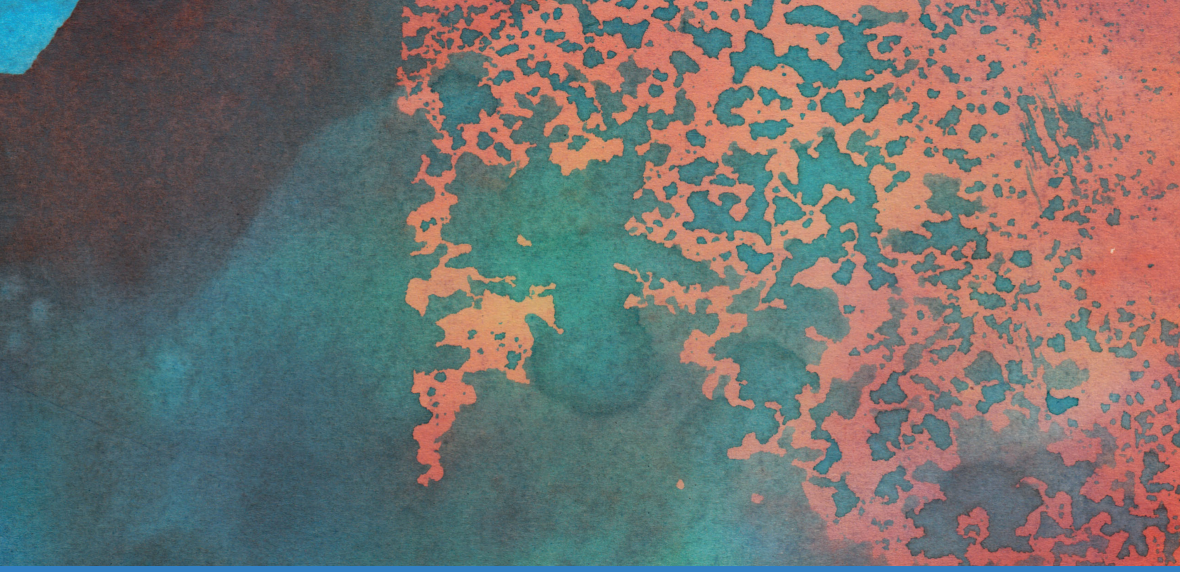
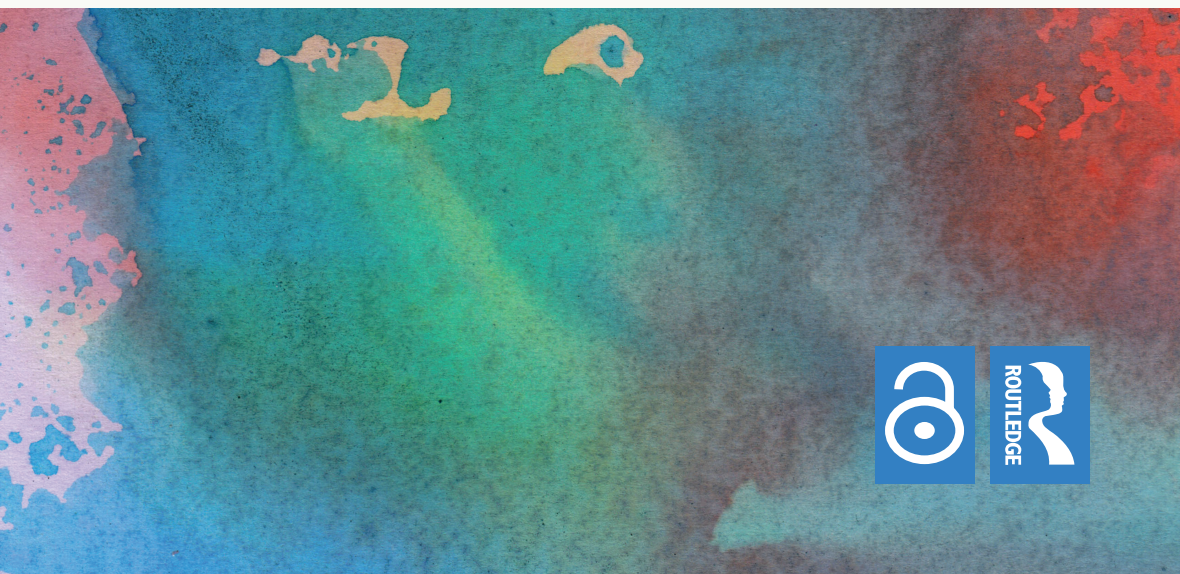


Routledge Studies on Democratising Europe

JOURNALISM, DISINFORMATION, AND EUROPE'S RESPONSE

TRUTH UNDER SIEGE

Edited by Jacopo Custodi,
Martin Moland and Hans-Jörg Trenz



Journalism, Disinformation, and Europe's Response

This edited book examines the relationship between journalism, democracy, and disinformation in contemporary Europe.

Drawing on original empirical research with journalists and media regulators, it provides a timely analysis of the European Union's evolving regulatory response to disinformation and media pluralism, while foregrounding the perspectives of those directly involved in interpreting and implementing these changes. Through a comparative study of seven countries – Spain, Italy, Norway, Iceland, Croatia, Poland, and Bulgaria – the book explores how media actors across diverse political, institutional, and regulatory contexts understand and respond to post-truth politics. In doing so, it investigates whether a shared European normative space around journalism, media freedom, and democracy is beginning to take shape.

This book will be of interest to students, scholars, and practitioners in European studies, media studies, journalism, political communication, and cultural sociology.

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Introduction

Journalism, disinformation, and Europe's response

Jacopo Custodi, Martin Moland, Hans-Jörg Trenz and Tine Elisabeth Brøgger

Disinformation and fake news have become defining challenges for contemporary democracy. Far from fleeting buzzwords, these terms capture deep, structural shifts in how knowledge, authority and trust are negotiated in the public sphere. Their rise reflects more than just technological change – it signals a broader erosion of democratic norms and institutions, including the diminished authority of journalism, academia and the judiciary. As democratic societies in Europe and beyond confront increasingly polarised political debates and algorithmically driven information flows, the boundaries between fact, opinion and manipulation have become harder to maintain.

In 2016, the Oxford English Dictionary selected the term *post-truth* as its Word of the Year, defining it as "relating to or denoting circumstances in which objective facts are less influential in shaping public opinion than appeals to emotion and personal belief" (Oxford English Dictionary, 2016). While this definition has its limitations, the increasing use of this term reflects the growing prominence of fake news, "alternative facts", and online disinformation over the past decade. The phenomenon, which seemed to be in its early stages in 2016, has since grown significantly, most notably during the COVID-19 pandemic, which was quickly described as an "infodemic" due to the unprecedented volume of conspiracy theories, hoaxes and falsehoods circulating on social media and infiltrating new segments of the public sphere in a context marked by uncertainty and existential fear (Boccia Artieri, 2023; Trenz et al., 2021).

Digital platforms have transformed how information is produced, circulated and monetised, frequently at the expense of quality journalism and in favour of sensationalist or misleading content. This transformation intersects with wider dynamics, including news tabloidisation, mounting commercial pressures, accelerated news cycles, algorithmic amplification on social media and growing concentration of media ownership, collectively reshaping the contemporary information ecosystem (Custodi et al., 2026). At the same time, populist politicians around the globe have leveraged social media to mobilise supporters directly, amplify anti-establishment narratives and challenge traditional sources of expertise (Ernst et al., 2019; Hameleers, 2020; Ott, 2017). Leaders such as Donald Trump, Jair Bolsonaro and Viktor Orbán have contributed to a climate in which the legitimacy of fact-based institutions is increasingly eroded. This growing reliance on direct, unmediated communication coincides with a marked decline in public confidence in intermediary

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bodies and in institutions historically tasked with delivering mediated, evidence-based information (Fink, 2019; OECD, 2024), creating fertile ground for what has been termed "post-truth politics", in which emotional and identity-based appeals often prevail over factual argument in shaping public opinion (Iyengar & Massey, 2019; McIntyre, 2018). Trust in independent journalism, for example, has declined significantly in recent years, particularly in countries such as the United States (Lee, 2010; Strömbäck et al., 2020).

Beyond blatant fake news, the decline of quality journalism is also reflected in the growth of what has been termed "churnalism": A form of journalism based on quickly produced, superficial articles that recycle press releases, news-agency copy or content from other outlets, with little or no original reporting, verification or fieldwork (Johnston & Forde, 2017). These dynamics have been described as a broader "information disorder" (Wardle & Derakhshan, 2017) that erodes the communicative foundations on which pluralistic democracies – and shared standards of truth – rest. As post-truth politics and information disorder gain ground, they continue to destabilise the democratic norms and communicative conditions on which contemporary democracies rely.

Yet, even within this troubled context, the pandemic years also revealed new opportunities for high-quality journalism. As accurate reporting became essential for navigating both personal decisions and collective crises, public demand for trustworthy information increased (Melki et al., 2021; Trenz et al., 2021). This illustrates how the question of informational veracity has become both increasingly relevant and complex in democratic life.

Journalism and disinformation

In such a post-truth landscape, journalism is both a target and a potential bulwark. On the one hand, journalism has become highly vulnerable to post-truth attacks, with political and economic pressures increasingly weakening professional standards and undermining trust in the media (Broersma, 2013; Fink, 2019). On the other hand, even if the way journalists frame particular issues of societal importance can be contested, journalism remains influential as a critical watchdog for defending evidence-based discourse and democratic pluralism (Hamada & Abdel-Salam, 2025). Yet the existing literature rarely accounts for the perspectives and experiences of journalists working in traditional newsrooms. This represents a key angle of analysis for understanding post-truth politics and its consequences for the public sphere and democratic institutions (Trenz, 2023). While the relationship between post-truth politics and journalism has been documented (Bechmann, 2020; Michailidou & Trenz, 2021; Waisbord, 2018), few studies directly engage with journalists themselves to ask how they interpret disinformation, which challenges they face, and which regulatory responses they consider most effective (Jahng et al., 2023). In fact, despite intense academic and political interest, the problem of disinformation and fake news remains contested and ambiguous. As Egelhofer and Lecheler (2019) argue, the term "fake news" itself draws speakers onto rhetorically charged terrain, where disagreement about meaning can obscure effective policy and practice.

In approaching the ideal of evidence-based information, the role of news media and journalism can best be understood as truth mediators in the public sphere. Journalists rarely have access to scientific methods of truth-finding; rather, they must mediate and filter diverse and often conflicting perspectives. Instead of holding journalists individually accountable for the spread of fake news, truth should be considered as an unstable outcome of fact-finding, information-seeking and contestation, where journalists act as professional brokers (Michailidou & Trenz, 2021, p. 1345). In relation to this, Farkas and Schou (2018) identify three dominant ways of understanding the so-called fake news phenomenon. First, as a market failure: In the digital attention economy, the pursuit of clicks and visibility incentivises misleading or sensational content. Second, as an ideological pathology: Especially in the United States context but increasingly also in Europe, fake news is often linked to the right-wing media ecosystem and political actors who systematically undermine journalistic credibility. Third, as a populist tool: Populist movements increasingly invert the charge of fake news, using it to attack the very journalists traditionally seen as mediators of truth (Krämer, 2017).

The variety of these uses contributes to broader uncertainty about how disinformation should be addressed. Regulatory responses tend to cluster around four archetypes (Farkas & Schou, 2023): moral condemnation of anti-democratic actors; criminalisation of disinformation; technological solutionism (the hope that digital tools will eventually solve the problem); and re-establishing centres of truth-making, such as fact-checkers and public service media. Yet these models are not mutually exclusive, and their adoption depends in part on national political cultures and the historical relationship between media and the state (Humprecht, 2019).

Overall, these different understandings of problems and solutions highlight the contested nature of the debate, but they also raise a pressing question: How can democratic societies – and particularly Europe – best respond to the challenge of disinformation while safeguarding pluralism and trust in journalism? It is this overarching question that guides the present book.

The EU's regulatory response and the puzzle of implementation

The status of journalism as a watchdog of democracy, together with freedom of expression and information, has long been constitutionally protected in European democracies. Media freedom and pluralism are explicitly guaranteed by Article 10 of the European Convention on Human Rights and Article 11 of the European Union (EU) Charter of Fundamental Rights. In response to the challenges of digitalisation and the various threats they pose to the well-functioning of journalism, the EU has gradually moved from soft, self-regulatory approaches to a more robust regulatory framework. Since the mid-2010s, it has progressively built this framework, from early soft-law instruments and the 2018 Code of Practice on Disinformation, through the European Democracy Action Plan, to the adoption of the Digital Services Act (DSA) in 2022 and the European Media Freedom Act (EMFA) in 2024. Together with the Anti-SLAPP Directive, these initiatives seek to protect the independence and safety of journalists in Europe and beyond, strengthen media

pluralism, enhance transparency, and constrain some of the most harmful effects of platform power and ownership concentration.

This regulatory shift reflects the EU's evolving role as a norm entrepreneur, committed to promoting a European model of democratic communication based on evidence, accountability and institutional trust. It also illustrates the EU's ambition to assert itself as a global champion of democratic values and media freedom. Far from being merely technical fixes, these measures are framed as part of a broader normative project – one rooted in institutional consensus but also actively shaped by engagement with social actors and academic debates (García-Guitián, 2022; García-Guitián et al., 2024). However, while much research has focused on the process of EU policy formulation (e.g., Bouza García & Oleart, 2024; Gorwa et al., 2024), or on consultations and lobbying by the digital platforms (Tarrant & Cowen, 2022), there is far less understanding of how the specific rules for safeguarding democracy are being interpreted and implemented across member states – and even less about how their effectiveness is perceived by journalists operating at the national level. This book addresses that gap by critically investigating the real-world application and interpretation of EU regulation across seven national media contexts. Specifically, it does so by understanding the process of Europeanisation not simply as legal harmonisation, but as a process of both norm diffusion and norm creation.

Europeanisation as norm diffusion refers to the ways in which EU-level values, norms and rules are shared and translated – often unevenly – into national practices and professional understandings. It focuses on how such norms are transmitted to, contested by and internalised within specific groups, such as journalists (Schimmelfennig, 2010). At the same time, we argue that Europeanisation in the field of media and communication should also be studied as a process of norm creation, through which standards related to European values (such as truth orientation and information integrity) are (re)defined and debated among different actors. Thus, rather than focusing merely on compliance with European law and how such compliance potentially differs across countries (Börzel, 2021; Zhelyazkova et al., 2016), we focus on the normative interpretations that key actors in the policy field apply to democracy challenges. Rather than assuming automatic compliance with EU rules, this perspective asks whether and how EU-level democratic norms – especially those concerning information governance and media freedom – are received, interpreted and operationalised in different national contexts, with a particular focus on the role of media actors.

This perspective foregrounds the dynamic interaction between EU initiatives and domestic media systems and traditions – an interaction that can generate "regulatory misfits" and political tensions. While the regulatory agenda is formulated at the European level, its effects are primarily mediated through national media landscapes. This raises important questions: How can the EU's self-proclaimed role as a defender of democratic values be leveraged to address its ongoing legitimacy deficit and the conflicts that emerge at the national level? Are member states responding in a coordinated manner, or do variations in interpretation and implementation hinder the development of a unified European response to post-truth challenges? Because any coherent European approach ultimately depends on

effective national-level implementation, this dimension remains underexplored in the existing literature.

Truth under siege

This edited book is the outcome of a three-year research collaboration funded by the EU project *Reclaiming Liberal Democracy in the Postfactual Era*. It examines disinformation dynamics in journalism and addresses Europeanisation by situating these dynamics within ongoing empirical and normative debates on journalism's role in democracy. It also advances these debates through original primary data collected from journalists and media regulators.

More specifically, the book investigates how journalists and media regulators across Europe perceive and respond to post-truth challenges, and how they navigate the evolving EU regulatory framework on disinformation and media pluralism. In doing so, it assesses whether a shared European normative space around journalism and democracy is beginning to emerge. The book thus offers a timely, in-depth examination of the EU's recent regulatory responses to disinformation, foregrounding the perspectives of those directly involved in their interpretation and implementation.

Accordingly, the research underpinning this book is guided by two core questions:

- How do journalists in Europe perceive post-truth phenomena and respond to the challenges they pose, while upholding democratic principles and values promoted by the EU?
- How are new EU regulations affecting journalism – particularly the DSA and the EMFA – perceived and implemented at the national level? More specifically, to what extent are stakeholders (journalists, national regulators, professional associations and oversight bodies) converging in their understandings of, and proposed solutions to, disinformation, and how does this shape national agendas?

Before addressing these questions empirically, Chapter 1 introduces and develops Europeanisation as a process of norm diffusion and norm creation, which provides the conceptual framework for the rest of the book. It situates the EU's regulatory agenda within its broader commitment to promoting democratic norms and examines the EU's emerging role as a global norm-setter in media regulation. In particular, it traces the shift from a largely non-interventionist stance towards a social-responsibility paradigm that foregrounds media pluralism and public service journalism. The chapter also highlights tensions with liberal market models and considers the implications for EU citizenship and for the development of global regulatory standards.

The subsequent country chapters move into empirical analysis, presenting detailed case studies of national media landscapes and challenges. They explore how journalists, national media regulators and other key stakeholders perceive post-truth dynamics and the EU's efforts to mitigate them. While the implementation of EU regulations necessarily entails legal and institutional responses – as discussed across chapters – our main empirical focus lies in the extent to which EU norms

diffuse among national journalists. Europeanised norm diffusion would suggest alignment between journalists and regulators across borders in how they perceive the challenges of disinformation and fake news, as well as the role of both the EU and national authorities in combating them. Accordingly, rather than assuming automatic compliance with EU rules, we ask whether and how EU-level democratic norms – especially those concerning information governance and media freedom – are received, interpreted and operationalised in different national contexts. To explore this empirically, the country chapters examine formal implementation but, more importantly, whether we see alignment of norms in the member states we study. Given our focus on norm diffusion, we approach this from the actors' own perspective, investigating how journalists, media regulators and other practitioners engage with, adopt, resist or reinterpret these norms in their daily work.

Our country selection – Spain, Italy, Poland, Bulgaria, Croatia, Norway and Iceland – allows us to compare a wide range of media systems, democratic traditions and relationships to the EU (Hallin & Mancini, 2004). The sample includes Nordic states with high trust and strong public broadcasters (Norway and Iceland); Mediterranean systems marked by political parallelism and press partisanship (Italy and Spain); post-socialist states with politicised media and weak institutional safeguards (Poland, Croatia and Bulgaria); and non-member states (Norway and Iceland) with close legal alignment to the EU but differing implementation logics. These contrasts allow us to examine how factors such as journalistic professionalisation, state–media relations, media trust, and political polarisation shape journalists' perceptions of post-truth challenges and their responses to the EU's regulatory agenda.

However, our case selection is not driven solely by a media-systems logic. From a Europeanisation perspective, it is also important to consider how different forms of membership entail varying degrees of commitment to EU norms and law, as well as differing levels of access to EU policy debates. In this respect, including Norwegian and Icelandic journalists is particularly valuable, since these countries are closely connected to EU regulatory developments without being EU member states. At the same time, our selection does not include liberal media systems such as Ireland, which limits the extent to which our findings can be generalised to that cluster. Rather than aiming for statistical representativeness, we treat our cases – including "unlikely" sites of Europeanised norm diffusion – as analytically valuable trajectories for understanding how EU norms travel across diverse media and political contexts.

Methodologically, each country chapter draws on semi-structured interviews with journalists and media regulators, supplemented by document analysis, to capture national-level responses to post-truth dynamics and the pressures of Europeanisation. Fieldwork was conducted in 2023–2024. All interviews followed a common guide, ensuring thematic consistency across cases while allowing flexibility to probe national specificities, particularly in Norway and Iceland. This comparative case study approach is well suited to understanding how journalists interpret complex regulations, navigate professional pressures and respond in context-specific ways (Hanitzsch, 2009).

The concluding chapter synthesises the findings to assess whether a common European approach to tackling post-truth politics is emerging at the national level,

and it reflects on the broader normative importance of journalism in troubled times. By tracing how journalism and media regulation are evolving in response to post-truth politics, this book offers critical insights into the future of democratic communication in Europe – and into whether the EU's normative ambitions can translate into meaningful, on-the-ground change.

By bringing together insights from political science, media studies, and EU studies, this book offers a comparative and empirically grounded account of how European journalism and media governance are being reconfigured in response to post-truth challenges and evolving regulatory frameworks. It foregrounds the voices of journalists and regulators as they navigate the complex terrain of media freedom, democratic resilience and European integration – showing how the struggle over truth is increasingly also a struggle over Europe's democratic future.

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1 The EU regulatory approach to media pluralism and disinformation in a global context

Exceptional or trendsetting?

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Introduction

This chapter discusses the evolving response of the European Union (EU) to the information disorder in the post-truth condition. It does so by assessing and explaining the EU's regulatory and normative agenda developed in response to these challenges. This includes a critical analysis of flagship initiatives such as the *European Democracy Action Plan* (EDAP), the *Code of Practice on Disinformation*, now integrated in the *Digital Services Act* (DSA), and the *European Media Freedom Act* (EMFA), in their objective of promoting media freedom. Understanding the EU's regulatory and normative response will serve as a premise for the country case studies collected in this book. Here, the extent to which this approach has been Europeanised across states is explored from the perspective of key stakeholders (journalists, national regulators, professional associations and oversight bodies).

We propose examining the EU's regulatory approach to media pluralism and disinformation through the lens of two competing paradigms, each reflecting distinct underlying models and broader conceptions of media freedom and regulation in a democratic system. We show how these two competing paradigms – the negative approach, which guarantees freedom from state intervention in the media, and the positive approach, which regards regulation enabling the media to fulfil its democratic obligations as justified – relate to the EU's approach to regulating the digital sphere and its efforts to counter post-truth discourses in the public sphere.

The chapter is organised as follows. We first describe key aspects of the EU's regulatory response to the post-truth democratic challenges it faces, as well as some of the controversies that have accompanied the EU's role in that domain. Second, we move on to describing and explaining the EU's broader normative approach to post-truth challenges. To do this, we first elaborate how the EU has justified its increased role in media regulation. For this purpose, we distinguish between three justification strategies it has applied over time: a *traditional strategy* where EU interventions are justified as *market correctives*; a *social responsibility strategy* linked to the EU's role in protecting individual rights in a global context where national regulators increasingly fail to do so; and lastly, a *risk strategy* designed

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as an explicit response to the democratic risks associated with disinformation. We demonstrate how the combination of these strategies enables the EU to establish an innovative and progressive regulatory agenda that seeks not only to protect citizens' rights in the digital economy, but also to expand them. We conceptualise this as a citizenship paradigm for media freedom, and we explore how it is becoming an increasingly important part of the EU's approach to the post-truth challenge.

The EU as a norm entrepreneur in the field of media pluralism and disinformation

In the past years, the EU has stepped forward with a number of important policy initiatives and regulations in the field of digital communication, media and journalism. Envisioned with the perceived need to regulate global tech companies, the EU has become an important norm entrepreneur in the defence of media freedom and digital rights of the citizens. However, these policy initiatives have remained controversial. The EU is committed to protecting the integrity and diversity of the media systems of its member states, and any action in this area is often perceived as a violation of the principle of subsidiarity. In this sense, it is certainly the case that media pluralism and disinformation are the least likely to be transferred to EU policymaking. However, the EU's regulatory approach to the media should not be understood solely as a market-corrective mechanism (Schoenmaekers, 2024). As we propose in this book, the way in which the EU has claimed regulatory authority in this area reflects a deep concern for democracy. Here we need to go beyond existing approaches that explain EU-rule-making as a market-corrective mechanism.

In this book, we therefore propose to examine the EU as a norm entrepreneur, analysing the specific policy struggles in the transnational field of media and communication as normative contests over the application of democratic values and principles. More specifically, our focus will be on the elaboration and implementation of the EMFA and the DSA, as well as related regulations. These constitute the first instances of the EU explicitly regulating media freedom (Bouza García et al., 2025b) and, as such, have elicited both celebration and concern within the media and journalism sector. The ways in which these measures are contested and implemented at the national level are the focus of the empirical chapters in this book.

Democratic governments around the world will have different reasons for promoting media freedom. One main line of conflict therefore concerns the different approaches to, and understandings of, media pluralism. Even though international organisations such as the Venice Commission or the OECD try to develop indicators for media independence, there is still no common understanding of what it encompasses and how it should be grounded in substantive norms and translated into legal rights and obligations (Stępińska et al., 2024; Tambini, 2021). As an example, a fundamental divide regards the way media freedom is defined in the US, with its emphasis on a negative rights approach, and in Europe, where a more positive understanding of rights prevails, with a willingness to take proactive state action (Tambini, 2021). The promotion of a more positive rights approach to media pluralism by the EU can be expected to have major repercussions on global norm

setting and regulation of internet providers and social media platforms. The EU now imposes stricter rules on content moderation and requires platforms to actively combat illegal content and disinformation. As such, the EU regulatory framework is strongly resisted by the digital industries and the present US government. More recently, the US government and the platform industries entered a new alliance to oppose EU regulatory action, which, according to them, violates principles of free speech and independence of the media. This will lead to a more fundamental opposition between negative and positive rights understandings in the interpretation of media pluralism.

Such a new divide between the US and Europe should not obscure the fundamental differences in the interpretation of freedom of speech in Europe, for example the liberal understanding in Scandinavian countries and the much more restrictive interpretations in Germany and Italy. In the past, several EU Member States have experienced violent confrontations over the interpretation of the principle of freedom of speech, such as the Charlie Hebdo attack in Paris and the cartoon crisis in Denmark and Sweden (Lægaard, 2007; Meer & Mouritsen, 2009). EU member states have long witnessed state interference in public broadcasting and the capture of private media, while recent democratic backsliding in countries such as Poland and Hungary has led to intensified political control over media ownership structures and editorial content (Stępińska et al., 2024).

Another line of conflict regards the competence of the EU as a norm entrepreneur in the field of media and communication. Media pluralism and independence have become an element of EU norm entrepreneurship that justifies political interventions and investments not only in areas such as human rights protection and environmentalism (Zwolski & Kaunert, 2011) but increasingly also in the area of communication such as data protection, cybersecurity and internet governance (Glen, 2021; Radu et al., 2021; Schünemann & Windwehr, 2021). This is a significant step away from the previous practice of non-intervention in culture and communication, where the EU had no regulatory powers. The EU's expansion of authority over these areas was prepared by international norm setting of media freedom as promoted by the activities of NGOs engaged in international media freedom campaigns. Examples include "Reporters without Borders", and intergovernmental initiatives such as "United Nations Plan of Action on the Safety of Journalists", the "Media Freedom Coalition"[1] and the "International Partnership on Information and Democracy" initiated by UNESCO[2] (Scott et al., 2023).

With its commitments to respect human rights, freedom, equality, democracy and the rule of law, the EU understands itself as a forerunner of global internet governance. Interventions in support of media pluralism are not only part of the EU's external action but are introduced as market corrective measures in response to perceived urgency of regulation in the field of media and information society. Media freedom is protected in the EU Charter of Fundamental Rights (Article 11), which stipulates that "The freedom and pluralism of the Media shall be respected". This builds on earlier Council of Europe initiatives to monitor media freedom within Europe. Such approaches to "respect for" or "monitoring of" media freedom do not provide a substantive definition of what exactly media freedom implies and what

rights and duties for journalists and states are linked to it. However, such a minimalist approach to media freedom as a free-market principle proved insufficient to respond to alleged violations of media freedom by EU member state governments, most notably state intervention in independent media in Hungary and Poland. Media freedom was now reinterpreted as a case of protecting the rule of law.

The EMFA is the most comprehensive legislative act for this new interpretation of media freedom as a rule of law principle. Media freedom is still linked to market freedom in terms of commercial activities that relate to the spread of information and opinion. Such media services "cover, in particular, television or radio broadcasts, on-demand audiovisual media services, audio podcasts or press publications" (preamble (9) European Parliament & Council, 2024). The EMFA introduces a positive rights understanding of media freedom as linked to a shared set of principles that are meant to assess the democratic value of media services and media content and define areas of protection for the provision of such services. Among others, the EMFA will:

- protect editorial independence,
- protect journalistic sources, including against the use of spyware,
- ensure the independent functioning of public service media,
- enhance transparency of media ownership,
- safeguard media against unjustified online content removal by very large online platforms (VLOPs),
- introduce a right of customisation of the media offer on devices and interfaces,
- guarantee transparency in state advertising for media service providers and online platforms,
- ensure Member States provide an assessment of the impact of key media market concentrations on media pluralism and editorial independence and
- boost transparency in audience measurement for media service providers and advertisers.

The EMFA is unequivocal in its commitment to safeguarding democratic standards and practices. However, it also empowers journalism and strengthens its position against digital service providers and online platforms. This approach is consistent with the broader definition of users as digital citizens and their associated rights. Journalism is therefore being targeted as an ally in the fight against disinformation, as the EU has been doing for the last decade through a series of initiatives and appeals to civil society, academics and journalists to cooperate with EU institutions in the fight against disinformation.

In this sense, the key piece of legislation in the struggle against disinformation is the DSA, which builds on a risk-based approach to media and communication by clarifying the duties of online platforms as information providers and the rights of citizens as users. This is an expanded concept of media freedom that goes beyond narrow definitions of journalism independence to hold providers accountable and recognises them as key players responsible for protecting individual rights (Verza, 2025). In addition, the DSA seeks to enhance transparency in content moderation,

addressing concerns about practices like shadow banning, whereby users' contributions are concealed or made less visible to others. Nonetheless, its emphasis on measures such as shadow banning falls short of addressing the deeper algorithmic structures that shape content visibility on social media platforms (Leerssen, 2023). The real-world impact of the DSA on disinformation is still uncertain, pending future enforcement and implementation. What is clear, however, is that the EU has taken a relatively restrained stance in regulating major platforms such as Meta and X (Oleart & Rone, 2025). In relation to Big Tech platforms, the European Commission often used terms like "facilitate", "invite" or "aim to ensure" (Cauffman & Goanta, 2021, p. 768), illustrating how regulatory responsibility has, to some extent, been delegated to private actors. Tellingly, the term "disinformation" appears only in the DSA's recitals, highlighting that under the EU's co-regulatory framework, platforms largely shape what qualifies as "harmful" content and how it should be addressed (Ó Fathaigh et al., 2025).

This cautious regulatory stance reflects the broader notion of "co-regulation" (Oleart & Bouza García, 2025). In this logic, the DSA aims at promoting democratic integrity by protecting elections and democratic discourse and introduces transparency obligations for VLOPs. But the regulation does not define the specific risks (Ó Fathaigh et al., 2025, pp. 1–2) nor does it mandate harmful but legal content censorship. Instead, platforms retain significant autonomy in defining and implementing their own moderation policies, which are mostly done through the Code of Conduct on Disinformation. This is initially a self-regulatory and voluntary code of practice (the first version of which was signed in 2018, the second in 2022) that was officially endorsed in 2025 as a "Code of Conduct" by the Commission and the European Board for Digital Services. This endorsement transforms it into a reference point for evaluating DSA compliance among VLOPs and Very Large Online Search Engines (VLOSEs) that adhere to it (European Commission, 2025). Although the EU has encouraged action against disinformation, the responsibility for shaping and implementing these actions has largely remained in the hands of the platforms. Recent assessments of the EU's regulatory efforts on disinformation note that the 2022 revision of the Code of Practice reflected ongoing compromises between transparency and accountability, shaped by non-binding agreements and constrained by commercial interests (Nannini et al., 2024).

In relation to social media, a key aspect of the DSA is Article 14, which obliges platforms to enforce their terms of service with appropriate respect for fundamental rights, including freedom of expression as outlined in Article 11 of the EU Charter. This aims to foster greater accountability in content moderation decisions. However, the DSA does not treat social media platforms as traditional media spaces. It therefore upholds the principle of the 2000 E-commerce Directive: the non-liability of platforms for third-party content, provided they have no knowledge of its illegality, coupled with a duty of care regarding legal but harmful content. Focusing on Google and Meta's lobbying role in the DSA, Kausche and Weiss (2024, p. 3) argue that "platforms succeeded in removing the idea of 'liability' from the reform agenda and replaced it with the notion of responsibility, which ultimately discharged them from legal obligations". In consequence, the "platforms' entrenched position has

been reinforced and legitimised, and their powers of enforcement have even been institutionalised with respect to the moderation of digital content". In this sense, a dominant policy frame is that the DSA was "an update of the e-commerce directive", thus maintaining the principle of non-liability for third-party content, and that the aim was to make illegal online what is already illegal offline.

The positioning of journalism as independent from states and markets was further strengthened by the 2024 Anti-SLAPP directive that takes action against abusive litigation targeting journalists or human rights activists for their investigations of the powerful and defence of the public interest and thus guaranteeing their participation in public life.[3] A law against silencing was necessary to protect the work of journalism, which, for instance, covers corruption cases (such as the murdered Maltese journalist Daphne Caruana Galizia) (Farrington & Zabrocka, 2023).

Even though these approaches remain contested with respect to the definition of media freedom and the formulation of binding rules, they agree on an understanding of positive freedoms, emphasising the social responsibility of journalism and the role of professional ethics, thus accepting controls and quality checks of journalistic practice and content or empowering journalism to investigate stories. At the same time, the Commission positions itself against the interpretation of media freedom as a purely negative freedom. It therefore distances itself from the laissez-faire paradigm, which is particularly influential in the US and whose supporters have countered the EU's regulatory stance by promoting a global campaign advocating the unrestricted development of digital and AI technologies. Thus, while the EU promotes media freedom through instruments such as the EMFA – which mandates protections for editorial independence and journalistic sources – the US government under Donald Trump has attacked related EU rules like the DSA as unfairly burdening American platforms such as X and as restricting what it portrays as "freedom of expression" online.

By promoting Europeanisation as a professional standard and norm in the media and communications sector, the EU is targeting a key democratic institution: journalism. A pertinent question is therefore how the EU's regulatory approach has been adopted and/or contested by the wide variety of media organisations and journalists in the member states, and how different stakeholders have interpreted this new agenda for ensuring the quality of information.

