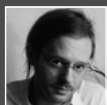


# Understanding the EU's Role in the Fight Against Disinformation: A Public Policy Perspective



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MÁRTON  
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**P**ublic Policy is the science of what a government does or does not do in reaction to a particular social problem<sup>1</sup>.

For a phenomenon to *become* a social problem, it must affect a wide range of citizens or hinder the functioning of the state. This is precisely why one must talk about disinformation, as it has grown into a real – not only state-wide, but global – problem over the past two decades.

In the current day and age, sharing and finding information is exceptionally easy. A few decades ago, there was no way for us, regular citizens, to monitor the credibility of every piece of information we are being told. As citizens were not connected by the Internet the only way to reach out to an entire population was through education, television, mail, telephone, newspapers, books. Meanwhile, the spread of information by means of these methods was very costly, and so governments had considerable control over information flow in their respective countries. This is also exactly why in the past, the entities spreading large-scale disinformation this way were the governments themselves. Back then, the average person did not have the means to fact check the information they receive. Nowadays, “disinformation policy” constitutes a brand-new wave of governmental and even supranational policy that did not exist in its current form in the past.

False information harms its recipients, and if the damage is done to a large number of citizens or households, this causes problems for governments too. An example would be a foreign country using disinformation to influence the outcome of elections in another country. In this study, I resorted to methodology used in the field

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of Public Policy, to define the truly social problem of disinformation. I use a combination of tools in order to create a model in which disinformation policy can be interpreted. The main questions I will be asking are, firstly: How can we combat disinformation?; secondly: What could be called a “liberal” approach in disinformation regulation?; and finally: Where does the EU stand in all this?

### THE FIVE ELEMENTS OF DISINFORMATION

In this study, we are looking at disinformation as a combination of five main elements: source of disinformation, spread, reception, regulation, and implementation. This article attempts to model disinformation as an interaction between actors; each actor having a role in any of the five key elements of the interaction. The policy process of disinformation regulation starts with:

<sup>1</sup> Birkland, T. A. (2001) *An Introduction to the Policy Process*, Armonk: M.E. Sharpe.

1. **Source:** Those who come up with the false information;
2. **Spread:** Those who both intentionally and unintentionally spread false information, and;
3. **Reception:** The people who are affected by false information and who we want to protect from disinformation, as they could become future spreaders

These three elements demonstrate how disinformation has become a social problem. Actors associated with these three elements of the interaction are the main *subjects* of disinformation policy. Citizens on the receiving end of disinformation are the most critical ones – this is the element where the damage is done. Even though their ignorance causes many problems, the people being lied to are not the source of the problem. Disinformation regulation should not focus on the actions of the receiving individual, but rather, it should be

aimed at sources and spreading actors. The only type of regulation that is meant to target reception would be an information campaign. Recipients would most likely not have to be held accountable for their actions caused by disbelief, as one would not hold a baby accountable for being dirty.

The second half of the interaction (4. regulation: creating laws; and 5. implementation: compliance with passed laws) is where policymakers and states are most likely getting involved. They are also the ones that define what is *real* and what is *false* information, which, in turn, also causes a number of problems.

## ORGANIZED DISINFORMATION

There are two main cases where disinformation spread can go as far as being organized crime. While spreading disinformation is not considered to be a crime in every country, as it is not regulated, the European Union has implemented a policy to combat it. And while one person spreading false information does not require its own regulation, when disinformation is spread intentionally and in an organized manner, policymakers and governance might have to take extra steps. Organized disinformation refers to private, civil, or state-funded, but not state-run organizations (e.g.: large media or international organizations, etc.) that intentionally spread false information to citizens about current events.

Governments and governmental institutions have the means to combat organized disinformation, should they want to, in their own jurisdiction, and supranational associations such as the European Union (EU) have the means to regulate organizations even beyond borders. The only two concerns are country governments' weak influence over social media and the issue of human rights – freedom of speech, as

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a basic human right, is being challenged by disinformation regulation<sup>2</sup>.

