin, which complicates regional and state-level coordination. The federal states however lack resources for monitoring and implementing legislation, especially in relation to the major social media companies.

As a result of the problems of coordination and resourcing, the importance of dealing with disinformation had to first be brought to the attention of German authorities via a series of high-profile events. Most notably the "Lisa case" in January 2016 and the Russian manipulation of the US presidential elections in November of the same year first spurred widespread public discussion about the Kremlin's malign media activities.⁴⁵⁰ Subse-

⁴⁴⁸ Kobsew, A., „Russland ist der böse Bube“ [Russia is the bad boy], *Russia Beyond*, July 30, 2014.

⁴⁴⁹ Litowkin, N., „Putin: Die Welt braucht eine neue Ordnung“ [Putin: The world needs a new order], *Russia Beyond*, October 28, 2014.

⁴⁵⁰ A German-Russian girl disappeared for a couple of days and later falsely claimed that she was raped by migrants. This case was picked up by Russian domestic and international media, especially on the heels of an interview given by Russian Foreign Minister Lavrov, where he suggested that German authorities had covered up the case. The Russian community in Germany took part in demonstrations, blaming police and law enforcement institutions for not performing their job adequately: Meister, St., "The "Lisa case": Germany as a target of Russian disinformation", *NATO Review*, July 25, 2016.

quently, heated debates ensued ahead of the German federal election in autumn 2017 about the threats of Russian interference.⁴⁵¹ Additionally, the hacking of the German Bundestag by a group close to the Russian military intelligence (GRU) not only led to an increase in funding for cyber defense at the Bundeswehr (the German military) but also accelerated the sense of alienation in German-Russian relations.⁴⁵²

Since then, Germany has introduced several initiatives to deal with foreign influence and disinformation. As in many European countries, the main approach centered on fact-checking and the importance of strictly implementing criminal legal procedures vis-à-vis online hate speech. Legislative initiatives culminated in the *Network Enforcement Act (Netzwerkdurchsetzungsgesetz – NetzDG)* which came into effect on January 1, 2018.⁴⁵³ The law was the first European regulation that required large social media platforms, such as Facebook, Instagram, Twitter, and YouTube, to remove "illegal content" within 24 hours, which is delimited in 22 provisions of the criminal code. The definition of "illegal content" ranges from child pornography to hate speech and fake news. Faced with fines of up to 50 million euros, the companies have to expediently monitor content to comply with the law. Furthermore, companies have to establish a notification system and publish transparency reports on the deletions of posts and accounts, as well as designate specialist individuals that are accountable for making these decisions.

Throughout the first two years since the law entered into force, the Federal Office of Justice has initiated 1,300 fine proceedings against providers of social networks. When introducing the law, the federal government had expected 500 proceedings per year. However, an actual fine has only been issued once so far: Facebook has had to pay two million euros for providing incomplete information in its published report on the number of complaints it received about unlawful content. Facebook submitted a transparency report that counted just over 1,700 complaints based on the NetzDG law. For comparison: Twitter counted 260,000 complaints. The reason for this discrepancy is that Facebook had hidden the reporting channel for complaints based on the

⁴⁵¹ Spiegel Netzwerk, „Was plant Moskau?“ [What Moscow Plans], September 1, 2017.

⁴⁵² Zeitonline, „Angela Merkel droht Russland mit Konsequenzen“ [Angela Merkel threatens Russia with consequences], May 13, 2020.

⁴⁵³ Bundesministerium der Justiz und für Verbraucherschutz. Gesetz zur Verbesserung der Rechtsdurchsetzung in sozialen Netzwerken. *Netzwerkdurchsetzungsgesetz* [Federal Ministry of Justice and Consumer Protection. Law improving legal enforcement in social networks. Network Enforcement Act], accessed January 8, 2021.