The EU's approach to post-truth and disinformation: Misfit and conflict

This EU approach to disinformation has been defined as risk-based and protective in the way it combines market corrective measures with rule of law principles (Brogi et al., 2023, p. 3). The emphasis shifts from the struggle over the principled need of state regulation of media to the question about the controversial interpretation of risks that require state intervention. This reflects an understanding of media as facilitators of informed opinion in democracy. In the common market, media are meant to inform, to educate and even to entertain, and their content should be made widely available. It has further been argued by Seipp et al. (2023) that such

a definition of media as public service providers goes substantially beyond the liberal market model of independent media but might still conflict with a human rights understanding of media. This is because it does not necessarily apply to individual journalists, bloggers or non-professional content creators and therefore does not sufficiently protect them from possible human rights violations. The EU regulatory package can be criticised for avoiding formulating shared standards of media freedom in line with human rights law, although its emphasis clearly lies on standard setting of media-based services. If media pluralism and content can serve democracy and markets, they can also be identified as harmful. A public service understanding of the media provides the normative foundation upon which the EU can justify media regulation in response to possible market and democratic dysfunctions. Media regulation therefore depends on how risks related to media content and performance are defined. Such a public service and risk-based approach is inherently open to policy contestation, as understandings of the media's role and perceptions of risk vary widely within and across EU member states. From this perspective, EU regulatory action in the field of media and journalism is potentially highly controversial, and agreement among member states, societal stakeholders and citizens on EU minimum standards to safeguard media independence cannot be taken for granted.

In the EU studies literature, research has focused mainly on the implementation of EU directives and regulations as either a strategic adaptation by national administrations, resulting in uneven Europeanisation (Harmsen, 1999; Mastenbroek & Kaeding, 2006), or an institutional adaptation resulting in policy convergence (Börzel, 1999; Knill & Lenschow, 2005). The focus in this book is not so much on the question of compliance in the implementation of EU rule, but rather to open a **broader perspective of Europeanisation as a diffusion of norms and ideas**. Europeanisation as norm diffusion includes a wide range of actors and the general public in debates that transcend short-term interests and invite a reflection about shared values and notions of the public good as the guiding principles of democratic government (Jonasson, 2024). The effect of ideational Europeanisation (Schimmelfennig, 2010) is not just policy convergence, but institutional adaptation or even societal transformation, for instance, in the way particular groups of actors socialise over time or engage in collective learning (Liebert &Trenz, 2010; Trenz, 2016).

Such processes of Europeanisation are not necessarily harmonious. They may also lead to enduring conflicts between political factions or social groups. In our case, for example, there are contentious relationships between content producers (the media industries), content providers (social media platforms and journalism) and audiences, as well as governments representing their respective interests to varying degrees in the support of media pluralism. In addition, there is a proliferation of providers beyond professional journalists, including academics, fact-checkers, associations, companies and citizens, who contribute to news production and can claim protection. Within the EU regulatory framework, some of these actors might feel empowered, such as consumers of media content, who are now being redefined as digital citizens. Others might feel disempowered, such as the industries

that need to comply with EU rule. However, the EU regulatory framework is also concerned with the formation of such groups of actors and their collective mobilisation in more or less inclusive ways. For example, this could involve empowering ordinary citizens to generate media content or strengthening the professional role of journalists.

The EMFA is a classic example of supranational policy entrepreneurship over an existing array of diverse national models. We propose that this can be analysed as a case of normative or ideational Europeanisation. To understand policy implementation in our national case studies, we can refer to the concepts of policy uploading and downloading (Howell, 2004). In such a scenario, transnational policy is not limited to particular policies or laws but establishes a new policy framework that will have to be taken up by member states. Policy implementation of a set of EU rules is then likely to cause misfits of adjustment and policy conflicts within and across member states (Börzel & Risse, 2000). This is clearly the case of the regulation of the digital public sphere, which includes a whole package of legislation in alignment or in conflict with national media systems and regulatory approaches (de Blasio & Selva, 2021). As discussed above, media regulation in Europe ranges from the liberal traditions of Scandinavia to government oversight of media in Southern Europe. The EMFA does not seem to attempt to create a single model of EU media regulation, since it is more focused on promoting media freedom than on redefining the role of the state. Regulatory responses to post-truth may alter the delicate democratic balance between individual freedoms, public debate, and political decision-making, particularly when driven from the EU supranational level. This may, in turn, generate mismatches between regulatory frameworks and the preferences of domestic political actors and citizens.

In addition to national legacies of media regulation, our findings underscore the role of transnational policy entrepreneurship in the media sector in exploiting the policy window created by the EDAP. Rather than national policy uploading, we will assume that any matches between specific national models and the EMFA are not necessarily the result of the member state agency as a rule-setter. Instead, key players at the national level have been Europeanised to varying degrees and participate in transnational networking, which influences their agendas and policy ideas. Norm diffusion thus matters more than strategic adaptation of EU rule in national contexts. Nevertheless, this implies that EMFA will place some member states in a position where they must adhere to provisions that are not aligned with national rules and preferences. The EMFA obliges member states to engage in joint supervision of audiovisual media and the press, thereby introducing press regulation in countries that previously lacked a press regulator, such as Spain. Generally, common standards are needed to create registers for the transparency of media state funding and media ownership structure. It introduces pluralism considerations on top of market competition to authorise mergers and to promote the transparency and independence of public service media. Each of these obligations is likely to create misfits and conflicts between different principles and stakeholders. For example, actors in countries with weaker regulations are likely to view the EMFA as the first step towards stronger state authority in the media sector.

This conflicts with the competing principle of economic freedom for media companies, which is limited by merger control and transparency requirements. In such cases, resistance to EMFA is likely to result in the emergence of liberal positions and claims for free media entrepreneurship in national debates. In opposition to media market liberalism, the framing of journalism as a public good and calls to protect journalists from economic pressures are likely to be followed by new debates on non-market-dependent forms of media funding. Furthermore, executive actors will likely attempt to delay or water down the provisions on public service media independence: the EMFA establishes the principle that public service media must have long-term funding that cannot be suspended by political motivations and that their boards are not easily removed. In countries with authoritarian tendencies but also in those with a tradition of government control, executive actors will lose leverage over these media if applied.

In summarising this debate, one interviewee in Spain described the EMFA as a "directive-looking regulation" because it requires substantial action by member states to become enforceable. This is likely to create a regulatory misfit between EU-level rules and national implementation. National executives may comply to varying degrees depending on domestic pressures. Differences may also emerge across member states, for example in how the EMFA shapes models of media funding. Finally, the regulation may generate tensions between EU requirements, existing national legislation, and citizens' preferences. The potential for such a misfit is a theoretical expectation that we explored in our interviews with the regulators. However, confirming its existence requires further empirical evidence, which will be provided by our authors in the country case studies, where they examine the implementation of the EMFA in different national contexts.

Justifying EU media regulations

As we have elaborated above, the current regulatory approach to social media content is still primarily formulated in a protective and defensive way. This includes the formulation of responsibilities of providers, such as content moderation, in relation to predefined risks, such as disinformation. Media regulation is needed for safeguarding existing standards and protecting the integrity of existing institutions, such as journalism. However, it is interesting to note that the EU considers both content providers and states to be subject to regulation. The former should be prevented from disseminating harmful content and ensure that political content is transparently identified, while the latter should be prevented from interfering unlawfully with media independence and pluralism. In the first case, the social responsibilities of content providers are derived from standards of truthfulness of public discourse and equal access to information. In the latter case, states are responsible for ensuring adequate infrastructure for the circulation of media content and fair competition between providers. It is important to recognise how these two sides of media regulation are connected: precisely because users need to be protected from unbound market forces and providers need to be protected from the states' abuse of authority. At the same time, the protective measures taken are not

simply reactive and interventionist, but also enable the generation and free circulation of media content in a plural and democratic society. It is worth taking a closer look at how the EU positions itself in relation to shared normative principles and standards of public discourse, which, as we shall argue, are derived from the normativity of the democratic public sphere.

From the perspective of the media's role in democracy, we can question *what justifications are provided by the EU for expanding regulation in the field of media freedom and test the robustness of these justifications in light of current challenges*. In liberal democracies, the threshold for justifying state intervention in media independence is high, as media freedom and freedom of expression are constitutionally protected and media actors are highly sensitive to any form of governmental interference in their work. Media freedom is also closely monitored by international organisations and NGOs, such as the *International Press Freedom* and *Reporters without Borders*, which hold governments accountable for obstructing the work of journalists. In the case of EU regulatory action, the threshold of justification is arguably even higher, as the EU institutions are expected to comply with the principle of subsidiarity and to respect the areas of media and culture as national prerogatives.

In the evolution of EU regulatory action on media pluralism, *three different strategies of justifying EU interventions and claiming EU authority in the field of media and communication* can be distinguished.

The first, and the most traditional strategy, is the call for EU media regulation as *market corrective measures*. In response to the concentration of media ownership in some member states, the EU has, since the late nineties, introduced audience thresholds for media owners to guarantee fair competition between different private providers (Harcourt, 2005). This can be defined as a minimal interventionist strategy, which aims to restore the rules of fair play and competition between established players in the market.

The second strategy responds to new challenges, which go beyond concentration of media ownership and monopolies in some member states and relate to *public authorities claiming control over media*. In particular, the EMFA and the SLAPP Directive are grounded in rule of law principles, which require the EU to take action when member states fail to protect fundamental rights of EU citizens. This is the case when citizens are denied access to particular media services, or when the privacy of user data is not sufficiently protected. Both regulations also enforce strong safeguards for journalists to protect editorial independence, safeguard media from surveillance and spyware, protect the independence of public service media and restrict state advertising through privately owned media and public broadcasting. Regulation is no longer directed primarily at private companies but at states and member state governments, which must adhere to EU standards and can be sanctioned for non-compliance.

The third strategy is designed as a *specific response to risks, particularly those related to disinformation strategies pursued by both governmental and non-governmental actors, and to the perceived need to regulate the information society and online communication*. While in the past, media pluralism was seen as

threatened mainly in relation to the activities of market players and public authorities, the expanded EU regulation also turns to the potential victims of violations of media freedom, i.e., consumers as EU citizens. The issue of protecting consumer rights is defined not only as the right of market citizens to choose from a variety of media services, but also in terms of the political rights of voters to be impartially informed, to have access to evidence-based information and to be able to participate in the formation of political will. For this purpose, the EMFA and the DSA rely on an expanded notion of risks that are inherent in particular types of information and communication exchanges. In other words, the content itself is now identified as harmful. The idea of harmful content goes significantly beyond the first and the second strategy, but it also combines them, as content regulation can be seen as both market corrective and rule of law protective. Content is harmful because of the bad intentions of some kind of content providers, for instance, to manipulate opinion and shape preferences based on wrong information. Furthermore, the way content is generated and shared is seen as harmful when interfering with the democratic process, such as electoral integrity (European Parliament & Council, 2024). The justificatory hurdle is now highest as the EU directly interferes in the way media operate in generating and sharing content.

The question of how sustainable the EU risk and responsibility approach to disinformation and media regulation is ultimately depends also on the way it sets global standards and sustains media freedom beyond Europe. In this regard, the EU has taken a decisive step towards establishing a social responsibility paradigm of media in democracy. This approach stands in increasing contrast to the liberal paradigm of media freedom identified in most empirical studies, which is embedded in a laissez-faire system of capitalism (Tambini, 2021).

The importance of the media in serving key democratic functions is thus increasingly recognised in EU regulations. There is a shared conviction that European media markets should not be solely driven by private ownership and demand-driven content and that there is a public service function of media that deserves to be protected and promoted. Media independence is thus linked back to the normative anchorage of media functioning in democracy that defines a particular social responsibility for media actors and institutions to not only operate in a way to be profitable, but also to inform, to build public knowledge and to facilitate institutional accountability and democratic self-determination. This is the idea of public service media maintaining particular communication standards and enhancing individual capacities and societal benefits.

Towards a citizenship paradigm to media freedom

One question that is investigated in this book is whether the EU risk-based strategy is not only protective in terms of safeguarding free media markets, rule of law and consumer-citizen rights, but also promotes more inclusive and participatory media. We view the protection and promotion of the rule of law as intrinsically connected. The identification of risks does not merely assign EU citizens a passive role in need of protection but instead relies on an active conception of citizens as participants

in the provision of media services. Moreover, the EU strategy is evolving from a focus on rights protection to rights promotion, and from combating disinformation to fostering information integrity. Citizens' input, through consultation and user engagement, is therefore required in identifying shared risks, building resilience and mobilising resistance.

In advocating the risk and responsibility approach to media, the EU is recognising the insufficiencies of traditional liberal notions of media based on freedom and independence from state interventions. The principles of open access to content and free exchanges of opinion commonly apply to an institutionally mediated public sphere, where information is channelled, filtered and qualified. This does not only include the application of so-called news values as criteria of relevance for news selection, but also the application of standards to decide about the truthfulness of news and its potential beneficial or harmful effects (Broersma, 2013; Smith, 2011). Taking back democratic control over media can therefore not simply mean to facilitate the free flow of content and opinion, but to establish standards of truthfulness and procedural rules of civicness of public discourse. This does not necessarily require the intervention of state authorities into media freedom and independence, but the application of legal rules and guarantees that protect and strengthen the role of the mediators of public discourse. Intermediary institutions are thus perceived, in the classical sense, as the third estate between states and markets. The marketplace for the free flow of content and information is redefined as a public sphere where users are not addressed as consumers but as citizens.

The task ahead for the promotion of a social responsibility model of media is to recognise and expand the rights of citizens as receivers of unbiased and evidence-based information and as participants in public debates. Such a view of empowering citizens becomes necessary because social media users are increasingly shifting between the two roles of providers and receivers of information. Public intermediaries become necessary not only to channel top-down flows of information, but also to facilitate horizontal exchanges and user-driven debate. In this sense, there is a need to reintroduce intermediation and to reinvigorate the role of media institutions in shaping information flows on social media.

To address these new challenges of public intermediation, it is necessary to move from a focus on rights protection, as emphasised by the social responsibility paradigm, towards rights expansion. We will call such a comprehensive understanding of EU media governance the *citizenship paradigm to media freedom*, which adds to the free market and social responsibility paradigm in particular ways.

The EU regulatory approach to disinformation therefore concerns, in essential ways, the relationship between citizens and truth and the capacities of citizens to relate to professional fact-finders. This is linked to various media literacy programs and educational initiatives to enhance such capacities of citizens and empower them to navigate social media content. The idea of EU regulatory interventions as being not just protective of the status of individuals but enhancing their capacities further gains relevance with the use of AI technologies (see Oleart & Flores Moleón 2026). The emergence of machine-enhanced intelligence fundamentally affects established regimes of citizenship. More specifically, AI applications raise

concerns about equality among individuals, as machine-enhanced human capacities could give rise to new political demands for representation and participation. (Heinrichs, 2022; Jungherr, 2023).

The way social media platforms ascribe status to their users has been called algorithmic citizenship, which is not assigned at birth, but through opaque algorithms that treat users as points of data (Tomasello, 2023). Algorithmic citizenship is a way of constantly calculating status but, based on these calculations, gives unequal access to digital affordances and content. Citizens as users are thus constantly counted and weighted with a clear outcome that decides over opportunities. For algorithms, equality does not exist, as each user is defined by a distinct status and a datafied identity shaped by the history of their online activities, which individuals can neither fully control nor easily change. This identity is also influenced by the intensity of one's online engagement: some users develop highly detailed algorithmic profiles, while others are represented only in approximate terms. Users may choose to withdraw, for example by browsing anonymously and minimising their digital traces, but this comes at the cost of reduced addressability and recognition as digital citizens. Recognition as a citizen with entitlements comes at the price of agreeing to sell your personal data, only that the market value of individual user data differs widely, which inevitably results in unequal status and unequal rights of data access and usage.

In light of these challenges and the profound transformation of the meaning of citizenship, the EU regulatory framework can be understood as an experimental setting for testing new forms of positive citizenship rights in the digital sphere. Both the 2025 *Democracy Shield* and the emerging concept of information integrity seek not only to protect citizens from foreign manipulation and interference, but also to promote the right to a plural, trustworthy and democratically governed information environment (European Commission & High Representative of the Union for Foreign Affairs and Security Policy, 2025). A progressive agenda for promoting an inclusive and fact-based public discourse in a democratic society relies on preemptive strategies and policies that develop fact-checking capacities and strengthen the individual rights of users. These are defined as digital citizens, in relation to the providers of content and information on digital markets. A regulatory approach that restrains the rights of providers strengthens at the same time the rights of users as citizens. Civic rights of digital citizens include classical rights of freedom of expression and privacy, which have been redefined so that they not only protect against state authority but can also be used against private internet providers. The new digital rights also stretch beyond the classical canon of citizenship to include the rights to evidence-based information, the right to data protection, data usage and data transparency and the rights of authorship of digital or AI-generated content.

That is why the EU institutions are changing their narrative from the fight against disinformation (focused on some actors' intentional actions) towards the emphasis on integrity of information, following international standards. By late 2025, the EU strategy has evolved from a concern about disinformation as a tool for foreign interference (European Parliament, 2024) to an overarching strategy grounded in information integrity (European Commission & High Representative

of the Union for Foreign Affairs and Security Policy, 2025). This is significant because it responds to the growing complexity of digital information environments, marked by distortions of truth and manipulation, as well as to the increasing challenges of foreign interference by third countries.

When information integrity and evidence-based information are approached as public goods, Commission documents primarily reflect a risk-based strategy towards disinformation. Disinformation is now understood in its broadest sense as encompassing all forms of harmful content and is therefore perceived as a threat to democracy, security, and sovereignty (Bouza García & Oleart, 2024). By targeting specific risks and harms that call for EU action, the public good of information integrity is defined in negative terms, with reference to the public harms that justify regulatory intervention. As regulatory attention centres on harmful content and disinformation, the field of risk communication is significantly expanded to encompass multiple public goods in need of protection, including security, public health and environmental sustainability. Our analysis of key EU documents shows that the justificatory discourse for regulatory action frequently shifts across these domains, for example emphasising public health during the COVID-19 pandemic and security in the context of the Russia–Ukraine conflict (D'Ambrosi et al., forthcoming).

By adopting a comprehensive and evolving response, EU institutions can maintain their legitimacy against authoritarian alternatives. At the same time, it is imperative to clearly explain how the new geopolitical landscape is changing our understanding of friends and foes – including hostile actors who may try to interfere – while also recognising the rise of political forces and states that oppose this view despite pretending to stand for other forms of democracy and freedom of expression. This requires coordination with policies that explain the EU's vision of democracy to be defended and protected, by specifying the role of its core elements – the public sphere, the role of the media and the rule of law.

Contesting media freedom

Related to these global challenges, the EU risk and responsibility approach to media pluralism is currently under attack. In the US, the state and the media industries have entered a new alliance of power and interests for the promotion of a largely unregulated platform capitalism. Such a powerful alliance is likely to trigger data and informational conflicts around the world. The global information disorder adds a new dimension to international conflict, with information becoming increasingly weaponised by states and private entrepreneurs. Beyond the power and interest-driven struggle over the control of global data and information flows, there is also a struggle over the value of evidence-based information and truth in democracy. Platform capitalism not only claims to defend freedom of expression worldwide by resorting to ultraliberal arguments, but is also running crusades against what they identify as censorship. This opens a normative battlefield over the (dis)information world order, in which the EU must position itself.

Within the scope of the EU's evolving Democracy Shield idea, the notion of information integrity has increasingly developed in a more confrontational way.

By acting based on the EMFA and DSA regulatory framework and calling for regulatory sanctions, the EU starts to position itself in stark confrontation with other global players, and, since early 2025, has entered a digital war with the US. In light of the more recent attacks of the Trump administration against the EU internet laws, the confrontation with the big techs and their allies has become, for the EU, not simply a matter of democracy but a fundamental question of sovereignty. In this sense, the EU regulatory framework opens up a field of political struggle, positioning the EU and its institutions either in alliance or in opposition with the various member states and stakeholders involved. This also includes journalists and digital industries. We will conclude this chapter by providing a brief overview of the key areas of conflict at the EU level and in the international arena.

The contested field of EU civil society

The EU response to disinformation must be understood in the context of the broader effort and resulting sociopolitical struggles to regulate digital information flows. This process also involves a complex balancing act between non-hierarchical governance, transnational regulation, and the authority of individual member states. It directly touches on sensitive differences in how values are balanced across EU countries. Like other areas of internet regulation, it is closely linked to the growing geopolitical stakes of internal market rules, the influence of Big Tech and emerging technologies such as artificial intelligence (Broeders et al., 2023; Monsees & Lambach, 2022).

The high stakes have brought together actors from different sectors in an emerging field of practice, where disinformation is increasingly perceived as a threat. The regulation of disinformation brings together multiple issues: transparency of online advertising, algorithmic accountability, the role of fact-checking, and the future of journalism. For instance, some actors want platforms to be more open about how they distribute news and what content gets priority. Others defend "journalism as a public good" and worry that platform-based fact-checking may undermine traditional journalistic standards.

Ördén (2019, p. 422) found that the emerging policies were "articulated within four separate EU policy communities: the security/defence, Internet, media and education sectors". Although our own research emphasises the importance of other actors such as digital rights associations (Bouza García et al., 2025a), what remains important is that each of these communities prefers different solutions according to their preferences and values. For instance, we can see that "the security/defence and Internet communities outline security-making in abstract procedural terms, emphasising efficiency and coherence" (Ördén, 2019, p. 422). On the other hand,

> the media and education communities relate security to the production of pluralistic online content and initiatives teaching citizens to consider different viewpoints. Security-related values implied are perspectivism and, ultimately, independence of judgement, while the object of protection can be described as citizens' independent democratic judgement.
>
> (p. 422)

Therefore, this struggle has raised important questions about media freedom and democratic communication in the digital age in the context of dramatic transformations of digital markets and media industries. The EU has tried to create new rules for large online platforms – such as Meta (formerly Facebook), Google and X (formerly Twitter) – to make them more transparent and responsible for the content they distribute. The EU's approach to disinformation does not focus on defining what is "true" or "false". Instead, it relies on co-regulation, whereby platforms are asked to collaborate with fact-checkers, experts, and civil society organisations to limit the spread of disinformation. This co-regulatory approach is largely based on voluntary commitments, such as the Codes of Practice on Disinformation. However, it has generated tensions among different actors who disagree over how media and digital communication should be regulated.

In order to approach the contested meaning of media pluralism and, more generally, the functioning and performance of the media in a democratic society, it is necessary to provide an overview of the positioning of the main stakeholders in this field. In the country chapters, this regards three groups of actors: the governments of the member states, the associations of journalism and individual media workers and consumers. However, before turning to national-level political contestation during the implementation of the EU regulatory framework, it is necessary to provide a brief overview of the interaction between the Commission, acting as the regulatory authority, and the various EU-level stakeholders in the field of media and communication who were consulted during the policy formulation process.

At the heart of the debate is a political and social struggle over who should shape the rules of the digital public sphere, and what media freedom means in this context. The EU institutions, particularly the European Commission, play a central role – but they do not act alone. Tech companies provide technical expertise and data, making them influential in the regulatory process. Civil society groups argue for stronger protections for freedom of expression and democratic values, while journalists and educators raise concerns about the impact of platform dominance on public trust and media independence.

This competition also reveals a deeper conflict about whether EU media regulation should mainly serve market or democratic objectives. For example, the DSA is often framed as an update to the old e-commerce directive, meaning it treats online platforms as part of the internal market. This framing makes it easier for EU institutions to act upon Article 114 TFEU, which has tended to favour market actors such as VLOPs in policy responses. Democracy Shield and Civil Society Strategy (European Commission, 2025) innovate in the framing by making public-interest journalism or media pluralism the main framing but also contain fewer regulatory commitments than those in the previous legislature, therefore not changing the policy principles.

Drawing on the work of Bouza García et al. (2025a), the main controversy in the policy debate was about the allocation of EU rule in the media sector and the perceived risks of interference with the functioning of national media systems. More specifically, media organisations involved in the policy debate broadly endorsed the EMFA's objective of protecting journalism and media freedom. However,

several actors expressed reservations about grounding the proposal in the internal market, arguing that no genuine EU media market exists. The following quote in a joint paper by two key players provides a significant example:

> […] while we fully support the Commission's general objective to safeguard press and media freedom in Europe, and appreciate the attention given to this important matter, the EMFA provides a deeply problematic policy choice. Not only is there no EU competence for a general media regulation such as the EMFA, as noted by the national parliaments of several Member States, but the chosen legal basis as well as several concerning provisions of the EMFA would also lead to grave interferences with functioning national media systems, whilst at the same time not addressing the root cause of the issues identified in certain Member States.
>
> (EMMA & ENPA, 2023, p. 1)

Another central conflict in the phase of policy formulation was over the principle of social media platforms not being held liable as content providers. This principle that remained largely unchanged by the DSA. Insisting on the principle of non-liability for content provision was a key issue in lobbying powerful social media platforms. However, the success of this campaign resulted in substantial regulatory and economic losses for media publishers. The latter argued that they, as publishers, have responsibilities that social media platforms do not have, yet both compete in the same market to monetise content via advertising. This, in turn, shapes the possibilities of the social media business model, which relies on selling personalised content based on targeted advertising. This was expressed since the first consultation on disinformation in 2018 by the publishers' association News Media Europe:

> While the press is bound by rules and regulations, and is in this way held accountable, platforms are not. Platforms therefore pose a problem regarding fair competition, since they operate on the same market for the same advertising money but on different terms. In addition, it has become clear that press publishers and platforms have similar business models: both social media and news media monetize content online.
>
> (News Media Europe, 2018, p. 13)

Advertising used to be a central source of revenue for traditional media, which has forced publishers to rely on alternative business models. Interestingly, however, several of our informants rejected a change in media business models (Bouza García et al., 2025b):

> Although many of our members have experienced success in growing subscriptions to paid-for content, these revenues are in no way compensating for the overall migration of advertising revenues to the gatekeeping platforms.
>
> (European Publishers Council, 2022, p. 4)

The dispute over lost media revenue has not resulted in a specific demand for advertising to return to the media. In fact, some courts have concluded that media organisations and online platforms evolve in the same market but with differing regulation. In consequence, media companies want to compete for advertising in a fair market (del Castillo, 2025). This is reflected in fundamental demands to increase transparency in digital markets and to restrict platforms' ability to render competitors' content invisible.

This was not achieved in the DSA despite several demands, and EMFA's Article 18 – which essentially establishes that platforms cannot remove or shadow-ban media content without due notice and gives them 24 hours to reply in a substantial manner (as a correction). This has been confirmed by multiple interviews we undertook in Brussels in 2023, during the EMFA negotiations (members of News Media Europe, European Federation of Journalists, Alliance de la Presse & ERGA confirmed this). The following quotes from the interview with Alliance de la Presse is expressive of this:

> Actually, we did not really lose the DSA battle. We never fought it. Because mainly, we discovered things afterwards, the same on the Reinforced Code on Disinformation, which is more soft law than real regulation. We saw this text appearing from nowhere, saying, okay, now platforms will be responsible to say which publisher is trustable, on which publisher is not, which is incredible.

Considering the quote above, Article 18 must be seen as a compensation within the EU response to disinformation, giving media organisations a more salient role than they had had previously. This article has been described by critics in academia (Seipp et al., 2023; van Drunen et al., 2023), civil society (European Partnership for Democracy et al., 2023) and the pro-tech sector (C4C, 2023) as a "media privilege", undermining the coherence of the DSA in the fight against disinformation. This position is shared by up to four tech organisations or alliances, which argue that the EMFA contradicts key principles established in the DSA/DMA package:

> The DSA and the P2B Regulation suffice and there is no need for a specific media content moderation privilege: the DSA ink is barely dry, yet another unnecessary layer of complexity could be added with Article 17 of the EMFA, and creating a narrower right applicable to fewer platforms than the P2B Regulation makes no sense.
>
> (C4C, 2023, p. 1)

More than a concession of the Commission to this sector in exchange of support, the EMFA can be seen as the result of effective collective action by the sector during negotiation, since the Parliament strengthened (van Drunen et al., 2023, pp. 154–156). One of the interviewees from a critical civil society further

confirmed that, in contrast to the self-perceived exclusion from the DSA, the media sector was a dominant player during the policy process:

> And I would say that a dominant player in the negotiations, especially with the European Parliament, have absolutely been the publishers, because they are very strong. They have people everywhere, and try fighting something, when the reporting is going against you.
>
> (Interview with a Member of the European Partnership for Democracy, November 7, 2023, Brussels)

It is fair to say that the media sector viewed the EMFA as an opportunity to restate demands that had not been successfully incorporated previously (in particular in the DSA), despite its principled opposition to regulation at EU level. We can assume that the systematic involvement of the media sector in policy debates on disinformation since 2018 had already legitimised an EU policy solution. EMFA simply achieved a tangible result for the sector, whereas organisations that were less intensely involved in policy consultation remained opposed. (Bouza García et al., 2025a). The following quote illustrates the stronger rejection among national stakeholders:

> The draft regulation constitutes unprecedented interference by the European Union in the press sector, a sector which falls within the specific competence of each Member State by virtue of the principle of subsidiarity. Under no circumstances can the European Union – under the cover of the existence of a "European media market" – be competent to regulate a sector whose specificity lies in the cultural and linguistic particularity of each country. And whose actors, contrary to what the Commission claims, are not faced with obstacles which would slow down their activities in the internal market under the EU. Proof of this is the non-existence of such a European media market [authors' translation from French original].
>
> (Fédération Nationale de la Presse d'information Spécialisée, 2023, p. 1)

Another conflict lies in who has "insider access" to the Brussels policy-making space. Business lobbies tend to be well-organised and resourceful. They attend consultations, submit feedback, and regularly interact with EU officials. Some civil society organisations and digital rights NGOs also have a presence in Brussels, but many other actors – especially from national contexts – remain outsiders. This insider–outsider divide affects who gets to shape the agenda and which values dominate the policy field.

Importantly, the coalitions that form around these issues are not always predictable. For example, Big Tech companies may support certain types of regulation – such as co-regulation – because it helps them avoid stricter national laws. At times, they even align with digital rights groups on issues like copyright or privacy (Heermann, 2024). However, they often oppose stronger regulatory intervention when it threatens their control over data or advertising models.

The international conflict arena

The EU's recognition of disinformation as part of a form of hybrid warfare coming from strategic rivals is a relatively recent development:

> Disinformation campaigns by third countries can be part of hybrid threats to internal security, including election processes, in particular in combination with cyberattacks. For example, Russian military doctrine explicitly recognizes information warfare as one of its domains.
>
> (European Commission & High Representative on Foreign Affairs and Security Policy, 2018, p. 2).

Initially, the EU's delayed response reflected the tension between countering harmful information and preserving core principles of liberal democracy and freedom of expression (Casero-Ripollés et al., 2023). The idea that information could function as a weapon – used to manipulate public opinion or undermine democratic systems – posed a conceptual challenge to the EU's traditional soft normative power approach.

This external framing helped legitimise a more centralised and security-oriented response. The European External Action Service (EEAS) emerged as a key actor, particularly focused on foreign disinformation campaigns. Compared to other EU bodies grappling with the complexities of domestic digital ecosystems, the EEAS was able to define a clearer and more specific strategy centred on external threats. This allowed it to shape not only internal EU policy but also public narratives around disinformation.

In 2021, the EEAS introduced the concept of *Foreign Information Manipulation and Interference* (FIMI), expanding the scope from "false information" to include broader manipulative behaviours and coordinated strategies – still largely associated with state-based actors such as Russia. The FIMI approach marked a shift towards a more comprehensive, but also more defensive, information strategy.

This shift raises important questions about the coherence of the EU's broader regulatory philosophy. The EU has long presented itself as a normative power that promotes democratic values through soft power and public diplomacy. However, the adversarial logic underpinning responses to FIMI risks blurring the boundary between diplomacy and information warfare. From this perspective, the EU's efforts to counter disinformation externally may come into tension with its internal commitment to media freedom and democratic dialogue. Critics have warned that such an approach could undermine the EU's credibility as a soft power actor and strain its relationships with both citizens and international partners (Proto et al., 2025).

These tensions became more visible following Russia's invasion of Ukraine in 2022. As part of its response, the EU banned the Russian state-funded media outlets RT and Sputnik, arguing that they were disseminating propaganda aligned with Russia's military strategy and broader disinformation campaigns. The bans were legally grounded in the EU's sanctions regime and were subsequently upheld by the EU General Court in July 2022. In this context, RT and Sputnik were framed not merely as media outlets but as instruments of hybrid warfare designed to

destabilise European societies, amplify social divisions, and incite violence (Baade, 2022). However, these measures were not without controversy. Some scholars and commentators cautioned that banning media outlets, even those widely regarded as propagandistic, risks establishing precedents for broader restrictions on freedom of expression (Helberger & Schulz, 2022).

Conclusion

This chapter has elaborated the EU's evolving response to the post-truth democratic challenges it faces, discussing both the regulatory framework developed at the EU level and the normative paradigms that underpin this approach. We argued that EU media governance increasingly reflects a citizenship paradigm to media freedom, suggesting a switch from a perspective of right protection to right expansion. At the same time, we have collected evidence for how the defence and promotion of media freedom has become increasingly contested in the European and international arena. In the empirical country chapters, we will examine these controversies from a comparative perspective during the implementation of the EU's regulatory framework with its wider implications for media freedom and the fight against disinformation.