## INSTITUTIONALIZED DISINFORMATION

Institutionalized disinformation is a sub-type of organized disinformation, and is the trickiest type of disinformation by far. State-level disinformation, or institutionalized disinformation refers to false information that is being spread not only in an organized manner, but with the involvement of state institutions, and with the intention to hurt other countries, international legislative bodies (such as the EU), or to forge political capital for the governing political force, both internationally and domestically.

This kind of institutionalized disinformation is by far the hardest to combat. Most countries, especially in Eastern Europe have the authority needed in their own country to be able to define what *facts* and *truths* are, and governments have the influence to make *their truth* the majority opinion.

The resources available for a country to actively spread disinformation are virtually infinite. Regulating the flow of false information channeled to the countries' own citizens is near impossible; just as extracting valid information from those countries, which is quite hard in itself.

When Hungarian's governing party Fidesz's membership in the European People's Party (EPP) was suspended in 2019, PM Viktor Orbán, state communications, and state-financed news media claimed Fidesz unilaterally suspended its own membership, while publicly accessible sources could easily prove the contrary. This example shows us that even though correct infor-

mation is available, it falls short of accessibility compared to state news. Because of this, the majority of Hungarians woke up to the news that Fidesz once again showed their strength in the EU, while the rest of the European Union knew what had actually happened. What mattered to the Hungarian government was that its voters did not take notice of this.

## THE ROLE OF PRIVATE AND CIVIL SECTORS

With the introduction of social media, the spread of information exploded. Platforms such as Facebook and Twitter are great tools for anyone looking to spread false information without spending too much money, and it can be done very quickly. At first, big tech companies assumed little to no responsibility for the validity of information that was spreading on their platforms, but in the last few years, not only did they

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<sup>2</sup> See: Nunez, F. (2020) "Disinformation Legislation and Freedom of Expression", [in]: UC Irvine Law Review, pp. 784-798.

give in to pressure, they took incentive in the fight against false news. With this, social media is in a special place when it comes to disinformation: Their existence alone assures the steady spread of false information, but at the same time, they play an enormous role in disinformation regulation and implementation.

The implementation of EU disinformation regulations<sup>3</sup> may be done by three actors. First, state governments can implement regulations at home (even if they cannot effectively be forced to do it). Second, private social media companies, who play a large role in both spread and regulation, can implement regulation on their platforms (they, unlike states, are forced to do it, if they want to continue operating undisturbed in the EU). A third actor, civil organizations, is also connected to implementation. While they have no authority over media, they can be contracted to do news watching, fact-checking, and other similar activities for EU institutions.

## STAKEHOLDERS OF EUROPEAN DISINFORMATION

The term *stakeholder* is generally used in the field of management, and may be described as: "People or small groups with the power to respond to, negotiate with, and change the strategic future of the organization"<sup>4</sup>. Stakeholders are actors that can influence, or are influenced, by a certain policy or lack thereof. With each actor, the aim is to estimate how much influence they have over policy action, and how much it is in their interest that policy action is taken. This division is most commonly used to see if there are any actors that are against policy

<sup>3</sup> Eden, C. and F. Ackermann (1998) *Making Strategy: The Journey of Strategic Management*, London: Sage Publications, p. 117.

<sup>4</sup> See: Brzeziński v. Poland Available Online: <https://globalfreedomofexpression.columbia.edu/cases/brzeziński-v-poland/>

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action that have enough power to sabotage implementation.

For example, Russia and China are the main disinformation sources and their influence is immense in the region. However, the EU cannot restrict them directly with policy, since these are large countries that are not members of the EU, and it is in the European Union's interest to cultivate a good diplomatic relationship. Affected persons can appeal to the European Court of Human Rights and the Court of Justice, and if disinformation regulation were harsh on freedom of speech, this would most definitely occur<sup>5</sup>.

EU Member states collectively make up the heart and soul of EU legislation, in the form of prime ministers and finance ministers.

<sup>5</sup> Based on Hajnal, G. and G. Gajduschek (2010) *Közpolitika. a gyakorlat elmélete és az elmélet gyakorlata*, Budapest: HVG-ORAC.

While most EU member states can be expected to support the fight against disinformation, member states can cause problems if the policy is controversial. Other actors such as social media companies and the EU's own agencies pose little threat to policy action and their role in implementation is most crucial.