NetzDG provisions and the company did not include complaints that were submitted via pre-existing standard complaint channels. Facebook has since filed a complaint against the fine.⁴⁵⁴

Although the NetzDG law is an important step towards greater accountability from major tech companies for the content published on their platforms, its effectiveness has remained limited mainly due to the lack of transparency and the use of alternative channels of communication. Platforms designed for individual communication such as WhatsApp and Telegram are explicitly excluded from the NetzDG because the law only applies to providers who operate platforms on the Internet with the intention to make a profit and maintain a large number of users. However, this represents a legal blind spot as more and more people are using these apps to consume information disseminated by certain individuals and influencers in mass group chats. Therefore, apps like Telegram have started to resemble Facebook and Twitter in that they are not geared to individual communications only. This became very apparent when Telegram groups were used to share conspiracies about the Covid-19 crisis and demonstrations against the government restrictions were organized via these groups.⁴⁵⁵

Overall, NetzDG has raised questions about the extent to which accountability should be lodged primarily with the technological giants and how to ensure that deleted content does indeed fall within the scope of hate speech and that rightfully expressed views are not censored.⁴⁵⁶ Users whose speech was censored by the NetzDG range from a leader of the far-right party Alternative for Germany, to a satire magazine⁴⁵⁷ and political street art.⁴⁵⁸ The four large opposition parties in the

German Bundestag, The Left, Free Democrats, Alternative for Germany, and the Green Party oppose the law. The Green Party made proposals on how to improve the NetzDG, which in their opinion has not limited hate speech.⁴⁵⁹

Another prominent legislative initiative has focused on the reform of the **Interstate Media Treaty** (*Medienstaatsvertrag*), whereby the main aim is to strengthen democratic discourse and update the German system of media regulation to meet the challenges of the digital era. The draft for the new Interstate Media Treaty envisages greater transparency of the functioning of the recommendation algorithms of video-based platforms, such as YouTube and Netflix, as well as other platforms, particularly Facebook and Google, that distribute visual content.⁴⁶⁰ The new law also gives priority to journalistic publishing (especially produced by public broadcasters).⁴⁶¹ However, one of the key challenges in relation to the updated Interstate Media Treaty is that the federal states' media authorities, which are non-governmental regulatory bodies, have to exercise control over powerful global tech companies, yet they possess limited administrative, financial, and expert capacities to do so.

The approval of the new **competition rules** proposed by the Federal Ministry of Economic Affairs and Energy represents a further important step in regulating the digital domain. According to the law, market dominance of digital companies is attained when companies hold significant amounts of user data. To prevent such dominance, the Federal Cartel Office would receive more powers to intervene in markets when there is a threat of monopolization and competitors would have easier access rights to data kept by large digital players.

Moreover, the fall-out from the "Lisa case" led to the establishment of a **new special unit for strategic communication at the German Foreign Office**. Its main aim is to counter disinformation and propaganda by publicizing reliable information and maintaining a visible profile in the digital domain. The German Foreign Office has so far sponsored several information campaigns on social media channels and the German foreign broadcaster Deutsche Welle (DW), including "Rumors about Germany" which focuses on migrants and offers cor-

⁴⁵⁴ Federal Office of Justice, "Federal Office of Justice Issues Fine against Facebook", July 3, 2019.

⁴⁵⁵ BR, "Messengerdienst Telegram: Wo die Verschwörungstheorien sprießen" [Telegram: where conspiracy theories sprout], May 28, 2020.

⁴⁵⁶ Simone Rafael, "Offener Brief zum NetzDG: NGOs fordern bessere Transparenzberichte, Quick Freeze und Marktortprinzip" [Open letter on the NetzDG: NGOs demand better transparency reports, quick freeze and market location principle], June 15, 2020.

⁴⁵⁷ In 2018, the German satirical magazine 'Titanic' saw its Twitter account suspended for 48 hours following allegations of hate speech. The magazine had posted a number of tweets parodying German lawmakers, as it has often done in the past with other politicians: Martin, D., "German satire magazine Titanic back on Twitter following 'hate speech' ban", *Deutsche Welle*, January 6, 2018.

⁴⁵⁸ In 2018, Facebook censored a picture by award-winning street artist 'Barbara' featuring a road-bump sign wearing a bra. The image was likely censored because it alluded to female breasts. The artist speculated that the then-newly introduced NetzDG law put pressure on social media platforms at the risk of "over-blocking": Chase, J., "Facebook slammed for censoring German street artist", *Deutsche Welle*, January 15, 2018.