Notes

1 The Media Freedom Coalition is an international alliance between 51 countries to promote media freedom through advocacy, diplomatic interventions, legal reforms, events and funding. See: https://mediafreedomcoalition.org/
2 The International Partnership on Information and Democracy is a self-commitment to principles of media freedom and freedom of expression. See: https://informationdemocracy.org/international-partnership-on-information-democracy
3 European Parliament & Council of the European Union. (2024). *Directive (EU) 2024/1069 of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings (Strategic lawsuits against public participation) (Official Journal L 2024/1069, 16 April 2024)*. *Official Journal of the European Union*. See: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401069

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2 The impact of EU regulation on media in Spain

Debates about fighting disinformation

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Introduction: Spain's contested implementation of the European democracy action plan

In 2024, the Spanish Prime Minister Pedro Sánchez announced the "Plan de Acción por la Democracia" that reproduced the language of the "European Democracy Action Plan" (European Commission, 2020). It introduced a variety of proposals to adapt Spanish regulations to the European Union's (EU) 2018 agenda against disinformation. The Plan builds on the notions of open government and accountability through increased administrative transparency, by proposing the creation of a national registry of interest groups, reforms in electoral integrity and participation, and enhanced digital information security. Measures include support for media pluralism, fact-checking initiatives, and media literacy education. The plan builds strongly on EU frameworks[1] and commits to significant regulatory changes, but its implementation seems unlikely, since the government lacked a parliamentary majority in July 2026. Rather than any fundamental contestation of the plan itself, the absence of a parliamentary majority is the more likely cause of implementation misfit in the Spanish case. It can therefore be considered a *prima facie* textbook example of top-down norm diffusion "where EU-level norms and rules are translated, often unevenly, into national practices and professional understandings" (Schimmelfennig, 2010). As will be discussed below, norm diffusion operates primarily as a necessary response for legal compliance because of strong misalignment between national and European regulations. The government, however, reframes this necessity positively as an opportunity to counter disinformation and so-called "pseudo-media" (Sierra et al., 2025, p. 10). Therefore, the plan was presented to the Spanish public not as the obligatory implementation of EU strategies but as a response to "pseudo-media" and far-right hoaxes perceived to threaten Spanish democracy. In doing so, it became part of a deeply polarised political context. (Sigma Dos, 2024). To understand this context, it is important to highlight that the coalition government (PSOE, Sumar) is the driving force here, having an unstable majority in Parliament due to the support of small parties. From the outset, the opposition (PP and Vox) has sought to delegitimise the government for relying on nationalist parties that supported a controversial amnesty for Catalan leaders. In this polarised environment, the *Digital News Report 2025* (Sierra et al., 2025)

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highlights growing concern about press freedom in Spain, identifying political interference as a major source of tension. Both the ruling government and the opposition are reported to have applied pressure on journalists and sought to influence the framing of media coverage. The report observes that the government differentiates between established news organisations, which it generally endorses, and what it refers to as "pseudo-media," accused of disseminating far-right narratives. Commentators suggest that this terminology is employed to undermine critical voices, particularly those within digital outlets and segments of the mainstream press that investigate sensitive judicial cases involving the Prime Minister's relatives and close associates (Impulso Ciudadano, 2025, pp. 5–7). Moreover, the report notes that recent legislative reforms and state interventions have intensified concerns, not only about the erosion of press freedom but also regarding the autonomy and financial sustainability of media institutions (Sierra et al., 2025). Consequently, it is hard to separate the government's claim of applying the agreed European regulation from the polarised political debate. Some view it as an effort to control the media, while others see it as a defence of institutions against opposition-led disinformation. Unlike the usual Spanish acceptance of EU regulation, which in this case could be expected given citizens' concerns about disinformation (see comparative attitudes in "Democracy"), there has been little public debate on the issue, especially about the implementation of the European Media Freedom Act (EMFA) and, partly, the Digital Services Act (DSA). Spain's "polarised pluralist" media system relies on long-standing patterns of political influence, asymmetric regulation between audiovisual and press sectors, and selective institutional reform. All this contrasts sharply with the EMFA's uniform and binding standards. Moreover, the Spanish government's implementation of EU initiatives tends to be partial and filtered through domestic political considerations as predicted by Europeanisation theory. This leads to incomplete alignment, as reforms in politically sensitive areas, such as public broadcasting, are avoided. The situation is further complicated by a changing regulatory environment at the EU level, where the shift from combating disinformation to promoting "information integrity" increases the pressure on national systems. Spanish institutions, media actors, and professional cultures remain unevenly prepared to adapt to this pace and depth of change. The implementation of the EMFA in Spain is therefore likely to generate a significant regulatory misfit. It confronts a national media system marked by political alignment, economic dependency, and fragmented governance with a European model designed to guarantee institutional independence, transparency, and editorial autonomy.

Therefore, this chapter views Europeanisation not only in terms of compliance or misfit with EU law but also as a catalyst for debate about the "normative interpretations that key actors in the policy field apply to democracy challenges." (see Introduction of this book, p. 4). Here, we want to test the EU's recent regulatory responses to disinformation, incorporating the perspectives of those who have participated in the elaboration and are now in charge of its implementation. Starting with the description of the national reality, we also try to see if the concrete implementation fits with a shared European normative space around journalism and democracy, suggesting that norm diffusion may be taking place. Methodologically,

this chapter is grounded in two waves of interviews with journalists, fact-checkers, regulators, and policy actors. This allows us to assess, in line with the aims of this book, how EU-level democratic norms concerning information governance are understood, debated, and applied within the Spanish context. Furthermore, this relates directly to the book's central argument that Europeanisation involves not only legal transposition but also the diffusion, reinterpretation, and contestation of EU democratic norms. The Spanish case illustrates how EU regulation can arrive both "misunderstood" and "out of the blue," leading to fragmented or superficial debates and interpretations in a context of political polarisation and institutional fragmentation. This chapter engages with two key questions posed in this book. It first considers how journalists in Europe understand and evaluate disinformation in light of post-truth concerns and the EU's democratic values. It then examines how different actors perceive the continuing implementation of the DSA and the EMFA, and their implications for democracy at the national level.

The political and regulatory landscape of journalism in Spain

To contextualise the Spanish responses, we need to briefly describe the recent evolution of the media. The 2023 media report from the *EU DinsinfoLab* pointed out that "Spain is very permeable to disinformation" and that "the Spanish disinformation landscape stands out for its acute political and media polarization" (Romero Vicente, 2023). The report suggests that "political and media polarisation" is an old phenomenon and that Spain's vulnerabilities come from entrenched partisanship and distrust of the media. Although Spain's polarisation is deeply anchored in a left–right divide that has become sharper on the political supply side, Spanish democracy has dealt with this dynamic since its earliest years.

Since the acute political crisis of 2010–2011, when the Spanish socialist government adopted austerity measures despite having promised the opposite, Spanish politics and media faced major changes but showed strong resilience. Before the crisis, Spain's political system was dominated by two major parties – the centre-left PSOE and the centre-right PP – which alternated in government, occasionally relying on the support of small nationalist parties such as the PNV and CiU. The media reflected this balance: Major companies leaned either to the left (such as Prisa) or to the right (such as Vocento and Planeta), while the public broadcaster RTVE remained politicised and press regulation was weak (Hallin & Mancini, 2004). After 2016, the political scene broke into a complex multi-party system, with governments requiring support from regional and nationalist parties. The media landscape also changed as traditional companies, such as Atresmedia and Mediaset, merged, and newspapers, after a period of deep crisis, expanded their digital content (Artero-Muñoz et al., 2021). However, despite some growth in subscriptions, they still depend mainly on advertising revenue. During the crisis, media consumption increased, reflecting heightened political interest. As politics later became more stable, consumption declined sharply, although many people may also be avoiding the news because of growing polarisation. In fact, according to Standard Eurobarometer 102 (October 2024), 58% of Spanish citizens

see national media organisations as delivering information influenced by political or commercial interests (European Commission, 2024, p. 6). RTVE sought to strengthen its role as a serious public service media platform by prioritising quality news over entertainment and taking steps to reduce political influence. However, these reforms remain incomplete, and many old habits persist. RTVE's governance has long been a source of political contention in Spain (Fernández Viso & Fernández Alonso, 2019). A 2006 reform under the Zapatero government introduced a two-thirds parliamentary majority requirement for appointing board members, aiming to ensure consensus and independence. However, political fragmentation later led to prolonged deadlock and interim leadership, weakening the model. A 2021 reform already eased the threshold to an absolute majority after two failed votes. In late 2024, the PSOE–Sumar government went further with Royal Decree Law 5/2024, reducing the requirement to a simple majority and expanding the board from 10 to 15 members. While framed as a solution to institutional paralysis, the reform drew criticism for increasing political control. The RTVE News Council and journalists' associations protested what they described as hand-picked appointments and called for transparent, professional selection processes to safeguard RTVE's editorial independence. The EMFA requires the boards of public broadcasters to be independent and protected from easy removal, yet the government's action plan does not include any amendment to Royal Decree-Law 5/2024. Taken together, these developments illustrate why Spain's current regulatory framework risks a significant misfit with the EMFA, which requires robust safeguards to ensure the independence and stability of public service media governance. This remains one of the areas where alignment with EU standards is most fragile.

Spain's regional television landscape is deeply shaped by the country's territorial decentralisation, with most of the 17 autonomous communities operating their own public broadcasters that promote local languages and cultures. These regional TV channels, such as TV3 in Catalonia or ETB in the Basque Country, play a vital role in reinforcing regional identities. However, because they are funded and managed by regional governments, political control over these stations is pervasive and often controversial (Fernández Viso & Fernández Alonso, 2019, pp. 161–162). The ruling parties in each autonomous community typically appoint the leadership and influence editorial policies, resulting in programming that frequently reflects the political agenda of the local government. This dynamic is especially pronounced in regions with strong nationalist or separatist movements, where regional broadcasters are sometimes used as tools to promote particular political narratives (Fernández Viso & Fernández Alonso, 2019, p. 156). Consequently, these channels can be highly polarised and differ significantly from the national public broadcaster, RTVE. Despite criticism and calls for reform to increase editorial independence, political interference remains a defining characteristic of Spain's regional television landscape.

In Spain, post-truth concerns mix with the country's traditional left–right polarisation. Journalists are worried about losing their ability to hold power to account, but they rarely see this as part of a broader change in how truth is understood.

Policies are difficult to frame in response to disinformation and instead tend to focus on long-standing issues such as privacy and reputation. There is also little attention to the problem among both the general public and specialised audiences. This specific political context has a strong impact on how the EU regulation is being perceived and implemented. Nevertheless, we also find similarities with the experiences of other EU countries, as is often the case in the implementation of EU policies.

To address all these points, we will focus on the general hypothesis that the EU regulation generates a field of political struggle within nation states. We specifically address the contestation of civil society (associations of journalists, media workers, and academics), trying to identify the positions of the main stakeholders towards the institutional narratives and policies (i.e., in terms of sovereignty interference; non-liability of platforms; media business model; inclusiveness and co-regulation). It is important to bear in mind that implementation of European policy is not merely a vertical downloading exercise, and that stakeholders often act as policy entrepreneurs between Brussels and national/regional capitals. In this sense, several of our interviewees, in particular those of the second part of the interview process, are not simply national stakeholders but Europeanised. We also take into account the international turbulence that is simultaneously shaping domestic perceptions of EU regulation on this issue.

This study of the Spanish case builds on two phases of interviews (see Appendix): First, with journalists (Dec 2023–Feb 2024) to capture their views on disinformation, EU policies, and media practices, and second, with regulators and experts (Nov 2024–Jun 2025) to understand the development of EU rules in Spain. The first phase progressed smoothly, covering a range of Madrid-based outlets including quality newspapers, fact-checkers, alternative media, and satirical press, while the second was marked by political sensitivity, refusals, and limited access to key actors such as the Ministry of Justice and the CNMC, Spain's regulator. Fieldwork was shaped by the political controversy surrounding Prime Minister Sánchez's 2024 Action Plan for Democracy, which placed the EMFA at the centre of partisan disputes. Despite these challenges, interviews with ministry officials, oversight bodies, and media representatives highlighted a broad consensus on the vulnerability of journalism and democracy to disinformation. This was coupled with a shared recognition that countering disinformation raises tensions with freedom of expression but can also serve to strengthen it.

Disinformation threats and the democratic roles of the media

Consistent with the book's aim to investigate "the real-world application and interpretation of EU regulation" (see Introduction of this book, p. 4) through the perceptions of actors, we treat journalists and regulators not simply as implementers of EU law, but as actors who may diffuse, resist, or reframe EU democratic norms in their everyday professional practice.

Perception of disinformation and threats to independence in media newsrooms

The interviews conducted with both Spanish journalists and regulators demonstrate a broad consensus regarding the definition of disinformation. The interviews show a marked contrast between the polarisation of the issue in the political sphere and a clear consensus among regulators and experts on the vulnerability of journalism and democracy. Almost all interviewees recognise that tackling disinformation can create tensions with freedom of expression, and all value free speech. However, virtually all interviewees also agree that the political and legal culture in Spain limits this right when it undermines public goods, as previous examples of the agreement have shown. One interviewee (number 9) particularly stressed the fact that exposing disinformation means not undermining but reinforcing free speech.

The distinction between opinion (as a subjective choice of preferences), satire, and mistakes, on the one hand, and disinformation, on the other, lies in the *intention* to deceive. Yet, as interviewee 17 notes, intention is virtually impossible to establish under Spanish law. Additionally, interviewees agree that disinformation harms public goods, albeit many of them focus on different aspects. Frequent examples include: democracy, fundamental rights (Interviewee 17), formation of public opinion in electoral contexts (Interviewees 12 and 16), and a fact-based public sphere (Interviewees 11 and 15).

However, it is worth mentioning that disinformation is an ambiguous concept in the Spanish language. Unlike in English, there is no terminological distinction between unintentionally inaccurate information (misinformation) and deliberately misleading information (disinformation). Instead, the latter term in Spanish is used to encompass both meanings, which can occasionally lead to confusion. Therefore, the majority of the stakeholders interviewed consider it necessary to differentiate between these two types of toxic content within the media system. In response to this, Interviewee 4 defines disinformation as follows:

> All toxic information that aims to cause destabilization and induce citizens to lack reliable information and erode trust in the media by saturating the ecosystem with falsehoods, deceit, and rumours.

Additionally, Interviewee 1 refers to it as "a monster with many tentacles" and quotes Spanish writer Javier Cercas, stating that disinformation becomes particularly dangerous when lies taste like truth. Likewise, Interviewee 6 uses a metaphor to describe disinformation, arguing that it is "the harmful noise that diverts attention from what is important." Furthermore, Interviewee 3 goes further and explains why the term "fake news" should not be used to refer to disinformation. Drawing on expert sources, he points out that if information is false, it is not news, as news can never be false.

In recent years, disinformation has become a real problem for Western societies, including Spain. A phenomenon that, according to some interviewees, has been exacerbated by social media. "The ability to create fake news has been

socialized, that is, the evil has been democratized," states Interviewee 5 and notes further that social media enables content to go viral. Likewise, the rise of digital platforms has also had a direct impact on the way journalism is done in Spain, since the technological revolution has allowed to bypass the work of journalists and target messages directly to citizens without a professional filter (interview 2).

However, while social media is pointed out as a rumourmonger, Interviewee 5 further insists that in Spain "the greatest element of disinformation is still traditional media," and "there is not a very healthy ecosystem" within traditional media. For his part, Interviewee 4 points out that, since the emergence of social media, journalists have noticed how misinformation has managed to creep into the media due to the lack of content verification.

The convergence of traditional media platforms and social media within the same digital landscape has intensified competition for advertising revenue, with Spanish newspapers increasingly suffering from the loss of this crucial source of funding. The perception that the press business model is in crisis is virtually unanimous among interviewees. This leads, on the one hand, to a reduction in the number of journalists in newsrooms, and on the other hand, to journalism incorporating the dynamics of social media into its work. "The problem is when we, journalists in general, have relaxed and thought that we can write articles, make videos and chronicles, based on things we see on social media because that is far from journalism," argues Interviewee 1. This leads to "more serious media becoming sensationalist and somehow, even if not consciously, seeking bias towards their audience," which can lead to strategies such as clickbait or headline distortion, as pointed out by Interviewee 3. Thus, the quest for the speed of news publication leads many media outlets to not fully verify information, leading to misinformation. Interviewee 1 argues:

> Alternative facts are not only found on social media, they are also present on television and newspapers, more so in some than in others […] There are people who put us all on an equal footing when there are media outlets that have a way of operating, let's say, that makes it more difficult for post-truth to be slipped into their pages.

The business model of the media sector is also a ground for political controversy and regulatory misfit, since governments in Spain, both at the national and regional levels, are usually accused of attributing institutional publicity according to political sympathy criteria (Impulso Ciudadano, 2025, p. 5). The EMFA establishes that institutional advertising needs to be transparent and non-discriminatory, on which interviewees are unanimously in agreement. This would also align with existing regulations, since Spain already has a law on institutional advertising. But, according to Interviewee 9, this law is not applied in practice. The action plan aims to reform the law in order to align it with the EMFA standards on transparency, non-discrimination, and the credibility of media reach data. The issue of media outreach is also potentially controversial,

despite its technical nature, since one of the main criticisms of so-called "pseudomedia" is that they act as political activists with little readership while being politically rewarded with subsidies that are disproportionate to their audience size (e.g., Interviewee 9).

Although the majority agree that social media and messaging services are the primary source of disinformation, it is particularly relevant to note how blogs and supposed alternative media outlets align with political ideologies. Interviewee 7 points out that one of Spain's major sources of disinformation is media linked to far-right parties. Some actors also point to other types of actors linked to disinformation campaigns stemming from foreign interference, which aim to generate opinion currents and undermine the system as a whole. "There are major actors of disinformation who have discovered that if they dedicate themselves to it diligently, they can achieve great results," according to Interviewee 3.

Finally, political dynamics are also blamed for disinformation, due to political parties spreading misleading narratives, as asserted by Interviewee 9. Similarly, Interviewee 17 is sceptical about the ability of Spanish political actors to lead the response, given their central role in the creation of such a polarisation.

Combating disinformation in Spanish newsrooms

"At the end of the day, all journalists are often at risk of getting caught up in that [disinformation] dynamic, not only as transmitters, but even as consumers of information," notes Interviewee 5. In this regard, he points out that journalists now have to be more vigilant even when consulting media outlets they have always trusted, as these can also unintentionally spread misinformation. Along these lines, Spanish media outlets are dedicating more efforts to fact-checking. In the case of one of the newspapers, they adhere strictly to an internal checking procedure, as Interviewee 1 points out:

> There are many editors and layers of editing, which usually serve as the newspaper's biggest safety net. For example, when the journalists from the National section write something, apart from having to identify sources, their work is then reviewed by their bosses. Even for very delicate topics, it's also reviewed by the management, and there's an editing team that scrutinizes it.

However, he also points out that, given the difficulties the media in Spain are currently struggling with, "newspapers have slimmed down," and therefore, their editing teams have as well. "That's a recurring complaint among the staff that I share. The more editing there is, the better the newspaper is."

Regarding the other major Spanish newspapers interviewed, Interviewee 2 states that they constantly receive disinformation. He gives the example of communication directors who regularly send them videos and images, presenting them as evidence that something extraordinary has occurred. "If you see it and publish

it, you're not doing journalism," he remarks. Faced with this situation, their *modus operandi* is as follows:

> I assign a reporter to fact-check the information, and while my reporter is fact-checking, which may indeed be true but may not, another media outlet has already published it without fact-checking. That is disinformation because even if it is true, you have to fact-check it. And that happens constantly.

In this regard, he calls upon the readers to understand the many processes of editing that go into the pages of their newspaper, that it has depth, and that it is different from what others do, especially in terms of disinformation.

Faced with the vast amounts of disinformation that infiltrate digital spaces and reach the newsrooms, some of these media outlets have, in recent years, created departments dedicated exclusively to fact-checking. "Disinformation has begun to circulate so rapidly that specialisation is necessary to combat it," indicates Interviewee 3. Therefore, such departments work in two ways: They publicly publish fact-checks of external claims, and they also verify their own content internally before it is published.

Interviewee 4 emphasises what they call "real content verification," that is, verifying that information is entirely true before broadcasting it on their channels. "If a single manipulated fake video slips into the TV news as if it was a real video, we are spreading disinformation and could become part of the problem."

Furthermore, in this dual aspect of publicly verifying false content, Interviewees 3 and 4 establish two essential criteria when presenting their content verifications. On the one hand, they consider the virality of the hoaxes circulating on social networks, and on the other hand, their intentionality, that is, whether they are particularly harmful to society as a whole. "During the pandemic, doubts about the safety and efficacy of vaccines could cause deaths, as well as home remedies or other health information," Interviewee 3 exemplifies. It is in this combination where content verification becomes especially relevant as a public service.

They also provide internal training on content verification for members of their staff who are not part of these departments. Additionally, both corporations join forces to provide training and workshops to students in their courses or master's programmes. Moreover, they themselves also receive external training in this regard: Interviewee 4 points out that:

> We recently received a course on open-source intelligence, and we are going to be students in a training course on advanced digital investigation […] These are paid courses that we request from our media outlet and our media outlet hires them. This happens in all media.

In this line, other major newsrooms that do not have these departments have also started to receive training to tackle the new challenges facing journalism. "We are going to have training on artificial intelligence, which is very related to post-truth, and that debate sneaks in," says Interviewee 1. "We need very demanding continuous training because if you fall behind in technology, it's very difficult to do your

job, although you always feel like you're running out of time because technology is advancing so rapidly," indicates Interviewee 2. Interviewee 9, however, thinks that AI is not good news for the profession as it cannot replace nuance and detailed information-seeking, even as media companies are already using it to lay off journalists.

However, these courses do not reach smaller media outlets or those without large media groups behind them. "All the training I have had either I sought it out on my own, or it was quite self-taught," states Interviewee 5. Despite this, Interviewee 6 establishes that, although they are a very small business created and managed by journalists, the fight against disinformation is very present in their newsroom, seeking to encourage their readers to do the same. "It's a very conscious way of appealing to thoughtful journalism and the necessary investment of time to go beyond disinformation," highlights Interviewee 6.

The importance of (trans)national journalism collaboration

"Collaboration is embedded in the organisation's DNA," states Interviewee 1. Moreover, some journalists have engaged in transnational journalism networks, as exemplified by Interviewee 5. Such initiatives are more common among smaller media outlets, which often lack the resources to join and collaborate as extensively as larger corporations. They explain:

> I have collaborated with various research networks, including a former platform, similar to Wikileaks, through which we obtained information from across Europe. I believe that all of this is essential for fostering trust and encouraging people to support reliable media outlets that possess limited power on their own.

However, Interviewee 2 noted that, within the newspaper company, there is little understanding of international collaboration, except in relation to specific events, and not as a general practice.

Notably, the case of fact-checkers can be considered paradigmatic, as it underscores the centrality of collaboration with peers and experts from diverse countries and regions, which constitutes a fundamental component of their professional practice. "We are here in the day-to-day practical world, sharing information with academic researchers. And they give us back information, explaining the trends of disinformation or creating rapid alert systems," explains Interviewee 3.

It is worth emphasising that, within the fact-checking community, a number of transnational projects and collaborative initiatives have emerged across Europe, aimed at fostering the exchange of best practices, improving methodological standards, and enhancing the fight against misinformation. In this sense, the EU has actively supported fact-checking organisations, recognising the essential role of fact-checking in combating disinformation (Sánchez-del-Vas, 2025). In this regard, Interviewee 3 maintains that "the fight against disinformation benefits from the impulses of the European Union, and Spain is one of the main actors."

Among the most significant initiatives in this domain is the promotion of the European Fact-Checking Standards Network (EFCSN). Established in 2022 with

financial support from the European Commission, the EFCSN brings together over 50 European fact-checking organisations with the aim of setting and promoting the highest common standards of quality and ethics in the practice of verification. In fact, it is led by the Spanish fact-checking outlet Maldita.

Another particularly notable example is the European Digital Media Observatory (EDMO), which, through its network of regional hubs, brings together academics, media professionals, fact-checkers, policy experts, and other relevant stakeholders to facilitate research, training, and the development of technological tools for content verification.

In the Iberian context, the IBERIFIER hub plays a particularly significant role, as it serves as the primary platform for collaboration between Spain and Portugal. This hub not only coordinates fact-checking initiatives but also conducts research on digital media trends and supports the dissemination of verified information across both countries. By integrating journalistic expertise with academic research, IBERIFIER exemplifies the growing convergence between media organisations, universities, and technology partners in addressing the challenges of the contemporary information ecosystem.

At the national level, some collaborative initiatives in the fight against disinformation can be identified. An example of this is Comprobado. It is an alliance formed by EFE Verifica, Maldita.es, Newtral, VerificaRTVE, and Verificat that aimed to join forces in detecting rumours and disinformation for the electoral campaign of the General Spanish elections on July 23, 2023. In this regard, they published fact-checks distributed not only on their websites but also freely to 20 allied media outlets, both regional and national.

When it comes to regulators, however, transnational collaboration is quite different. Interviewees 14, 15, and 17 in the executive branch have been involved in different stages of negotiations on Spanish regulations and agree that everything in the national policies is determined by the EU response. On the other hand, actors with regulatory/interpretative functions like the Junta Electoral Central (JEC), Consejo General del Poder Judifical (CGPJ), and Tribunal Constitutional (TC) point out that international cooperation is a general trend, but report only participation in events, congresses, and the like. Two Interviewees (9 and 13) are well aware of the European membership of their organisations, but have been involved in different capacities, with Interviewee 13 much more present at the EU level negotiations. In fact, these organisations, as well as most of our regulators, must be considered as national Europeanised actors contributing to the implementation of EU legislation: Regulators are well aware and, in general, have a positive view on the application of EU regulation in Spain.

The interviews reveal a tension around 2024 "Plan de Acción por la Democracia": The Spanish government's political framing of disinformation and the more nuanced understanding shared by journalists and regulators. While the Plan reproduces the language and aims of EU frameworks like the EDAP, it was publicly framed as a partisan response to far-right "pseudomedia," which inserted itself into Spain's broader climate of political polarisation (Palomares Herrera, 2024), rather than an EU-aligned regulatory necessity. This contrasts sharply with the consensus among the interviewed media professionals and regulators, who largely define disinformation

in terms of its impact on public goods such as democratic integrity, public trust, and informed debate, instead of its partisan origin. Many interviewees recognise disinformation's structural and systemic nature, acknowledging the complicity of both traditional media and political actors, including the ruling government, in the erosion of public trust. Their emphasis on the need for rigorous editorial standards, fact-checking, and media literacy cuts across party lines. Moreover, while pro-government narratives distinguish between legitimate and illegitimate outlets, most journalists interviewed warn against such binary labels, noting that disinformation also infiltrates established media and that the profession itself is vulnerable to economic pressures, technological disruption, and a declining editorial culture. The interviewees' insistence on structural reform, professional integrity, and EU-level collaboration suggests that the effective fight against disinformation requires more than reactive policies driven by short-term political narratives. Rather, it demands a systemic and credible commitment to media independence. This is something the current political framing may undermine by instrumentalising the issue along partisan lines, instead of fostering a unified, democratic response rooted in trust, pluralism, and press freedom.

The uncertain Spanish implementation: Dispersion and lack of public debate

A common topic across all interviews is Spain's limited capacity to tackle disinformation and the expectation among interviewees that regulation will be updated. Interviewee 11 elaborates on this and does not expect Europeanisation to impact Spain's specific distinction between freedom of expression and information. They argue that constitutional guarantees need to be updated to reflect new technologies and markets. A shift towards broader freedom of expression is also called for, although it remains limited in areas such as religious feelings or national symbols, issues that the government action plan proposes to review, alongside stricter regulation for journalistic practice.

National press regulation in a cleaved and precarious context

The regulatory environment is marked by a strong cleavage: The state has a strong role in audiovisual regulation, whereas the press is not subject to virtually any regulation below the constitution itself. Therefore, the state's political intervention in the media market is not extensive but intensive, and it is largely concentrated in the audiovisual sector through public television and radio, as well as through the strong regulation of private channels. The Constitutional Court has developed a doctrine that is particularly protective of journalistic practice as a result of the need to uphold public freedoms during the establishment of the democratic regime. Interestingly, in the post-truth scenario, the central rule for the legitimacy of journalistic exercise, according to the Constitutional court, is "veracity." This means that the information does not need to be true in absolute terms, but that it has been produced with journalistic professionalism and due diligence. It is up to ordinary courts to enforce this, and the criteria to uphold rights to honour privacy vs freedom of information are stringent. Interviewee 11

also pointed out that regulatory development in Spain is marked by a jurisprudential development that distinguishes freedom of expression from freedom of information, with the latter protecting citizens' right to obtain information. This has led to a view of journalists as privileged holders of citizens' rights, which places higher responsibilities on them, since citizens' opinions are not subject to expectations of veracity, while also granting them stronger protections, such as the protection of sources.

This is particularly relevant in the context of the current internal and external crisis of journalism because of the economic and technological transformation of the media (Artero-Muñoz et al., 2021). In the past, media organisations were relatively large and complex, therefore acting as internal enforcers of journalistic standards. During all this period, being a journalist and doing journalism were functionally equivalent to being employed by one of these large organisations. The polarisation of the Spanish journalistic field was concentrated around a relatively small number of large actors (Artero-Muñoz et al., 2021).

However, economic crisis and technological change have transformed the landscape (Vara-Miguel et al., 2023). The decade following the 2008 financial crisis was marked by mass layoffs of journalists and a dramatic reduction in the fixed costs of entering the media market. As digital media no longer require printing facilities, distribution networks, or even office space, the media landscape has become more fragmented and polarised, while the regulatory framework has remained largely unchanged. Virtually any organisation can establish a news site and benefit from the constitutional protections afforded to journalists, while not adhering to self-regulatory rules beyond their own internal standards and the limited, though existing, regulations enforced by the courts.

Additionally, political polarisation has changed, with challenger parties more willing to contest the legitimacy of political institutions and practices, including the role of the media and their relationship with the political system (Haapala & Roch, 2025). The new period is characterised by clashes among reporters, between reporters and party representatives, and a return of party-affiliated – and not only aligned – media.

The strong presence of the state in the audiovisual sector responds to technical reasons (the need to regulate the limited "radio-electrical space"), policy reasons (the legacy of a strong general public service TV at the national level historically, and regionally since the establishment of democracy) and more recently, EU legislation path dependency with the AVMSD directive (Interviewee 15).

On the other hand, the written press has not been subject to specific legislation since the Franco dictatorship. Existing regulation refers directly to Article 20 of the Constitution and is rooted in a distinction between free speech for all citizens and the right of citizens to receive information. This understanding has been developed over time by the Constitutional Court (Interviewee 11). The Court has defined the limits of this right in relation to privacy and the reputation and honour of third parties. It has also recognised the right to protect sources and, critically, clarified the relationship between journalism and truth. Constitutional protection is granted on the basis of veracity understood as a professional practice, rather than strict factual truthfulness. This *de facto* regulatory framework is poorly suited to technological change and a changing market, as establishing a

media outlet now requires far less technical expertise and investment. Nevertheless, no national attempts to regulate the press have been undertaken.

One area where the pro-regulation consensus among interviewees is clear is in the field of anonymity. Several interviewees agree that anonymity in digital media is a major obstacle to accountability, supporting content labelling and transparency measures (Interviewees 12 and 16). Interviewee 11 points out that anonymity is incompatible with the responsible exercise of freedom of expression, since it affects the rights of others and even conceptually it should be seen as an external expression of personal opinion.

There is also significant complexity in the attribution of competences. At least three interviewees (Interviewees 14, 15, and 17) described how responsibilities for EU dossiers are allocated at the domestic level, with one ministry in charge of coordination and others holding substantive competence over the policy area. In the case of the EMFA, two interviewees explained that up to three ministries declared themselves not competent, partly due to the workload generated by the DSA. As a result, responsibility was assigned to the Ministry of Culture through an internal negotiation, mirroring its representation in the Culture Council, but with support from the Ministry for Digital Transformation. The interviewee from the latter ministry (Interviewee 15) stated that this decision reflected his own agency in the process and showed a degree of path dependency linked to the Audiovisual Media Services Directive, for which the ministry had previously held responsibility.

This complex internal situation also made policy discussion with stakeholders more difficult, with little time to coordinate the government and media sector's position (Interviewee 15), resulting in important national actors, such as the Asociación de Medios de Información, participating in European policy debates to voice their opposition to EMFA.

The attribution of national DSA and EMFA competences to CNMC – where it has been impossible to obtain an interview – is based on path dependency and the reputation of being an independent rule enforcer, but it creates tensions in the Spanish media field:

- It has no expertise on media matters and no networks with the press sector.
- It has experience in applying competition policies, but no track record on defence of democracy, fundamental rights or pluralism.
- It is insufficiently independent as per European standards, as nominated by government (Interviewee 9).
- It has no experience on issues related to election defence (Interviewees 12 and 16).

Interviewees 16 and 17 emphasise the Spanish electoral system's institutional weaknesses in addressing digital disinformation. The absence of political agreement on the matter, coupled with the failure of regulatory frameworks to keep pace with technological advancements, is a key issue. This makes Spanish democracy particularly vulnerable in the context of elections. The Interviewees 11, 12, and 16 agree that electoral authorities and courts are ill-equipped to quickly respond to social media manipulation or external interference.

There is a broad consensus that the JEC is structurally and legally unable to respond to current challenges (Corredoira y Alfonso, 2024). The JEC lacks technological infrastructure and specialised staff. The legal framework also makes it difficult to intervene: Spain's electoral law (LOREG) was designed with large traditional media in mind and is therefore outdated and not fit to address the challenges of digital communication during campaigns, such as the use of algorithms, targeted political advertising or deep fakes. Its decisions show a growing sense of institutional helplessness and repeated calls for support (Corredoira y Alfonso, 2024). Moreover, the recent European regulations (such as the DSA and EMFA), although applicable, have not been adequately implemented at the national level, and Spain has yet to appoint or equip the necessary intermediary and enforcement bodies. Those Interviewees (12 and 16) working on election protection stress that the current fragmentation of responsibilities, institutional inertia, and lack of political prioritisation render Spain particularly vulnerable to digital manipulation during electoral periods.

These institutional tensions speak directly to what the theoretical chapter identifies as the likelihood of "regulatory misfit between EU regulation and Member State implementation." In Spain, fragmented competences, political contestation, and the lack of a specialised press regulator highlight tensions between EU regulatory requirements and the preferences of domestic actors. The national difficulties in designating and equipping an EMFA/DSA authority therefore represent a textbook example of Europeanisation generating conflict rather than convergence.

The impact of EU regulation and policies on disinformation

Interviewee 15 points out that the EMFA will have a significant regulatory impact in Spain. However, the fieldwork reveals a general lack of awareness among Spanish journalists and, to a lesser extent, regulators regarding the new regulations promoted by the European Commission in the areas of media and the digital environment, such as the EMFA, the DSA, and the associated Code of Practice. Whereas this book asks how the EU's efforts are "received, interpreted, and operationalised in different national contexts" (see the Introduction of this book, p. 6), the lack of substantive public or even specialised discussion of emerging regulation in Spain reinforces the view that Europeanisation in this case takes the form of unexpected or misunderstood norm transfer, rather than alignment with European normative goals through deliberative debate.

In this regard, as pointed out by Interviewee 2, this is a matter that should be addressed more by media owners than by journalists themselves, as "they are the ones who have the strength and the capacity to defend our work." Nevertheless, the majority express confidence in the relevance of these new regulatory frameworks and the need to promote them. "It is absolutely essential that regulations leading to the accountability of social media and the digital ecosystem be applied," notes Interviewee 6.