In the collective European disinformation policy, member states, social media companies, civil organizations, and EU legislative bodies can be involved in both policymaking and implementation. Given the willingness of these actors and their influence on the disinformation interaction, not to have means of cooperation and coordination between them or to exclude anyone from implementation would prove ineffective.

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Now that the kind of actors that should be involved in the policy process has been laid out, let us introduce a regulation typology that could be applicable, when trying to decide the proportionate policy response to social problems. Later, this basis of evaluation is used to try and define what a liberal disinformation policy would look like.

### **REGULATION: RESPONSIBILITY AND INTENTIONALITY**

Talking about policy tools, it is crucial to look at a few characterizing factors of disinformation source and spread. The first, most important factor when appointing the regulation subject is defining responsibility. Responsibility usually presumes intentionality, but can come from bad observation too. In disinformation policy it can be extremely hard to appoint responsibility, as it is usually difficult to find the source and differentiate it from the actors that spread it. Cases of organized spread are the most important focal points of policy.

Regulation and implementation in not just disinformation policy, but any legislative action, always has to look at intentionality and responsibility to be proportionate to the crime itself. In an area of policy such as disinformation, where most of the wrongdoings (spreading of disinformation) are unintentional, most of the policy budget will probably go into tools that are less on the punishment side and are more focused on limiting the spread as much as possible.

Unintentional spread could be punished more harshly, in an attempt to incentivize Internet users to double check for credibility before sharing anything online. Regulation like this would be controversial to say the least, but considering we see an ever-growing crowd of people that support stricter regulation of social media and Internet communities, especially in the wake of recent hate crime tragedies, it is worth



## THE EU USUALLY HAS NO AUTHORITY TO DIRECTLY CENSOR MEDIA OUTLETS

mentioning such a regulation alternative. In social media it does not matter that one did not know if the shared information was fake, all that matters is that they wrote one's own post about it instead of sharing the source.

### REGULATION: POLICY TOOLS

When looking at policy tools, it must be ascertained that the policy is proportionate to the volume of the problem. The EU usually has no authority to directly censor media outlets. State-funded propaganda media (which is a recurring problem in Hungary, for example) cannot be censored by EU bodies. Regional private news media outlets can only be bought out or, very rarely, censored or prohibited by local governments and state institutions. While directly censoring false information or propaganda in news media is problematic and raises concerns with regards to freedom of information, speech, and democracy, disinformation can still be monitored and suppressed.

Although we cannot censor the news outlet itself, social media companies can block most of the traffic, since most of the traffic on online news media sites is generated by people *coming in* from social media. The EU does not directly prevent or prohibit the spread of disinformation in the media, it just

provides funding, contracting, and so on, to other actors that are directly involved, such as social media companies.

Direct regulation can target social media companies in the EU, because they are in the private sector – social media companies can be forced, as they already are, to comply with some EU guidelines, if they want to operate in the EU seamlessly. Apart from that, though, direct regulation tools are limited and less effective when one tries to suppress the spread of disinformation.

Regulative authority of the EU is limited over news media, since a lot of disinformation media sources are funded by member states or other countries (e.g.: Russia, China), and the EU's regulative competence is mostly aimed to control international trade and the private sector. As far as economic tools go, the EU's power is uncontested.

The volume of the EU budget can be presented as a recent example: in July 2020, the EU leaders agreed on a comprehensive budget of EUR 1 824.3 billion (!), which combines the multi-annual financial framework (MFF) and an extraordinary recovery effort – Next Generation EU (NGEU). The package helps the EU rebuild after the COVID-19 pandemic and will support investment in the green and digital transitions. Out of this, EUR 750 billion takes up just the recovery budget<sup>6</sup>.

If the EU is capable of such an extreme level of resource allocation, introducing mobilization and incentive economic tools, and setting up organizations to combat disinformation should not be a matter of "Do we need this?" The EU already answered this

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<sup>6</sup> As a side note, like I said, regulative action was needed for EU bodies to even be able to free up such a big portion of their budget to go into crisis management, so regulative and economic tools went hand in hand in this case too.

question, as we will see in the final segment of this study. By showcasing all these different policy tools, the “How can we combat disinformation?” part of the question is answered.