⁴⁵⁹ Bündnis 90/Die Grünen Bundestagsfraktion, *Das NetzDG und die grüne Alternative*, September 26, 2018.

⁴⁶⁰ Sueddeutsche Zeitung, "Unterschriften sind komplett" [Signatures are complete], May 1, 2020.

⁴⁶¹ Jaurisch, J., and Lenoir, T., "Disinformation: The German approach and what to learn from it," *Institute Montaigne*, February 28, 2020.

rect information about rules and conditions to apply for immigration to Germany.⁴⁶² The German Foreign Office cooperates with the think tank Foundation for New Responsibility (*Stiftung Neue Verantwortung*) to strengthen the competencies of ministries and authorities in dealing with disinformation.⁴⁶³

Education and fact-checking are other areas in which German government institutions are active. The German Federal Agency for Civic Education (*Bundeszentrale für Politische Bildung*) has published a series of articles, videos, and reports on fake news and information warfare.⁴⁶⁴ The agency also provides financial support to Correctiv, a nonprofit organization that implements fact-checking and offers training and workshops in journalism and media literacy.⁴⁶⁵ The public German TV channel ARD has also launched an online fact-checking initiative for the German media landscape, called *Faktenfinder*. The main tasks of *Faktenfinder* are combating and correcting political propaganda, rumors, lies, and half-truths spread on the Internet.⁴⁶⁶ The influential German public broadcaster, with its TV stations, radio, and online content, shapes the German media landscape and public discussions through the provision of quality reporting.⁴⁶⁷ Although some studies have shown eroding trust in mainstream media in Germany, public broadcasters are still by far the most trusted media outlets in the country. In a recent survey, 81% of respondents said they consider public radio to be credible and 79% said they consider public TV to be credible.⁴⁶⁸ Big private media outlets such as *Der Spiegel*, *Die Zeit*, *Süddeutsche Zeitung* and *Frankfurter Allgemeine Zeitung* also strive to deliver reporting that meets high journalistic standards. They were among the first who investigated and reacted to instances of disinformation even before German policy-makers turned their attention to the regulation of social media.

⁴⁶² German Foreign Office, [Rumors about Germany](#).

⁴⁶³ Stiftung Neue Verantwortung (SNV), [About us](#).

⁴⁶⁴ Bundeszentrale für politische Bildung, [„Spezial zum Thema „Fake News“](#) [Special on the topic “Fake News”].

⁴⁶⁵ Correctiv, [About us](#).

⁴⁶⁶ ARD-Faktenfinder [Fact checker].

⁴⁶⁷ Also, in Germany, trust in the media is declining. Even if during the pandemic there was a growth in trust of public media, like the ARD, long-term studies show that trust in public media is lower than 50%. In a poll by the University of Mainz in 2019, 43% trusted the traditional media in full and 29% only partly trusted it. Johann Gutenberg Universität Mainz, [Langzeitstudie Medienvertrauen, Forschungsergebnisse der Welle 2019](#) [Study of trust in media, results of research from 2019].

⁴⁶⁸ Infratest dimap 2020, [„Glaubwürdigkeit der Medien 2020“](#) [Media credibility in 2020].

The German government additionally established the **Federal Agency for Digital Education** in August 2020 with the intent of strengthening citizens' media literacy. The agency is focused on developing a basic understanding of cyber-security topics. Awareness-raising campaigns will be conducted and parents, teaching staff, and educators will be educated about how to deal with social media, data protection, fake news, hate speech, and cyber-bullying.⁴⁶⁹ However, the federal government has not been able to make concrete statements about the design of the agency and its goals as the planning is still in the conception phase. How the agency will be financed and how it will be distinguished from the Federal Agency for Civic Education is also still unclear.⁴⁷⁰

As regards to teaching media literacy in schools, there is no coherent nationwide measure as it is the remit of federal states to determine their own educational curricula. Although the promotion of media literacy in schools has been well-founded in a conceptual framework for 20 years in Germany,⁴⁷¹ it is only recently that the subject's importance has been recognized. In the strategy paper “Education in the digital world” from 2016, the responsible ministers of the federal states defined media literacy as a key qualification that should be taught already in primary schools.⁴⁷²

Civil society

Nevertheless, **the promotion of media literacy among students has been shaped more by civil society projects than by government action.** For instance, the “Lie Detectors” initiative has been sending journalists to schools across Europe since 2015. The goal is to explain how to identify disinformation, expose propaganda, and use social media in a critical and self-reflexive manner.