Although regulators are much more aware of EU legislation, they point out that it may have a marginal effect in Spain. Firstly, it does not change the regulatory playing field for the journalistic profession: The new EU board will be an overseer more than a new regulator (Interviewee 13), and EMFA does not oblige Spain to establish new criteria for the exercise of the profession. Secondly, disinformation

is likely to be difficult to frame in policy debates. The interviewee from the judicial power made the point clear: Spanish judges have no regulation or legal tradition to respond to "disinformation" (Interviewee 10). Whenever prompted to adjudicate between free speech and the defence of democracy, they revert to issues of privacy and the balance between private interests. This new debate and limitations to freedom of expression are rarely addressed (a point also shared by Interviewee 11).

Furthermore, there is a unanimous consensus, both among journalists and regulators, that even among specialised publics, there is very little knowledge of EU regulations such as DSA and EMFA. This has been admitted in several interviews we were conducting. Further, this is accompanied by the view that intense polarisation and the framing of disinformation as a partisan issue. This hinders its recognition as a policy problem requiring collective action, instead casting it as a political weapon to be attributed to opponents.

Faced with the lack of in-depth knowledge on the new legislation by Spanish journalists, the interviewees dedicated to fact-checking stand out for their understanding of the topic. "The European Union has been very concerned about fighting the situation because it has had several wake-up calls. One is the Brexit campaign that directly affected the European Union, but also the victory of Donald Trump in 2016," points out Interviewee 3.

For Interviewee 4, the regulatory framework must serve to enable the EU authorities to demand accountability and transparency from social media platforms regarding the functioning of their algorithms and to act when misinformation is detected. However, he argues that although the new regulatory framework is interesting, its enforcement is not adequate. In this sense, he gives the example that Elon Musk withdrew from the Code of Good Practices. "If platforms opt for self-regulation, I believe it should be a permanent and growing commitment, not a diminishing itinerant commitment as is the case with X," asserts Interviewee 4. Furthermore, they note that although META is committed, there is much passivity on their part when it comes to tackling the spread of erroneous content about false medications on its platforms.

For Interviewee 3, the EU took a long time to react because "it is a heavy freighter that moves slowly." However, they suggest that this new legislation may have a global impact beyond the EU, as platforms have to make changes to adapt to the European market. It may be more convenient for them to change everything at the international level rather than apply it only here. This is also observed by Interviewee 2, "When Europe makes a move, it sets the trend." Here, Interviewee 1 emphasises:

> The regulation is fine, but regulation always addresses the previous crisis, never the crisis that is yet to come, and there will be new forms of disinformation in the future that are not even on our minds at the moment and are not anticipated in that regulation.

However, most of the interviewees agree that the ultimate key to ending the impact of disinformation in our societies is media literacy. "The regulatory framework is interesting, but it is a secondary avenue," argues Interviewee 4, "the main solution is education because the more critical thinking a citizen has, the more protected they will be against disinformation."

"The situation right now is overwhelming. Disinformation will not end, and putting a stop to it is also very difficult," points out Interviewee 3. Therefore, mechanisms need to be created in the citizens' way of thinking, teaching them how to consume information. "If society supports quality newspapers, we will have quality press. If society supports other types of newspapers, then that type of press develops," argues Interviewee 1. Therefore, ideally, society should be mature enough from an informational standpoint to detect disinformation by itself and combat it. For Interviewee 2, "being informed today is a challenge that requires personal effort." That's why they advocate for deep media education that fosters critical thinking and interest in consuming quality media. In this sense, the media and educators should lead the strategy, asserts Interviewee 6. According to Interviewee 8, such education should be incorporated into the Spanish curriculum from early on since "adults already have a petrified brain, and it is extremely difficult to change."

While the foundations of a new media regulation are being established in Europe, in Spain, the journalistic profession finds itself in a regulatory limbo with no clear definition of what it means to be a journalist. Interviewee 5 argues that:

> Journalism is a method, and many people can do it, not just a journalist, but there are very blurred lines where we see people who are only seeking to disinform and who are sharing spaces with people who are doing their job honestly.

This absence of consensus enables numerous propagandists to disseminate disinformation through websites and social media platforms, presenting themselves as journalists and invoking self-ascribed professional legitimacy.

Similarly, for Interviewee 5, the Spanish media system presents massive deregulation. "I think we need to enact a media law and be more restrictive in the way we are treated as journalists." In this regard, he points to the overprotection of journalists, to the point where "the falsification of reality is practically covered simply by trying to prove that you have tried to verify it."

In response to this deregulation of the Spanish media system, Interviewee 2 argues that greater internal organisation of the profession is needed. "I believe that the journalism profession must take a step forward in the legal protection of our function and in defending the work of information professionals." However, he argues that "the problem is that in Spain, whenever politicians want to talk about the issue, it's to cut or control, not to guarantee independence." That is why a large part of the profession is fearful of any change.

Conclusion: National political fights, distortion of narratives, and difficulties in implementing political agendas

Despite the diversity of interviewees, a few aspects can be generalised. The first one is that social media and networks are generally seen as having a negative effect on the public sphere and on media business models. Most interviewees also see positive aspects, but there is a generalised reflection that journalists have not been able to adapt their work to this new environment. This means that they are "cannibalising" their traditional methods to suit more volatile publics,

entering shorter news cycles. There is thus a generalised agreement that social media must be regulated. However, there is no general agreement on what to regulate and how to do it. When asked what they expect from EU regulation or policies overall, most journalists gave general or evasive answers, whereas the representative of media companies reminded us that the sector was against EMFA. On the contrary, regulators hold positive expectations for the EMFA but recognise that it is too early to make any prognosis, and a lot will depend on national implementation.

The business model of the media sector remains a potential source of misfit and controversy. Political contention frequently arises over the allocation of institutional advertising, with governments at both national and regional levels often accused of distributing publicity based on political affinity rather than objective criteria. The recent Action Plan seeks to reform the legal framework to better conform with EMFA standards, emphasising transparency, non-discrimination, and the credibility of media reach data. Funding debates, alongside ongoing struggles over media pluralism and independence, are less about introducing a new media model and more reflective of deeper, systemic political instability and polarisation within Spain. Consequently, the discourse on media governance must be understood within the broader context of Spain's entrenched political conflicts and institutional dynamics, rather than as isolated media-sector issues.

There is clearly a lack of debate and information about EU regulation and policies. Despite this, interviewees are generally favourable to greater transnational cooperation, although it is not seen as a major solution. New EU-level legislation is largely considered unnecessary, with the notable exception of fact-checkers. Although our pool of interviewees is too small to derive any major conclusion, one could link this to the emerging role of these professionals in EU policies. They have recently shown an increasing collaboration within the IFCN and their ability to work with platforms. More research is required to develop and test this hypothesis.

Overall, the Spanish journalists interviewed see media literacy training policies and programmes as the best solution. According to them, it is not journalism which is in crisis, but the public sphere and the public's relation to information. In turn, the regulators tend to see these programmes to combat disinformation as too focused on the long term, with short-term policies necessarily addressing political polarisation, quality reporting and media economic viability.

This may also finally explain that, surprisingly, most of our respondents are relatively optimistic in relation to the future. Spanish journalists think that their profession has changed over the span of history and that ongoing changes equip them better to face challenges. Interviewee number 4 expresses this feeling clearly:

> Current journalism is the same as always, just with new tools. When I started many colleagues couldn't use the internet, few had email addresses and journalists wrote with two fingers on keyboards as in typewriters. We use computers, mobiles and AI tools, but we do the same thing they used to do: make sure your info is grounded, checked or you ask, look for another source, call, consult"

Situating these findings within the broader argument of the book, Spain exemplifies the complexity of Europeanisation as a normative process. As the introduction states, the book moves beyond compliance to examine "whether and how EU-level democratic norms – especially those concerning information governance and media freedom – are received, interpreted, and operationalised." Our results show that in Spain, such norms do diffuse, but can do so in a partial or politically reframed manner. Rather than a smooth convergence towards a European normative space, Spain demonstrates how EU regulation can be simultaneously welcomed, resisted, and misunderstood – and how, when reforms arrive without warning or debate, the EU's democratic ambitions can become entangled in national political struggles. This makes Spain a paradigmatic case of the book's central theme: That Europeanisation unfolds not only through the downloading of rules, but through contested and uneven processes of meaning-making across national contexts.

Note

1 The European Democracy Action Plan frames disinformation as a deliberate manipulation of democratic processes and rights, linking its control to the protection of human rights, media pluralism, and the rule of law. Anchored in a normative vision of democracy, this approach underpins major regulatory efforts – such as the Digital Services Act, the European Media Freedom Act, and the Strengthened Code of Practice on Disinformation – and advances actions in diverse fields, from citizen empowerment to oversight of platforms and defence against foreign interference.

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Appendix

List of interviews:

Interviewee	*Number*	*Date of interview*
Senior position at a newspaper	1	January 2024
Senior position at a newspaper	2	February 2024
Fact-checker	3	September 2023
Fact-checker	4	January 2024
Freelance journalist	5	December 2023
Senior position at a journalism magazine	6	January 2024
Contributor to a satirical magazine	7	January 2024
Senior position of a satirical magazine	8	February 2024
National journalists trade union	9	November 2024
Official of the Consejo General del Poder Judifical (CGPJ)	10	January 2025
Official of the Tribunl Constitutional (TC)	11	February 2025
Official of the Junta Electoral Central (JEC)	12	February 2025
National Newspaper Association	13	April 2025
Official of the Ministry for Social Rights, Consumer Affairs and the 2030 Agenda	14	April 2025
Official of the Ministry for Digital Transformation	15	May 2025
Academic advisor to the JEC	16	June 2025
Official of the Ministry for Culture	17	June 2025

3 Italian journalism amid declining standards and counter-disinformation efforts

Jacopo Custodi

Introduction

This chapter examines the challenges and opportunities Italian journalists face in addressing disinformation within the country's media landscape, focusing on the perceptions and strategies of media professionals and stakeholders, with particular attention to the evolving regulatory framework shaped by recent European Union (EU) legislation. Disinformation has emerged as a defining issue for many liberal democratic societies, eroding public trust in institutions, polarising debate and weakening journalism's ability to act as a credible source of information. In Italy, these challenges are compounded by a media system historically characterised by pronounced political parallelism and commentary-oriented journalism and are further intensified by more recent – though not uniquely Italian – pressures such as the erosion of traditional revenue models and the growing concentration of media ownership.

Against this backdrop, the EU's recent regulatory initiatives on disinformation – and on the governance of information more broadly – assume particular salience, as EU institutions in recent years have intensified efforts to counter disinformation and safeguard media pluralism, most notably through landmark measures such as the Digital Services Act (DSA) and the European Media Freedom Act (EMFA). These legislative frameworks aim to enhance transparency, combat disinformation and safeguard journalistic independence. However, their effectiveness depends on the strength of national regulatory systems and the degree of cooperation from digital platforms.

In light of this evolving and complex context, this chapter addresses the book's core questions as they pertain to the Italian media landscape: how journalists in Italy diagnose disinformation-related threats and the professional repertoires they mobilise in response, and the extent to which EU norms and instruments – particularly the DSA and the EMFA – shape national understandings of appropriate solutions across newsrooms, professional associations and institutional regulators.

Empirically, the analysis draws on fifteen semi-structured interviews (see Appendix) conducted between 2023 and 2024 with journalists from a diverse range of national outlets (*La Stampa*, *La Repubblica*, *Domani*, *Il Post*, *Il Manifesto*, *ANSA*, *DIRE*, *Il Giornale*, *Libero*), alongside representatives of key professional

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bodies (*Federazione Nazionale Stampa Italiana [FNSI]*; *Ordine dei Giornalisti*) and regulatory institutions (*Autorità per le Garanzie nelle Comunicazioni [AGCOM]*; *Dipartimento per l'Informazione e l'Editoria*). Interviewees were selected using purposive sampling (Robinson, 2024) based on their professional exposure to issues of disinformation and misinformation in journalism. The sample is not intended to be statistically representative but to capture a range of professional positions and institutional standpoints. The choice of semi-structured interviews allowed us to compare respondents' answers while still leaving room to explore issues that were particularly relevant for each interviewee (Magnusson & Marecek, 2015, pp. 46–72). We relied on an interview guide that included a coherent set of questions grouped under several broad themes, while leaving open the possibility for interviewees to digress and for the interviewer to add or customise specific questions within these themes (della Porta, 2014, pp. 228–261).

This study offers an up-to-date, empirically grounded account of how traditional journalism in Italy is responding to disinformation – an area that remains comparatively understudied and mostly limited to the exceptional case of the COVID-19 pandemic (Morcellini, 2023; Sarelska & Jenkins, 2023). It also engages with broader debates on journalism's resilience in the post-truth era and situates the discussion within the EU's evolving role in regulating democratic media ecosystems.

An overview of Italy's journalism landscape and its challenges

Italy's media system is conventionally located within the Mediterranean/polarised-pluralist model (Hallin & Mancini, 2004). It is historically characterised by notable political parallelism – where outlets often align with parties or broader ideological camps – and a tradition of commentary-oriented, advocacy journalism. The print newspaper landscape is pluralistic, though newspaper readership is comparatively modest, and television has long played a central role. State involvement is significant (as owner, regulator and funder), with public service broadcasting subject to political influence, and private media historically connected to political and/or economic interests.

While EU integration spurred reforms promoting liberalisation and media pluralism, with EU directives in the 1990s and 2000s encouraging structural reforms, issues such as political interference and increasingly concentrated media ownership have continued to undermine journalistic independence in Italy. These dynamics were epitomised by Silvio Berlusconi's longstanding dominance of private broadcasting and influence over public service media since his entry into politics in 1994, and they remain salient today.

The public broadcaster *Radiotelevisione Italiana S.p.A.* (RAI), some private TV channels and a broad range of private print newspapers define a media landscape shaped by pluralism but also marked by ownership concentration and political interference. Political control over RAI, together with increasing media ownership by politicians and business figures, continues to undermine editorial independence. A telling example is the case of Antonio Angelucci, a right-wing

MP (first elected with *Forza Italia* and later with *Lega*) and an entrepreneur in private healthcare, who now owns three daily newspapers: *Il Giornale*, *Libero* and *Il Tempo*. As noted in the 2024 Country Report on Italy by the Centre for Media Pluralism and Media Freedom, "the independence of the public broadcasting service remains, alarmingly, at a high-risk level. Safeguarding the political independence of the media is an urgent concern, given the presence of direct or indirect political control over major news outlets" (Vigevani et al., 2024, p. 44). It is important to underscore that political interference is not confined to Italy's public service broadcaster, RAI. It also intersects with a broader trend of rising media concentration that has unfolded over the past two decades and is still ongoing, consolidating many local and national titles under common ownership. This consolidation has reduced the plurality of providers and has increasingly exposed editorial independence to proprietorial and commercial pressures (Vigevani et al., 2024, pp. 20–27).

Adding to these challenges to journalistic independence are global trends: the increasing precarisation of journalistic labour – which leaves workers more vulnerable to pressure and less able to exercise editorial autonomy – and the erosion of traditional revenue models driven by the rise of large global platforms (Custodi et al., 2025). Public trust in the media remains comparatively low in Italy today (OECD, 2024), a situation exacerbated by polarisation and the rise of populist narratives exploiting digital platforms. These structural changes, intertwined with the digitalisation of news flows, increasingly compel journalists to work across multiple channels, reshaping organisational routines and production processes, the skills required, and, potentially, journalists' perceptions of their autonomy and professional role (Sorrentino & Splendore, 2022).

Finally, there has been a rising number of incidents involving legal attacks and censorship attempts against journalists. In 2023, Mapping Media Freedom, a monitoring tool from the European Centre for Press and Media Freedom, recorded an increasing number of such incidents in Italy (EFJ, IPI & ECPMF, 2023). Notably, there has been a rise in the use of strategic lawsuits against public participation (SLAPPs) by politicians or influential media figures, aimed at silencing critical voices and stifling public debate (Kelner, 2024).

Public funding for newspapers is another key issue that characterises Italian journalism. The allocation of state subsidies significantly affects the survival of many print publications. Most major national newspapers do not receive direct public funding and thus do not benefit from the law governing subsidies. However, some high-circulation newspapers, such as *Avvenire* and *Libero*, do receive support. According to Italian law, direct funding is intended to support the pluralism of information by aiding small local newspapers, publications in minority languages and journalist cooperatives. Nonetheless, some private newspapers continue to receive significant funding as if they were cooperatives. This is often done by formally assigning ownership of the publication to a cooperative, while in reality, a commercial company controls the newspaper (Santoro, 2021). In the past, party newspapers were also subsidised, but this provision has been eliminated. Beyond direct funding, all newspapers published in print format benefit

from indirect support (e.g., newsprint or postal discounts), but these are generally not essential for their financial stability – unlike direct subsidies, on which some outlets heavily rely.

In terms of regulatory and supervisory frameworks, AGCOM is the main body overseeing the communications sector. The authority was established in 1997 as a semi-independent agency that plays a central role in the development and implementation of new EU regulations related to information policies, such as the DSA (for which AGCOM acts as the Digital Services Coordinator) and the EMFA. Another key institution is the Department for Information and Publishing (*Dipartimento per l'informazione e l'editoria*), a structure within the Prime Minister's Office that coordinates institutional communication efforts, manages direct and indirect subsidies to the press, and works to protect copyright and combat digital piracy.

Lastly, the National Order of Journalists (*Ordine dei Giornalisti*) is a professional organisation that plays a key role in regulating and representing journalists. Founded in 1963, it operates as a public entity with an associative structure. It sets the standards for professional conduct within the sector, and journalists in Italy must be registered with the Order to practise professionally. Importantly, the Order is not a trade union. The Italian National Press Federation (FNSI) is the unitary trade union of Italian journalists and is responsible for negotiating collective labour agreements on their behalf.

Italian journalism and disinformation

This section advances the chapter's empirical analysis by tracing how journalists understand and navigate disinformation pressures and how these dynamics intersect with EU regulatory efforts. Guided by the book's research questions, we first examine journalists' own accounts of disinformation and perceived threats to professional independence; we then map the strategies, routines, and tools mobilised to counter false or misleading content; and finally, we situate these practices within the evolving European regulatory environment, analysing how EU values, rules, and guidance are perceived not only by journalists but also by stakeholders in professional bodies and regulatory institutions.

Journalists' perceptions of disinformation

The first observation regarding how journalists perceive disinformation concerns the plurality of their interpretations of the phenomenon. Just as the concept is subject to multiple conceptualisations in academic scholarship, journalists likewise display a variety of perspectives in their understanding of disinformation. Some of the journalists interviewed equate disinformation with classic fake news, that is, manifestly false stories. Others adopt a broader conception, encompassing incomplete, decontextualised or misleading information. From this latter standpoint, disinformation is not limited to wholly fabricated news; it also includes information that, while not entirely incorrect, is tendentiously manipulated.

The first conception of disinformation emerged among journalists working for the right-leaning newspapers *Libero* and *Il Giornale*, who focused their reflections on classic fake news. By contrast, the second, more expansive interpretation was expressed by all the other journalists, albeit with differing emphases and nuances. These interlocutors stressed the need not to reduce disinformation to the mere dissemination of falsehoods, underscoring the complexity and multifaceted nature of the phenomenon instead. This perspective was even more pronounced among journalists at alternative, non-mainstream outlets. As a journalist from leftist *Il Manifesto* put it:

> Disinformation is information that does not contribute to the advancement of the public sphere, in the Habermasian sense of the term, but rather harms it, pollutes it, sullies it. (…) We must move beyond fake news in the narrow sense; we must move beyond the blatant lie. Disinformation is not only that – indeed, that is the easiest to combat and, despite everything, often remains confined within echo chambers. The bigger problem is a subtler disinformation: out-of-context stories, manipulated information, data used as weapons, etc.
>
> (Interviewee 5)

This divergence in understanding disinformation is closely tied to another difference concerning where fake news originates and circulates. Journalists at right-leaning outlets maintain that fake news is inherently linked to social networks, since that is where it is born, spreads and gains traction. Only later do such false stories reach newspapers, often by mistake. As a journalist from *Libero* stated:

> Disinformation is the offspring of social networks, which convey false information that then, often incidentally, also reaches newspapers. (…) Journalism is the end point of the news. We must understand that the primary source of today's news is social networks.
>
> (Interviewee 9)

Most of the other journalists interviewed, however, insisted on viewing disinformation as a longstanding phenomenon that has assumed new forms and speeds with the advent of social media, but cannot be confined to them. They emphasised that digitalisation has certainly increased the rapidity and abundance of information, perhaps making it easier than in the past to fall for fake news, while at the same time rendering it easier to recognise. As the ANSA journalist observed:

> Let us remember that the Pulitzer Prize is named after a journalist who was also one of the greatest manipulators of information, who – through his disinformation and yellow journalism – helped set off the Spanish–American War. It is true that today, in the digital realm, disinformation takes on new forms, but it has always existed.
>
> (Interviewee 6)

As the President of the National Order of Journalists explains, disinformation is a global, long-standing phenomenon that today takes new forms and often circulates through new channels of dissemination via social media and, more recently, artificial intelligence, but which in itself is neither uniquely Italian nor uniquely contemporary. In his words: "Throughout history, every authority has resorted to disinformation campaigns. This can be traced from parchment to the advent of print; from the earliest news-sheets of the modern era to the industrial revolution and, later, the digital age" (Interviewee 11).

If disinformation is not only about fake news, and if its causes cannot be reduced solely to social networks, does this mean it can also originate within traditional newsrooms? One point on which all the journalists interviewed agreed is the tight connection between disinformation and the accelerating pace of journalistic work. It was unanimously acknowledged that journalism today requires greater speed than in the past, with the primary goal being to publish stories online before competitors. In this context, digitalisation plays a crucial role, reshaping journalistic practices and routines by imposing timelines different from those of print. This digitally induced "need for speed" recurs throughout the interviews as one of the main challenges the profession faces, insofar as it reduces the time available for careful source verification and in-depth investigation. Moreover, this issue is closely intertwined with job precarisation, which favours excessive workloads, shorter deadlines and limited organisational support. That is why, in our interview, the President of the National Order of Journalists links the problem of disinformation to the issue of fair remuneration, arguing that "underpaid journalists on precarious contracts do not always have the time and resources required [for quality journalism]" (Interviewee 11). This point is also underscored by the Secretary-General of the Italian National Press Federation, who notes that ever-faster production cycles and increasingly precarious employment conditions encourage copy-and-paste practices and make rigorous source verification less common (Interviewee 10).

This dynamic often leads to the production of low-quality or inaccurate information – by-products of human error – or to the unintentional reproduction of false stories. This phenomenon closely aligns with the English-language concept of "misinformation" (Armitage & Vaccari, 2021), which, in brief, refers to unintentional disinformation. The term *misinformazione*, however, remains rarely used in Italian and is more commonly subsumed under the broader notion of *disinformazione*. As a journalist from *La Stampa* reiterated:

> Investment in newspapers has declined; Italian newspapers have eliminated copy editors – very few still have them – so errors slip through: typos and grammatical mistakes, poor word choice, but also conceptual errors that are neither checked nor corrected. (…) The problem is not even the journalists, who are forced to work more, with fewer tools, and ever faster; rather, the responsibility lies with publishers, who want ever more sensational, exaggerated stories that chase clicks.
>
> (Interviewee 1)

However, focusing solely on misinformation in discussions of journalistic responsibility can, in a sense, absolve journalists of direct accountability by shifting attention only to contextual reasons or unintentional commercial imperatives. Starting from this reading, some interviewees – particularly journalists from alternative outlets such as *Il Post* and *Il Manifesto* – highlighted a broader responsibility borne by traditional journalism, one that goes beyond misinformation (which remains a shared concern, especially given the deterioration of working conditions). Instead of serving as a bulwark against disinformation, mainstream journalism is, in their view, co-responsible for low-quality practices that fuel the phenomenon. This, they argue, is especially evident among certain influential journalists at major outlets, who often favour tendentious and imprecise reporting that serves to bolster a particular interpretation of events. In other words, there is a preference for commentary over investigation – a hallmark of the polarised-pluralist model to which the Italian media system historically belongs – and this preference can itself become a generator of disinformation. A telling example of such practices is the improper use of quotation marks: at times, they are used to attribute statements that were never actually uttered – that is, summary phrases written by the newsroom (with potential biases in word choice) presented as verbatim quotations. In the words of *Il Post*'s deputy editor:

> When journalists talk about fake news, they often discuss it as something that does not concern them – except perhaps as those who can step in to curb the phenomenon. But in Italy, a large share of disinformation is caused by the mainstream press and television news. It doesn't come from Macedonian sites with people in a basement churning out false stories; it comes from the major newspapers, which daily publish falsehoods and inaccuracies. For example, fabricated quotes. Every day, Italian newspapers are full of statements in quotation marks that no one has ever said.
>
> (Interviewee 4)

In light of the foregoing, disinformation is perceived as a complex phenomenon that manifests in multiple forms. As reported by journalists in our interviews, post-truth challenges range from fabricated online content to intentional, subtle distortions and involuntary misinformation. This more granular view complicates reductive "fake news" narratives and highlights the multiple pathways through which trust in journalism is undermined. While these issues fall within a broader context of declining journalistic standards, each exhibits distinctive features. Differentiating among them has clear heuristic value – for scholarship and for policy – because each entails specific causes, consequences, and potential remedies. Table 3.1 summarises the post-truth challenges identified in interviews with Italian journalists, along with the perceived sources and drivers of each phenomenon.

Table 3.1 Post-truth challenges according to Italy's journalists

Post-Truth Phenomena	*Typical Form*	*Main Causes*	*Main Sources*
False content	Online fake news, conspiracy theories	Economic profit, political manipulation	Social networks, alternative media
Subtle disinformation	Biased, out-of-context, selective news coverage	Political polarisation, partisan press, media ownership	All media
Misinformation	Unintentional spread of false or misleading content	Digitalisation, accelerated news cycles	Traditional media

How to combat disinformation?

Another significant finding that emerged from the interviews is the widespread lack of training, specific guidelines, or formalised procedures within news organisations to prevent and counter disinformation. Although news outlets often possess general guidelines or codes of ethics, these instruments do not specifically address the problem of disinformation and fake news. None of the journalists interviewed reported that their outlet has formalised guidelines, mandatory training courses, or binding protocols to prevent the dissemination of false content. On the contrary, source management is largely left to individual professional ethics and/or subsumed under broader regulations with modest practical impact.

The interviews also revealed that the overall number of foreign correspondents has declined significantly, leading newspapers to rely increasingly on news supplied by wire services, to which journalists often add their own interpretation and judgment. In this context, the truthfulness of news coming from wire services becomes even more crucial than in the past. This is something that the two wire service journalists – from DIRE and ANSA – were well aware of. As the journalist from DIRE argued, "for us it is extremely important to be accurate, because it is essential for maintaining contracts with newspapers. We, for example, sell news to *Repubblica* and *Corriere*. We are therefore required to exercise enormous accuracy" (Interviewee 7). The ANSA journalist made a similar point, stating that

> working for ANSA imposes an extra level of care when you disseminate the news, because you know that nine times out of ten that story will be picked up by all Italian outlets, very often without any further checks, and so you bear an added responsibility. If you spread a false story you risk a great deal at ANSA, more than at newspapers, because the responsibility is higher.
>
> (Interviewee 6)

Consequently, both at DIRE and ANSA, there is more rigorous fact-checking than in newspapers. This takes the form of a second check on every article written. As both journalists explained, it is rare for stories to be published without first being reviewed by at least one other person besides the author.

Across most interviews, the practice of having someone other than the author re-check a story prior to publication is regarded as a measure of primary importance and utility in the fight against disinformation. However, this practice does not appear to be implemented in newspapers with the same frequency and systematisation as in wire services. Although second-reader review has not disappeared, it is reportedly employed less often than in the past, leaving numerous articles without external scrutiny before publication. Interviewees attribute this situation both to the drastic reduction in the number of copy editors in recent years and to mounting pressure to publish quickly. This problem fits within the broader context of accelerated work rhythms and the downsizing of roles deemed non-essential – from foreign correspondents to copy editors – with a consequent deterioration in journalistic quality. As some interviews indicated, this review may at times be carried out informally by journalists within the newsroom, yet without a formal or binding structure to guarantee its consistency and effectiveness.

In general, journalists – even from outlets that differ greatly from one another – expressed a shared awareness: to counter disinformation, it would suffice to adhere strictly to the principles of professional ethics, that is, to journalistic deontology. In this regard, some interviewees cited the Anglo-American tradition of quality journalism as a virtuous model, especially with respect to procedures and guidelines. Others noted that the Italian journalistic code of ethics is already highly developed, which partly explains the limited use of ad hoc rules within newsrooms. As the Secretary-General of the Italian National Press Federation put it, "Italian journalists have a very rich, very careful code of ethics, and our professionalism depends on complying with it" (Interviewee 10). A potential pitfall, however, lies in the Order of Journalists' limited capacity to monitor compliance and take appropriate enforcement action. Strengthening these powers could, in some respondents' view, offer a meaningful safeguard against disinformation and misinformation alike. As the *Repubblica* journalist argued, what is needed is a stronger, more assertive Order capable of effectively overseeing strict adherence to deontological standards (Interviewee 2).

Another anti-disinformation practice, highlighted by the journalist from *Domani*, is the verbatim transcription of interviews – a method he himself reported adopting (Interviewee 3). Although this practice is not widespread among professionals, it has the advantage of preventing false quotations – such as the "fake quotation marks" increasingly found even in major dailies – and of promoting greater accuracy in reporting interviewees' statements. The underlying problem, however, is that verbatim transcription collides with the growing pressure to accelerate work processes.

Ultimately, the problem of the increasing speed of journalistic work emerges as a central and recurring element, reflecting two distinct business models. On the one hand, there is the model adopted by most outlets, which focuses on speed and on being the first to report news online. On the other hand, there is a model that privileges the building of reputation and in-depth coverage, even at the cost of being the last to publish. In recent years, interest has grown in "slow journalism" – the latter model – catering to audiences seeking credible alternatives to click-driven content. This shift suggests opportunities for innovation and resilience within an otherwise

fragmented and vulnerable media system. In this sense, disinformation can represent an opportunity for this second business model, as it positions itself in a minority yet growing segment of the market and aims to meet rising demand among a portion of the audience for precise, verified news – within a media landscape increasingly dominated by an overload of low-quality information. This strategy also allows outlets to step outside the race to immediate publication – a competition that smaller organisations can hardly win, given their limited resources.

From this perspective, the experience of *Il Post* is noteworthy, as it is a small outlet that has sought to embrace this second business model, recording substantial growth in readership in recent years, especially during and after the COVID-19 pandemic. As its deputy editor stated,

> *Il Post* is a newspaper that is doing well – and has done even better since the pandemic – when false news became a matter of life and death. *Il Post*, which had built credibility over the years, grew a great deal. To benefit from the desire for quality information, however, you must have credibility, and that is built over time.
>
> (Interviewee 4)

It is significant that both journalists from *La Stampa* and *Il Manifesto* cited *Il Post*'s *spiegato bene* format ("explained well") as a reporting format that has achieved considerable success and effectiveness in recent years, in response to information overload and the decline in quality. This example shows how an approach oriented towards the clear, in-depth explanation of news – with opinion-driven commentary relegated to the background – can prove profitable in a media market marked by the spread of disinformation, an excess of opinion-driven content, and a growing demand for accurate and reliable reporting.

However, this practice is not without risks. As the ANSA journalist observed, although disinformation can at times stimulate the search for quality information – as occurred during the COVID-19 pandemic – it also risks compromising the pluralism of interpretations by encouraging a rigid dichotomy between truth and falsehood. In his words, "it is true that sometimes the spread of disinformation generates a search for quality information – we saw it with Covid – but it also carries the risk of reducing pluralism by playing on the slippery terrain of 'truth'" (Interviewee 6).

A related topic that emerged from the interviews, and that merits mention, is journalists' relationship with fact-checking services. It is an ambivalent relationship: while recognising the positive potential of independent fact-checkers, the journalists we interviewed also regard them as a reflection of the shortcomings of contemporary journalism. As the journalist from *La Stampa* put it:

> Fact-checking – if you think about it – is absurd, because it is actually at the heart of a journalist's work. A journalist cannot provide unverified news, and yet now there are separate entities that do fact-checking on news provided by journalists – this is the height of absurdity.
>
> (Interviewee 1)

Although with differing emphases, this view is shared by many of the journalists interviewed. This does not mean that fact-checking services are regarded as negative; rather, the very existence of fact-checking is often viewed with a touch of scepticism, as it is perceived to be tied to the decline of newspapers, which, if they carried out their work adequately, would render such services superfluous.

Moreover, the effectiveness of these services is frequently considered limited. As *Il Post*'s deputy editor stated, "these services are not decisive; we know that those who believe a false story do not believe the debunking produced by a fact-checking service" (Interviewee 4). Most of the journalists interviewed further noted that the effectiveness of fact-checking is even more compromised in a polarised media environment such as Italy's. This limitation is accentuated when a fact-checking service, operating in polarised contexts, ends up being perceived as partial, thus losing the reputation for objectivity and impartiality essential to its effectiveness. An example cited by the journalist from *Il Manifesto* concerns the fact-checking service by the online news outlet *Open*, which was indicated as an instance of a service that is not fully neutral. Its impartiality is called into question primarily in the selection of stories to verify and in the political opinions that surface during the debunking process – making it a polarising service, especially on social media. According to the journalist, this gravely undermines the usefulness of fact-checking as a tool to counter disinformation: "we must be careful not to turn fact-checking into an ideological issue associated with a specific political side, and therefore no longer heeded by others because it is perceived as partisan. We must avoid this, otherwise it becomes useless" (Interviewee 5).

Another important dimension of strategies to counter disinformation is cooperation among journalists, particularly cross-border collaboration, where journalists' opinions varied. Among the journalists interviewed, the most fervent advocates of international cooperation were those from the wire services *ANSA* and *DIRE*. Both described collaboration among journalists not only as an essential tool for avoiding the trap of false news, but also as a "fundamental pillar" of journalism itself (Interviewee 6 and Interviewee 7).

Both journalists also explained that there are two distinct forms of transnational collaboration, each important but different. The first is a more formalised, often top-down cooperation involving news organisations, sometimes established with the aim of jointly investigating specific events or facts. The second is an informal, immediate collaboration – exclusively among journalists and more "bottom-up" – that takes shape through the exchange of messages and data among reporters while drafting a story. Although this analytical distinction was not always explicitly stated, it emerged across all the interviews conducted and thus constitutes a key element for understanding the dynamics of transnational cooperation in journalism.

