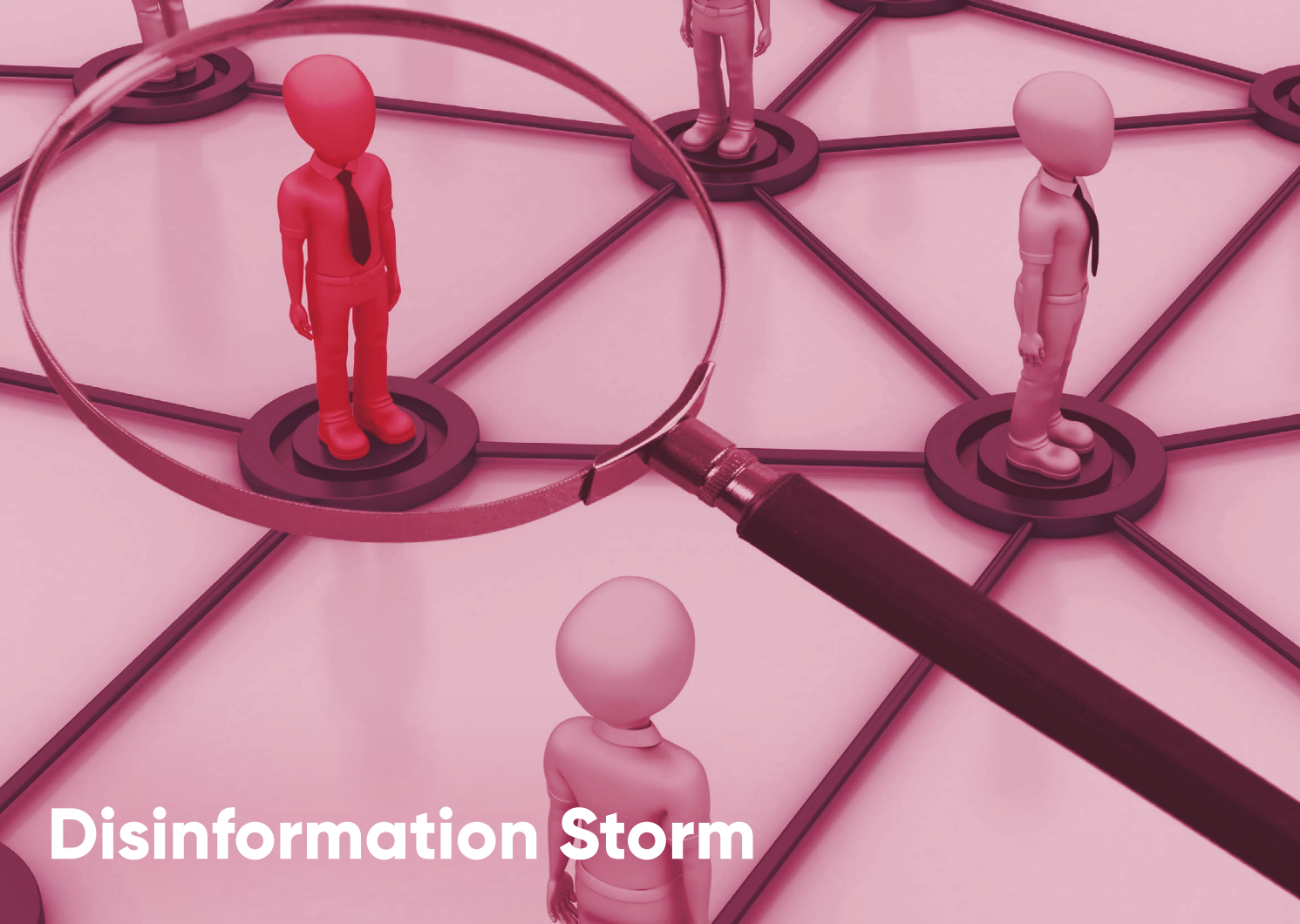




CENTER FOR  
THE STUDY OF  
DEMOCRACY



# Disinformation Storm

| WMD Hybrid Threats in Bulgaria and Romania

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WMD Hybrid Threats in Bulgaria and Romania

Disinformation and media capture are part of the Kremlin’s arsenal of hybrid threats; both leverage economic influence to hijack political agendas and shape public opinion in target countries. This report examines the specific challenges faced by Bulgaria and Romania vis-à-vis the spread of WMD-related disinformation by Kremlin-controlled and pro-Kremlin actors. It summarizes the results of a comparative media monitoring analysis that focuses on the spread of the narrative about bioweapon laboratories in Ukraine in the Bulgarian and the Romanian media space. The report provides evidence-based public policy recommendations, in order to support the development of integrated national approaches for countering hybrid threats

The development of this report is part of an initiative on “Countering WMD Hybrid Threats in the Black Sea Region” that the Center for the Study of Democracy, Bulgaria implemented in cooperation with New Strategy Center, Romania. The report benefited from the input and insights of Assistant Professor Roberta Raducu, National University of Political Studies and Public Administration, Romania and Associated Expert, New Strategy Center provided during the planning of the media monitoring analysis.

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# LIST OF ABBREVIATIONS

AI	Artificial intelligence
BG	Bulgaria
CEM	Council for Electronic Media
CNA	National Audiovisual Council
DMA	Digital Markets Act
DSA	Digital Services Act
DSC	Digital Services Coordinator
EEZ	Exclusive economic zone
Hybrid CoE	European Centre of Excellence for Countering Hybrid Threats
ML	Machine learning
RO	Romania
SEO	Search engine optimization
SLAPP	Strategic lawsuit against public participation
WMD	Weapon of mass destruction

# INTRODUCTION

The Kremlin began **institutionalizing hybrid warfare** as a tool of its foreign policy long before its full-scale invasion of Ukraine in February 2022.<sup>1</sup> Over the past decade, Russia has consistently deployed and adapted its array of tools for interference and destabilization, particularly targeting the internal unity and integrity of the European Union (EU) and the North Atlantic Treaty Organization (NATO). The annexation of Crimea in 2014 was a major dress-rehearsal characterized by a blend of hybrid measures that accompanied the invasion and occupation by conventional military forces.

During and in the aftermath of the annexation, Russian forces bearing no insignia took over the premises of local investigative outlets, nongovernmental organizations, and digital service providers, repurposing and integrating them into the Kremlin's growing propaganda machine. New pro-Kremlin multi-lingual outlets that **spread and amplify disinformation** such as News Front and South Front started broadcasting throughout Crimea in the weeks after the annexation and still continue operating to this day with the support of Russian intelligence services. The Kremlin also backed insurgent forces in the Luhansk and Donetsk regions, thus contributing to a protracted armed conflict and increasing regional destabilization. Russia's full-scale invasion of Ukraine in February 2022 constituted an escalation of continuous (and ongoing) belligerent behavior.

The Kremlin's geostrategic goals remain the same as during the Cold War but the means used to pursue these goals have evolved and their severity has intensified. The Russian leadership seeks to achieve supremacy in the Black Sea region and this top priority is often framed as an existential struggle. In pursuing this objective, the Kremlin relies on **an arsenal of tools for interference** in and destabilization of other countries, now repeatedly tried and tested throughout Europe, Africa, and the Americas. As frontline states and former Soviet satellite countries, Bulgaria and Romania are among the most vulnerable and frequent targets of the Kremlin's wide-ranging hybrid tactics. Both countries have been affected by persistent Russian interference, including the spread of **disinformation and propaganda, cyber-attacks** on institutions and critical infrastructure, political and election meddling, **strategic corruption**, and encroachment on their exclusive economic zones (EEZ). Both have also proven to be important strategic allies in the ongoing war, providing Ukraine with valuable military supplies, humanitarian aid, and help for refugees.