The German government has thus partnered up with civil society initiatives and provided funding to fos-

⁴⁶⁹ Bundesregierung, [„Die Bundeszentrale für Digitale Aufklärung – eine Initiative der Staatsministerin für Digitalisierung“](#) [The Federal Centre for Digital Clarification – an initiative of the State Minister for Digitisation].

⁴⁷⁰ Bundestag Press Release, [„Wenig Konkretes zur „Bundeszentrale für Digitale Aufklärung“](#) [Little detail on the “Federal Agency for Digital Education”], October 21, 2020.

⁴⁷¹ Eickelmann, B., [„Schulische Medienkompetenzförderung“](#) [Promotion of media literacy in schools], *Bundeszentrale für politische Bildung*, October 9, 2017.

⁴⁷² Eder, C., and Frost, B., [„Von der Mediennutzung zur Medienkompetenz“](#) [From the use of media to media literacy], *Bundeszentrale für politische Bildung*, May 23, 2018.

ter media competence. The initiative “Ein Netz für Kinder”,⁴⁷³ developed by the Federal Ministry for Family Affairs, Senior Citizens, Women, and Youth, gives parents and caretakers guidelines on how to introduce children to the Internet and includes concrete recommendations for safe use of the media. Another comparable initiative, “Schau Hin!”,⁴⁷⁴ is pioneered by the same ministry, which together with the two public broadcasters, ARD and ZDF, and public health insurance company, AOK, informs parents and educators about current developments in the media world and interesting facts about various media topics. The initiative cooperates with more than 60 other organizations. In addition to that, from 2017 to 2019 a project called “Demokratielabore” (democracy labs) held over 94 workshops for young people to show them how they can actively shape society with digital tools.⁴⁷⁵

The EU

Germany actively contributes to tackling disinformation on the European level by supporting relevant EU legislative initiatives. Berlin also participates in the European Centre of Excellence for Countering Hybrid Threats and it co-sponsors NATO’s special unit of strategic communication, the StratCom Centre for Excellence. At the same time, **Germany privileges the development of regulatory measures against disinformation primarily at the national level** rather than actively building coalitions among fellow EU member states to promote joint action.

The right-wing party Alternative for Germany (AfD) opposes the action plan of the EU Commission against disinformation and all documents linked to it.⁴⁷⁶ AfD argues vehemently that the European initiative undermines freedom of the press by forcing the German government to spread information that is in the sole interest of the EU as an institution.⁴⁷⁷ In turn, members of the Left party have been skeptical about any German and EU policies aimed at tackling Russian disin-

formation. The Left’s MPs regularly deny the presence of Kremlin propaganda and insist on the ubiquity of US disinformation that supposedly floods the German media space.⁴⁷⁸

The German federal government has not actively commented on the **Digital Services Act**. There was only an assessment by experts on behalf of the government in the form of a statement by the Council for Consumer Issues of the Federal Ministry of Justice, which approves of the objective to make technology companies more accountable for harmful content disseminated by social media users.⁴⁷⁹

On the other hand, representatives of civil society have been much more vociferous.⁴⁸⁰ Forty-six CSOs asked the EU Commission to include binding transparency requirements for online platforms in the DSA draft, especially in relation to improving the transparency of algorithms and granting greater access to social media platforms’ data for research purposes.

Similar to the DSA, there has been limited substantive political debate in Germany concerning the **European Democracy Action Plan** (EDAP), with the majority of initiatives being led by civil society actors who responded to the calls for public consultation launched by the European Commission. In an open letter, multiple organizations and associations from the arts and culture scene welcomed the proposal to develop the European Democracy Action Plan. The authors asked the European Commission to specifically reflect on the importance of freedom of artistic expression in the EDAP.⁴⁸¹

In addition, a coalition of forty-six civil society organizations working for democracy, human rights, media, and the rule of law in Europe drew up a declaration listing proposals for the EDAP. The group has also pub-

⁴⁷³ Federal Ministry for Family Affairs, Senior Citizens, Women and Youth 2018, „Ein Herz für Kinder“ [A Heart for Children], March 20, 2018.