While both forms are viewed positively by the *ANSA* and *DIRE* journalists, the interviewees placed greater emphasis on the relevance of the second form, underscoring its crucial importance in their daily work. As the *DIRE* journalist explains: "I often contact other international journalists individually to compare notes. It operates on an informal yet steady and ongoing basis" (Interviewee 7).

The preference for the second form of collaboration appears to stem less from the type of outlet they work for (a wire service) than from the specific domain of their reporting. In fact, both journalists interviewed specialise in foreign affairs – a sector that, as they themselves acknowledged, entails greater exposure to news from foreign sources of questionable reliability, making meticulous verification indispensable. Consequently, the need to verify foreign and international news quickly encourages peer-to-peer cooperation with colleagues abroad, preferably those residing in the countries they cover.

Because transnational cooperation appears effective chiefly in the domain of foreign affairs, several interviewees were sceptical about its generalisability as an anti-disinformation tool. In particular, journalists at *Libero* and *Il Giornale* questioned its effectiveness, arguing that national events dominate news agendas and thus relegate international cooperation to a secondary role. They consider their reporting, which is primarily focused on domestic politics, ill-suited to benefit from collaboration with foreign colleagues. However, both acknowledged that, in principle, cooperation at the national level could prove effective in countering disinformation in their journalistic field. They nonetheless questioned its practical feasibility, pointing to the many difficulties of establishing nationwide collaboration in a competitive, polarised environment like Italy's, marked by widespread mutual distrust among media and further complicated by the increasing political-economic interests of media owners. As summarised by the *Il Giornale* journalist: "The problem with collaboration is that it must be based on respect and trust. In Italy, where every publisher has, rightly or wrongly, their own interests, collaboration is difficult. It may be desirable, but it is complicated" (Interviewee 8). Similarly, the *Repubblica* journalist recognised that transnational cooperation is of limited use when it comes to national politics, thereby curbing the effectiveness of this practice as a tool to counter disinformation. As he stated, "for national politics it is useless, and national politics covers most of our work" (Interviewee 2).

Moreover, unlike the two wire service journalists, the *Repubblica* journalist placed greater emphasis on the first type of cooperation mentioned above, i.e., formalised collaboration among news organisations. He cited the example of the Leading European Newspaper Alliance (LENA), an international alliance of newspapers to which *Repubblica* belongs, calling it a positive initiative. He admitted, however, that such alliances are relatively rare and – even when they exist, as in the case of LENA – often neither exert significant impact nor attain substantial journalistic relevance.

Another noteworthy example of transnational cooperation, cited by the *Domani* journalist, is Lighthouse Reports, a project that, as the organisation's motto puts it, promotes "Pioneering Collaborative Journalism". Through this consortium, the journalist personally took part in an international investigation conducted by *Domani* in collaboration with *El País*, Sky News, *Le Monde* and *Süddeutsche Zeitung* into the Cutro shipwreck – a tragic maritime incident on the night of February 25–26, 2023, in which approximately one hundred migrants died. As the journalist explains, while informal cooperation can facilitate rapid source verification, only

more structured forms of collaboration make it possible to carry out investigative reporting that requires time, diverse expertise, and shared resources.

Finally, the *La Stampa* journalist stated that international cooperation represents the future of journalism, noting that all innovative startups in the sector place a strong emphasis on this type of collaboration. In her view, traditional media are slower to seize this opportunity. Although they sometimes engage in international collaborations – as shown by *La Stampa*'s efforts in certain cooperative reports on Europe – they often face large-organisation bureaucracy, which tends to make them less agile and responsive.

As for alternative media, both the *Il Post* and *Il Manifesto* journalists expressed support for transnational cooperation, while stating a preference for informal collaboration among journalists over more formalised partnerships among outlets. Both also highlighted a potential risk associated with transnational alliances among major media: these could turn into a kind of closed consortium among the principal actors, with attendant limitations. The first limitation, noted by the *Il Manifesto* journalist, is that since these outlets often already produce quality information, such consortia tend to have limited impact on the problem of disinformation, as cooperation occurs mainly among actors where it is already less prevalent. The second limitation, raised by the *Il Post* journalist, concerns the risk that these alliances – should they evolve into large corporate consortia against fake news – might acquire the power to affix green or red labels to stories, thereby risking more harm than good by compromising informational pluralism.

Journalism and EU regulations

Regarding EU policies on disinformation and journalism, the interviews yield an immediate and striking finding: across outlets and ideological lines, journalists report that they do not perceive any tangible EU presence in their daily work. This points to a disconnect between EU policy and newsroom practice. This is partly attributable to the recency of the DSA and the EMFA, neither of which had been fully implemented by late 2023, when most interviews with journalists were conducted. Even so, most journalists were only superficially familiar with these instruments and with the broader EU debate. For example, asked about the impact of EU policies or rules on their work and on countering disinformation, the *Repubblica* journalist stated: "I have absolutely no awareness; I often hear excellent general statements, but in practice they have had no correspondence in the reality of our daily work" (Interviewee 2). Similarly, the deputy editor of *Il Post* said: "I have never noticed any role, in my work, for European mechanisms, codes, or guidelines" (Interviewee 4).

While this perception was equally present in most interviews, views diverged on what role the EU should play in protecting journalists, promoting quality information, and countering fake news. These differences did not map neatly onto outlet type. The *Il Post* journalist argued that the EU should invest more in media literacy, especially for younger generations, through school-based education. By contrast, journalists at ANSA and DIRE contended that the EU should focus on the

supply side and fund producers of quality journalism. They noted that many small, high-quality outlets struggle to compete with larger groups due to limited resources and tools, and they proposed direct financial support for hiring new journalists on secure contracts.

Another axis of disagreement concerned whether to prioritise the promotion of virtuous practices or the repression of disinformation. Most interviewees favoured incentives for good journalism, warning that punitive measures could threaten press freedom. The *Libero* journalist took the opposite view, calling for a deterrent role for the EU through fines targeting those who first spread falsehoods on social media: "We need sanctions and fines that hit the individual, the one who first circulated a certain kind of false information: the source" (Interviewee 9). The *Il Giornale* journalist instead proposed that the EU facilitate concrete fora for dialogue between EU institutions and national media, considering this essential to develop consensual and workable journalism policies.

Several interviewees also discussed the EU's relationship with digital platforms. They perceived EU regulation as directed more at platforms than at journalism itself, which is affected only indirectly. This platform regulation was viewed positively as a potential step forward, but also as carrying risks and limits. As the *La Stampa* journalist – who showed greater familiarity with the DSA and related EU policies – observed:

> The EU is doing something important by setting privacy rules for platforms and large digital multinationals, which are all American. Europe made a mistake in leaving technology to the Americans; it would have been better to develop it together, for example, by encouraging digital entrepreneurship in Europe, rather than delegating everything to Silicon Valley. So regulation is good, but the absence of European technological sovereignty is a constraint. (Interviewee 1)

The *Il Manifesto* journalist likewise welcomed EU platform regulation but criticised the focus on requiring platforms to install disinformation filters, which gives them additional discretionary power, while failing to fully address what he sees as the core issue: algorithms that deliberately boost polarising news to maximise engagement.

If, overall, journalists did not prove to be especially acquainted with the new European regulations, the situation – as one would expect – changes radically when one looks at professional bodies and regulatory institutions. As for the latter, the Director of the Office for International Affairs at the Department for Information and Publishing and the Commissioner at AGCOM were fully conversant with the new European framework and with the challenge of its implementation within national law.

However, their public roles and the fact that implementation was still ongoing required considerable caution in their responses. A core complexity arises because the EMFA and the DSA are indeed regulations but, in certain respects, they are *sui generis* – they are "regulation-directives", to use the expression

informally employed by the Director at the Department for Information and Publishing when referring to the EMFA in our interview (Interviewee 12). In fact, the EMFA sets out binding principles and obligations for Member States, while leaving them some discretion as to the means of compliance. Moreover, although the enforcement of these regulations does not entail a formal transposition, as in the case of directives, it nonetheless often requires targeted adjustments to national laws, procedures, and the powers of domestic authorities. On this point, a particularly salient issue is the adjustment of RAI's governance, implied by EMFA provisions, which require greater editorial independence of the public service broadcaster from governmental influence. The effective application of this principle of public broadcaster independence would in any case require new parliamentary legislation and therefore ultimately hinges on the *political* interpretation of EMFA principles (Interviewee 14 and Interviewee 15).[1]

With respect to journalism and disinformation more broadly – beyond the specific issue of RAI's governance – the compatibility of the European regulatory framework with Italian law appears more straightforward. The AGCOM Commissioner claimed that AGCOM was already active against disinformation and broadly aligned with the principles of EMFA and DSA even before they became applicable. By way of example, he noted that AGCOM had intervened to remove from certain websites manifestly false news about the war in Ukraine, acting on the basis of pre-existing regulations and acts predating the EMFA and the DSA; and that AGCOM had launched media literacy policies prior to the relevant European provisions (Interviewee 13).

Regarding the professional bodies – the Order of Journalists and the FNSI – both leaders we interviewed emphasised that their organisations had participated in multiple phases of discussion and drafting of the European instruments. Both view the new framework (EMFA, DSA, and the anti-SLAPP Directive) positively, while reserving full judgment on its effectiveness over time.

As the FNSI Secretary-General recounted, the protection of journalistic sources was a salient and contentious issue during the drafting of the EMFA. While the FNSI and others advocated full protection of sources, some governments – particularly France and Italy – sought to prioritise state interests to the point of allowing spyware ("Trojans") on journalists' devices. The final compromise permits state intervention, but only when public integrity and security are at risk. Although this falls short of the blanket protection the FNSI sought, the Secretary-General nonetheless regards it as a positive step and thus sees the EMFA as an improvement in the protection of journalistic sources, which she deemed fundamental (Interviewee 10).

Similar cautious optimism was expressed regarding the regulation of online news, especially within online platforms. As the President of the Order of Journalists explained, the EMFA and the DSA adopt "a middle way between prescription and self-regulation, with progressively tighter obligations", resulting in "a set of very cautious mechanisms whose effectiveness will need to be monitored at both the EU and national levels" (Interviewee 11).

Finally, the EU anti-SLAPP Directive is regarded as providing an "excellent framework for the protection of journalists" (Interviewee 10), but as having limited practical utility. This is because it establishes procedural safeguards only for civil matters with cross-border implications and therefore does not directly cover most domestic actions, as the FNSI Secretary-General also stressed (Interviewee 10). Consequently, Italy remains largely exposed to the problem, which, in the President of the Order of Journalists' words, is a very important issue that still needs to be properly addressed at the national level (Interviewee 11).

Overall, from a Europeanisation perspective, the Italian case suggests that EU-level norms around disinformation and media freedom travel unevenly: they are salient for regulators and professional bodies but remain largely invisible in everyday newsroom practice. In other words, there is much institutionalisation but little professional internalisation.

Conclusion

This chapter has shown that "disinformation" in Italy is not a single, platform-born pathology but a spectrum of practices – from fabricated content to subtler distortions and unintentional misinformation – that cut across both digital platforms and legacy newsrooms. As in other countries discussed in this book, Italian journalists identify disinformation as a critical, multifaceted threat and call for coordinated, credible regulation and support to protect their work. They describe a profession that still considers itself an impartial mediator of truth, for whom fact-checking should be an everyday task. However, accelerating news cycles, precarious labour and persistent political–commercial pressures on editorial independence are widely seen as favouring the spread of disinformation and, more broadly, lowering reporting quality, even as journalists diverge on where disinformation originates and how best to counter it.

Digitalisation intensifies speed and commercial pressures, hollowing out safeguards such as copy-editing and second reads. In this environment, unintentional errors and subtle distortions flourish alongside outright fabrications. At the same time, counter-currents are visible: the growth of "slow", quality-focused formats that prioritise verification and explanation in response to audience demand for credibility.

This tension unfolds within a polarised-pluralist media system where private ownership and platform logics increasingly weigh on newsroom routines. Many interviewees are wary of leaving ethics to individual heroism: they tend to align with the social-responsibility model in which professional standards are embedded institutionally and backed by law. That implies practical, near-term investments – time and staffing for verification, systematic second reads, disciplined sourcing and quoting (e.g., verbatim transcripts where feasible), alongside firmer, faster enforcement of deontological rules by professional bodies.

On the regulatory front, the EU framework (notably the DSA and EMFA regulations, and the anti-SLAPP directive) is viewed as necessary yet quite distant from day-to-day practice. Europeanisation as norm diffusion does not automatically

translate into greater awareness of EU legal mechanisms or uptake of opportunities. Implementation in Italy is likely to be conflictual – especially EMFA's implications for public broadcasting – and will hinge on national choices (e.g., RAI governance) and on the capacity and will of authorities and platforms to enforce obligations credibly. Moreover, while the framework promises greater transparency, platform accountability, reinforced public-service independence, and improved protections, important gaps persist, including the limited reach of SLAPP protections and the unresolved challenge of algorithmic amplification of polarising content.

Ultimately, combating disinformation in Italy is less about inventing new punitive architectures than about rebuilding the conditions under which journalism can do its oldest work well. Europeanisation helps by setting shared norms and minimum guarantees, but it will matter most where it is translated into concrete improvements in autonomy, pluralism, working conditions, verification routines and platform accountability. Moving beyond a narrow fight against "fake news" towards a broader restoration of trust requires aligning newsroom practice, professional self-governance, and EU-backed safeguards so that credibility – not speed – again becomes the organising principle of Italian journalism.

Note

1 At the time of writing (August 18, 2025), the EMFA has already entered into force, and it ought to be applied from August 8, 2025. However, no reform of RAI has yet been enacted to bring it into line with the new European provisions, placing RAI's current operation in technical non-compliance and opening the door to a possible infringement procedure by the Commission.

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Appendix

List of Interviewees:

Interviewee 1	Journalist at La Stampa
Interviewee 2	Journalist at La Repubblica
Interviewee 3	Journalist at Domani
Interviewee 4	Journalist at Il Post
Interviewee 5	Journalist at Il Manifesto
Interviewee 6	Journalist at ANSA
Interviewee 7	Journalist at DIRE
Interviewee 8	Journalist at Il Giornale
Interviewee 9	Journalist at Libero
Interviewee 10	Secretary-General at the Italian National Press Federation
Interviewee 11	President of the Order of Journalists
Interviewee 12	Director of the Office for International Affairs at the Department for Information and Publishing
Interviewee 13	Commissioner (*Commissario*) at AGCOM
Interviewee 14	President of IDMO – Italian Digital Media Observatory
Interviewee 15	Researcher at IDMO & Luiss Data Lab

Note: All interviews were conducted between 2023 and 2024. The specific date of each interview has been removed for data anonymisation.

4 The state of journalism in Norway and Iceland in a time of fake news and disinformation

Highly trusted yet still threatened

Martin Moland and Jón Gunnar Ólafsson

Introduction

Despite operating in countries where news media entities enjoy comparatively high levels of trust, and where public funding for news media outlets is more generous than in most other European countries (Andersson, 2023; Hallin & Mancini, 2004; Ólafsson & Jóhannsdóttir, 2024), journalists in Norway and Iceland are not exempt from the challenges that fake news and disinformation pose for journalism in the 21st century. The spread of false and misleading information commonly takes place online and on social media, and in the Nordic states, including Norway and Iceland, online news consumption ranks among the highest in the world (Skogerbø et al., 2021).

European solutions also look different in a context where associations with the European Union (EU) are tight, but still looser than what a full membership entails: As non-members of the EU that are nonetheless affiliated with the EU through the European Economic Area (EEA) agreement, journalists in Norway and Iceland are in a different position than those interviewed in the other countries that are covered by this book. Even though both countries' relationship with the EU is covered by an extensive agreement that demands harmonisation between EU, Norwegian and Icelandic law in specific areas (Fossum, 2015), most EU legislation relevant to combating fake news and disinformation, such as the Digital Services Act (DSA) or the European Media Freedom Act (EMFA), is either outside of the legal scope of the EEA agreement or, where it is inside the scope of the agreement, it is unclear precisely when and how the rules will be implemented in the national law. This means that while Norwegian and Icelandic legislators may seek ways of aligning themselves with European legislation, it is likely that awareness of it among both journalists and the general public will be lower than it will be among those working in EU member states.

In this chapter, we begin by describing the structure of the Norwegian and Icelandic media landscapes. In a second step we discuss the implications of the two countries' status as non-members of the EU for their attempts to implement relevant EU policies for combating the post-truth problem, and how the two countries can negotiate a situation where the EU is implementing an ambitious regulatory agenda (Bouza García & Oleart, 2023) that would normally fall outside of the

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bounds of the two countries' established relationship with the EU. Lastly, we report the results of interviews conducted with journalists in both countries. These interviews dealt with issues relating to anti-disinformation practices, journalists' perceptions of what should be done to address these issues and their awareness of relevant EU legislation.

Our findings are built on sixteen interviews with journalists, equally divided between Iceland and Norway, conducted in late 2023–early 2024. Employing a semi-structured interview frame, we probe the journalists' perceptions of the importance of fake news and disinformation to their daily lives, their strategies for navigating the challenges that both phenomena create, and what the EU and national authorities can do to help professional journalism combat fake news and disinformation. We thus provide a novel perspective on how Nordic journalists, who typically operate in a media system characterised by high levels of public trust, navigate a situation where the nature and value of truth is increasingly contested by political actors. Our key finding is that Norwegian and Icelandic journalists, despite being the least likely cases, have highly overlapping views as journalists from EU member states when it comes to the demands that they are willing to make to both the EU and the journalistic profession. We thus find that the Europeanisation of norms and policy demands for addressing the challenges of post-truth phenomena extends even to countries that are not fully obligated to implement the same legislation as the other countries where we conducted interviews for this book.

State of journalism in Norway and Iceland

The Nordic countries belong to a group of countries characterised by a high level of journalistic professionalisation and extensive trust in media (Brüggemann et al., 2014; Hallin & Mancini, 2004). Iceland was the only Nordic state excluded from Hallin and Mancini's study, but many similarities are found there when compared to the other Nordic countries, including Norway. In both countries, there is a strong tradition of public broadcasting, with the two broadcasters, RÚV and NRK, being among the main news providers on a national level, with high levels of trust (Ólafsson & Jóhannsdóttir, 2021; Skogerbø & Karlsen, 2021).

However, the two countries differ in important respects. One of the most important differences relates to public funding: While the Norwegian media system for most of the 20th century was characterised by a robust public funding system and a strong public broadcasting system, neoliberal media policies have typically held greater sway in Iceland. This has meant that Icelandic non-public media have, to a greater extent than in Norway, been left to "fend for themselves" even as digital advertising has made for more challenging economic conditions (Guðmundsson & Jóhannsdóttir, 2024). The market libertarian approach has been challenged by the Nordic media welfare state model in Iceland in recent years, with subsidies for private media being introduced in the country for the first time in 2020 in relation to the Icelandic government's COVID-19 economic relief package. Following this, a government bill was passed in 2021 and again in 2023 to support private media outlets with public funding. This has led to the Icelandic media market becoming

more similar to the other Nordic media markets, including the one in Norway (Ólafsson & Jóhannsdóttir, 2024).

Iceland and Norway also differ in their level of media centralisation: The Icelandic media system is characterised by a relatively small media market, in terms of outlets and the number of journalists working in the country. Recent figures show that the number of working journalists in Iceland is only around 450 (Ólafsson, 2024). Currently, *Morgunblaðið* is the only printed daily newspaper. However, there are also a few weekly newspapers and online newspapers (websites) that play an increasingly prominent part in news dissemination in Iceland (Jóhannsdóttir et al., 2021; Ólafsson & Jóhannsdóttir, 2021). In contrast, the Norwegian media system is characterised by a set of core national newspapers, several regional newspapers and a broad range of local newspapers with different publication frequencies (Skogerbø & Karlsen, 2021). In other words, there is a large difference in how widely centralised the two countries' media systems are, and in how many options exist for journalists. This has implications for what kind of options exist for journalists that want to contradict existing market logics related to fake news and disinformation.

In other words, we find evidence of both the corporatist logic that has typically dominated Nordic media markets and a historical neoliberalist media policy that is much more prevalent in countries such as the United Kingdom and Ireland. Moreover, the Icelandic media market is much smaller than the Norwegian one, and this can impact journalists' working practices, levels of specialisation and knowledge in certain areas, and how much time they have to work on their news stories (Ólafsson, 2024). Thus, while the two countries are very evenly matched in how consumers relate to the media, the institutional framework regarding the fight against fake news and disinformation differs between the two countries.

Norway, Iceland and EU legislation: An outsider wanting to be inside

In contrast to other chapters in this book, we have not been able to interview regulators and politicians involved in the implementation of the EMFA, Digital Services Act, Digital Markets Act and other relevant legislation. This is because the European Free Trade Association (EFTA) countries – Norway, Iceland and Liechtenstein – are not EU member states, and because of the structure of their agreement with the EU, EU legislation is implemented into national law only after it is ratified by the national legislatures (Eriksen, 2019). This leads to potential conflicts between national and European political processes (Moland, 2024), as well as frequently delayed implementation of legislation like the DSA and EMFA.

As of the writing of this chapter, neither legislation has been implemented into Norwegian and Icelandic law. This fact is particularly important for the DSA, which has long been implemented across the full member states of the EU. Importantly, this is not because either country's government opposes the legislation: The Norwegian minister for digitalisation, Karianne Tung, has been clear that her government sees Norwegian assent to the DSA as essential for Norwegian

consumers (Blaker, 2024; European Commission, 2021). There is, however, much less discussion of legislation like the Digital Markets Act and EMFA. In Iceland, the Icelandic Media Commission has published material on the DSA in Icelandic and highlighted how it is not yet part of Icelandic law through the EEA agreement (Fjölmiðlanefnd, 2023).

One reason that the legislation may not be heavily debated, even if it is supported, may be that the relationship between the EU and the EFTA countries also shapes both the nature and amount of debate about the EU in the associated non-member countries. Because the treaty structure of the EEA agreement essentially makes EU policies more akin to highly impactful foreign policies, they remove one incentive for the politicisation of EU policies (Fossum, 2021). The lack of debate about EU legislation before it is implemented in national law makes it less likely that the details of EU legislation will be familiar to citizens and stakeholders, while making it more likely that important stakeholders (such as journalists) will be less exposed to EU-level debates and norms regarding the post-truth problem than journalists working in countries that are full members of the EU.

Because of the lack of debate about EU politics in Norwegian and Icelandic public life, we see both countries as a hard test of our assumption of norm diffusion: Because they are, as we outlined above, likely to be further removed from European debates about policy solutions to the post-truth problem, finding that even non-EU member state journalists place similar demands upon the EU and their own industry would offer convincing evidence of a Europeanised system of norms for how post-truth problems should be addressed.

Journalistic interpretations of disinformation challenges

While the institutional constraints are somewhat different between Norway and Iceland, and also between the two Nordic countries and the EU member states, the journalists interviewed (who, to protect their anonymity, are neither named nor have their age listed) in both countries had rather similar views of what constitutes "fake news" and "disinformation". However, they were not entirely clear on how this related to what Egelhofer and Lecheler (2019) call "fake news as genre". For instance, while Icelandic journalists clearly stated that fake news necessarily required the false information to appear as a legitimate news story, the Norwegian journalists interviewed focused much more on the intentionality as a dividing line.

In practice, while there are overlaps between the definitions, most of the journalists interviewed in Norway felt, in other words, that most things that qualified as deliberately spread false information should also be counted as "fake news", while the Icelandic journalists focused more on how the false information needed to look like a news story. Norwegian journalists, in other words, were more concerned than their Icelandic colleagues with why false information was spread, rather than how it looked. In this context, a more important dividing line was the one between erroneous misinformation, spread, for instance, through careless reporting on the part of journalists, and deliberate disinformation spread to misdirect the public and

cause confusion. Several of the Icelandic journalists mentioned that they had accidentally spread false information (misinformation) in their news reporting. Generally, this was linked to time constraints and the lack of resources available for journalists at small news outlets.

There was substantial overlap in the sources of fake news and disinformation that journalists in both countries identified as the most prominent. In both cases, they highlighted social media and other types of online platforms as the main arenas for the dissemination of fake news and disinformation. One Norwegian journalist, who at the time worked in a large media house sharing news on TikTok, was even more specific on the most common source of fake news and disinformation: "A lot of it spreads on social media, and the way I see it a lot of it comes from these small niche pages that try to make themselves out to be news sites". Similarly, both a foreign correspondent working in a leading Norwegian newspaper and a public broadcasting journalist based in Northern Norway clearly pointed to Russian troll farms, and Russian authorities more generally, as an important source of false information.

Icelandic journalists were less clear about pointing to Russia as a disseminator of disinformation, which is understandable in light of the geopolitical situation of the country compared to Norway. However, like Norwegian journalists, they were clear that fake news and disinformation present particular challenges for journalists reporting on foreign news. They highlighted that the amount of information coming from overseas is overwhelming and that it is often difficult to figure out how to fact-check this material. In this sense, both Norwegian and Icelandic journalists expressed an idea that is very common in current discourses surrounding these issues: The idea that fake news and disinformation are typically something that is done by a foreign actor (Lemke & Habegger, 2022). Fewer journalists in both countries pointed to the prospect of internal discord through domestic actors using fake news and disinformation to advance their own agendas. This is particularly interesting because it shows that there is a disconnect between the sources of disinformation that are typically thought of as the most prevalent and the increasing clarity, brought by the COVID-19 pandemic, that fake news and disinformation are also a matter of domestic concern (Vériter et al., 2020).

Our interviews, moreover, revealed an important insight about how journalists saw their own roles in the struggle to combat disinformation: Many journalists were clear that they themselves had been used in attempts to spread disinformation. This aligns very well with literature findings that traditional media sources are actually among the most important vectors for the spread of fake news and disinformation (Al-Rawi, 2019). One example of this came from a Norwegian journalist who worked as a foreign correspondent for a large Norwegian newspaper. The journalist pointed out that they had been used as part of a Syrian attempt to create a counter-narrative to the one that existed about the previous Assad regime's behaviour in Syria. This illustrates that a key way in which journalists can work to stop the spread of disinformation is to be more vigilant about fact-checking information that they receive from sources as part of their daily journalistic practice. While this was a very blatant example of mainstream media being used as a vector

of disinformation, several Icelandic journalists also made clear that, as mentioned previously, they had accidentally contributed to the spread of false information. The main culprit was, in these cases, a lack of time to do the fact-checking and the rigorous journalistic work necessary to avoid spreading misinformation stemming from other sources.

The indication that a mismatch between increased workload and the time available to do quality reporting has led to the accidental spread of misinformation points to an important insight regarding the interplay between the post-truth era and journalistic quality: The emergence of the digital advertising market and retrenchment of newsrooms has meant that fewer and fewer journalists must do more in less time (Birkner et al., 2024; Franklin, 2014). While this financial crisis may not increase the prevalence of deliberate disinformation, it may be more likely that we will see more misinformation. While such misinformation is crucially distinct from more deliberate forms of disinformation, that are typically spread intentionally and with knowledge that the information is false (Hameleers & Minihold, 2022), it may have a relatively similar impact on the perceptions of journalism: Past research finds that even relatively minor factual errors lead to much more negative perceptions of the journalistic product compared to a story that is both factually correct, well-written and offering context (Wilner et al., 2022). The strained resources that journalists have to make do with as they go about doing their daily work may thus also have adverse effects on the journalists themselves, and lead to a sustained weakening of the trust that people have in journalism more broadly.

Strategies for countering disinformation

One tool commonly thought to act as an important weapon against the spread of deliberate disinformation and falsehoods masquerading as news and news-related information is the increasing use of specialised "fact-checkers" (Graves, 2018). Such fact-checking has gone from a practice that is deeply rooted in journalistic practice, and which is embedded in the traditional news product, to a genre with its own particular layout and linguistic choices (Verhoeven et al., 2024). In Norway, this "fact-checking as genre" is most typically found in the publications of "Faktisk.no", a collaboration among several of Norway's largest media.

Norwegian journalists consistently report seeing fact-checking services such as Faktisk and related fact-checking services as important tools, but not necessarily a solution in itself. One experienced journalist, working for a well-known local newspaper, said that he saw Faktisk as something that particularly local newspaper journalists could leverage in order to "up-skill", using it as a resource bank for new ways of thinking about how to spot false information in their daily practice. Another journalist, who had a background working for a leading Norwegian tabloid, reported a similar feeling that the most important thing services like Faktisk could do was to act as a resource for other journalists. This represents a slightly different approach to thinking about what fact-checking should be: Rather than thinking about the publication of fact-checks as an independent goal,

journalists interviewed by one of the authors reported seeing fact-checking as a tool for strengthening journalism as a whole, even outside of the fact-checking organisations.

What emerged as a common theme throughout both countries was a willingness not to settle for new technology as a crutch in the battle against disinformation. Instead, journalists in both Norway and Iceland were very clear that the best solution for addressing fake news was greater rigour in all parts of the journalistic process. This is similar to findings from other countries in previous studies where journalists have been interviewed (Mayerhöffer et al., 2022). One local journalist interviewed in Norway, who described a situation where a local politician tried to undermine the credibility of their reporting, was very clear on what needed to be done: "The more your counterpart tries to muddy the water, the more you need to be crystal clear in your own journalism. You need to be absolutely accountable in everything you are doing". Similarly, another local journalist with decades of experience was clear that "You can stay out of a lot of trouble by following VVP [the Norwegian press' self-policed ethical guidelines] to the letter". Icelandic journalists all generally reported much the same, with several editors and journalists stating that they believed that it was still possible to do quality reporting even in an age of strained resources and political elites challenging the veracity of their reporting.

This is also relevant to the work done by the first author, Martin Moland, of this chapter, which fielded a survey asking about quality in journalism in 2023 to a representative sample of the populations of Norway, Italy and Poland (Moland et al., 2025). The survey showed that there is a large convergence between how journalists and the public think about what future journalism should both be and do. What both groups propose is, in fact, a reinforced commitment to journalism that adheres to traditional quality criteria. Thus, both sides of the consumer-producer divide of the news economy seem to have overlapping views of the qualities journalism needs to uphold to fulfil public trust: Accuracy, a dedication to truth over entertainment and an ability to contextualise current events.

The post-truth environment may, however, present both an opportunity and a challenge for traditional journalism. This was also mentioned by one of our Norwegian interviewees, a foreign correspondent from a major Norwegian newspaper. As the correspondent pointed out, the emergence of an ever-quicker news cycle means that quality journalism might be more important than before to ensure a public debate with high-quality interventions. However, as was also made clear, this was highly dependent on there being a sufficient demand for information. As the journalist said, "If you're not too concerned about it [the quality of information], you'll get your news from TikTok or Snapchat or directly from some Russian propaganda medium, thinking that information is information". The Icelandic journalists interviewed similarly reported perceiving that there was both a need and a desire for quality journalism. As one of them stated, "There is so much information available on social media and on the internet in general. Much of it is unverified and false. I think many people simply want good journalism in this environment".

What can be done: The view from Norwegian and Icelandic media professionals

As mentioned, the two countries have very different environments when it comes to public interventions in the media. Whereas Norwegian media organisations are accustomed both to high levels of public funding and a comparatively well-functioning advertising market, Icelandic media have to a much greater degree had to make do with market-based funding in a very small market (Ólafsson & Jóhannsdóttir, 2021; Skogerbø & Karlsen, 2021). In contrast to this tradition, Icelandic journalists were clear that they wanted a bigger role for the government in funding media. In other words, the journalists we interviewed in both countries were clear that the best thing national governments could do to combat fake news and disinformation was to strengthen traditional media.

The public-led approach to strengthening journalism is more important today, according to one of the local journalists we interviewed, because fake news and disinformation have the potential to undermine both trust in journalism and the market for news itself. Referring to a relatively widespread phenomenon of blog posts that can best be described as "fake news as genre" (Egelhofer & Lecheler, 2019), using well-known athletes to advertise for, typically, cryptocurrency, they said that "It is a problem that undermines the whole credibility of the Norwegian advertising market". While this was not mentioned as a typical problem by other Norwegian interviewees, the problem that tools commonly used for so-called "programmatic advertising" are also well-suited to spreading fake news is well-known from the broader journalism literature (Braun & Eklund, 2019). The interviewee pointed to the example of two well-known Norwegian corporations that essentially ceased all advertising on Meta-owned social media, due to the proliferation of false ads purporting to be from the same companies. The interviewee expressed concern that this shift might soon have a greater impact also on companies' willingness to spend money on advertising in traditional media.

The EU as a policy actor

The journalists we interviewed in Norway and Iceland predominantly thought of national responses to the question of what should be done to address challenges related to the post-truth era. As such, almost all needed to be prompted to think about the EU as a potential venue for policy action. When prompted, almost all Norwegian journalists interviewed reported that they felt the EU could be most relevant for addressing disinformation spread via social media. As one journalist, who worked with social media in a leading Norwegian business medium, said,

> the [Norwegian] Data Protection Authority could never have brought a case against Meta on their own. GDPR could never have…If it had only been Norwegian law it wouldn't have been too effective. And now you have the AI Act that will need to address a lot of different things. So, you really can't regulate any of this stuff without the EU.

The journalist's reaction reflects the fact that the EU has been an important policy actor in the regulation of social media and other emerging technologies (Bouza García & Oleart, 2023). It also reflects the fact that a "Brussels effect" is argued to have emerged as a reaction to the General Data Protection Regulation (GDPR), with the framework of data protection it established enjoying great political legitimacy among both governments and corporations (Tarafder & Vadlamani, 2025). Because of the novelty of, for instance, generative AI technologies, it is clear that there is no similar shared understanding of how they should be governed. However, the fact that all of these journalists needed to be prompted to think about the EU reflects the fact that, in the field of media regulation, the nation-state is still seen, perhaps, as the most important player.

However, one of the local journalists interviewed also pointed to the Nordics as another possible venue for action, pointing to the example of the German NetzDG program, which requires the moderation of German-language social media content (Maaß et al., 2024). According to the rules of the NetzDG legislation, German-language content that is perceived as threatening must automatically be forwarded to law enforcement. This requirement has meant that social media companies have had to bolster their moderation of German-language content. The journalist interviewed by the first author suggested that something similar might be achievable on the Nordic scene and that this would be a good strategy for improving the content moderation of Scandinavian content. Such content is often a lower priority for content moderators working in lower-income European countries than the content moderation of more frequently used languages:

> If Scandinavia, as a common language area, gets together to create shared guidelines we can help decide whether content directed at our countries end up first or last in line, if there's a handful people in Spain doing this moderation, or if it requires a slightly larger operation….