One of the most troubling aspects of the Kremlin's increasingly aggressive foreign policy is a renewed interest in **unconventional weapons – chemical, biological, and nuclear – as a means of power projection**, both as material and psychological threats. Since the beginning of its invasion against Ukraine, Russia frequently made threats to use nuclear weapons. This belligerent posture follows a long trail of state-sponsored targeted assassinations involving hard-to-detect chemical, biological, or radioactive substances by

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<sup>1</sup> See: Shentov, O., Stefanov, R., and Vladimirov, M., *The Kremlin Playbook in Europe*, Sofia: Center for the Study of Democracy, 2020.

Russia's security services.<sup>2</sup> In 2015, the owner of one of Bulgaria's major arms producing companies, his son, and the company's production director were poisoned using a Novichok-like agent. Kremlin-backed **poisoning attacks** constitute a significant deterrence challenge, as they require a drastically altered approach for detection, preparedness, and response in comparison to traditional large-scale attacks involving weapons of mass destruction (WMD).

Russia's use of WMD-related disinformation campaigns is particularly malign as these campaigns exploit public perceptions of the gruesome and destructive nature of chemical, biological, and nuclear weapons to achieve political and military objectives. Disinformation is a well-established tool of influence in the Kremlin's arsenal of hybrid threats.<sup>3</sup> The Kremlin's disinformation strategy generally integrates Soviet-time tactics with the potential of modern information and communication technologies, such as online platforms and social media to increase the scale and speed of disinformation messaging. Media capture is a vivid example of Russia's sharp power which leverages economic influence to hijack political agendas and shape public opinion in target countries.<sup>4</sup> The **oligarchization of media sector** at the hands of pro-Kremlin and Kremlin-sponsored networks of influence is an important vehicle through which Russian disinformation actively penetrates the media space of the countries in the Black Sea region.<sup>5</sup> Both Bulgaria and Romania are vulnerable to the Kremlin's cognitive warfare activities, particularly as the primary goals of these activities are to fracture unity within the EU and NATO, exacerbate public divisions, and undermine the systems and processes of democratic governance by attacking the fundamental principles upon which they are based.

Russia's WMD-related disinformation is not a new phenomenon. During the Cold War, the Soviet Union systematically accused Western governments of using biological weapons, while, at the same time making use of disinformation messaging to conceal its own illegal biowarfare program. Despite the piling evidence that the Assad regime used chemical weapons during the Syrian civil war, Moscow persistently rejects the outcomes of internationally-mandated investigation activities in Syria and, instead continues to support the government in Damascus unequivocally. For years, the Kremlin has carried out disinformation campaigns against Georgia's public health reference laboratory, the Lugar Center, claiming that it is a bioweapon production facility that the USA operates on Russia's doorstep. During the COVID-19 pandemic, Kremlin-backed and pro-Kremlin media outlets repeatedly sought to discredit EU- and US-produced vaccines presenting them as 'unsafe' and 'ineffective'. And, a further disinformation narrative that the Russian media amplified held that the virus responsible for COVID-19 was a biological weapon engineered in a US laboratory.

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<sup>2</sup> Center for the Study of Democracy, *Countering WMD Hybrid Threats and Malign Interference in the Black Sea Region*, Policy Brief No. 141, November 2023.

<sup>3</sup> Filipova, R., Vladimirov, M., and Gerganov, A., *Tackling Kremlin's Media Capture in Southeast Europe: Shared Patterns, Specific Vulnerabilities and Responses to Russian Disinformation*, Sofia: Center for the Study of Democracy, 2021; Novosiolova, T. and Georgiev, G., *Disinformation in the Kremlin's Toolkit of Influence Training Guidance for Scoping the Threat to the Norms and Institutions of Weapons of Mass Destruction Nonproliferation*, Sofia: Center for the Study of Democracy, 2022.

<sup>4</sup> Georgiev, G., Petrova, V., and Tsabala, K., *Breaking the Code: Russian and Chinese Disinformation and Illicit Financial Flows in Southeast Europe*, Center for the Study of Democracy, 2023.

<sup>5</sup> 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.



Shortly after the invasion against Ukraine, the Kremlin spurred yet another disinformation campaign that was designed to provide a justification for the war. The Russian leadership and state sponsored media accused Ukraine and the USA of developing biological weapons on the premises of biomedical laboratories in Ukraine. This campaign has quickly spread into the international diplomatic arena. For example, Moscow has used its seat in the United Nations Security Council to advance its unfounded allegations and weaken international support for Ukraine. Russia's embassies in the countries of the Black Sea region, including those in Bulgaria and Romania have further amplified these disinformation narratives among local audiences.

This report examines the specific challenges faced by Bulgaria and Romania vis-à-vis the spread of WMD-related disinformation by Kremlin-controlled and pro-Kremlin actors. It analyses the sustained efforts by the Kremlin and its local enablers in Bulgaria and Romania to produce and amplify disinformation narratives related to WMD to sow confusion, evade accountability, legitimize its policies, and undermine international disarmament and non-proliferation norms. The report summarizes the results of a comparative media monitoring analysis that focuses on the spread of the narrative about bioweapon laboratories in Ukraine in the Bulgarian and Romanian media space (Box 1). Evidence-based public policy recommendations are provided for institutional audiences in both countries, with the ultimate aim of supporting the development of integrated national approaches for countering disinformation.

### **Box 1: Media Monitoring Methodology**

The analytical framework used for the media monitoring research is based on previous work by the Center for the Study of Democracy (CSD) on analyzing the Kremlin's influence and in particular how Kremlin's media capture tactics manifest in European information spaces.<sup>6</sup> The monitoring is part of a wider initiative that explores evidence-based policy options for developing integrated national approaches to countering hybrid threats in the Black Sea region, with a special focus on WMD-related threats and their impact on non-proliferation norms.

CSD, in cooperation with the New Strategy Center (NSC), monitored content on online outlets and public Facebook space published in 2022-2023 regarding Russia's claim that biological laboratories in Ukraine are developing weapons of mass destruction (WMD). Content from news websites and data on its volume and reach were collected using the media intelligence tool Sensika, which has an exhaustive catalog of over half a million sources globally. Social media content from public Facebook account types (pages, verified profiles, and public groups) was collected using the Meta-owned tool CrowdTangle, which provides accurate metrics on the volume and reach of posts.

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<sup>6</sup> For examples, see: Georgiev, G., Petrova, V., Tsabala, K., *Breaking the Code: Russian and Chinese Disinformation and Illicit Financial Flows in Southeast Europe*, Sofia: Center for the Study of Democracy, 2023.; Galev, T. et al., *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.