Now, we have everything we need in order to look at existing disinformation policies and evaluate them by checking: 1) If it suppresses the spread of disinformation; 2) If the policymaker and implementation have sufficient authority; 3) If the policy action taken is proportionate to the volume of the problem; and 4) If the right policy tools are being used.

Using what has been laid down, we can attempt to define a kind of liberal disinformation policy that meets our criteria, along with the criteria of being “liberal”.

### **LIBERAL DISINFORMATION POLICY**

One central question here is: “What core values define liberalism, which must be taken into account, when the European policymakers’ aim is to solve a social problem in an ideologically compatible way?” For this, we might as well quote the Polish *Liberté!* magazine, which refers to: “(...) widely understood freedom, free economy, open society, as well as European integration”<sup>7</sup>.

A liberal disinformation policy would presumably make little use of preventive tools and binding regulation. The same goes for censorship. Since disinformation policy in itself is pushing the boundaries of current freedom of press and freedom of speech, a liberal approach would have to resort from going near that gray area too. Because of this, liberal policy must rely heavily on the private and civil sector for implementation, or at least for monitoring.

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MOST DISINFORMATION IS NOT ORGANIZED OR INSTITUTIONALIZED; MOST OF THE SPREAD IS UNINTENTIONAL

In an economic sense, withdrawal of resources, punishing preventive economic measures, extra taxation, and – especially because of the open society and freedom of information aspect of liberal policy criteria – it should not have heavy state or supranational level supervision. Instead of creating a new institution inside the governmental hierarchy and endowing it with control powers, the correct way would be the development of a transparent and public funding system that relies on tenders and innovation, to supervise this policy. Pre-existing supervisory institutions, such as Media Authorities, could also receive funding to extend their intelligence services to flag disinformation. It would not be fitting, with a liberal perspective, to doubt the civil and private sector’s ability to combat disinformation when it is in their absolute interest to fight it. For those who are looking to make a profit on organized disinformation, and hence it is in their interest to spread false information, however, the Competition Authority of their country of operation should proceed as usual, as in any other case of economic foul play. Liberal disinformation policy should not rely on creating new

<sup>7</sup> See: <http://liberteworld.com/about/>





# THE MAIN ELEMENTS OF THE EUROPEAN UNION'S DISINFORMATION POLICY ARE: EUVSDisinfo, THE CODE OF PRACTICE, THE ACTION PLAN, AND SOMA

institutions and passing new binding legislation, but rather, it needs funding and organization, and the cooperation of the three sectors (public, civil, and private). Since we live in the European Union, we must also try and make sure that whenever something of importance happens in the EU, the citizens of every state hear about it, and that they all hear the same version of the story. In today's age, this is only a matter of reach. And reach is only a matter of money.

It is also crucial to remember that most disinformation is not organized or institutionalized; most of the spread is unintentional. Because of this, liberal policy can benefit from information tools and any soft incentive tools that encourage citizens and journalists to double check the facts before they spread them.

An example of liberal disinformation policy would be an open access database where

private, public and civil sector actors are funded to collect disinformation. From there, based on the nature of the spreader and the source of disinformation, if available, the data is forwarded to the institution or actor which practices authority over the actor that is responsible for spreading. Many times the source is from outside of the EU (Russia, China), but the platform for this disinformation is mostly social media. After the appropriate authority deals with that disinformation, it is organized that the factual information gets to people, or is at least easy to reach, possibly in the form of an EU-funded news outlet that is widely available to European citizens.

This is not to be taken as a word-for-word policy proposal, but rather, a combination of policy elements that are compatible with liberal values and comply with our other requirements, organized into one package.