Beyond this, the Norwegian journalists interviewed were not necessarily knowledgeable about European initiatives to combat fake news and disinformation. While most had a good understanding of the GDPR, recognising its importance for their work, fewer knew much about regulations like the DSA and the EMFA. To the extent that they mentioned transnational cooperation and policy proposals, these were typically media-led initiatives such as transnational fact-checking cooperations (Graves, 2018). This suggests that European policy-making venues are still recognised as secondary to the national ones in the field of traditional, non-social media policy. The Icelandic journalists were likewise not particularly knowledgeable about European initiatives to combat fake news and disinformation. What was clear, however, was that the Icelandic journalists were interested and wanted to learn about what was being done on the European level. They acknowledged in the interviews that they could do more to educate themselves on this topic, but also stated that it was important to raise awareness of it in societal discourse more generally.

Conclusion

This chapter has outlined how journalists in two countries that are simultaneously outside and inside the EU perceive the EU's future role in political efforts to combat fake news and disinformation. We also probe how they navigate a situation where the quality and truthfulness of journalism, typically taken for granted to a much greater degree in the Nordics than in other parts of Europe, are increasingly contested by political elites.

What we find is that journalists in both Norway and Iceland tend to believe that the best way for journalists to handle a situation of unprecedented threat is to redouble their commitment to traditional virtues of journalism. In other words, while new technologies mean that the modes of transmitting news are changing, our informants are convinced that contextualisation and accuracy are qualities that will remain "in fashion" regardless of the format a news story is delivered in. They are thus mainly looking to public authorities to implement policies that predominantly strengthen traditional media institutions rather than allowing for the establishment of alternative media ecosystems that operate according to new logics of media production. Importantly, we find that many of the qualities that these journalists see as essential for journalism to have the requisite quality are the same ones that media consumers across Europe also ask for.

This suggests that there may be an opportunity for regulators and the media industry to cooperate to create policy solutions that address the twin challenges of a post-truth public sphere and a media industry that increasingly rests on shaky economic ground. This solution goes through policies that strengthen the economics of traditional media institutions, for instance, by strengthening or (in the case of Iceland) implementing public funding mechanisms that would strengthen the robustness of traditional media organisations and their employees' ability to perform their journalistic functions in the best way possible.

In this sense, our interviews show the pervasiveness of a Europeanised problem description and policy prescriptions for addressing the challenge of post-truth: Even in countries that are not automatically bound by the rulebooks of EMFA and DSA, journalists look to Brussels, especially, to address post-truth discourses disseminated via social media. Looking to their own sector, they express a similar commitment to norms of traditional journalism as European colleagues working in very diverse media landscapes. This shows that Norwegian and Icelandic journalists, despite their countries not being members of the EU, experience the problem of post-truth discourses and recognise the EU's potential for addressing it, similarly to journalists working in countries that are full members of the EU. This is important because it suggests that there has emerged something like a thin public sphere around these issues. This public sphere does not seem to adhere strongly to the boundaries of membership or non-membership of the EU. Instead, it seems to be bound to shared professional understandings of what journalism should do and the challenges it faces, which pave the way for a common understanding of how the EU and the national level together can legislate in a way that mitigates the challenges that disinformation and fake news pose.

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5 Journalism in Croatia in the era of post-truth

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Introduction

Post-truth refers to a situation in contemporary politics in which truth has lost its symbolic value in political life and where it is increasingly difficult to distinguish factual truth from untruth (Newman, 2019). Post-truth politics is characterised by a specific way of communication, where certain types of populist actors use the infrastructure provided by social networks on digital platforms to permeate the public sphere with disinformation (Conrad & Hálfdanarson, 2023, p. 4). The emergence of post-truth political culture was made possible by digital communication technologies and social networks, which largely supplanted traditional sources of information, creating "echo chambers" through which disinformation spreads rapidly (Newman & Conrad, 2024, p. 6).

In such chaotic circumstances, it is urgent to ensure the independence of the media and the development of professional journalism and media literacy programs. As part of the latter, it is necessary to communicate to citizens that information is not synonymous with the truth, which journalists only need to collect and spread to make it available to the public. In this sense, truth should be understood as the outcome of a process that involves establishing facts, seeking and contesting information and journalists acting as professional mediators (Michailidou et al., 2023, p. 56). Despite the entrenchment of disinformation, public authorities have been reluctant to regulate digital platforms, especially their social networks – until recently (Rone, 2021). The European Union (EU) is not an exception; instead, it has only recently recognised the importance of regulating digital platforms to counter disinformation.

From a theoretical perspective, this chapter adopts an understanding of Europeanisation that moves beyond formal legal compliance and focuses instead on the diffusion of norms (Börzel, 2021; Schimmelfennig, 2010). Following this approach, Europeanisation is conceptualised as a process through which EU-level values, norms and rules related to democracy, media freedom and information integrity are translated into national practices and professional understandings, often in uneven and context-dependent ways. In line with the broader analytical framework of the book, the chapter pays particular attention to the normative dimension

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of Europeanisation, highlighting how Croatian media actors increasingly frame challenges to journalism within a European horizon of values and democratic standards.

This chapter examines the situation in Croatia regarding journalistic perceptions and responses to challenges to democracy in the post-truth era associated with the spread of disinformation and fake news. The research is based on secondary sources as well as a series of interviews with prominent journalists, national regulatory agencies and professional journalist associations in Croatia (see Appendix). The following research questions are posed: How do Croatian journalists perceive post-truth phenomena and respond to their challenges? And how are new EU regulations affecting disinformation and journalism implemented at the national level, and how do they affect national agendas? Here we are using a descriptive and diagnostic research method.

The chapter is divided into four parts. After the introductory part, in which a broader theoretical and contextual framework is briefly presented, a section about the state and key challenges of journalism in Croatia follows. Here, the current state of journalism and the impact of state policies on journalistic practice are analysed. The second part of the chapter examines the journalists' perceptions of disinformation and related threats to their independence. In the third part, the strategies of Croatian journalists in the fight against disinformation are analysed mostly through a discussion of the tools used for this purpose. Finally, the fourth part of the chapter deals with the stakeholders' perceptions (regulators, professional bodies and journalists) on the role of the EU in addressing the challenges posed by disinformation. It presents the legislative and institutional framework for the implementation of related new EU regulations in Croatia and examines the stakeholders' perceptions about what should be the EU's role. The concluding part of the chapter summarises the key findings. It considers how the insights gained contribute to understanding journalism in the post-truth era and the impacts of EU regulations.

State of journalism and key challenges

Croatian journalism has a rich history, shaped by the country's political, social and cultural developments. Its evolution spans Austro-Hungarian and Ottoman influences, the Yugoslav era and the period of an independent Croatia.

With the breakup of Yugoslavia in the early 1990s, Croatian journalism faced significant challenges. The Homeland War (1991–1995) was marked by intense media manipulation, where both domestic and international journalists navigated a complex landscape of national identities and conflicting narratives. During this period, the media played a crucial role in shaping and dividing public opinion and was often used to stoke nationalist fervour (Grbeša & Volarević, 2021).

In the aftermath of the war, Croatia saw a gradual democratisation process, improving press freedom and increasing the number of independent media outlets. However, challenges persisted, including political pressure, economic constraints and the need for journalistic integrity. The media landscape became more pluralistic, with the emergence of private television stations, radio broadcasts and

online journalism, allowing for a range of different perspectives on national issues (Dobek-Ostrowska, 2015; Grbeša & Volarević, 2021; Kutri, 2022).

Here, it is important to understand that the desired democratisation of the Croatian media space was based on the establishment of a media market and entrepreneurship. Especially during the first ten years, key challenges needed to be tackled, such as privatisation, inherited monopolistic positions in content distribution, a lack of transparency in new ownership structures, difficulties in establishing an independent regulatory body, and efforts to transform the Croatian Radio Television into a public service broadcaster.[1] The EU used its conditionality mechanism in the European integration process to influence the development of a pluralistic media, both in the sense of content and ownership.

The Croatian contemporary media system can be defined as a "polarised pluralist media system" (Peruško, 2013, p. 714). Grbeša & Volarević (2021, p. 625), on the other hand, describe it as "diverse and competitive" because foreign media corporations are the largest media owners in Croatia. Based on the characteristics of its media system, Peruško et al. (2013) categorises Croatia within the South/East European model, which is characterised by stronger party and owner influence, lower newspaper circulation, lower levels of journalistic professionalism and independence and lower to medium quality of public television. According to Dobek-Ostrowska (2015, p. 28), Croatia belongs to the "politicised media model", characterised by low democratic standards and political cultures, a high politicisation of public broadcasting service and control over public radio and television by political actors. The Media Literacy Index (Lessenski, 2023) places Croatia in the transitional cluster, alongside countries from Southern Europe (Italy, Malta and Cyprus) and Central Europe (Slovakia and Hungary).

Bilić (2012, pp. 828–831) divides the transformative period of the Croatian media system into three phases. The first one consists of the last decade of the 20th century, characterised by the construction of the state and the monopoly of national state television. The importance of the second period between 2000 and 2003 lies in the liberalisation of the market, which resulted from structural political transformation and democratic consolidation. At the beginning of the 21st century, the launch of the first commercial television stations with national concessions, Nova TV in 2000 and RTL in 2004, together with the transformation of Croatian Radio Television from a state-owned broadcaster into a public service media organisation, marked a significant turning point. The third period started in 2004, focusing on aligning the national media legislation with the provisions of the EU. The latter had a crucial role in modifying the Croatian media system by emphasising the liberalisation of broadcasting markets and conditionality mechanisms primarily in the form of the EU progress reporting.

Croatia has had no significant media reforms since it acceded to the EU in 2013 (Bilić, 2025, p. 5). Even though the research shows that Croatia has made substantial progress regarding media freedom and journalistic autonomy in the last thirty years (Grbeša & Volarević, 2021), the Croatian system lacks a comprehensive media strategy (Bilić, 2025). Commercialisation and digitalisation eventually led news media to succumb to tabloid-style journalism and to downplay their professional

standards (Grbeša & Volarević, 2021). Furthermore, professional standards have declined as many Croatian journalists increasingly rely on social media and digital sources to meet demands for speed and exclusivity (Grmuša & Prelog, 2020, p. 76).

According to the 2023 Freedom House report, the country was characterised as free, with an overall global freedom score of 83/100. Croatia received a score of 3/4 on free and independent media, indicating that improvements are needed. The report noted that the media in Croatia is highly polarised but generally free from overt political interference or manipulation (Freedom House, 2023).

According to Kutri (2022), even though in Croatia freedom of expression is guaranteed, the application of these guarantees is not the most effective. The most significant problems facing journalists are the need for more time and workforce, poor work organisation and communication, and outdated office equipment. The COVID-19 pandemic caused significant losses to Croatian media companies, mainly traditional media. This development accelerated the transition to digital media. By 2021, 91 percent of Croatia's population had internet access, and smartphones had become the primary means of accessing digital news (Vozab & Peruško, 2021).

Trust in the media in Croatia is among the lowest in the EU and has been on a downward trend. In spring 2021, that trust amounted to only 28 percent, while the EU average was 41 percent (Grbeša Zenzerović & Nenadić, 2022, p. 64). Overall trust in news in 2023 was at 34 percent, which is at a similar level seen in many other Southern and Eastern European Countries. The World Press Freedom Index Score for 2023 was 71.95 (RIDNR, 2023). Based on Eurobarometer surveys, Croatians consider radio and television the most trustworthy sources of information, while social networks are the least trusted media. However, it is notable that trust in social networks is higher than the EU average (Badovinac, 2022).

As it was emphasised before, Croatia's accession to the EU in 2013 was a pivotal moment for the country's media environment. As part of the EU integration process, Croatia was required to adopt laws and policies that upheld media freedom, transparency and journalistic ethics. These requirements were intended to ensure that Croatia's media landscape would become more independent and in line with EU standards of press freedom.

However, in practice, EU membership did not guarantee an end to state influence. Journalists continued to face significant challenges, including harassment, physical attacks and lawsuits aimed at silencing critical voices. While the legal framework for media freedom had improved, the rise of online disinformation, hate speech and the increasing influence of social media platforms raised new questions about journalistic ethics and the role of traditional media in shaping public discourse. Moreover, political parties continued to exert influence over media outlets, and a lack of funding for independent journalism led to a decline in investigative reporting (MFRR, 2025). The decline of regional and local media, which are essential for holding local authorities accountable, has become a particularly worrying trend (Đukić & Levak, 2018).

Also, the Croatian regulatory agency faces certain functional challenges. At the EU level, the Directive of the EP and EC prescribes that the EU member states

must ensure that the regulatory bodies possess adequate financial, human and technical resources, which enable their independence and impartiality (EPC, 2010). At the same time, members of the Council for Electronic Media are appointed by the Croatian Parliament on the proposal of the Croatian Government, which leaves room for political interference in the process.

In recent years, the media landscape in Croatia has faced growing challenges, including increasing political polarisation, a lack of economic sustainability for many media outlets, and a hostile environment for journalists. Media freedom continues to be threatened by political interference and a rise in nationalist rhetoric, with the ruling parties often accusing journalists of bias or disloyalty (Bilić & Petričušić, 2024; MFRR, 2025).

The public service media broadcaster (HRT) has been subject to sustained criticism over the influence of the governing party, both from domestic civil society organisations and from international monitoring bodies, including the World Press Freedom Index 2023, the BTI Transformation Index Croatia Country Report 2022, and Media Freedom Rapid Response 2024. In December 2023, the government signed an annex to its contract with HRT that provides additional budgetary funding for programming, a move that directly affects the broadcaster's financial independence and, consequently, the selectivity and impartiality of its programming.

The increasing concentration of media ownership, which is part of a global trend, as well as the influence of foreign media conglomerates, further limits media pluralism (Grbeša & Volarević, 2021). Local journalists and independent outlets face financial constraints, leading to a reduction in investigative journalism and public interest reporting. At the same time, the growing dominance of social media platforms has led to an erosion of trust in traditional media.

Journalists' perceptions of disinformation

For this study, we conducted ten semi-structured interviews with prominent Croatian journalists, working both in the private and public sectors (see Appendix). Most of our respondents reflected upon their understanding of disinformation and fake news concepts. Several of them distinguished between intentional and unintentional spread of disinformation and fake news. They noted that while the latter is a result of superficial journalism, the former is much more dangerous since it represents a product of an ulterior political agenda.

Interviews with journalists from the professional fact-checking organisation Faktograf highlighted that the concept of "fake news" is poorly defined, insufficiently comprehensive and carries problematic connotations, which is why the journalists avoid using the term. Instead, their work uses the definition of disinformation formulated in the European Democracy Action Plan published by the European Commission in 2020. Accordingly, "Disinformation is false or misleading content disseminated to deceive or secure economic or political gain, and that may cause harm to the public".

Across the interviews, journalists overwhelmingly stressed that disinformation has had disruptive effects on the public trust and the wider democratic environment.

Many noted that when audiences are repeatedly exposed to disinformation, they often generalise distrust to all media, assuming that all journalists are biased, incompetent or even complicit in spreading disinformation. In other words, the lack of trust was described as one of the greatest dangers, as it weakens the role of journalism as a watchdog and undermines citizens' ability to make informed decisions. Another recurring theme was the distortion of political life. Namely, disinformation is frequently used as a tool of manipulation by domestic or foreign political actors seeking to influence public opinion. Furthermore, several interviewees pointed to the ways in which false narratives fuel polarisation and distract the public from important issues.

All our respondents agreed that disinformation, as a rule, first appears on social networks. From there, it finds its way to around 500 portals operating in Croatia or various blogs. Finally, some disinformation enters the mainstream media from the portals and blogs. According to several of our respondents, the most problematic is this third instance, where disinformation enters the mainstream media. This happens because the mainstream media in Croatia has been increasingly weakened. The publishers demand that the news be published quickly, which prevents correct information verification. Several other respondents noted that the mainstream media in Croatia has been weakened because nowadays, the editors are "the last among the managers instead of being the first among the journalists".

Regarding the primary source of disinformation, all our respondents agreed that these are political, economic, financial and social powers. Most of our interviewed journalists specifically noted that the role of intelligence services as primary sources of disinformation, including foreign ones, is enormous. All respondents noted that the development of digital technology has made the spread of disinformation much easier than it used to be. However, while some asserted that there is more disinformation today than it used to be, others disagreed. For the latter, the quantity of disinformation did not necessarily increase, but rather its capacity to spread quickly and widely.

When asked about the future of disinformation, most journalists highlighted a rather pessimistic outlook, stressing that the phenomenon is likely to intensify. However, some respondents showed more optimism, arguing that the professionalisation of fact-checking, combined with stronger regulation and increased media literacy, could in the future strengthen the public resilience against disinformation.

Journalists' strategies to combat disinformation

The Croatian Journalists' Association (HND) has a code of honour that binds all journalists in the country, regardless of their membership in this professional association (HND, 2025). The code states that journalists must present accurate, complete and verified information and that the sources of information (usually cited) should be critically assessed. According to the code, a journalist has the right not to disclose the source of information but is nevertheless responsible for the information published. The code also states that in the event of an inaccurate or incomplete

publication, the injured party has the right to a correction, which must be published in the same or an equivalent place in the media space.

One of Croatia's most prominent journalists, Inoslav Bešker, distinguished four types of fact-checking approaches, each encompassing a range of journalistic practices. The first approach includes a comprehensive reading of the text, contextualisation, and checking of sources. The second approach includes checking the text's relevance, the illustrations' relevance and basic information about the author. The third approach consists of consulting professional literature, experts and websites that deal with fact-checking. Finally, the fourth approach includes checking the seriousness of the text and one's prejudices (Bešker, 2018).

The interviewed Croatian journalists noted that they integrate fact-checking procedures into their work to prevent the spread of disinformation. This includes the basic journalistic rule that information should be checked with at least two independent sources. Some respondents stated that they had received basic training in fact-checking and verifying the authenticity of photos and videos. However, most pointed out that the media outlets they work for do not conduct systematic training for journalists about fact-checking tools. There are no formalised fact-checking processes within media outlets, which means that the process depends on the individuals and their ways of working.

Journalists working for HRT sometimes have access to European Broadcasting Union workshops on combating disinformation, but participation in these trainings is voluntary. In other words, there are no editorial decisions on which journalists' participation in these workshops would be treated as a work assignment. However, journalists who work for the public service are in a better position than other journalists because the public service is very well networked with related broadcasters at the European level, which often significantly facilitates checking the accuracy of information.

Several respondents indicated that the organisations they work for have work guidelines and ethical codes that journalists must adhere to, which are instructive and valuable when fighting disinformation. Likewise, many media outlets have special internal rules regarding the publication of extraordinary news. Nevertheless, the respondents believe these existing internal systems for combating disinformation could be further improved and developed.

It is challenging to apply the journalists' anti-disinformation strategies in the same way in all media. From the interviews, journalists who work for a public service broadcaster are comparatively in a better position concerning the time available to check the accuracy of information. On the other hand, the journalists who work for internet portals are in the worst position due to the constant editorial pressure for the news to be published as soon as possible.

One strategy that Croatian journalists partly apply is to integrate fact-checking into their regular reporting. Journalists sometimes publish dedicated columns that describe the research process and the challenges of fact-checking, expose false narratives and correct inaccurate statements. These columns or explanations sometimes show how disinformation spreads and why people believe it, and refer the public to available tools for identifying such harmful content. However, this

practice has generally not yet taken hold and will need to be given additional focus in the future. According to several respondents, in order for the public to develop critical thinking, the media should participate in targeted national or European campaigns promoting media literacy among citizens.

The interviews show that Croatian media still do not adequately act on the issue of correcting inaccurate information, which plays an important role in the fight against disinformation. Examples of media taking responsibility for previously published information that turned out to be inaccurate and publishing a correction in a visible place are still relatively rare.

A significant obstacle to Croatian journalists in the fight against disinformation are strategic lawsuits against public participation (SLAPP). These are lawsuits against journalists or media outlets that are used to intimidate and prevent the public from being informed about topics of legitimate and public interest. The Croatian legal system does not contain a regulation defining SLAPP, so Croatian journalists have high expectations from the 2024 EU directive that will start to regulate this area in 2026. The principal problem with SLAPP in Croatia is the duration of court proceedings, which averages four years. During this time, journalists suffer from significant psychological and financial burdens due to the uncertainty of the lawsuit outcome, litigation costs and legal default interest rates (CMT, 2024, p. 12).

Most interviewed Croatian journalists support the activities of fact-checking associations because they raise public awareness about the harmful effects of disinformation. Furthermore, this provides citizens with a way out of the so-called "echo chambers" in which only one set of opinions and beliefs is considered "true". However, most respondents believe that their efforts to combat disinformation would be much more supported if public funds for fact-checking were at least partly allocated directly to the media organisations instead of being given entirely to fact-checking associations. The main limitation of the current model is that it assesses the credibility of news stories only after they have been published. If funding for fact-checking were allocated directly to media organisations, newsrooms could employ staff trained specifically for this work to support journalists. Under such an arrangement, fact-checking would become a core responsibility of media organisations and would take place before publication. In the long term, this approach could help rebuild trust in established media and professional journalism.

The interviewed Croatian journalists consider transnational cooperation very important for successful anti-disinformation strategies since it transcends borders and ensures a unified response to a global problem. In this sense, they emphasise the importance of membership in transnational professional associations such as the International Federation of Journalists or the European Federation of Journalists, which often provide training on the fight against disinformation. Nevertheless, the current engagement in transnational cooperation primarily depends on the enthusiasm of individual journalists rather than editorial decisions in the newsrooms. Therefore, the established work patterns of most journalists should be changed to integrate transnational cooperation patterns to a greater extent.

The interviews show that journalists employed in HRTs, large media houses, and fact-checking associations are more involved in transnational cooperation activities

related to the fight against disinformation than others. Large media houses are usually included in international information exchange programs, which are frequently lacking in small media companies. This is reflected in the anti-disinformation strategies of the journalists working for smaller outlets. The interviews revealed that the media business model represents an obstacle to more intensive transnational cooperation regarding anti-disinformation efforts. Media outlets compete because each tries to publish the news first, limiting openness and desire for cooperation.

To reduce the spread of disinformation and hate speech, numerous portals in Croatia abolished the possibility of publishing comments by readers under published articles. At the end of 2020, this practice was legally supported by amendments to the Law on Electronic Media (OG 111/21, 114/22), which extended the responsibility of publishers to the reader comments as well. Although there was initially some public resistance to this practice, which some claimed threatened freedom of speech, it turned out that it did not decrease the readership of electronic media. In this regard, most interviewed journalists emphasised that the public in Croatia still needs to be educated about what professional journalism is and that there are certain limitations regarding the content that can be published. Part of this education involves raising public awareness that social networks are not the same as traditional media and should therefore not be considered a place where citizens can be reliably informed.

Most interviewed journalists argued that to improve their existing strategies for combating disinformation, the position of journalists should be legally strengthened, the capacities of journalists and their audiences should be supported by additional education programs, while the work of social networks needs to be better regulated. The latter implies that social networks must be treated as publishers. Most respondents noted that the improved legal position of journalists represents a crucial prerequisite for upgrading their existing anti-disinformation strategies. This position was often justified by the argument that numerous newsrooms lack mentors for young journalists since older journalists frequently quit their profession due to poor working conditions.

Role of EU regulators

General assessment

According to EU regulations, the provisions of the Digital Services Act (DSA) have been applied to the digital platforms operating in Croatia since February 2024 (EPC, 2022). The procedure for adopting the Law on the Implementation of the DSA began in January 2024 with a public consultation on the draft law, but there were no further developments until July 2024. Therefore, the European Commission initiated a process against Croatia for violating EU law. Afterwards, in August 2024, the Ministry of Justice, Public Administration and Digital Transformation adopted the proposal of the Law on the Implementation of the DSA, which was discussed in the Croatian Parliament in September of the same year. This Law was ultimately adopted in April 2025 (OG 67/25).

In accordance with the Law on the Implementation of DSA, the Croatian Regulatory Authority for Network Industries (HAKOM) was declared the national coordinator for digital services. HAKOM is the national regulatory agency for carrying out regulatory and other tasks within the scope and competence prescribed by the Law on Electronic Communications (OG 76/22, 14/24), the Law on Postal Services (OG 144/12, 153/13, 78/15, 110/19) as well as the Law on the Regulation of the Market of Railway Services and the Protection of the Rights of Passengers in Railway Transport (OG 104/17). As such, the Croatian coordinator is an exception compared to other EU member states because it is not a regulator of media services. In many EU countries, media regulators are integrated into one institution that oversees both media content and distribution. In Croatia, it is different, and while HAKOM oversees distribution, the Agency for Electronic Media (AEM) has jurisdiction over content.

At the national level, the digital services coordinator is responsible for implementing the DSA, liaising with the European Commission and coordinating with digital services coordinators in other member states. The connection of the coordinator with the European Commission is very important in the context of the implementation because the authority to sanction very large digital platforms is under the direct competence of the European Commission.

HAKOM, as the national coordinator, and the European Commission contribute to monitoring the DSA implementation. They can request access to digital platforms' data, order inspections, and impose fines. HAKOM certifies trusted flaggers, i.e., independent entities with expertise to detect, identify and report illegal content on digital platforms and out-of-court dispute resolution bodies (Law on Implementation of DSA: Art. 4). The bodies competent to issue orders to act against illegal content and orders to provide information according to the Law on Implementation of DSA law are: (i) the State Attorney's Office and the Ministry of the Interior, (ii) the Agency for the Protection of Personal Data, (iii) the Customs Administration of the Ministry of Finance, (iv) the State Inspectorate, (v) the Ministry of Health, (vi) the AEM and (vii) other bodies in accordance with the powers determined by special laws regulating their scope of competence (Law on Implementation of DSA: Art. 6). The Law ensures judicial protection, as it is possible to file an objection against the order of the competent authorities, which will be decided by the Municipal Misdemeanour Court in Zagreb (Law on Implementation of DSA: Art. 13). Additionally, an administrative dispute may be initiated against decisions and resolutions of the coordinator for digital services (Law on Implementation of DSA: Art. 14).

In addition to the DSA, another important EU regulation aimed at strengthening media transparency, combating disinformation and protecting journalists is the European Media Freedom Act (EMFA). The EMFA, adopted in April 2024 as Regulation (EU) 2024/1083, began to apply in most of its provisions from August 2025. To create the necessary legal framework for its implementation at the national level, Croatia adopted the Law on the Implementation of the EMFA, which passed through the Croatian Parliament in March 2026. The law introduces definitions related to media services that are not contained in the Law on Media (OG 59/04) and

the Law on Electronic Media (OG 111/21). It also introduces additional safeguards for the independence of public service media, prescribes duties for media service providers and the national regulatory authority, and establishes additional rules for assessing media market concentration. Furthermore, it regulates transparency and criteria in the allocation of public funds for state advertising and public procurement (GRC, 2024).

Implementation of EU regulations

For the purpose of analysis in this section of the chapter, seven additional specifically designed interviews were implemented with Croatian media regulators, professional media associations and some other relevant actors, which we refer to in continuation (see Appendix). We asked regulators and professional associations how the new EU regulations on disinformation affect national programs and practices. HAKOM, as the national coordinator for digital services, has no recommendations or rules for combating disinformation. Therefore, to assess whether digital platforms comply with European rules, they primarily rely on the Code of Practice on Disinformation, adopted by the European Commission in 2022 and signed by all major digital platforms. Based on the Law on Electronic Media (OG 111/21, 114/22), the AEM can make recommendations, decisions, warnings, admonitions, misdemeanour orders, indictment proposals and temporary or permanent withdrawal of the concession to media service providers. In this context, the AEM evaluated the effects of the DSA extremely positively in the interview, considering that the penalties provided for violators of the provisions are now significantly higher than what was previously common in Croatia.

In the context of the DSA implementation, the Representation of the European Commission in Croatia (RECC) sees itself as a platform for discussion with all involved actors. To all of them, the RECC can clarify the European Commission's understanding of the fight against disinformation. In addition, they note that since 2020, the European Commission has annually published a report on the rule of law, which covers all member states and makes recommendations in this area. The institution of the Ombudswoman, although not a regulator in the sense of the DSA, submits a report every year to the Croatian Parliament, in which the problem of disinformation and the related phenomena of censorship and hate speech are discussed. Disinformation is seen in the report as a phenomenon that negatively affects the constitutional right to receive information. In accordance with her powers, the Ombudswoman can issue recommendations, opinions, proposals, and warnings to state bodies and legal entities with public powers. In 2023, the Ombudswoman issued a recommendation to HAKOM to design and implement a media campaign to raise public awareness about the impact of DSA on citizens' rights, but this was not respected at the time.

AEM believes that, for them as a media content regulator, the EMFA is much more important than DSA. Unlike DSA, which is restrictive, EMFA is focused on freedom of speech and the protection of the media's position. In AEM, they emphasise that Croatia is the only member state that upgraded the idea of DSA

and EMFA through the project "Exactly so", focusing on establishing the accuracy of information.[2] This project introduces decentralisation and democratisation of fact-checking. Implemented by AEM and worth six million euros, it was financed by the EU's Recovery and Resilience Facility (RRF) as part of the National Recovery and Resilience Plan (NPOO). The project established an internet domain that brings together 21 civil society associations and academic institutions from Croatia, previously selected in an open tender to provide fact-checking services for selected Croatian electronic media content.

Commenting on the DSA, the Ombudswoman noted that this regulation has not created a sufficiently stimulating framework for the work of trusted flaggers, which represents a broader European problem. Therefore, the question arises about the motivation of organisations that will apply to work as trusted flaggers without adequate financial resources. The Law on the Implementation of the DSA states that HAKOM will provide the funds necessary to implement this law as the national coordinator for digital services. However, it provides no other details.

Faktograf, founded in 2015, is the only association in Croatia that is internationally verified for fact-checking activities. The association is a co-founder of the European Fact-Checking Standards Network (EFCSN), a signatory of the 2022 European Code on Disinformation, and participates in the international working group for its implementation. The code standardises the journalistic method of fact-checking as well as the transparency of the fact-checking organisation itself. Furthermore, Faktograf participates as one of the fact-checking organisations in the implementation of the AEM-led project focused on establishing the accuracy of information. Faktograf emphasises that when the EMFA was adopted, the association actively participated in international consultations. Regarding the position of organisations engaged in fact-checking, Faktograf warns that from the moment a fact-checking association signs a contract with any digital platform, harassment of their journalists drastically increases, including the number of SLAPPs.

The Trade Union of Croatian Journalists (SNH) emphasises its connection with the HND, where there is a very strong code of honour, which binds all journalists in Croatia. Based on this code, the SNH and the HND often respond with warnings about irregularities in the media space, including disinformation. In 2024, the HND Assembly accepted the conclusion that an interdisciplinary group of experts should be formed to work on advocating for and implementing EMFA and other related EU legislation. The trade union believes that if Croatia truly wants to implement EMFA, it should change all its media laws. According to EMFA, the HRT and the media regulator (Council for Electronic Media) should be depoliticised. However, some fear that changes will be formal to maintain political influence (Nenadić, 2025).

The Croatian Association of Digital Publishers (HUDI) was founded in 2021 to promote and standardise this industry. The association seeks to set the rules of conduct for large digital platforms in Croatia. HUDI currently does not have guidelines on DSA and the fight against disinformation. However, it is participating in the implementation of fact-checking projects that provide editorial offices with access to new methodologies that can be used when checking the accuracy of facts. One of these projects seeks to use artificial intelligence in the fight against disinformation.

It involves the development of software that will chronologically display how a particular news item was processed.

Perceptions of key actors

Most respondents emphasised the importance of focusing on the intention behind disinformation to understand it properly. Unlike fake news, which is blatantly false, disinformation usually relies on a portion of information that is potentially accurate and corresponds with the beliefs of a certain group of people. However, along with this truthful part, disinformation includes the untrue part to achieve economic or political benefits. Some respondents emphasised that it is incorrect to label digital platforms, i.e., social networks owned by them, as sources of disinformation. Social networks do not generate content. Rather, individuals use this infrastructure to spread disinformation. However, these respondents also noted that digital platforms can no longer pretend merely to be providing an online arena within which information is exchanged and for whose content they bear no responsibility.

According to the Ombudswoman, the DSA points towards the need to balance the right to freedom of expression and the right to freedom of receiving information. This balance can only be achieved through content control, which must be adequate and transparent to prevent the violation of one of these two rights. Furthermore, the Ombudswoman stated that experts from various fields should be involved in the content control process in addition to algorithms and artificial intelligence. The SNH shares a similar view, stating that freedom of speech and freedom of the media, as such, cannot be unlimited. In this context, the AEM noted that marking and removing content on the Internet, as provided by the DSA, cannot alone provide results in the fight against disinformation since these efforts need to be combined with preventive and educational activities.

According to HAKOM representatives, the DSA was more than necessary legislation because previously, in Croatia, there was no legal possibility to combat illegal online content, including disinformation. Authors of such content could have been sanctioned, but it was impossible to sanction the content whose author was unknown. Respondents from HAKOM and AEM believe that it is still too early to develop national policies to complement the EU framework for combating disinformation. They argue that Croatia first needs at least one full cycle of DSA implementation, including compliance by online platforms, in order to identify problems and determine the extent to which they are specific to the national context.

Some respondents highlighted additional positive effects of the DSA and related EU legislation. According to these sources, because of EU legislation, the 2024 European Parliament elections were much better regulated than previously. During the 2019 European Parliament elections, it was much easier to target users with political advertisements, finance political options with funds originating outside of the EU, and leave political content unmarked.

The Faktograf association and the SNH trade union expressed hope that, following the adoption of EMFA, Croatia will obtain better-quality editorial statutes ensuring minimum standards for the protection of the journalistic profession. In their view,

the quality of these statutes would need to be regularly monitored by the AEM, and media organisations that fail to meet minimum standards would be barred from competing for public funding. The respondents from Faktograf and HUDI expressed the belief that professional journalism in Croatia should be strengthened by additional financing of the media from public funds. They consider this necessary because, due to the market dominance of large digital platforms, other media publishers can no longer rely solely on advertising income. The SNH trade union sees the situation similarly, stressing that all Croatian national media depend on the state and commercial advertising, which prevents them from becoming truly independent.

Most respondents believe that, currently, new emerging technologies are enabling and hindering the spread of disinformation in equal measure. However, some respondents expressed more optimism, noting that in accordance with the EU regulations, digital platforms are required to inform users in case their content was generated by artificial intelligence.