News websites and Facebook were selected due to their prevalence in both countries' information spaces. In December 2023, Bulgaria and Romania had an internet access rate for households of 88% and 92%, respectively, according to the latest comparative data from EUROSTAT.<sup>7</sup> According to Meta's first-ever Transparency Report published pursuant to its obligations under the Digital Services Act (DSA), **the average monthly active user base** between 1 April 2023 - 30 September 2023 was 4.4 million for Bulgaria and 12.2 million for Romania, which equated to approximately 82% and 77% of national internet users in 2023, respectively.<sup>8</sup> **Traffic data** from the web traffic intelligence tools SimilarWeb and SEMRUSH confirm Facebook's market dominance as it accounted for over 80% of all web traffic to non-video-based social media in both countries in 2023.<sup>9</sup>

**Boolean searching** was used to filter and identify relevant content, and the same search parameters were inputted for both languages. Keywords and terms strongly associated with the Kremlin's discourse about bioweapon laboratories in Ukraine were identified based on a review of previously manually collected misleading and/or false information from Kremlin-controlled and local pro-Kremlin media. These were combined with Boolean search operators (i.e., logic-based words such as AND, OR, or NOT) to form a tailored search for relevant material published throughout 2022-2023. Native speakers from CSD and NSC reviewed the selected words and terms for the sufficient presence of relevant grammatical categories, synonyms, figures of speech, and other linguistic idiosyncrasies.

The resultant search queries were run on all Bulgarian and Romanian-language content indexed by Sensika and CrowdTangle. Representative samples from each identified website or public Facebook account were manually reviewed by the research team to limit the rate of false-positive results to less than 10% in each case. The final data set was exported, processed, and visualized by CSD.

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<sup>7</sup> EUROSTAT, "Households - level of internet access", 18 January 2024.

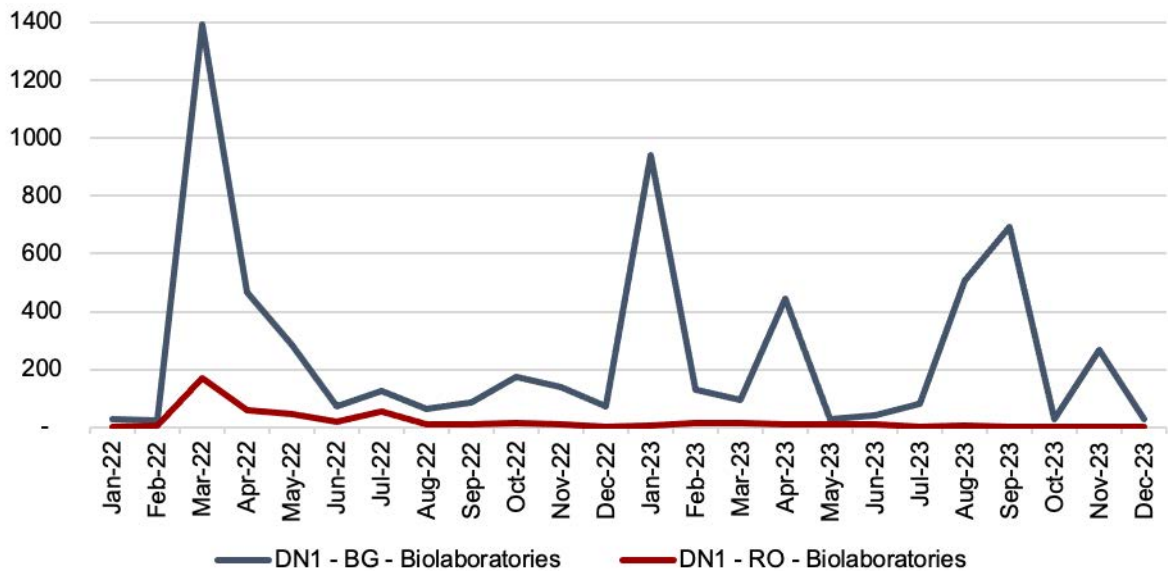
<sup>8</sup> Meta, "Regulatory and Other Transparency Reports", 2023.

<sup>9</sup> Data collected and verified by CSD using SimilarWeb and SEMRUSH.

# MONITORING WMD-RELATED DISINFORMATION IN BULGARIA AND ROMANIA

The **recurrent disinformation narrative** that laboratories in Ukraine develop biological weapons and are also used to conduct experiments on the local military, is present in both the Bulgarian and Romanian online ecosystems albeit to different extents in terms of both volume and reach (Figure 1). In Bulgaria, the narrative has clearly **penetrated the mainstream media space**, with thousands of misleading articles being published on some of the country's most visited websites throughout 2022 and 2023. The narrative has been consistently republished and amplified in Bulgarian online space since its heyday in March 2022. In contrast, **in Romania the story flatlined** for the rest of the two years.

Figure 1. Volume of articles in Bulgarian and Romanian-language websites containing disinformation about biological laboratories in Ukraine (2022-2023).



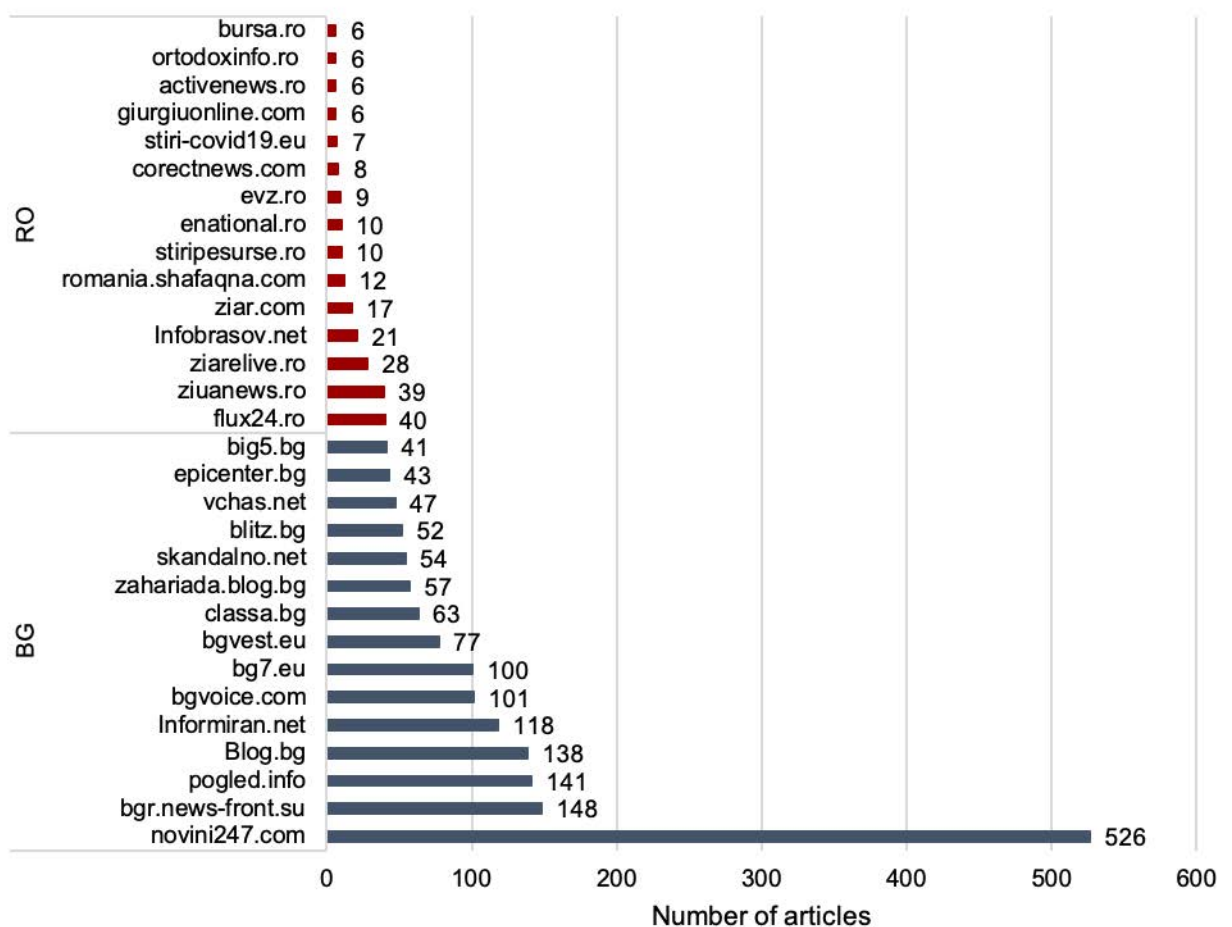
Source: CSD based on data from Sensika.