⁴⁷⁴ Schau hin!, [Über uns](#) [About us].

⁴⁷⁵ Demokratielabore, [Über die Demokratielabore](#) [About Democracy labs].

⁴⁷⁶ European Commission, [Action plan against disinformation](#), March 21, 2019.

⁴⁷⁷ Deutscher Bundestag, 19. Wahlperiode, „Antrag: Presse- und Meinungsfreiheit schützen – EU-Aktionsplan zurückweisen“ [Proposal: Protect freedom of press and freedom of expression – to reject EU action plan], Drucksache 19/17781, March 11, 2020.

⁴⁷⁸ One example is a disinformation campaign by Russian actors against the Bundeswehr in Lithuania which was questioned by one Left Party MP as Cold War rhetoric by the West and NATO, „Andrej Hunko zur angeblich durch die russische Regierung erfolgte Verleumdung der Bundeswehr in Litauen“ [Andrej Hunko on the alleged defamation of the Bundeswehr in Lithuania by the Russian government].

⁴⁷⁹ Federal Ministry of Justice Press Release, „Sachverständigenrat für Verbraucherfragen legt Studie zur verbrauchergerechten Regulierung digitaler Plattformen vor“ [Advisory Council on Consumer Issues presents study on consumer regulation of digital platforms], June 17, 2020.

⁴⁸⁰ Fanta, A., „Rechteinhaber fordern Haftung für Digitalkonzerne“ [Rights holders demand liability for digital corporations], *Netropolitik.org*, February 6, 2020.

⁴⁸¹ Culture Action Europe, „Open Letter On The European Democracy Action Plan And Freedom Of Artistic Expression“, September 14, 2020.

lished the position paper “Civil society vision for the European Democracy Action Plan”, coordinated by the European Partnership for Democracy.⁴⁸²

In regards to **digital tax**, the German government prefers an extra-European, i.e., global, solution coordinated with the United States via the Organization for Economic Co-operation and Development (OECD). An EU-wide digital tax was largely prevented by Berlin, even though many EU countries, most notably France, were advocating in favor of the tax. At a meeting in Brussels in late 2018 to discuss early proposals about the tax, the German representative said the draft proposal was not yet adequate enough to warrant making a final decision. However, no specific reason for the German opposition was given then. Until March 2019, the digital tax was discussed at several meetings of the EU finance ministers, but an agreement could not be reached. Due to the lack of support for the project from Germany, the EU's plan for the digital tax was eventually abandoned in March 2019. Berlin's reluctance can most likely be at-

tributed to fears of US countermeasures targeting the German auto industry.⁴⁸³

On the whole, there is a lack of a comprehensive, whole-of-society approach towards disinformation in Germany, which makes it difficult to address the phenomenon in all of its complexity. This becomes especially visible in the differing policies of different ministries at the regional and federal level in reaction to disinformation and the lack of an overarching coordinating body. In 2017, there was a discussion to establish a center against disinformation that could coordinate all policies in this area. The Ministry of the Interior showed interest in hosting the institution, but the Federal Chancellery and the Federal Press Office were also noted as leading institutions that would be up to the task, this led to disagreement on where to locate the center and plans fell through.⁴⁸⁴ There is increasing legal regulation of disinformation by different ministries, but the involvement of and coordination with the civil society in fighting disinformation remains limited.

⁴⁸² European Partnership for Democracy, *A comprehensive plan to innovate democracy in Europe: Civil society vision for the European Democracy Action Plan*, 2020.

⁴⁸³ Netzpolitik.org, „Wie Deutschland die EU-Digitalsteuer mitverhinderte“ [How Germany helped to prevent the EU digital tax], January 20, 2020.

⁴⁸⁴ Frankfurter Allgemeine Zeitung, „Bundespresseamt will Fake News strafrechtlich nicht bewerten“ [The Federal Press Office does not want to judge fake news under criminal law], January 15, 2017.