Conclusion

Following the Homeland War (1991–1995) and the creation of the independent state, Croatia started to liberalise its media market around the year 2000. This process accelerated after 2004, when the country officially became an EU candidate, and the EU became better equipped to influence the development of pluralistic media using its conditionality mechanism. The key challenges at that time were associated with privatisation, transparency of media ownership, establishing an independent media regulatory body, and transforming Croatian Radio Television into a public service media company. However, since joining the EU in 2013, the media reforms seemingly subsided (Bilić, 2024). According to the Freedom House report for 2023, the media in Croatia is highly polarised but generally free from overt political interference or manipulation. However, journalists continue to face harassment, physical attacks and lawsuits aimed at silencing critical voices. While in the past 20 years, the legal framework for media freedom has improved, the rise of online disinformation in the post-truth environment poses new questions about journalistic ethics and the role of traditional media in shaping public discourse. Additionally, media pluralism in Croatia is currently limited by the increasing concentration of media ownership, which negatively impacts local independent media outlets.

Considered in relation to the book's broader theoretical framework, the findings of this chapter suggest that Europeanisation in Croatia is best understood as a gradual and uneven process of normative alignment rather than a straightforward outcome of regulatory change. The analysis shows that journalists, regulators and professional organisations increasingly frame challenges related to disinformation and post-truth politics in terms that reflect shared European values, such as the protection of media freedom, democratic accountability and the public's right to reliable information. At the same time, persistent structural constraints within the Croatian media system continue to shape how these norms are translated into everyday practices.

The interviewed Croatian journalists agreed that disinformation in Croatia, as a rule, first appears on the social networks run by digital platforms. Subsequently,

some disinformation enters the mainstream media due to the frantic pace of contemporary journalism, which stands in the way of proper information verification. The interviewed journalists also noted that the foreign intelligence services are probably behind much of the disinformation content. Due to the rapid spread of disinformation, the interviewed Croatian journalists now integrate fact-checking into their regular work. Some journalists even include sections in their reports that explain the investigative process concerning news. Most of our respondents described working guidelines and codes of ethics of the media outlets as helpful in combating disinformation. Nevertheless, they also noted that their employers provided them with no formalised education on detecting disinformation and that formalised processes of information verification do not exist in their organisations. Since disinformation campaigns are often spread across countries by means of digital platforms, national efforts are often insufficient. The interviewed journalists, therefore, attach great value to transnational cooperation as a tool for effectively combating disinformation. However, most Croatian journalists must be further encouraged and supported to engage in transnational cooperation efforts to combat disinformation. Currently, journalists in the public media broadcasting service and large media houses have much better opportunities for transnational cooperation than journalists working in the small, privately owned media companies.

Although provisions of the DSA have been applied to the digital platforms operating in Croatia since February 2024, Croatia passed an appropriate national law that ensured proper implementation of this EU regulation in April 2025. Similarly, adopted at the EU level in May 2024, EMFA became binding and directly applicable in Croatia in August 2025. To create prerequisites for its easier implementation, Croatia in 2025 started the process of adopting the Law on Implementation of EMFA, which came into force in March 2026.

By the Law on the Implementation of DSA, the HAKOM was declared the national coordinator for digital services. In most EU countries, media regulators are integrated into one institution in charge of media distribution and content. In Croatia, this is different because while HAKOM oversees distribution, the AEM has jurisdiction over content. The Law on the Implementation of DSA lists the number of state institutions (including the AEM) that will have the competence to issue orders to act against illegal content on digital platforms. The law also notes that HAKOM will certify trusted flaggers, i.e., independent entities with expertise to detect, identify and report illegal content on digital platforms.

According to our respondents, the penalties provided by the DSA for violators of its provisions are significantly higher than what Croatia is accustomed to. Furthermore, in Croatia, the DSA represents a necessary legislation because previous national legislation was unable to sanction the illegal online content and disinformation of unknown authors. The interviewed AEM respondent noted that Croatia is the only EU member state that has upgraded the idea of the EU regulatory framework expressed in the DSA and EMFA. Through an EU-funded six-million-euro project, the AEM established an internet domain that brings together 21 civil society associations and academic institutions from Croatia that provide fact-checking services for selected Croatian electronic media content. However, the problem with

this project is that only one of the included associations has been internationally accredited for fact-checking services. The Croatian regulators assess that it is still too early to think about national policies complementing the EU framework in combating disinformation. In order to identify problems and establish to what extent they are nationally specific, Croatia would have to pass at least one cycle of DSA implementation and platforms complying with its obligations.

Our analysis shows that Croatia was heavily impacted by the emergence of a post-truth political culture in which the mainstream media are overshadowed by social media run on digital platforms where disinformation spreads quickly (Newman & Conrad, 2024). In these circumstances, Croatian journalists are becoming increasingly aware of the need to safeguard professional standards and personal safety through improved legislation, stronger newsroom statutes, reinforced professional codes of ethics, and better-adapted individual and organisational practices. The new EU regulations play an important role in these efforts because the European Commission, representing the bloc of 27 different countries, is in a much better position to favourably regulate activities of the large digital platforms than the national countries themselves. Furthermore, the EU's new regulatory approach to combating disinformation, safeguarding media freedom, and protecting professional journalism has the potential to address many of the challenges facing Croatian journalism that have remained unresolved for decades. The question only remains how well these new EU regulations will be implemented in practice.

Notes

1 Many laws and by-laws were adopted in that period, the most important being the Law on Media (OG 59/04), the Law on Electronic Media (OG 111/21), the Law on Croatian Radio Television (OG 137/10) and the Law on Croatian News Agency (OG 96/01).
2 See: https://www.tocnotako.hr/

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Appendix

List of interviews with the journalists

1	Interview – Croatian Radio Television No. 1	27.11.2023.
2	Interview – Croatian Radio Television No. 2	08.12.2023.
3	Interview – Faktograf.hr	28.11.2023.
4	Interview – Adris News, Forbes Hrvatska	11.12.2023.
5	Interview – Nova TV	21.11.2023.
6	Interview – Faktograf.hr	28.11.2023.
7	Interview – Direktno.hr	22.11.2023.
8	Interview – Autograf.hr	27.11.2023.
9	Interview – Telegram.hr	04.12.2023.
10	Interview – Jutarnji list	08.11.2023.

List of interviews with the regulators, professional bodies and relevant actors

1	Interview – AEM	11.11.2024.
2	Interview – RECC	25.11.2024.
3	Interview – Faktograf.hr	06.11.2024.
4	Interview – HUDI	24.12.2024.
5	Interview – HAKOM	24.11.2024.
6	Interview – Ombudswomen	23.12.2024.
7	Interview – SNH	15.12.2024.

6 Disinformation and the media in Poland

Between polarisation and European regulation

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Introduction

Disinformation and "fake news" are now understood not as isolated pathologies tied to specific developments of the digital age, but as symptoms of a broader transformation of the democratic order. Scholarship on post-truth has repeatedly shown that the gradual erosion of shared epistemic values and standards, fuelled by partisan polarisation, political conflict, and the deterioration and radicalisation of political discourse, has made contemporary democracies increasingly vulnerable to manipulation, disinformation, and external intervention (Iyengar & Massey, 2019; Lewandowsky et al., 2017; McIntyre, 2018). It is not a matter of indicating a simple victory of "lies" over "facts", but rather acknowledgement of the existence of the "post-truth condition", which creates a new political mode of how truth claims are produced, authorised, and contested in the public sphere (Farkas & Schou, 2018, Waisbord, 2018). In this perspective, mis-, mal-, and disinformation are best understood as elements of what Bennett and Livingston (2018, pp. 124–126) term the "disinformation order", a configuration in which strategic deception, social media platforms' logic, and partisan mobilisation mutually reinforce one another.

These debates have become increasingly relevant within the broader European and, more specifically, Polish context, where the resilience of the liberal democratic order and its public sphere has taken central stage on the political agenda. Classic accounts of the democratic public sphere stress the importance of institutionalised arenas for rational-critical debate, emphasising the role of journalism as a mediating practice between citizens, political elites and expertise (Habermas, 1989; Dahlgren, 2009). It is difficult to overlook that this understanding of the public has become a model of the past, an ideal that is losing its grounding in a reality shaped by the rapid and aggressive deterioration of political and public debate. Recent research demonstrates how digital platforms, audience fragmentation and populist styles of communication have begun to destabilise the democratic public sphere, undermining traditional gatekeeping functions and normalising antagonistic and post-factual forms of contestation (Hallin & Mancini, 2004; Hameleers,

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2020; Krämer, 2017). As pointed out in the introduction to this book, journalism in this environment can no longer be idealised as a stable "truth-keeping" or information-verification institution. Instead, it operates as a "contingent truth-mediating practice", facing pressure from political and economic actors, market incentives and algorithmic infrastructures.

Poland offers a particularly revealing case for examining disinformation and its dynamics within the public sphere and journalistic domain. The Polish media system combines several features that can be associated with increased vulnerability to disinformation and information manipulation. These include strong political parallelism and partisan alignment of media outlets, weak guarantees of editorial autonomy, and the absence of a robust tradition of politically independent public service media (Hallin & Mancini, 2004; Mikucki et al., 2025; Olechowska, 2021). Over the last decade, partisan outlets and the so-called "journalism of identity" (Dzięciołowski 2017) have become central pillars of the public sphere, while public service broadcasting has been repeatedly politicised and repurposed as an instrument of party communication (Gajlewicz-Korab & Szurmiński, 2022). In this context, post-truth politics is reinforced and enabled by existing structural weaknesses, which are reflected in media actors who are drawn into polarised conflict, weak institutional guarantees of pluralism, and the blurred boundaries between party communication and news coverage.

The Polish case is also marked by a high degree of "affective polarisation" in which citizens' attachments to political camps increasingly shape their perceptions of reality and moral evaluations of out-groups (Kubin & von Sikorski, 2023; Tworzecki, 2018). Scholarship on polarisation and media consumption suggests that such conditions intensify selective exposure, encourage the adoption of conspiratorial or partisan narratives, and weaken citizens' willingness to accept corrective information, especially when it requires more advanced foundational knowledge (Iyengar et al., 2012; Štětka & Mihelj, 2024; Sunstein, 2017). In Poland, these processes have been reinforced by the reemergence of openly partisan press and broadcast outlets and by a "platformised" information environment in which attention is monetised and emotional and conflictual content is algorithmically rewarded (Marchal et al., 2019; Sojak et al., 2023). As a result, disinformation is not just an external disturbance to an otherwise neutral media field but is a useful weapon, a resource that can be strategically mobilised within ongoing political struggles, both by foreign actors and domestic elites.

Building on this discussion, in this chapter, we understand disinformation not merely as the circulation of false or misleading content, but as a practice embedded in specific institutional, political, and technological configurations. This approach draws on a wide range of scholarship on post-truth, specifically studies on how disinformation exploits cognitive shortcuts, affective cues, and hybrid forms of content that blend truth and falsehood in ways that make critical evaluation difficult or even impossible (Egelhofer & Lecheler, 2019; Lewandowsky et al., 2017). This includes research on "hybrid media systems", which shows how state institutions, political actors, legacy media, and digital platforms co-produce information

flows and norms of visibility (Chadwick, 2017). In Poland, these hybrid dynamics are further complicated by the presence of domestic actors who are invested in propagating the post-truth condition as well as foreign information operations, most notably Russian, but also Belarusian and Chinese, that capitalise on existing social cleavages and institutional vulnerabilities (Kaczmarek, 2024; Legucka & Przychodniak, 2020).

At the same time, the Polish case must be situated within the broader and evolving European regulatory framework that also attempts to address the emergence of post-truth and the intensification of disinformation in the European Union (EU). Over the last decade, the EU has shifted from a largely hands-off approach to digital media towards a more assertive regulatory model that combines binding legislation (most notably the Digital Services Act [DSA]) with softer instruments such as the 2022 Code of Practice on Disinformation and a growing set of initiatives supporting media pluralism, fact-checking, and platform accountability (Bouza García & Oleart, 2024; Domalewska, 2024; Klafkowska-Waśniowska et al., 2025). As the introductory chapter to this book notes, these measures reflect the EU's ambition to position itself as a norm entrepreneur, promoting a vision of democratic communication rooted in transparency, accountability and information integrity. This includes an expectation that member states such as Poland will internalise these principles through a process of Europeanisation and norm diffusion, here understood as the gradual transfer of EU-level rules, standards, and policy frames into domestic media and communication frameworks (Börzel & Risse, 2000; Radaelli, 2003; Schimmelfennig, 2012). In this perspective, the EU's regulatory attempt to fight disinformation is not merely technocratic but normative as it seeks to shape the cognitive and institutional environment in which national actors define problems of disinformation, formulate appropriate responses and negotiate the boundaries of media freedom and public responsibility.

However, research on Europeanisation and norm diffusion has consistently shown that the translation of EU-level rules into national practices is uneven and shaped by domestic political conflicts, institutional capacities and pre-existing media and political cultures (Börzel, 2016; Schimmelfennig, 2012). In Poland, these tensions are particularly visible. On one hand, Polish authorities participate in European debates on disinformation and have begun to establish institutional arrangements to implement the DSA and related frameworks (Domalewska, 2024). On the other hand, the politicisation of media regulation, the absence of a coherent national strategy on disinformation, and low public trust in state institutions complicate the effective and legitimate implementation of EU norms (Helsinki Foundation on Human Rights 2023a, 2023b). This raises broader questions about how EU-level commitments to protecting democratic communication are received, reinterpreted or resisted within a national context marked by deep polarisation and contested understandings of media freedom.

Against the backdrop of this discussion, the following chapter addresses three sets of questions: (1) *How has disinformation affected the quality and practice of journalism in Poland, and what are perceived to be its main sources?* (2) *Which*

tools, protocols, and organisational strategies have Polish media actors developed in response to disinformation, and how do these relate to broader concerns about professional standards, resource constraints, and audience demands? (3) *How do EU regulations and initiatives translate into addressing disinformation in Poland?*

The chapter draws on 17 semi-structured expert interviews conducted in 2024–2025 with journalists, practitioners in fact-checking, and representatives of national agencies involved in countering disinformation (see Appendix). The sample was constructed to specifically capture both newsroom-level experiences and regulatory or policy perspectives. The interviews were complemented by an analysis of relevant documents and legal acts. Rather than aiming at statistical generalisation, the study seeks to provide a qualitative analysis and reconstruct how actors embedded in different segments of the Polish media system perceive disinformation, position themselves within its broader context, and evaluate existing and proposed responses that are supposed to counter its consequences.

The chapter is structured as follows: First section, entitled "State of journalism and key challenges" maps the contemporary Polish media landscape, focusing on those features that increase its susceptibility to disinformation and shape the opportunities and constraints for journalistic practice. Second section (the "Analysis"), analyses journalists' perceptions of disinformation and their strategies of resistance and adaptation, as well as how key stakeholders understand regulatory solutions, including EU-level initiatives. The concluding section reflects on what the Polish case reveals about the possibilities and limits of building democratic resilience against disinformation in a highly polarised media system, reflecting on the conditions under which European regulatory ambitions can translate into meaningful change on the ground. Within this broader European framework, the Polish case offers an instructive lens on how post-truth dynamics and structural media polarisation intertwine, shaping both vulnerabilities to disinformation and possibilities for democratic resilience.

State of journalism and key challenges

Media landscape in Poland

In Poland, the present-day media system combines formal pluralism with strong political polarisation, making it particularly prone to disinformation and selective truth-telling. While the media landscape remains highly pluralistic both in terms of the variety of opinions and diversity of broadcasters, over the last ten years, researchers have observed a growing divide between media outlets in Poland and their alignment with strong ideological divisions within the Polish society (Dzięciołowski, 2017; Olechowska, 2017). These, in turn, correspond with the growing political polarisation of the Polish political scene (Tworzecki, 2018). In fact, since the 2010s, and especially following the entry into government of the national conservative United Right coalition (pol. *Zjednoczona Prawica*) under the leadership of the national populist Law and Justice party (pol. *Prawo i*

Sprawiedliwość, PiS) in 2015, the comeback of partisan media in Poland has become evident.

Almost every relevant media outlet, with few exceptions,[1] has since positioned itself on either of the two sides of the political divide (Mikucki et al., 2025). Dailies and weeklies, such as *Dziennik Gazeta Polska*, *Sieci*, *Do Rzeczy*, and *Gazeta Polska*, are known to represent right-wing sensibilities. With their conservative, sovereigntist (bordering on nationalist) and Eurosceptical narratives, they have enjoyed popularity among readers susceptible to the political message of the Law and Justice party. On the other hand, *Gazeta Wyborcza*, *Polityka*, or *Newsweek*, to name just a few, have targeted a more liberal, pro-democratic and pro-European side of Polish society.[2] Their readership has typically gathered voters of more centrist, pro-democratic parties such as Civic Platform (*Platforma Obywatelska*), the centre-right Polish People's Party (*Polskie Stronnictwo Ludowe*), Szymon Hołownia's Poland 2050 (*Polska 2050 Szymona Hołowni*), as well as the left-wing *Nowa Lewica* (New Left). While quite diverse programme-wise, these parties were nonetheless united by their common aversion to PiS policies during its eight years in office (2015–2023).[3]

Although most visible in the press market, media polarisation has spread to TV (Blum et al., 2024), radio and internet platforms as well. Of all TV broadcasters, TV Republika currently stands out as the main source of televised information for right-wing audiences. Despite all the limitations of private cable television, this station has become the primary outlet of the Law and Justice party, replacing public stations TVP1 and TVP Info in their former role as the mouthpiece of the Law and Justice party while it was in government. Of key importance are also the Catholic TV Trwam and, most of all, Radio Maryja, both presided over by Father Tadeusz Rydzyk, who has built strong political ties with numerous politicians from the United Right. It was Radio Maryja that is said to have played a fundamental role in securing Law and Justice's grassroot support (Duval Smith, 2015; Leśniczak, 2024). A liberal counterweight is television stations such as TVN and TVN24, as well as the radio station TokFM, known for their distinctly anti-PiS narrative.

The Internet, for its part, represents a particular space of political polarisation. In her analysis of two popular web portals, *wPolityce.pl* (right-wing) and *naTemat.pl* (liberal), Olechowska (2021) demonstrates the extent of polarisation in online media content, characterised by strongly oppositional and mutually hostile narratives. Both portals are exceptionally interesting examples showcasing, on the one hand, the growing importance of internet portals as opinion-forming platforms in Poland, while – on the other hand – exacerbating demand for politically engaged media. *wPolityce,* in existence since 2010, became one of the most popular platforms in Poland within its first five years. In 2015 – which marked the double electoral victory of the Law and Justice party in the Polish parliamentary and presidential elections – *wPolityce* even ranked as the 2nd most opinion-forming internet portal in the country (Instytut Monitorowania Mediów, 2016). Yet according to research conducted in 2019 by scholars from the University of Oxford, this platform was recognised as one of the most active producers of "junk news" (Marchal et al., 2019).

naTemat (founded in 2012), on the other hand, while officially professing the values of quality and objective journalism through its own fact-checking service (Trudat.pl), has, in practice, demonstrated visible bias, focusing almost exclusively on exposing the falsehoods in the statements made by PiS politicians.

A different category comprises Internet portals closely linked to established weeklies. These platforms have become spaces for channelling media content and political or ideological messages that would otherwise not be accepted for publication in print media, often due to concerns about journalistic quality. Notable examples include *niezalezna.pl* (the online platform of *Gazeta Polska*) and *gazeta.pl* loosely linked with liberal Gazeta Wyborcza within the same ownership of Agora.

We posit that one of the enablers of the political polarisation of Polish media is the fact that Poland lacks the tradition of an independent public media. In fact, both public radio and television broadcasters have always been linked to the ruling elite. The legal basis for the functioning of public broadcasting is to be found in the 1992 Broadcasting Act (with subsequent amendments), which inter alia, introduced the National Broadcasting Council (*Krajowa Rada Radiofonii i Telewizji*, KRRiT). It further specifies the appointment procedures for Council members and articulates the prerogatives conferred upon it. KRRiT is an important body whose role as the guardian of the freedom of speech and the right to information is enshrined in the Polish Constitution. The Council's principal responsibilities include granting licenses to private operators, the supervision of both public and private stations, and the nomination of the supervisory boards of public media. Although the members of the Council cannot belong to a political party, the Council members have often exhibited clear political alignments.

Following the change of political power in Poland in 2015, the Law and Justice party undertook measures to increase its influence over public media. Significantly, the National Media Council (*Rada Mediów Narodowych*, RMN) was installed in 2016, taking over some powers of KRRiT, especially in what concerns the appointment of public media authorities. The establishment of RMN provided PiS with the authority to replace the management of public television and radio broadcasters and fill the positions with party loyalists. This not only deepened the dependence of public media on the ruling party but effectively granted PiS its "own" television and radio platforms (Gajlewicz-Korab & Szurmiński, 2022). Following these changes, public television became increasingly biased in content, marked by sharp criticism of liberal actors, the democratic opposition, and the EU. Meanwhile, it demonstrated clear sympathy for the PiS-led government and gave substantially more airtime to politicians from the United Right coalition than to members of the opposition.

After the change of political power at the end of 2023, the new democratic coalition government undertook actions aimed at depoliticising public media. Acting based on a Sejm resolution on the restoration of the legal order and ensuring impartiality and credibility in public broadcasting, the Minister of Culture and National Heritage, Bartłomiej Sienkiewicz, invoked commercial company law to dismiss the existing supervisory boards of TVP, Polskie Radio, and Polish Press

Agency (PAP). He then appointed new ones, which in turn replaced the management boards. However, both the substance and the rapid pace of these reforms have been met with criticism (Helsinki Foundation on Human Rights, 2023b).

On December 27, 2023, Telewizja Polska, Polskie Radio and the PAP were put up for liquidation whilst retaining the right to continue broadcasting. The personnel were replaced, especially in the news channels. Many journalists associated with TVP under PiS left the public broadcaster, often finding employment at TV Republika. Although the TVP programming line has changed, this has not resulted in genuine depoliticisation of the media; instead, they have merely switched sides.

To properly contextualise the depth and importance of political polarisation of Polish media, it is crucial to acknowledge that while political dividing lines between the media are, of course, not the only axis of division, they are nonetheless the most important. They overshadow the classical divisions of media between tabloid and broadsheet, as well as the division based on ownership between private and public. While there are a few media outlets in Poland that meet the description of tabloids (e.g., Fakt), the fragmentation of audiences, politicisation of content (also in high-quality newspapers), and tabloidisation of traditional fact-focused media undermine this distinction. Paradoxically, in the face of growing political divisions and decreasing trust in the traditional information media, the only presidential debate in the first round of the recent elections in Poland (2025), in which all candidates took part (April 28, 2025), was one organised by Super Express, a tabloid-style, entertainment-oriented media outlet increasingly positioning itself within the informational sphere.[4]

Likewise, the division of the media along the axis of ownership, although important, has gained significance not so much due to any actual overrepresentation of foreign capital or genuine concentration of the media in foreign hands, but rather exclusively for political reasons.[5] The problem of who owns the media was largely generated by the PiS administration as part of a "Repolonisation campaign", theoretically aimed at deconcentrating media. In practice, the goal was to reduce foreign ownership and subordinate the media to state institutions. A prime example of the latter was the controversial purchase of Polska Press – a media house owning numerous local newspapers – by Orlen, a Polish state-controlled petroleum company (Helsinki Foundation on Human Rights, 2023b).

A critical argument concerning foreign ownership of the media resurfaced during a dispute over the license prolongation for TVN24 (a popular news service unfavourable to PiS) in 2021. Ownership issues have also been used as arguments against Onet.pl (owned by German-Swiss Ringier Axel Springer Polska), today the most opinion-leading media in Poland (Instytut Monitorowania mediów 2025), which does not shy away from criticising politicians of all political flavours.

Finally, a qualitatively significant development in the Polish media market is the rise of journalistic programs aired on the YouTube platform. Particularly noteworthy is the YouTube-based Kanał Zero (online since February 1, 2024), which positions itself as a politically independent medium that nonetheless engages in extensive political commentary. It ranked 10th in a recent ranking of

the most influential Internet media in Poland. Taken together, these structural and political conditions not only sustain a polarised information environment but also shape how public authorities conceptualise and address the problem of disinformation.

State interventions to combat disinformation

Poland's response to disinformation in the media sphere involves a wide array of state institutions, although no unified national strategy has yet been adopted. This, in practice, means that the responsibility of addressing disinformation is dispersed, and various activities aimed at combating disinformation on the regulatory level are addressed by various state bodies and agencies. In consequence, the strategic-level threat recognition is addressed by the National Security Bureau (BBN), which integrates disinformation risks into national security policy. The Ministry of Foreign Affairs (MSZ) focuses on institutional capacity-building, intergovernmental cooperation, and international communication campaigns. The Ministry of Justice provides legislation regulating online content and procedures for legal redress, including mechanisms like the so-called "blind lawsuit" (pl. *ślepy pozew*). The Ministry of Digital Affairs promotes media literacy, educational tools, and soft regulatory instruments such as codes of conduct developed in collaboration with digital platforms. The Government Centre for Security (RCB) plays a coordinating role in responding to hybrid threats, particularly around electoral processes, and publishes monthly disinformation monitoring bulletins. Technical response and public awareness initiatives are led by CERT Polska, operating within the NASK research institute. Meanwhile, the KRRiT supports co- and self-regulatory models in the media space. Civil society actors such as the Panoptykon Foundation and Demagog complement institutional efforts through fact-checking, public education, and watchdog activities. The latter organisation cooperates with EU institutions as well as international verification networks, including the International Fact-Checking Network (IFCN). Nevertheless, despite the high quality of their work, these initiatives are limited in scale due to resource constraints, and coordination remains fragmented and lacks a single overarching framework. This fragmentation stands in marked contrast to the increasingly coordinated regulatory efforts emerging at the European level, where disinformation is framed as a shared democratic and security concern.

Implementation of EU regulations at the national level

In recent years, the EU has significantly intensified its efforts to counter disinformation. This phenomenon is increasingly recognised as a serious threat to democracy, public discourse, and internal security of Member States (Domolewska, 2024). In response, the EU has introduced a range of both soft and hard regulatory initiatives. Among the most significant are the updated Code of Practice on Disinformation (2022) and the DSA, which entered into force in February 2024. Similar to the Code of Practice, which serves as a voluntary, self-regulatory framework for

online platforms, Polish actors have also taken bottom-up initiatives to respond to the growing challenges of online disinformation. In April 2023, several organisations engaged in the fight against disinformation, including Demagog, NASK, and Nauka. To Lubię, Crazy Nauka, and the Kościuszko Institute, jointly developed a Code of Good Practices on Disinformation (*Kodeks Dobrych Praktyk w zakresie dezinformacji*). Rather than a top-down regulatory instrument, this initiative emerged from within civil society and expert communities concerned about the impact of false and manipulative content on the Polish infosphere. The Code serves as both a diagnostic and an educational tool, offering a practical framework to identify and address various forms of disinformation, from bots and trolls to more subtle techniques such as cherry-picking, deepfakes, and whataboutism. It encourages proactive measures by users and institutions alike, including media literacy education, fact-checking, and the promotion of transparent moderation standards. It also highlights the limitations of relying solely on platform responsibility and stresses the need for broader societal involvement, including public institutions and traditional media. Importantly, while non-binding, the Code aims to serve practitioners across different sectors, from journalists and educators to public officials, as a flexible tool to navigate the complex dynamics of digital information flows.

The DSA, by contrast, constitutes binding European legislation. It requires each EU Member State to designate a Digital Services Coordinator (DSC) tasked with overseeing national compliance with the Regulation (Klafkowska-Waśniowska et al., 2025). In Poland, this responsibility has been provisionally entrusted to the President of the Office of Electronic Communications (*Urząd Komunikacji Elektronicznej, UKE*), following a resolution adopted by the Council of Ministers on May 15, 2025. Under this interim arrangement, the President of UKE acts as the national Coordinator for Digital Services, facilitating effective cooperation with the European Commission, the European Board for Digital Services, and counterparts in other Member States. Until the entry into force of a comprehensive national implementing act, the Coordinator is expected to carry out specific functions outlined in the DSA, such as processing notifications regarding very large online platforms and search engines (Article 33(6)), contributing to risk mitigation guidance (Article 35(3)), engaging in the EU-wide exchange of regulatory information (Article 57(1)), participating in the European Board for Digital Services (Article 62(1)), assisting the Commission in systemic risk assessment (Article 64), and staying informed about compliance activities undertaken by major platforms (Article 75(3)).

Despite the DSA's direct applicability, domestic legislative work is ongoing. A draft law amending the Act on the Provision of Electronic Services (*Ustawa z dnia 18 lipca 2002 r. o świadczeniu usług drogą elektroniczną*) is under preparation. This legislation aims to provide a durable legal foundation for the coordinator's functions and powers, clearly defining the scope of UKE's supervisory competences, procedural mechanisms, and its role in inter-agency cooperation. The amendment will officially designate the President of UKE as the competent authority for the enforcement of Regulation (EU) 2022/2065, expanding the office's

responsibilities to include inspections, the imposition of administrative fines, and structured collaboration with both European institutions and coordinators in other Member States. The draft law also foresees the involvement of the President of the Office of Competition and Consumer Protection (UOKiK), who will oversee areas falling within its jurisdiction under the DSA. It introduces a national enforcement regime aligned with the Regulation's penalty framework and clarifies the scope and procedure for administrative orders, such as content blocking. Contrary to recent media criticism, the government has underlined that such decisions will be subject to judicial review, specifically through administrative courts, and do not eliminate procedural safeguards.

Furthermore, the proposal reflects a deliberate effort to avoid "gold-plating", meaning that national rules will be limited to matters directly delegated by the DSA or where regulatory flexibility is explicitly provided. The legislative process was informed by public consultations conducted in two stages in 2024, which revealed the absence of sufficient legal grounds in Polish law to operationalise certain mechanisms introduced by the DSA. The forthcoming legal architecture aims to ensure effective protection for users against illegal content while preserving fundamental rights such as freedom of expression. The creation of an independent and accountable domestic framework is intended to shift regulatory oversight from private platforms to competent national authorities, enhancing democratic legitimacy and legal predictability in the digital domain.[6] In the end, however, the impact of these frameworks depends on how they are perceived and enacted by those who confront disinformation in practice, including journalists, regulators, and civil society actors operating within the Polish media system.

Analysis

Journalists' perceptions of disinformation

While the sources of disinformation may differ, in Poland, two seem to take precedence over the others. The first includes external, i.e., foreign, actors who use disinformation to provoke internal destabilisation in Poland and undermine trust in public institutions. All of our respondents who referred to foreign sources of disinformation pointed to the Russian Federation as an actor which employs a "disinformation industry" through which the state carries out disinformation campaigns targeting Poland's public sphere. One example is the "Doppelgänger" operation, mimicking trusted media brands to deceive audiences. Russia-originated campaigns are carried out mostly (but not exclusively) through social platforms, such as Telegram, Twitter/X, TikTok, and Instagram. They may also spread through other sources, including information and social platforms, with an example of Kresy.pl, where factual content about Eastern Europe is often mixed with fabricated narratives, especially concerning Ukraine. Such disinformation campaigns have been present in Poland for years. They were explicitly prominent during the coronavirus pandemic (Legucka & Przychodniak, 2020; Sánchez del Vas & Tuñón Navarro, 2024) and significantly intensified after Russia's full-scale invasion of Ukraine.

While Russian operations are well-documented (Kaczmarek, 2024; Sánchez del Vas & Tuñón Navarro, 2024), other foreign campaigns are also being noted, particularly Belarusian and Chinese ones (Legucka & Przychodniak, 2020). One of our respondents referred to a Meta investigation that uncovered a coordinated network mimicking Russian-style disinformation, which was ultimately traced to China.

The second source of disinformation in Poland is domestic actors, mostly politicians and political commentators linked to political interests. Nearly all our respondents pointed to the high level of polarisation of the Polish public sphere as the prime source of disinformation in Poland. As one respondent explicitly stated, "It seems that disinformation has become a tool in political competition" (Interviewee 2). Blatantly false narratives are often openly promoted by politicians in order to win the audience and sway public sympathies away from political opponents. The so-called "journalism of identity" (Dzięciołowski, 2017) that has gained importance in Polish public discourse, especially after 2015, has been particularly complicit in this endeavour. Not only have such politically and ideologically engaged media conveyed a skewed image of the world, but they also willingly reach for disinformation campaigns.

The key problem is the aforementioned politicisation and extreme polarisation of the media, a phenomenon that has intensified in Poland in the last decade. Of course, the media's closeness to politics is not unique to Poland (Stępińska et al., 2024; Teruel-Rodríguez, 2023). It is also not surprising that with the wave of populism sweeping across Europe and beyond, the objectivity of media reporting and their adherence to journalistic standards are widely being questioned (Kubin & von Sikorski, 2023; Štětka & Mihelj, 2024; Teruel-Rodríguez, 2023). Yet, the degree of politicisation not only of the content but also of the Polish media organisations as such, and the ties they have openly maintained with political parties over the last decade, is rather exceptional.

A prime example is *Gazeta Polska*, which serves as a mouthpiece for the Law and Justice party, not so much because of its conservative, right-wing profile, but primarily because of the space it provides for PiS politicians within its pages. In fact, the paper has become a kind of party pamphlet for promulgating party ideas. Its local organisations, known as Gazeta Polska Clubs, have *de facto* functioned for years as quasi-local offices of the Law and Justice party (Ślażyński, 2018).

The tightening of relations between media and political actors entered a new phase after 2015. This was associated, on the one hand, with the domination of right-wing parties on the Polish political scene (no left-wing party reached the electoral threshold), and on the other, with the unprecedented victory of the national populist United Right coalition. The situation in the media market, to some extent, thus mimicked the changes on the political scene, both in terms of an increasingly visible political orientation of media institutions and their more pronounced polarisation. It could be said that the populist division between "us" and "them" that dominated political language and policy-making in Poland (Orzechowska-Wacławska & Szewczyk, 2019) also spilt over into the media. The media, however,

were not passive recipients of these processes but actively participated in the deepening of those divisions. Becoming platforms promoting political views and at the same time endorsing politicians, the media in effect helped to strengthen the party's electorate base, thus becoming a driver further exacerbating internal polarisation. The media contributed to the widening of ideological divisions in society, creating an image of two completely different versions of Poland, leading to the formation of the "PiS"-"anti-PiS" ideological division, which has since dominated the discursive space in Poland.