Over 90% (or approximately 5,500) of all collected Bulgarian-language articles were published by websites belonging to the top half of domestic website rankings (ranks one through five), with 8% and 10% coming from websites belonging in the top two ranks, respectively (Figure 2).<sup>10</sup> For Romania,

<sup>10</sup> Ranking is provided by Sensika, which ranks websites on a scale of 1 to 10. Ranking is based on a mix of estimates of a site's monthly unique visitors and monthly page views across desktop and mobile web traffic. The more visitors and views, the higher the site's rank is. Highly visited mainstream websites typically belong in the first two ranks.

68% of the collected articles were published by websites belonging in the first five ranks but these only accounted for 295 articles, over **18 times less than the number of equivalent articles from Bulgarian sources**. Some 123 of Romanian-language articles (or 28% of all) were collected from websites in the first two ranks, signaling that the narrative was present in Romanian mainstream media discourse in March and April 2022, albeit to a significantly lesser extent compared to Bulgaria. The difference in volume and reach between the two countries becomes even starker when considering that Romania has nearly three times the population and internet users.

Figure 2. Top 15 sources of articles in Bulgarian and Romanian-language websites containing disinformation about biological laboratories in Ukraine by volume (2022–2023).



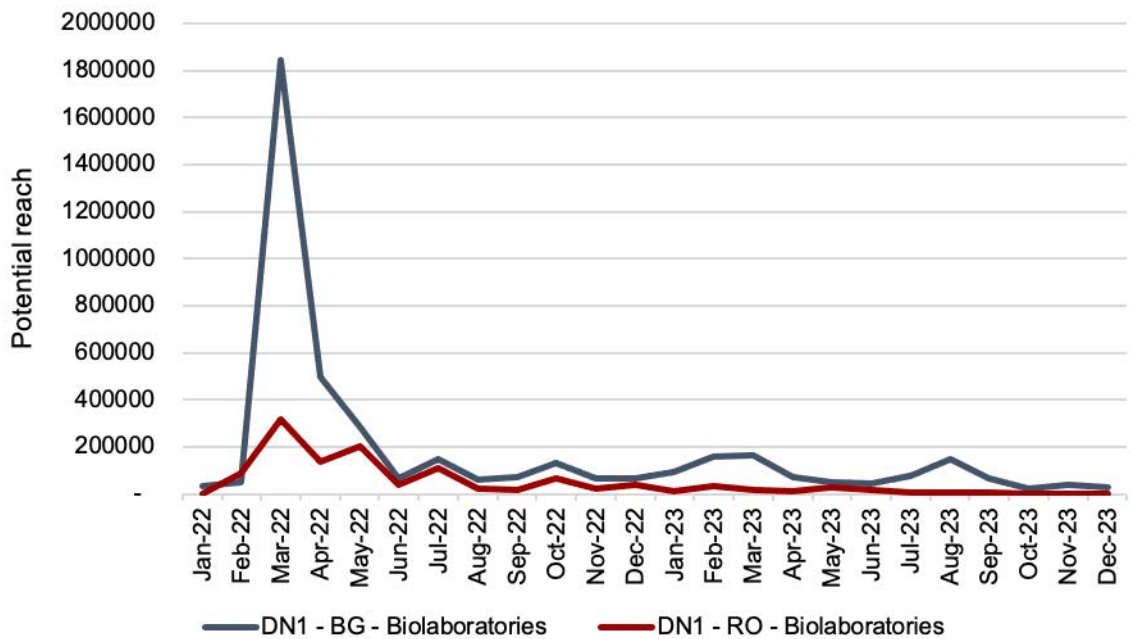
Source: CSD based on data from Sensika.

\*Note: novini247.com is a news aggregator website that automatically republishes content from various Bulgarian sources, including most outlets known for proliferating misleading, pro-Kremlin information.

The total potential reach of Bulgarian-language articles by month peaked in March 2022 at nearly 2 million readers, equal to some 40% of all internet users in the country (Figure 3). It never reached again equivalent levels of popularity despite subsequent peeks of another 1,000 articles in January 2023 and 700 in September 2023. In fact, a substantial majority (86%) of the Bulgarian readers that were exposed to this type of content in the two-year period did so in March 2022 alone. Misleading articles from Romania also peaked in March 2022 in

terms of total potential reach, with some 300 thousand potential readers, or about 2% of all internet users in Romania. Based on this, it is estimated that **the narrative was roughly 20 times more popular among Bulgarian users** compared to Romanian ones, at least so far as web traffic to local websites is concerned.

Figure 3. Total potential reach of articles in Bulgarian and Romanian-language websites containing disinformation about biological laboratories in Ukraine (2022-2023).



Source: CSD based on data from Sensika.