ANNEX: METHODOLOGICAL NOTE

The analysis of the challenges and responses to Russian disinformation has been carried out through a combination of qualitative and quantitative methods applicable to each of the four case study countries of Bulgaria, Poland, the Czech Republic, and Germany and implemented in a sequence of steps:

First, the **content analysis** of Kremlin-sponsored anti-democratic messaging was based on the investigation of four types of online news outlets, which exhibit differentiated political-economic enmeshment – and hence different degrees of distance from Russia:

- The closest level of affinity to Russia is fulfilled by outlets that are *directly owned by the Kremlin*, such as RT, Sputnik, and Russia Beyond;
- In turn, a *partisan outlet* is linked to (or published by) a domestic political party with strong ties to or publicly announced preference for the Kremlin. Hence, affinity to Russia takes place on a party basis;
- A *broader* (more widely circulated or read) *daily* aims to reach a wider audience (than just party members, for instance), includes some varied content and is, therefore, further apart from the Kremlin but nevertheless has informal ties to (pro)Russia groups and interests and/or still occasionally disseminates Kremlin propaganda;
- A *mainstream* (“control”) *outlet* is characterized by the greatest distance from Russia as it provides objective coverage of Russia-related issues and does not maintain political-economic ties to (pro)Russian groups and interests. This type of outlet serves as a benchmark for comparing how a relatively neutral source portrays the Kremlin as opposed to the preceding three categories of news channels that disseminate Russian disinformation.

The content analysis of the key topics, lines of narration, and stylistic means of message transmission was carried out on the basis of a sample of 500 articles per case country (i.e., 2000 articles in total) with respect to *four main anti-democratic themes informed by nationalist, anti-migrant, misogynist, and economically illiberal narratives*. These represent the major disinformation narratives aimed at squeezing the space for liberal democratic inclusivity of key societal groups (minorities and historically disempowered members of the community) through the Kremlin’s appeal to the “traditional identities” and populist sentiments of the target countries and positing of the Russian conservative-authoritarian model as superior to the Western one. The timeframe of the content analysis covers the period since 2014 – the year in which Moscow’s annexation of Crimea and military offensive in eastern Ukraine marked the intensification of Russia’s standoff with the West and the acceleration of informational warfare waged on liberal democracies.

Second, an **automated diagnostics** of the intensity of the spread of Russian disinformation narratives based on the analysis of the number of articles and peaks in the online presence of the four sources identified in the previous step.

The qualitative content analysis, as well as the automated quantitative diagnostics through the Sensika SaaS content tracking tool in the four case-study countries, were carried out in relation to four types of media outlets of differentiated political, economic, and ideological distance from (pro)Russian groups and interests. The media outlets were chosen by local media experts. The table below lists all the analyzed outlets.

Country	Directly Russia-owned outlet	Partisan outlet	Broader daily	Mainstream "control" outlet
Bulgaria	Russia Beyond Bulgaria	Duma	Epicenter	24 chasa
Poland	Sputnik Poland	Nasz Czas	Magna Polonia	Onet.pl
Czech Republic	Sputnik Czech Republic	Aeronet	AC24	ČT24
Germany	Russia Beyond Germany	Compact	Nachdenkseiten	Süddeutsche Zeitung
France*	Russia Today France	Valeurs Actuelles	Le Figaro	Le Monde

* Although France was not part of the cross-case content analysis, French outlets were included in the automated diagnostics to further increase the representativeness of the analysis for Europe, given France's position as an influential EU member state. The overview provided a pilot investigation of the pro-Russian French media environment in a comparative European context.

Third, the identification of best practices and gaps in dealing with disinformation was informed by a **review of the debates and actions undertaken on the governmental, civil society, and international institutional level.** The governance response to disinformation is composed of existing legislation and the key institutional bodies charged with the oversight of digital, electronic, and print media, as well as ongoing discussions and initiatives with respect to the regulation of the online and offline media space. Relevant *civil society activities* aimed at tackling information threats include media literacy campaigns, the creation of independent watchdog organizations, protest actions, journalistic advocacy. The legislative and policy initiatives of the EU are particularly important for shaping the *international institutional environment* of member states. The latter's reception, contribution to, and adoption of EU-level measures demonstrate the degree of willingness and preparedness to fight disinformation.