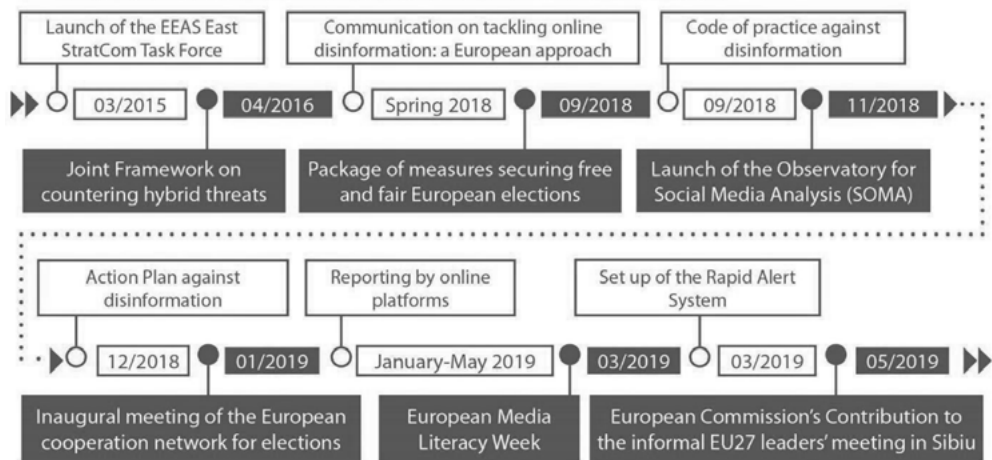
## EUROPEAN DISINFORMATION POLICY: ANALYSIS AND EVALUATION

The main elements of the European Union's disinformation policy are: EUvsDisinfo, the Code of Practice, the Action Plan, and SOMA. We need to be able to tell where and how these policies exert their effect. For this, an impact-process analysis of the European disinformation policy is presented, based on open-access EU data<sup>8</sup> [See: Figure 2].

Upon drawing the impact-process map of EU disinformation policy, I first had to define the problem itself. The approximate numbers in the 'problem' bracket are based on the Action Plan progress report – this is only the amount of disinformation cases

<sup>8</sup> See: [https://ec.europa.eu/commission/sites/beta-political/files/factsheet\\_disinfo\\_elex\\_140619\\_final.pdf](https://ec.europa.eu/commission/sites/beta-political/files/factsheet_disinfo_elex_140619_final.pdf); <https://ec.europa.eu/inea/en/connecting-europe-facility/cef-telecom/apply-funding/2020-edmo>; <https://ec.europa.eu/digital-single-market/en/news/action-plan-against-disinformation>; <https://euvsdisinfo.eu/disinformation-cases/>

Figure 1: Overview of EU joint and coordinated action against disinformation



Source: European Commission (2020) Tackling Online Disinformation. Available [online]: [https:// ec.europa.eu/digital-single-market/en/tackling-online-disinformation](https://ec.europa.eu/digital-single-market/en/tackling-online-disinformation)

that have been identified and dealt with in the first year of the Code of Practice. We can imagine that the magnitude exceeds these numbers, since it is near impossible to filter everything. These are essentially the indicators used to define the problem causes, the causes, not the problem itself.

The problematic elements of negative effects are what we see in the lower half of Figure 2's problem bracket. The essence of the problem is very comprehensively described in the Commission's *Shaping Europe's Digital Future* strategy:

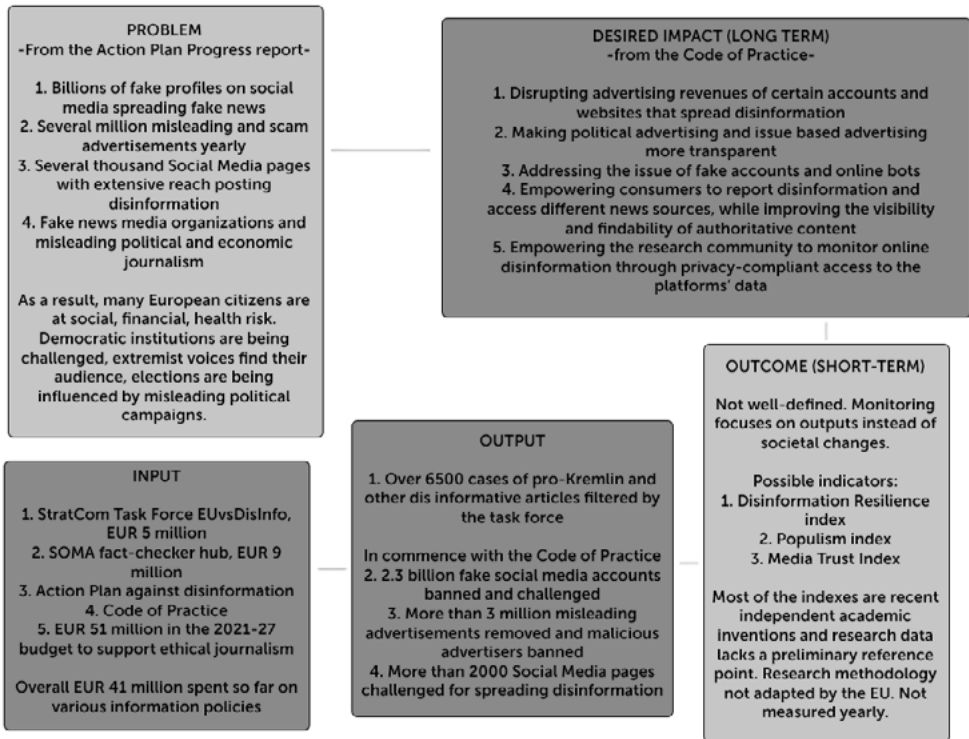
*"Disinformation can cause public harm, be a threat to democratic political and policy-making processes, and may even put the protection of EU citizens' health, security and their environment at risk. Disinformation erodes trust in institutions and in digital and traditional media and harms our democracies by hampering the ability of citizens to take informed*

*decisions. It can polarize debates, create or deepen tensions in society and undermine electoral systems, and have a wider impact on European security. It impairs freedom of opinion and expression, a fundamental right enshrined in the Charter of Fundamental Rights of the European Union"*<sup>9</sup>.

The Code of Practice Roadmap mentions five elements, which are what the EU defines in the five desired impact points [See: Figure 2]. The Action plan's progress report, however, focuses on the outcomes of the policy and decides to hit readers with big numbers, instead of showcasing how much progress has or has not been made towards the desired impact. The numbers we know only tell us how much disinformation cases were flagged and challenged by the policy

<sup>9</sup> Humprecht, E., F. Esser, and P. Van Aelst (2020) *Resilience to Online Disinformation: A Framework for Cross-National Comparative Research*.

Figure 2: Impact-process analysis of European disinformation policy



Source: Own elaboration

tools, and not how much, if at all, disinformation “decreased” in the past years. Because of this, the outcome bracket can only feature indicators adapted from academic life<sup>10</sup>.

However, as seen in the figure, we have no preliminary data to serve as reference, nor are there clear intentions from the publishers of the studies to do yearly surveys. The EU could potentially adapt these indicators and use them to define outcomes later on. From this impact process analysis, we can see that the EU has created policies with measurable and significant output, but we

have no way of telling as of yet, how much actual impact the policies had, because we cannot tell how much disinformation “goes through the cracks”. One possible way to get around this would be to adapt one of the many indicators introduced by academics of the field.

Finally, we need to check if European disinformation policy meets our other criteria we set up in the study. Namely: 1) if it suppresses disinformation spread; 2) if the policymaker and implementation have sufficient authority; 3) if the policy action taken is proportionate to the volume of the problem; and 4) if we are using the right policy tools.

<sup>10</sup> Ibid. See also: Ukrainian Prism (2018) *Disinformation Resilience Index*, Kyiv: EAST Center.

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#### 1. Does it suppress disinformation spread?

Based on our impact-process analysis, we saw that EU policy was successful in monitoring and filtering disinformation. Most of this was due to the Code of Practice and social media companies, and the StratCom Task Force, and while the numbers are high, we should not forget that these platforms

had pre-existing terms of services, that punished violation of terms in a similar way as it does now. The difference is that they report their progress to the EU, and possibly there is an extra incentive.

The big problem, when we try to tell if disinformation spread was really suppressed, is that we have no outcome indicators and no knowledge of the volume of disinformation that slips through the cracks. To give a definitive answer: EU policy *does* suppress the spread of disinformation, but we do not know if it does enough. Based on what we can observe, we can say that more needs to be done, as the problem of disinformation has not yet diminished.