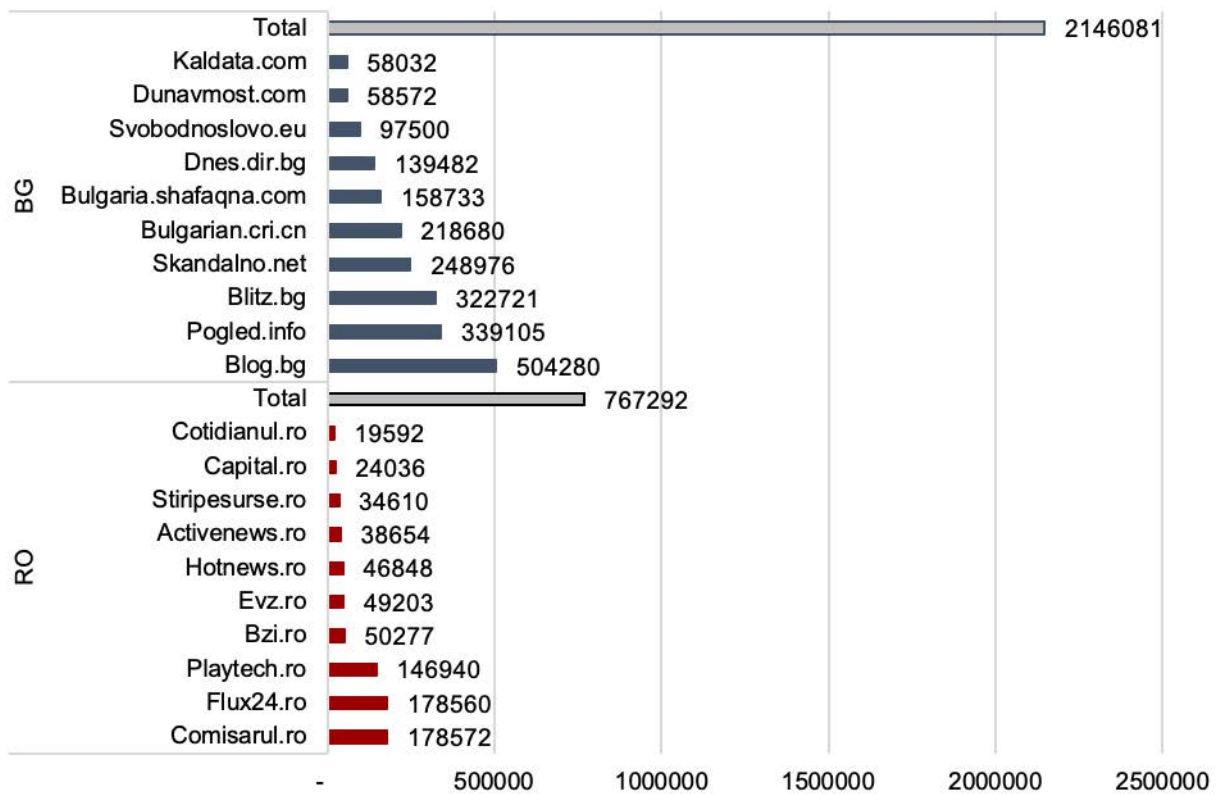
In Romania, the top three outlets by reach accounted for 66% of the total potential readers despite publishing only 10% of all misleading articles, which demonstrates the importance of quality (as it were) and the number of people reached over pure quantity (Figure 4). Outlets such as *Flux24*, *Activenews.ro*, *Ortodoxinfo.ro* and *Capital.ro* have been identified by local experts as systematic (but fringe) proliferators of pro-Kremlin content.<sup>11</sup> By contrast, others, such as *Playtech.ro* and *Comisarul.ro* appear to be tabloids and news aggregators with mass consumption in mind, where misleading content seeps through and is republished alongside various other content without showing a consistent local political bias. As far as the second group of Romanian outlets is concerned, running into pro-Kremlin content appears just as likely as finding articles that are critical of Russia's aggressive foreign policy. This tendency is problematic because it may create a **false sense of equivalency** in readers, i.e. the disinformation narrative about bioweapon laboratories in Ukraine is presented as an equally valid concern next to, for example, climate change, strategic corruption, evidence of war crimes committed by Russian forces in Ukraine, or any other issue of substance.

<sup>11</sup> Zamfir, R. & Iavita, V., *The Great Unification and Disinformation*, Budapest:Political Capital, 2020.; Calistru, E. Macanu, A., & Tableț, D., "Russian fake narratives in Romania, in the context of the war in Ukraine", Funky Citizens, 2023.; Stanoiu, I., "Rețeaua minciunilor. Cine răspândește propaganda pro-Kremlin, conspirațiile și dezinformările în România" ["The web of lies. Who spreads pro-Kremlin propaganda, conspiracies and disinformation in Romania"], Context, 10 March 2023.

Meanwhile, some of the most notable Bulgarian-language sources include: Blitz (often credited as being the most visited local news website); dnes.dir.bg (part of the Dir.bg media group and also among the most visited Bulgarian websites); the Bulgarian language-version of the state-owned China Radio International (at bulgarian.cri.cn); Pogled Info, an outlet that exclusively translates content from think-tanks and ideologues that are close to the Kremlin (e.g. the Strategic Culture Foundation, Katehon, and Alexander Dugin), many of whom have been sanctioned by the EU; and News Front, the Kremlin-controlled multi-lingual outlet based in Crimea that remains accessible for EU users.

The presence and growing influence of Chinese state-owned media reflects the **Chinese Communist Party’s own increasingly assertive and hybridized foreign policy**. Beijing’s political and informational influence in the two countries remains limited and its discourse has generally been more restrained compared to the Kremlin’s. Yet Chinese state officials publicly supported the disinformation narrative that the USA operates bioweapon laboratories in Ukraine and demanded explanations from Washington. The Romanian-language version of China Radio International (at romanian.cri.cn) also proliferated this narrative, albeit with a seemingly negligible impact compared to that of its counterpart in Bulgaria.

Figure 4. Top ten sources of articles in Bulgarian and Romanian-language websites containing disinformation about biological laboratories in Ukraine by potential reach (2022-2023).

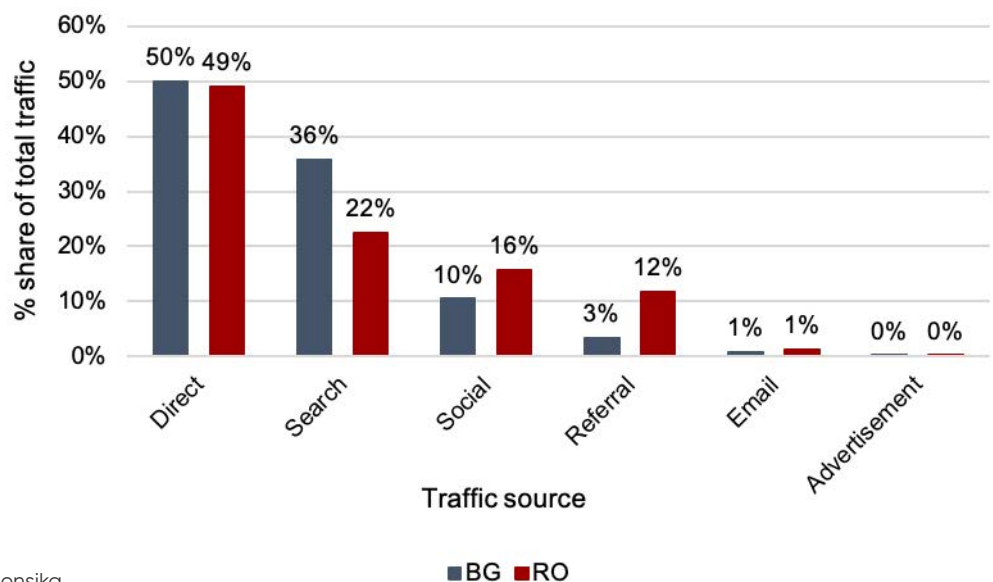


Source: CSD based on data from Sensika.



In both Romania and Bulgaria, **half of the total visits to the articles are estimated to have originated from direct traffic**, meaning users who access a website directly, without clicking on a different link on visiting another website (Figure 5).<sup>12</sup> Traffic originating from users who searched relevant words and terms on large **search engines** such as Google played a larger role in Bulgaria (36%) compared to Romania (22%). The opposite was true for traffic originating from **social media platforms** and referrals from links that appear on a different website. This indicates that Bulgarian users are on average more likely to land on this type of problematic content by searching for associated keywords, while Romanian ones are more likely to end up there through links on other websites or social media posts.

Figure 5. Article audience by traffic source of articles in Bulgarian and Romanian-language websites containing disinformation about biological laboratories in Ukraine (2022-2023).

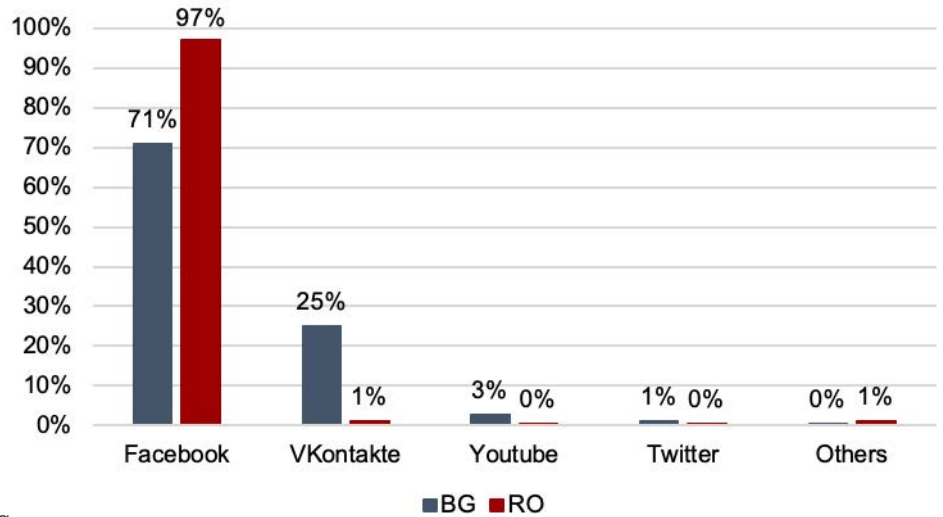


Source: CSD based on data from Sensika.

Breaking down social media traffic further, the vast majority (97%) of this type of traffic to the Romanian articles came from Facebook (which remains by far the most dominant social media platform in both countries) and just 1% came from YouTube (Figure 6). In the case of Bulgaria, Facebook's share of the traffic originating from social media accounted for 70%, nearly 3% came from Youtube and 25% came from VKontakte, the Russian social media giant owned by the state-controlled Gazprombank. The presence of significant traffic from VKontakte (which remains accessible to EU citizens) reflects the relatively higher cross-country connectivity between Bulgarians and Russians on the platform (and presumably beyond it). To give but one example, two of the Bulgarian editors working for the Kremlin-controlled News Front outlet based in Crimea are active on VKontakte, where they share their work and that of like-minded individuals. It is precisely a group of 99 articles published on [bgr.news-front.su](https://bgr.news-front.su) that account for the traffic from VKontakte.

<sup>12</sup> It is important to note, however, that unidentified referring sources are also categorized as direct traffic by search engine optimization (SEO) and website intelligence tools.

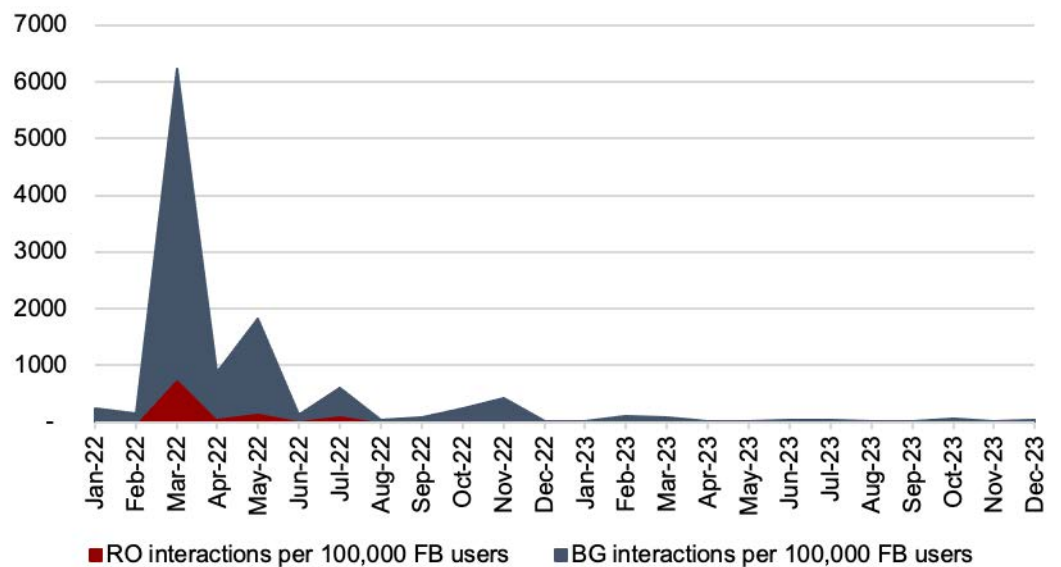
Figure 6. Source audience per social media traffic to articles in Bulgarian and Romanian-language websites containing disinformation about biological laboratories in Ukraine (2022-2023).



Source: CSD based on data from Sensika.

The difference in volume and reach of misleading content about biological laboratories in Ukraine between Bulgarian and Romanian online space is not as pronounced in terms of Facebook posts as compared to conventional media websites but is still significant. With a total of 1,817 posts and nearly 450 thousand interactions, **the group of misleading Bulgarian-language posts was a little over twice as large and collected three times the interactions compared to the Romanian ones.** However, the true contrast between the two Facebook spaces becomes apparent when accounting for the national user counts on the platform.

Figure 7. Number of interactions per 100,000 Facebook users on Bulgarian and Romanian-language Facebook posts containing disinformation about biological laboratories in Ukraine (2022-2023).



Source: CSD based on data from Sensika and NapoleonCat.



Nine of the collected misleading Romanian-language Facebook posts were published by the page of the **Russian embassy in Bucharest**, garnering 1,739 interactions (equating to just 1% of the 155 thousand interactions on Romanian posts). Out of those 1,739, at least 300 (17%) reactions were critical ones. In contrast, the Russian embassy in Sofia published 15 of the collected Bulgarian-language posts, receiving 20,876 interactions (equating to 5% of all). Less than 200 (0.01%) of these were critical. In other words, the **Russian embassy in Bulgaria** had over 7 times the interaction rate of its counterpart in Romania. Aside from the stark difference in post and interaction count, the actual content was verifiably false and/or misleading on both embassy pages.

# COUNTERING DISINFORMATION IN BULGARIA AND ROMANIA

The media monitoring reveals a significant discrepancy between the neighboring countries and indicates important nuances in the challenges they face in terms of the reception and proliferation of pro-Kremlin disinformation in their local media spaces. While pro-Kremlin, WMD-related disinformation constitutes **a security threat for both Bulgaria and Romania**, its magnitude is much more pronounced in Bulgaria. This is consistent with the fact that Romania does not share many of the cultural pull factors or cognitive capture that make Bulgarian citizens vulnerable to pro-Kremlin information interference, particularly the shared linguistic, ethnic, and historical heritage.<sup>13</sup> Differences in geopolitical public perceptions have been evident in numerous comparative surveys, with Romanians being over eight times less likely (at 3%) to see Russia as a strategic ally after the invasion compared to Bulgarians (at 26%).<sup>14</sup>

However, this is far from implying that Romania's information space and politics are safe from hybrid threats or authoritarian influence. Sympathies for **anti-systemic actors** have always been present and appear to be on the rise in 2024 together with political and social polarization, as the country prepares to hold local, presidential, parliamentary and European elections. Russia systematically has exploited such social attitudes and perceptions and used them to penetrate political decision-making and public debates to its own advantage. The same political and social developments have been visible in Bulgaria, with protest, anti-systemic, anti-EU and anti-NATO political forces reaching double-digit approval in polls. Analogous to Romania, these political actors are increasingly threatening the already fragile majorities of the current pro-Western coalition in power.