#### 4. Does the policymaker and implementation have sufficient authority?

EU disinformation policy consists of several different but intertwining elements – the Task Force, the Code of Practice, etc. The Task Force and SOMA use agencies that are funded by the EU, with SOMA making good use of a tender system I advocated for earlier.

Both the Task Force and SOMA incorporate open access databases, which ensure transparency. The Code of Practice is a prime example of outsourcing from EU institutions to the private sector, and this also ensures that implementation always has sufficient authority.

With this contract between the EU and advertising giants, the authority problem over source and a large considerable portion of disinformation spread dissolves. In many ways, the EU implemented policies similar to what I discussed in the ‘liberal policy approach’ segment are similar to my ideas of liberal disinformation policy, coordinating with private and civil sectors. Pre-existing organizations took on new roles – instead



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of the EU forcing another wedge into the institutional hierarchy, they provided funding for outside actors and initiated cooperation where intelligence is shared.

### **3. Is the action taken proportionate to the problem?**

Proportionality is difficult to determine because the volume of the problem is not known. The EU set up a robust network and a policy package to combat disinformation, which it does well, but not enough attention is paid to the scale of the social problems caused by disinformation, like populism, extremism, distrust in media, etc. Similarly, we cannot yet monitor our outcome “variable”. This does not mean that

the action taken is not proportionate to the problem, as the anti-disinformation budget multiplied over the years, but at this point, it certainly isn’t enough to just make large-scale disinformation – it just means that we have no idea if it is.

The other side of proportionality is proportionate punishment, which is handled well in EU policy. Appointing blame and defining consequences is done as it is supposed to be, with a ‘crime’ that is mostly unintentional. Actors with great responsibility (social media companies) are closely observed and monitored, with progress reports and during a 12-month period when they first join the Code.

### **4. Are the right policy tools used?**

As mentioned before, EU disinformation policy uses a wide variety of distributive, mobilizing, incentive, information, and regulative tools – as much as regulation is needed for any other policy action in the European Union. As with any policy in the EU, their main tools are distributive.

The EU is built around (re)distribution of funds and joint economic effort, and most of the time regulation means implementing laws about how resources are allocated. I did mention that fighting disinformation requires two things: funding and organization. By deciding what and how to fund, the EU legislative bodies also define how policy implementation is organized. As the EU’s main policy tool is distribution, and distributive tools are the backbone of setting up an anti-disinformation network, we can safely say the right tools are used. What is uncertain, though, is if these distributive tools are used in the right way.

*Ex ante* (preliminary) problem evaluation, and the integration of academic research of disinformation into the policy process

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## IN THE PAST FIVE YEARS, EUROPEAN DISINFORMATION POLICY EVOLVED AND EXPANDED

needs more attention, and these endeavors need more funding. Focusing on disinformation monitoring is a good practice, but to truly measure our impact, it is not enough. To sum up, the right policy tools are definitely being used, but their area of impact, or what the subjects of distribution are, allocation and policy focus could be improved upon.

### CONCLUSIONS

In the presented overview, we put on the Public Policy goggles and inspected disinformation as an interaction between actors, which consists of five elements: source, spread, reception, regulation, and implementation. Different stakeholders are associated with different elements of the interaction, and the European Union has everything an actor would need to have a positive impact on this interaction. The introduced policy and analytic tools may prove useful in laying out the structure of this interaction and to define the necessary impact points of policy action.

In the past five years, European disinformation policy evolved and expanded, and we saw a slow but steady increase in funding from legislation. We have a sample of what this anti-disinformation network can do

with additional resources, and we also see that there are several aspects of the fight against disinformation that could benefit from more funding. As this is a Public Policy analysis, the purpose of this study is not so much to define what the next step should be, but rather it is a thorough look at where we currently stand.

If we must absolutely synthesize the contents of this analysis and conclude with an observation, it is that EU policymakers need to direct increased attention towards measuring policy impact instead of policy magnitude. Since the sheer volume of disinformation in the media makes it either impossible or extremely costly to supervise all of it, it is more effective to set social impact goals and monitor how much closer we get periodically.



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