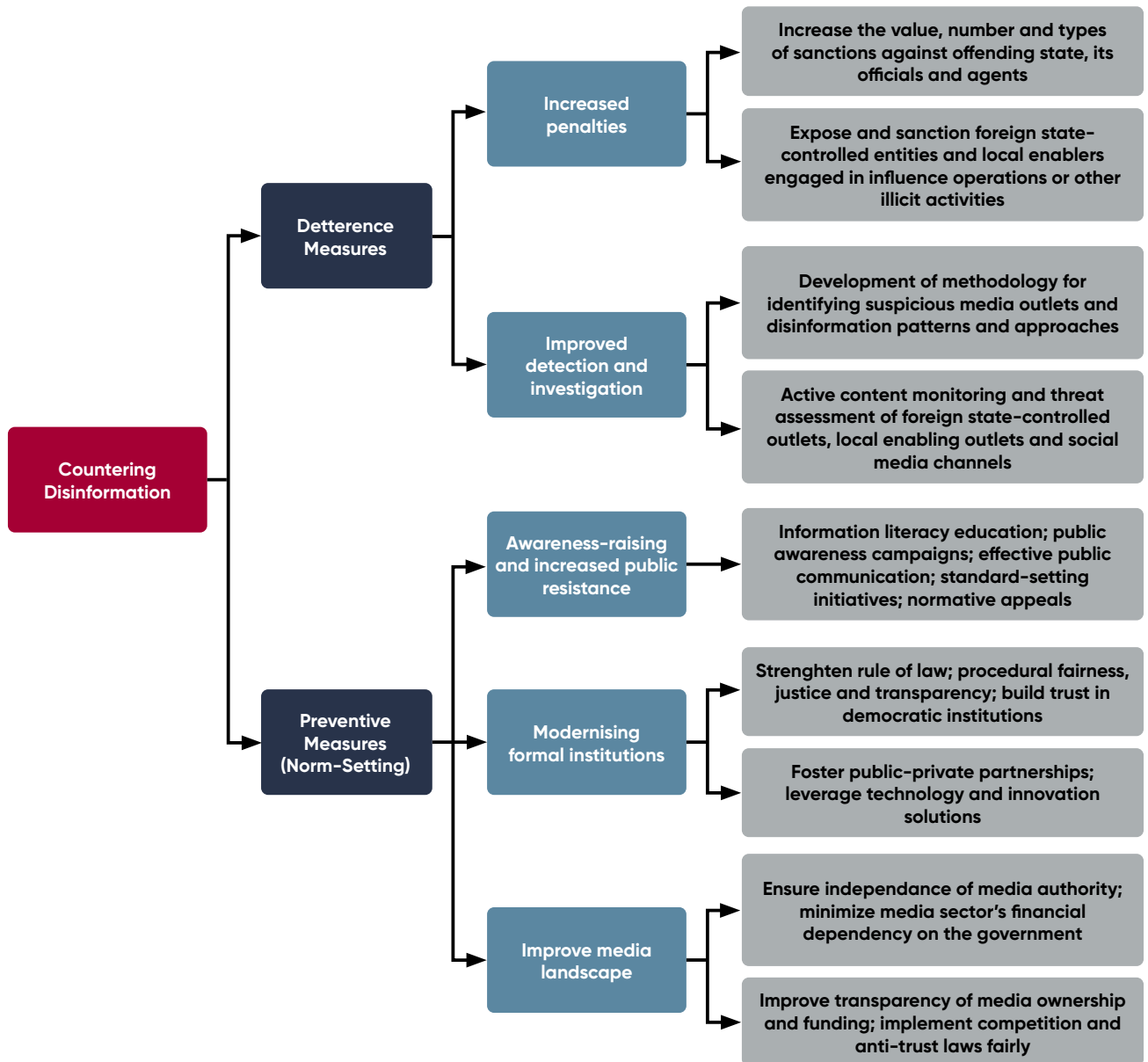
Safeguarding information integrity and countering anti-democratic and pro-Kremlin disinformation necessitates **a whole-of-society, multi-stakeholder approach** that integrates the activities of policymakers, civil society, and the private sector, and makes effective use of cooperation with the EU, the U.S., and Euro-Atlantic institutions. A **functional institutional framework** must aim to tackle both the supply of problematic content (such as fake news, conspiracy theories, and incitement to violence) as well as the demand for it by deploying a combination of deterrence and preventative measures (Figure 8). Measures should be packaged in **an integrated national approach** with several layers of defense, including not just institutional capacity and procedures, but also the **digital forensics infrastructure** and technical know-how needed to monitor the integrity of online information space.

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<sup>13</sup> See: Center for the Study of Democracy, *Building Institutional Capacity Framework for Resilience to Disinformation in Bulgaria*, Policy Brief No 131, March, 2023.; Center for the Study of Democracy, *Countering Hybrid Threats in Bulgaria*, Policy Brief No. 118, November 2022.

<sup>14</sup> Hajdu, D, et al., *GLOBSEC Trends 2023: United we (still) stand*, GLOBSEC, 2023.

Figure 8. Public policy model for countering recurrent disinformation.



Source: CSD, adapted from Colin Williams (Public policy professor, University of Sheffield).

## Institutional capacity

Institutionally, efforts to counter pro-Kremlin, WMD-related disinformation must extend **beyond information operations and strategic communications** and be part of wider efforts to expose state and media capture, decouple institutions from malign foreign interests and informal networks, and develop an integrated national approach for countering hybrid threats. **Disentangling critical nodes of the European media infrastructure** (including not just outlets but also telecoms, internet service providers, publishing houses, and other intermediaries) from corrosive foreign capital also involves offices that counter economic crime, as well as financial intelligence units.<sup>15</sup> A top priority for both Bulgaria and Romania is to address critical institutional issues related to media freedom and pluralism, especially the lack of transparency regarding media ownership, the distribution of state funds, and the broadcasting of content paid for by political parties (as both countries have been repeatedly advised to do in successive European Commission Rule of Law Reports).<sup>16</sup> This should be accompanied by regulating **strategic lawsuits against public participation** (SLAPPs), an issue that continued to affect press freedom in Bulgaria and Romania in the last two years. Setting measures to guarantee the editorial independence of public service broadcasters according to European standards must also be a priority in both countries. In addition, interference by prosecutors and other types of institutional retaliations against investigative outlets (including compelling journalists to reveal their sources) concerning politically contentious investigations continued in 2022-2023.<sup>17</sup> These need to be acknowledged by local courts and curbed as far as possible by introducing sufficient safeguards against conflicts of interest and political interference.

The role of **media regulators** must be reinforced with the mandate and capacity to track and effectively penalize the presence of content from sanctioned entities. This includes ensuring the independence of media regulators from political interference and increasing their budgets. Both regulators would benefit from being afforded the resources needed to hire **expert-level staff** as well as adopt new **technology solutions** that can automate some oversight functions. This is particularly relevant for equipping the regulators with the right tools to tackle technically complex topics, such as **WMD-related disinformation**, which also require much higher level and intensity of cooperation with the core organizations from **the national security system**.<sup>18</sup>

In the case of Bulgaria, there is no comprehensive legal basis and procedures for the application of media-related restrictive measures emanating from international and EU sanctions obligations. In the **absence of a proper legal framework regulating the application of sanctions**, the country's media regulator, the Council for Electronic Media (CEM), saw internal resistance

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<sup>15</sup> Center for the Study of Democracy, *Illicit Financial Flows and Disinformation in Southeast Europe*, Policy Brief No.126, March 2023.; Center for the Study of Democracy, *Investment Screening for Enhanced Economic Security*, Policy Brief No. 142, December, 2023.; Center for the Study of Democracy, *Policy Agenda for Countering Media Capture in Europe*, Policy Brief No. 116, October, 2022.

<sup>16</sup> See European Commission, 2022 Rule of law report - *Communication and country chapters*, 2022; European Commission, 2023 Rule of Law Report - *Communication and country chapters*, 2023.

<sup>17</sup> Wesolowsky, T., "Instead of Protecting Investigative Journalists, The Bulgarian Authorities Are Going After Them", RFE/RL, 3 May 2023.; Reporters without Borders, "Country fact-file Romania", 2023.

<sup>18</sup> Novossiiova, T. and Georgiev, G., *Countering Hybrid Warfare in Bulgaria: A Strategic Assessment of National Capabilities and Infrastructure*, Center for the Study of Democracy, 2023.

against their implementation. Notably, CEM's chairperson abstained during a vote to implement the third EU sanctions package, which targets media outlets controlled by Russia and the misleading content they produce. Moreover, the chairperson has publicly qualified the application of EU sanctions as "unconstitutional censorship" and **the Bucha massacre as "Ukrainian propaganda"**.<sup>19</sup>

For its part, the Romanian National Audiovisual Council (CNA) issued its largest fine ever - 100 thousand RON (approximately **20 thousand EUR**) - in April 2022 to GoldFM for spreading misleading pro-Kremlin content (including about bioweapon laboratories in Ukraine) in breach of audiovisual regulations.<sup>20</sup> This was on top of another 50 thousand RON in fines for GoldFM, 40 thousand RON for Realitatea, and a slew of other sanctions for similar breaches in 2022-2023.<sup>21</sup> Nevertheless, CNA faces similar **sustainability issues** as its Bulgarian counterpart, with the regulator's budget being too low (although likely to increase in the coming years) to effectively fulfill its full set of oversight responsibilities.<sup>22</sup>

Similar to other EU members (e.g. the Netherlands), Bulgaria and Romania must explore the option of **extending their legal and institutional frameworks** for media regulation to cover popular local video content on large online platforms (such as Facebook, Youtube., TikTok, etc.). Consequently, local media and communications regulators must have the capacity to implement such frameworks and ensure the compliance of online media and social media platforms. To this end, both countries should make use of the new tools and mechanisms provided by the Digital Markets Act (DMA) and particularly the Digital Services Act (DSA).

Following in the footsteps of their NATO allies, Bulgaria and Romania must seek to **publicly expose and pre-bunk Russian plans** and underlying intents, including by declassifying intelligence when deemed necessary. A counter-messaging strategic plan containing various options should be included as an integral part of a wider integrated national approach for countering hybrid threats.

Securing the **integrity of communication channels and information spaces** is of particular importance in the context of WMD attacks. Disinformation campaigns can be used to evade accountability and sow confusion and distrust, potentially amplifying the effects of an actual material attack. As such, governments must ensure their relevant counter-intelligence, strategic communications, and crisis management units have the resources, know-how, and infrastructure needed to prevent mass information manipulation and interference.<sup>23</sup> Accurate information is only as valuable as the ability to communicate it timely, effectively, and securely. Hence, competent security authorities should have in place established channels of communication with

<sup>19</sup> Heil, A. "Bulgarian Media Watchdog Equated Bucha Killings With Anti-Russian 'Propaganda'", RFE/RL, 27 June 2023.

<sup>20</sup> Stanoiu, I., "Rețeaua minciunilor. Cine răspândește propaganda pro-Kremlin, conspirațiile și dezinformările în România" ["The web of lies. Who spreads pro-Kremlin propaganda, conspiracies and disinformation in Romania"], Context, 10 March 2023.

<sup>21</sup> A list of sanctioning decision of the CNA is available on its website at: <https://www.cna.ro/Decizii-de-sanc-ionare-.html>.

<sup>22</sup> See European Commission, 2023 Rule of Law Reports, Country Chapter on the rule of law situation Romania, 5 July 2023.

<sup>23</sup> Center for the Study of Democracy, *Countering WMD Hybrid Threats and Malign Interference in the Black Sea Region*, Policy Brief No.141, November 2023.

## Digital forensics

relevant national scientific experts, as well as relevant international bodies. This includes protecting informants (such as doctors and investigators) from undue pressure.

The technological challenges posed by the rise of online news websites, social media platforms, and artificial intelligence (AI) language models, which together can produce and amplify content on an unprecedented scale, are complex and myriad. Online information providers operate in an environment that is much more challenging to supervise compared to that of legacy media, not simply because legislation lags behind technological developments, but also due to the very **scale and complexity of digital infrastructure**. The digitalization of knowledge production and consumption poses new and unfamiliar difficulties for public bodies responsible for safeguarding the integrity of their local information spaces. To rise to the challenge, they must adopt the accumulated expertise from entities in the **private sector, civil society, and academia** that have been analyzing and practically engaging with these issues over the last decade. Both Bulgaria and Romania host a wealth of experts and private enterprises to benefit from.

Establishing a basic line of defense requires the **development and deployment of a digital forensics infrastructure** to detect and investigate disinformation campaigns in near real-time, as well as the actors that produce and proliferate them. At the primary level, this means deploying media monitoring and audience analysis tools that can measure the volume and reach of recurrent narratives. A more sophisticated system would also comprise tools that analyze the digital makeup of online news sources in bulk and automatically detect signs of exploitation and abuse, such as inauthentic contact or ownership information, domain repurposing, and lack of a privacy policy or general terms of use, as well as other well-documented signs of malicious intent. A further step would be **monitoring the integrity of algorithms and the monetization of content** through advertisements, ensuring they comply with national and international obligations. Such technological solutions must be leveraged through **public-private partnerships** with the IT sector, where both Bulgaria and Romania have a comparative advantage and access to numerous local technology companies that offer the necessary services and technical know-how.

Data collected from digital forensics units must be used to inform **national security threat assessments and risk assessments** of the dangers posed by disinformation to critical security issues, such as foreign policy, energy security, and commitments under key EU policies, such as the DSA and sanctions packages against Russian entities. These efforts extend and complement **existing digital security mechanisms** established by NATO and the EU, such as the EEAS's Strategic Communication Task Forces and Rapid Alert System, the network of fourteen European Digital Media Observatory hubs, the EU-US Trade and Technology Council, the NATO Strategic Communications Centre of Excellence, and the European Centre of Excellence for Countering Hybrid Threats (Hybrid CoE).

Introducing **technology solutions, data analysis, and a flexible, case-based workflow** for media regulators, as well as Digital Services Coordinators (DSC), is practically a necessity at this point. These new elements will require significant budget increases but are nevertheless highly recommended given the multifaceted challenges regulators are likely to face in the future. Both

Bulgaria and Romania must explore options of setting up **dedicated data science units** and expert advisory panels (from civil society organizations, policy institutes, academia, and the private sector), and involving AI and machine learning (ML) engineers. These different roles will help **future-proof regulators** and prepare them for the inevitability of AI-dominated content generation, virtual and augmented reality, and augmented knowledge consumption.