The connection between "journalism of identity" and disinformation came up in several of the interviews. Disinformation – as mentioned by one of our respondents – has in practice been used by either side to distort the facts to suit political agendas and respective audiences. "[There is] a very skewed image of what is happening, verging on disinformation. Sometimes false, otherwise extremely selective [news reporting]" (Interviewee 3). A high level of polarisation has resulted in a decline in journalistic standards among the main news media, which have become highly partisan. One of our respondents went as far as to say that nobody is checking the facts anymore, as journalists now need to take sides.

Many of our respondents, directly or indirectly, singled out the Law and Justice party as the main culprit. One of our respondents explicitly mentioned that the party relied on fake news campaigns and disinformation to gain power. In this context, three of our respondents underlined the link between conservative right-wing media outlets and the Law and Justice party. One of the interviewees discussed this link in the context of the abandonment of ethical considerations and the selective usage of facts and misinformation campaigns aimed at attracting big audiences. Two other interviewees discussed the financial aspect, explicitly mentioning the practices used by the PiS-led government to influence the media content, namely by giving advertising contracts to certain media outlets whilst ignoring others. While they did not reveal the names of media organisations that benefited financially, such was indeed the case with right-wing weeklies supportive of the PiS-led government, such as "Sieci", "Gazeta Polska", and "Do Rzeczy". One of the interviewees mentioned the institutionally based disinformation campaign launched by the Polish National Central Bank (NBP) under PiS-appointed Adam Glapiński. Finally, another respondent emphasised that the PiS-led government was not interested in fighting disinformation because it used it for its own purposes.

While not *per se* listed as a source of disinformation on its own, some of the interviewees pointed to AI in the context of ethical problems which arise within media reporting. One of the respondents mentioned a personal story of their colleague, an IT professional, who created a portal handled largely by AI, which translated and reproduced content from other portals. No human supervision was involved. Having received a lot of clicks and visitors, Google started posting advertisements on the portal, which in turn attracted an American company which made an offer and purchased the portal for a significant amount of money. While the respondent mentioned that AI-generated content was not new, they admitted that it was unthinkable for people in professional

media to make use of AI in such a way. Another respondent emphasised the need for regulation of AI.

Journalists' strategies to combat disinformation

Strategies to combat disinformation vary depending on the formal structure of the media organisation; however, they all require the rebuilding of journalistic standards. They are pushed on the supply side by the lack of preparation amongst young journalists entering the field, the lack of time and manpower to fact-check information, or the "start-up mentality" of media outlets. On the demand side, they are pulled by audience preferences for "quick and easy" Tik-Tok-like information, "click mentality", or simply widespread disregard for the news and information. Yet it is the deteriorating quality of journalism which all our respondents found as an underlying crucial factor that has led to the proliferation of fake news and spread of disinformation. Of course, this trend is not easy to combat. The increasing "algorithmisation" of content, especially in electronic media, has led to a flood of low-quality, rapidly produced articles. Many of these are shaped by clickbait incentives, driven by underpaid journalists working under pressure to generate multiple texts daily. "Some materials – as noted by one of our respondents describing a 'copy-paste' culture – are just poorly made" (Interviewee 2). On the other hand (and in parallel to these trends), there are media outlets that focus on quality. They invest in in-depth fact-checking and produce longer, more thorough reporting. As observed by one interviewee, journalism might thus evolve along two tracks: Some segments may continue to decline under commercial pressure, while others could improve and gain public trust. In the context of combating disinformation, the availability of reliable and trustworthy media is absolutely essential.

The most basic strategy to ensure that journalist standards are met is through returning to the old-school ethical rules of journalism: To be accurate, to be impartial, to be diligent, not to cut corners and always check the sources. The editor plays an important role in securing those standards. However, it is easier said than done, as many media outlets in Poland that focus on "quick" news, especially on the internet, do not have editorial offices or traditional editors.

Every serious media organisation, however, as emphasised by our respondents, has its own internal fact-checking procedures, and in each case the editor plays a fundamental role in securing quality control. Fact-checking in these institutions is provided either through their own fact-checking service, as is the case with the PAP, or through reliance on an external agency (most often Bloomberg or Reuters). Many media outlets employ fact-checkers on staff and have formalised internal Codes or Rule Books which contain good practices, including procedures concerning countering disinformation (e.g., Wp.pl Group).

However, adhering to such standards can be challenging, especially for so-called "frontliners" – those who report news very quickly. This group refers mostly to internet media, but it can also include television outlets and news agencies. In many cases, time is of the essence, meaning that verification processes must occur

within minutes. At the same time, the responsibility for publishing inaccurate information is very high. In practice, this means that news items are sometimes triple checked before publication, as one respondent employed by a highly influential internet media outlet specialising in economic information noted. To avoid potential repercussions and secure sufficient time for fact-checking, they also refrain from posting "hot-off-the-press information" about stock market companies during trading hours.

Another way to promote high-quality journalism is through premium journalism, i.e., through attracting prominent journalists who specialise in various journalistic crafts, including investigative reporting, interviews, and scientific journalism. This approach is not only about recruiting outstanding individuals but most of all about embedding good practices into the organisational culture. However, there are cases where former exemplary journalists, highly skilled in their craft, have transitioned into commentators and influencers, aligning with one side of the political spectrum. In doing so, they often become active participants in political disputes, thereby contributing to further polarisation.

There is also a question of experts. The rule of thumb is that high-quality journalists rarely have to pay for a comment from a qualified expert. The biggest problem concerns acquiring those experts. Two respondents mentioned that academic experts might be very helpful in countering fake news, but they are often unwilling to participate in the debate, mainly out of fear of criticism from their peers or a lack of communication skills. Therefore, while editors ideally would turn to the best experts in the field, in practice, many of them have to choose those experts with whom they already have a working relationship.

Relatively few proposals for countering disinformation referred to transnational cooperation; rather, most of our journalist respondents admitted relying on personal connections. A few of them reported verifying information by directly contacting friends working in other news organisations (e.g., the New York Times).

Interestingly, especially in the face of European regulations aiming at counteracting disinformation, journalists did not put much trust or hope in regulatory measures. For one, many of them were not aware of EU regulations or anti-disinformation programmes. Those who did most often mentioned (directly or indirectly) the DSA. Secondly, many did not believe such regulations were necessary. This view is grounded in liberal principles of freedom and rests on the notion of deep decentralisation. In short, it comes down to the belief that the fewer regulatory measures of the state or any other international organisation (the EU in this case), the better. There is also a concern about the bureaucratisation of this issue. High-quality media outlets, it is argued, can address such problems independently without interventionist measures. Those respondents who stressed the need for regulation primarily had social media in mind. The goal of the regulation in this case would be to increase accountability for the content (both the one which is produced and reproduced). It was emphasised that such platforms profit from fake news because it generates more clicks. Beyond the newsroom, however, the challenge of countering disinformation becomes increasingly systemic, involving a constellation of actors whose efforts remain interdependent yet only loosely coordinated.

Key stakeholders' perceptions of solutions to disinformation

Combating disinformation, while necessary, is inherently a Sisyphean task. Firstly, there is a problem with the speed at which disinformation develops and fake news proliferates, which makes it impossible to prevent and difficult to countermeasure. One of our respondents rightly called it a "wild goose chase" – a battle that is impossible to win as we "currently don't have the capabilities or tools to eliminate disinformation at an early stage" (Interviewee 1). Whatever is being done at the EU level, or nationally, is always too little and is always reactive, despite the fact that a lot has changed over the last few years in this respect. Secondly, disinformation remains an elusive concept. Although, in principle, there seems to be a consensus over the definition adopted in the DSA, the devil still lies in the details, and more specifically in "the lack of specific, tangible criteria for assessing what this disinformation actually is, because the line between disinformation and individual or subjective opinion can sometimes be very thin, automatically generating the risk of abuse or possible censorship" (Interviewee 1). These specificities are crucial as any action and regulation taken to combat disinformation requires carefully balancing disinformation control measures with the protection of freedom of expression. There is also a question of proportionality. To be effective, any regulation must also be proportionate to the threat. Otherwise, as pointed out by our respondents, the regulations may be perceived as an attempt to limit freedom of expression, and this might further feed disinformation narratives.

For that reason, the solutions proposed by our interviewees relied on cooperation between different actors at different levels (media organisations, civil society, national regulators, EU institutions), as well as a multiplicity of actions. Based on our study, two approaches to combating disinformation emerge.

The first one emphasises bottom-up initiatives and includes remedies that are (or should be) at the disposal of the media organisation, which should be combined with society-wide educational campaigns. This approach supports ensuring quality journalism (adhering to journalistic ethical standards and due diligence) and strengthening fact-checking procedures, while at the same time enhancing education in the field of media literacy and generating a need for fact-based information. The end goal of such measures would be to rebuild trust in the media and institutions. As one respondent claimed: "If institutions and the media act transparently and consistently, then an educated society will reject disinformation on its own" (Interviewee 4). The emphasis is thus put on trust and knowledge rather than control and enforcement.

The other approach focuses on regulatory measures, which at the national level require coordination, communication, and effective enforcement. These, too, should be matched with grassroots education and long-term coordination among civil society, state institutions, and digital platforms. In this respect, Polish experience so far has left much to be desired. Despite various programmes and initiatives, the most daunting problem is the lack of a central authority responsible for analysing disinformation trends and issuing unified recommendations. The absence of a dedicated national coordinator hampers systemic efficiency, as stakeholders such as media

organisations and public agencies are increasingly aware that disinformation is not merely an online nuisance but a national security issue. Despite alignment with EU frameworks like the DSA, there is a visible lack of practical tools, such as monitoring systems, response protocols, and inter-institutional cooperation mechanisms. So far, there is also no national strategy that could complement EU-level initiatives through concrete, sustained action beyond isolated grants or awareness campaigns. In fact, Poland remains one of the last EU countries to implement the DSA into national law: Poland, together with a small number of other EU member states, has lagged behind in establishing a comprehensive national enforcement framework for the DSA, an omission that can be attributed to political deadlock rather than regulatory complexity. This failure has direct consequences for users, who currently lack mechanisms to challenge platforms' decisions regarding harmful content or account suspension and who face uncertainty and fragmented redress pathways in the absence of a fully operational, nationally anchored enforcement framework for challenging platforms' decisions regarding harmful content or account suspension. Apart from lagging behind, the very process of implementation of the DSA is also not without its challenges. For one, it lacks transparency. There was no broad public debate and prior consultation, which has contributed to low policy effectiveness and further reinforced political polarisation. There are also numerous structural barriers, including limited institutional capacity and a general lack of public trust in governmental bodies. This naturally has translated into its limited capacity.

Ultimately, national resilience hinges on informed public communication and consistent policy implementation. However, the regulation is not enough. "We will only prevail – as one of the respondents said – if society believes truth matters and if the cost of defending it feels lower than the damage of disinformation" (Interviewee 6). Societal resilience in the face of disinformation is not, thus, a legal issue but a cultural imperative.

The question that arises is how effective these methods can be if the problem of disinformation is not properly internalised even within those institutions that are themselves tasked with combating disinformation. A representative from one of the leading Polish fact-checking organisations expressed mixed views on national engagement with EU disinformation regulations. While acknowledging that fact-checkers are increasingly visible to public administrators, they noted that their recommendations are not systematically integrated into government procedures. Despite recognition, the organisation's influence is thus limited.

Taken together, these perspectives highlight a common understanding: While EU frameworks offer a necessary foundation, it is only through national political will, institutional coordination, and civic engagement that meaningful resilience against disinformation can be achieved.

Conclusion

The obstacle in combating disinformation in Poland lies in the strong political polarisation of the media. The return of the partisan press and the spread of "journalism of identity", in light of the lack of a politically independent public broadcaster,

have created an environment in which combating disinformation is a daunting challenge. Not only because disinformation has become a tool of political communication, but more importantly, because we have reached the situation in which even neutral information can often be interpreted as partisan. "It's very hard to create content that everyone will perceive as neutral" (Interviewee 5), as one of our respondents remarked.

The solution, while certainly beyond the disposal of a single media organisation, might start with reviving fundamental journalistic standards such as rigorous research, source verification, and adherence to professional rules, all of which remain the gold standard for ensuring quality journalism and countering false narratives. At the same time, raising public awareness and strengthening education are widely regarded as necessary tools in building societal resilience against disinformation.

At the same time, these findings place the Polish case within the broader analytical framework of this book, illustrating how Europeanisation as both norm diffusion and norm creation unfolds in a context marked by structural polarisation and low institutional trust. Poland exemplifies the tension between the EU's normative ambitions to foster information integrity and the domestic realities that constrain their translation into practice. In this sense, the country's experience underscores the varied implementation of Europe's governance responses to disinformation and post-truth dynamics across member states, indicating that democratic resilience depends as much on credible national institutions as on the reach of supranational regulation.

However, debates persist regarding the role of regulation at the EU level, with no consensus on whether supranational measures are necessary or effective. Compounding these challenges is the growing threat posed by AI-generated content, especially as it further blurs the line between reliable information and fabricated material.

The analysis of the implementation of EU disinformation regulations in Poland, as well as the perceptions of journalists, leads to several key conclusions. First, the effectiveness of instruments such as the DSA is shaped not only by legal compliance with EU standards but also by national contexts – namely, the level of public trust in institutions, the culture of public debate, and the engagement of civil society. The implementation of EU regulations so far has faced several key challenges. Chief among them was the absence of a coherent state policy on disinformation, insufficient institutional capacity, and the risk of politicisation, such as the blocking of certain media outlets without clear or transparent criteria. Moreover, there are concerns about discretionary content restrictions in the absence of clear and transparent criteria. In the longer term, the effectiveness of DSA implementation will depend on the government's ability to establish stable mechanisms for cross-sectoral cooperation and to adopt transparent standards of public communication during periods of informational crisis.

Second, while journalists generally support the goals of these regulations, they express concerns regarding their potential misuse and ineffectiveness in the absence of professional ethical standards and regulatory oversight of digital platforms.

Finally, from a systemic perspective, there is a need to develop a more balanced model that ensures effective counteraction of disinformation without infringing

upon freedom of expression. Media literacy, the strengthening of democratic competences, and the promotion of professional ethics in journalism are essential components of such a model. The EU continues to play a vital role as both a regulatory initiator and a forum for public deliberation. However, the effectiveness of its policies ultimately depends on local implementation mechanisms and the quality of democratic institutions within its Member States.

Notes

1 Perhaps the most outstanding exception is *Dziennik Gazeta Prawna,* one of a few examples of dailies which have never been clearly linked to any of the sides of political spectrum. For more on ideological alignment of Polish media – see: Sojak et al., 2023.

2 *Polityka* (established in 1957) represents the liberal and social-democratic tradition in Polish journalism. Once the leading opinion weekly, it has remained second in sales since 2011, with an average circulation exceeding 100,000 copies between 2007 and 2017; it targets a well-educated, centre-left readership (Dobek-Ostrowska 2019: p. 173). *Gazeta Wyborcza* (founded in 1989) emerged from the underground *Tygodnik Mazowsze* network led by Helena Łuczywo and the Solidarity movement, later becoming the country's most influential centre-liberal daily under Adam Michnik. *Newsweek Polska* (launched in 2001 under licence from *Newsweek Inc.*) entered an already crowded opinion market; its sales exceeded 96,000 copies in 2017 after earlier fluctuations, and it appeals primarily to a well-educated, liberal audience, generally centre-left in its political preferences but not affiliated with any particular party or ideology (Dobek-Ostrowska 2019, p. 173).

3 Following the parliamentary elections in 2023, those parties formed a coalition, the so-called "Coalition of October 15". In 2023, they took over the reins of government in Poland.

4 *Super Express* can be considered among the "(non)traditional media", having gradually evolved between 1991 and 2019 towards *infotainment*, that is, the blending of news with entertainment and celebrity content (Waśko, 2022, p. 149). This trend has further accelerated in recent years, as illustrated by the outlet's political programmes available on YouTube and podcast platforms, such as "*Dudek o polityce*", hosted by historian and political scientist Antoni Dudek.

5 In fact, when it comes to ownership, two distinctions come to the forefront – the one between national and foreign ownership, and the other between the public and the private. Key television stations in Poland are owned by Polish and American capital. TVP1, TVP2, and TVP Info belong to Polish State Treasury, Polsat belongs to the Polsat group, in which Zygmunt Solorz is the biggest stakeholder, and both TVN and TVN24 belong to Discovery Benelux, based in the Netherlands, which belongs to America Discovery, Inc. Radio is mostly owned by Polish capital, of which Polish Radio (Jedynka, Trójka, and regional stations) are public, Radio ZET and Tok FM are private. Only the RMF FM station belongs to the RMF Group, owned by the German company Bauer Media Invest GmbH. Ownership of key newspapers and weeklies is divided between Polish (Gazeta Wyborcza, Dziennik Gazeta Prawna, Polityka, Gość Niedzielny, Tygodnik Powszechny, Do Rzeczy, Sieci, and Gazeta Polska), Dutch (Rzeczpospolita), and German and Swiss capital (Newsweek and Fakt). Over half of the most often visited online media outlets are Polish: This includes most opinion-forming Wirtualna Polska, as well as Gazeta.pl, Wyborcza.pl, Interia.pl, and Polsatnews.pl. Foreign-owned media include: Onet (German-Swiss Ringier Axel Springer Polska), TVN24.pl (American Discovery, Inc.), and RFM24.pl (German Bauer).

6 The *Draft Act amending the Act on the Provision of Electronic Services and certain other acts* (Project UC21) aligns Polish law with the *Digital Services Act*, creating a national oversight framework for online platforms, introducing procedures for blocking illegal content, and enhancing user protection and redress mechanisms. The bill

was adopted by the *Sejm* on November 21, 2025 (*Sejm* prints no. 1757, 1922-A). On December 10, 2025, the *Senate* submitted amendments and referred the act back to the *Committee on Digitalisation, Innovation and Modern Technologies* for further consideration. As of December 2025, the legislative process remains ongoing.

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Appendix

List of interviewees:

Role	*Date*
Editor-in-Chief (monthly journal)	January 2024
Editor-in-Chief (monthly journal)	January 2024
Editor-in-Chief (monthly journal)	January 2024
Journalist (different outlets)	January 2024
Journalist (Polish Press Agency)	January 2024
Journalist (internet media)	January 2024
Journalist (internet media)	January 2024
Journalist (Polish Public Television)	February 2024
Journalist (leading weekly)	February 2024
Journalist (Polish Press Agency)	June 2025
Journalist (Catholic media agency)	February 2025
Fact-checking organization	January 2025
Fact-checking organization	February 2025
Think tank (countermeasuring disinformation)	January 2025
Think tank (countermeasuring disinformation)	March 2025
Regulatory agency	March 2025
National agency (countermeasuring disinformation)	July 2025

7 Bulgarian journalism amid fragile pluralism and declining professional standards

Hristo Panchugov and Dimitar Vatsov

Introduction

Bulgaria represents a revealing case through which to analyse the relationship between media, journalism, and the post-truth phenomenon, especially in relation to the prevalence and effects of disinformation across the European Union (EU). The specifics of the Bulgarian case can be explained by the characteristics of its communist past and its post-communist transition.

First and foremost, Bulgaria has a very strong pro-Russian sentiment buried in the historical foundations of the 19th-century state, created as a result of the Russo–Turkish war of 1877–1878. These sentiments have been significantly strengthened through 45 years of communist propaganda, since the Bulgarian communist regime was one of the most loyal and close allies to the Soviet Union between 1945 and 1989. This historical experience renders Bulgaria particularly vulnerable to disinformation, especially to narratives coming from Russia (Human and Social Studies Foundation, 2017; Junes, 2017; Kiuranov, 2017).

Secondly, the Bulgarian regime, if not the most oppressive, was among the most consolidated and least contested communist regimes in Central Europe. A relatively small and fragmented dissident movement, coupled with weak and scattered resistance, coincided with near-total control over the country's media. For this reason, it can be argued that two characteristics commonly associated with media models in Central and Eastern Europe – political parallelism and advocacy journalism (Brüggemann et al., 2014; Hallin & Mancini, 2004, 2013) – have particularly deep roots in Bulgaria.

Thirdly, Bulgaria's relatively small media market expanded in the 2000s through a peak daily print circulation of about 203,000 copies and a rapid growth of commercial television between 2005 and 2015 driven by foreign investment; television advertising expenditure rose from €240.5 million in 2010 to €650.5 million in 2019, and television now reaches 80 percent of the population daily, the highest share in Eastern Europe (Boshnakova & Dankova, 2023). However, even with some of the major European media conglomerates moving into the market, it remained susceptible to mergers, media market concentration and governmental influence, which have been the main threats to media pluralism in Bulgaria.

In light of these characteristics, to be discussed further below, the demand for qualitative journalism has had a rough ride throughout the period of the post-communist

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transition. Over the last few years, there has been general concern about the quality of journalistic education, the overall level of professional standards, and the willingness to adhere to a voluntary, not universally accepted, code of ethics.

Within this context, the chapter explores the development of Bulgaria's media landscape, building on public data about media reach and penetration. It investigates the influence of traditional media, its dependence on political or economic interests, and the increasing influence of social media and online platforms as dominant channels for news consumption. Drawing on interviews and official documents, the chapter identifies emerging challenges that go beyond simply recognising fake news and instead emphasise the need to build active resistance among journalists to the spread of disinformation, even in the face of internal or owner-driven pressure. This task is further complicated by insufficient investment in journalists' qualifications and a lack of institutional support. The factors outlined above are seen as facilitating both the spread and the instrumentalisation of disinformation by certain media outlets and journalists. Moreover, internal resistance to disinformation is often undermined by restrictive newsroom cultures, the lack of dedicated training on disinformation, and, in some cases, bullying directed at journalists and fact-checking organisations.

Still, the study revealed a growing recognition of the importance of professional standards rooted in traditional journalistic ethics, e.g., rigorous fact-checking, reliance on expertise, and ethical responsibility. Initiatives such as the Bulgarian National Radio's (BNR) internal academy and fact-checking training programs by the Association of European Journalists and Factcheck.bg are important responses. External fact-checking bodies are generally trusted, though their influence on actual newsroom practices remains limited. Innovative and visually engaging formats (e.g., explainers and reels) are increasingly seen as necessary to effectively counter disinformation and reach younger or disengaged audiences.

The chapter uses the case-specific national context to reflect broader challenges across the EU regarding disinformation, media regulation, and journalistic freedom. It analyses the advancement of the adoption of EU legislation in the area (namely the Digital Services Act [DSA]), evaluating it against both the challenges identified in the first part of the study and the recent political developments in the country. Based on this, it calls for decentralised and flexible European strategies that prioritise civic education, support for independent journalism, and the development of accessible, engaging formats. All this can rebuild trust more effectively than overregulation or purely technical solutions to disinformation. Importantly, it also demands a renewed understanding of media professionalism as an ethical and societal cornerstone, having a pivotal role in combating the effects of the "post-truth" era.

Methodological considerations

In line with the objectives of the study, two research questions were formulated. The first research question (RQ1), "*How do journalists perceive post-truth phenomena and respond to their challenges while upholding the basic principles and*

values promoted by the EU?", required operationalisation in a context where the term "post-truth" is relatively unfamiliar. For this reason, and following exploratory discussions during the interviews, the term "post-truth" was excluded from the interviews conducted in the Bulgarian context. We have referred to the phenomenon as "fake news" and/or disinformation in accordance with the distinction "between post-truth politics and labels such as fake news and/or mis-/disinformation" (Conrad, 2023, p. 4). The use of these terms is examined with the understanding that such practices do not "simply refer to an undermining of the demand for authenticity in democratic deliberation but also serve to undermine other basic rights and key tenets of liberal democracy" (p. 4).

The Bulgarian landscape, as described below, offers a challenging mixture of unclear media ownership, consolidation of the media market, governmental dependency, and foreign information interference. This puts a challenging spin on our case selection criteria. The answer that the respondent would produce would largely be dependent on the journalistic affiliation with a specific media entity. So, contacting respondents based on their affiliation with a media entity that has a history of practising quality journalism, while personally exercising high professional standards, has been a major consideration in our selection criteria for interview participants.

The research sought to cover both the representativeness of the Bulgarian media landscape and experts specialised in the issues of disinformation. The selected media and journalists are well-established, highly trusted names holding a record of accomplishment of high professional standards. A total of ten journalists were selected, reflecting diversity in professional experience, media types, and areas of expertise. Both public service media – Bulgarian National Television (BNT) and the BNR were represented, each of which has started its own fact-checking initiatives.

The sampling strategy prioritised heterogeneity in institutional affiliation (public, private, and independent media), type of outlet (television, radio, online, and print), and professional trajectory, while maintaining a strong focus on relevance to disinformation-related practices and debates. Respondents from private media included a national TV and radio station, a member of the Association of European Journalists, online and printed media representatives, and independent fact-checking platforms. Overall, the selection incorporated broad and extensive experience across broadcast, electronic, printed, and online media. The findings of the interviews were evaluated against the Bulgarian legislation in the field, the available data from international and domestic studies in the field of media studies, disinformation and its impact on the Bulgarian media landscape.

The second research question (RQ2), "*To what extent has there been a Europeanisation of the perceptions of key stakeholders (journalists, national regulators, professional associations, and oversight bodies) regarding solutions to disinformation at the national level, and how does this shape national agendas?*", also requires careful operationalisation. The concept of Europeanisation lacks a single, unified definition and can be overly inclusive, which limits its analytical usefulness without further conceptual refinement. Nevertheless, as Featherstone (2003) argues, the concept can serve as a valuable "entry point for the greater understanding

of important changes" (p. 3), particularly when it is interpreted in a maximalist sense, that is, as a form of structural change displaying characteristics that are predominant in, or closely associated with, Europe. At a minimal level, Europeanisation refers to "a response to the policies of the European Union" (p. 3). The author does offer five broad categories in which we can seek operational clarity of the term – to analyse it as a historical process, as a transnational cultural diffusion, as institutional adaptation, and adaptation of policies and policy processes. While these also sound too broad, they do offer a chance for us to operationalise the term with regard to the goals of the analysis. In the conceptual debate, we will side with Schimmelfennig and Sedelmeier's (2005) argument that "Europeanization is a process in which states adopt EU rules" (p. 7). Thus, the research focused on changes in the perceptions of journalists and national regulatory bodies regarding how the domestic regulatory agenda has evolved in response to disinformation, with particular attention to the adoption of EU legislation in this field and to proposals for new measures.

Furthermore, drawing on the cultural diffusion dimension of the definition above, a set of questions was designed to explore the experiences of Bulgarian journalists with international collaboration in combating disinformation, as well as the resulting changes in values and professional norms. It is important to note, however, that an ongoing political crisis has significantly affected the legislative process in Bulgaria. With seven elections held over a three-year period, much of the legislative agenda has been postponed, including regulations related to funding under the EU Recovery and Resilience Plans. As a result, legislation considered less urgent, such as the DSA, has remained largely absent from both political and public debate. Furthermore, the instability of the political situation has also meant that most of the members of the regulatory bodies were largely unwilling to talk on sensitive topics, especially given the current political climate. Largely for that reason, the conclusions were drawn based on secondary research, public reports, and an interview with a member of the Council for Electronic Media (CEM).

Key challenges to journalism in Bulgaria

The media sector in Bulgaria continues to face challenges despite economic growth, largely due to a limited media market and declining advertisement revenues. Overall, Bulgarian journalism faces a particularly high-risk environment. The latest EUI-report on media pluralism (Monitoring Media Pluralism in the European Union, 2025) ranks Bulgaria in 24th place out of 32 countries, with a score of 62 percent (medium – high risk environment). Many domestic media outlets maintain close ties with political power, particularly public broadcasters like BNR and BNT (Spassov et al., 2025). Financial instability, however, forces even commercial media companies to often seek state-supported advertising. The television market grows increasingly fragmented, with the number of television channels increasing to 66 in 2023 in comparison to 48 channels in 2013, while at the same time leaving a lot of room for market concentration. The country report for Bulgaria, as part of EUI's Centre for Pluralism and Media Freedom, estimated

"high risk (71 percent) for market plurality in 2025" (Spassov et al., 2025, p. 7), reflecting significant challenges in media ownership transparency and viability. With no sector-specific legal framework on media market concentrations, and with many media organisations failing to declare ownership details, particularly in the online sector, it is difficult to assess media concentration. Nevertheless, the level of media ownership concentration is reported as being high, with the top four TV media groups holding 91 percent of advertising revenues.

Print media faced a decline in its traditional paper format but moved its production to a digital format. As the Reuters 2023 report showed, 73 percent of the population is using online media (including social media) as a main source of news, and 61 percent of the audience is using social media specifically for that purpose, while television is the source of news for 63 percent (Newman et al., 2023). There are no public subsidies to regional and local media, apart from public service media, which creates a significant challenge to media pluralism. Moreover, state advertising is not subject to public procurement rules, allowing contracts below 10,000 Bulgarian lev (approximately 5,100 euros), as well as contracts awarded through intermediaries, to avoid public disclosure; media services are also excluded under certain EU rules. This framework enables the allocation of public funds in exchange for favourable media coverage and has constituted one of the most serious challenges to the integrity of the Bulgarian media sector over the past decade. The close relationship between state and EU funding for public and media campaigns places considerable strain on the media's critical watchdog function, even at the national level.

Most of the concerns are also regarding the risk for "Fundamental Protection" (Spassov et al., 2025). The experts recognise a "deteriorating freedom of expression online, worsening digital safety of journalists, as well as ineffective protection against disinformation and foreign information manipulations and interference (FIMI)" (p. 11). In July 2025, Bulgaria's Supreme Court of Cassation upheld a defamation ruling against investigative journalist Boris Mitov and the news outlet Mediapool. The case comes in line with a number of previous court decisions that have imposed Liability and Defamation charges against Bulgarian journalists. In two of these cases, the European Court of Human Rights (ECHR) ruled that Bulgaria violated rights to freedom of expression and a fair trial. Furthermore, EU Anti-SLAPP legislation has yet to be adopted in Bulgaria, which becomes even more important with 17 percent of surveyed media professionals reporting intimidation lawsuits (Spassov et al., 2025). Given the fact that "access to alternative sources of information…not monopolized by the government or any other single group" (Dahl, 1989, p. 223) is generally considered to be a key requirement for the functioning of the democratic institutions, the self-censorship, and the lack of critical voices challenging official narratives, that go with governmental funding, raises serious doubts with regards the performance of Bulgarian democracy.

Consequently, trust in the news is generally lacking in Bulgaria (28 percent), putting the country in place 41 out of the 46 countries that were ranked (Newman et al., 2023). Among media platforms, television and radio brands, including both public service broadcasters and leading commercial stations, are the most trusted

sources. Euronews Bulgaria TV, which was established in 2021, was included in the trust survey for the first time in 2023 and has garnered a relatively high trust rating of 50 percent, likely attributed to its high-quality journalism and brand reputation, which can attest to the public demand for such.

However, the regulatory framework that is presided over by the Bulgarian CEM has a detrimental impact on the editorial autonomy of public media outlets, due to the political alignment of its members. Similarly, privately owned media face challenges to their independence due to their owners' vested interests in other regulated industries, as discussed above.

The media environment in Bulgaria is poorly regulated and is exposed to significant distortions through disinformation, misinformation, and propaganda. The most significant share of the distortion is due to Russian propaganda, which is spread both by openly pro-Russian sources (parties and politicians, media and journalists) and by domestic populists who partially adapt it for their own purposes (Human and Social Studies Foundation, 2025).

The core of the Bulgarian statute governing media and audio-visual communication is the Radio and Television Act, adopted in 1998 and repeatedly amended. It establishes the CEM as the independent regulator for radio and television broadcasting. The act regulates the licensing, registration, and monitoring of radio and television service providers, sets rules on program content, advertising, sponsorship, protection of minors, and requirements for Bulgarian and European works. It also provides the framework governing the structure, management, and financing of BNT and BNR. While the law formally defines these broadcasters as public service media, it does not guarantee their independence in practice. Management mandates within public service media can be extended indefinitely without new appointments, resulting in prolonged interim leadership. In recent years, CEM has delayed the appointment of new directors at BNT, raising concerns about political interference. CEM operates on the basis of political quotas and has recently been criticised over the public statements and decisions of its former chair, Sonya Momchilova, who has been reported to have close ties to the Bulgarian President and to have promoted pro-Russian narratives.

Beyond these provisions, the media landscape is regulated via the Electronic Communications Act that sets up the Communications Regulation Commission (CRC) to oversee the telecommunications sector, spectrum management, and network operators[1]. The media ownership and concentration are subject to regulation by the Competition Protection Act, which is handled by the Commission on Protection of Competition[2]. And the Access to Public Information Act governs transparency and access to official information, indirectly affecting media freedom.

As briefly mentioned earlier, the country has been almost permanently ruled by provisional governments in the absence of a functioning parliament since 2021. Institutionally, that meant that most of the regulatory bodies in Bulgaria have been either idle, in the lack of political authority or with expiring mandates. Their members could not be substituted since such an act requires a functioning parliament. Consequently, most of the legislative agenda has been postponed. Two new legislative proposals to the Electronic Communications Act have been introduced, the last one

in 2024. They have been unified in a single proposal, establishing the legal capacity of the CRC and CEM to perform their duties related to the implementation of the DSA in the Bulgarian context. As of mid-2025, these acts have not yet been adopted.

Analysis: Exploring journalists' perceptions of disinformation and threats to their independence

Since 2017, analyses of the Human and Social Studies Foundation (2024) have continuously shown that there are two main streams of disinformation flowing into Bulgarian media and often mixing. On the one hand, these are national-populist discourses similar to those advanced by Trump and Orbán; on the other, they amount to overt pro-Russian propaganda.

National television broadcasters (BNT, Nova TV, and bTV) and radio stations (BNR and Darik Radio) are the least affected by Russian propaganda. However, such narratives most often enter their coverage through the routine citation of official spokespersons of the Russian Federation. They also appear via Bulgarian interlocutors presented as "the other point of view" in the name of media pluralism, insofar as pro-Russian positions are advanced by certain domestic political actors – notably the party Vazrazhdane, but also BSP, Velichie, and Mech – as well as by President Rumen Radev.

A special case is that of propagandist journalist Petar Volgin[3] of BNR, who has been openly promoting Russian narratives on air for at least a decade without being effectively constrained by civic protests, station management, or media regulators. Other, more marginal radio and television broadcasters also disseminate Russian propaganda.

However, Russian propaganda is not the only problem of disinformation identified in the research and during the conducted interviews. A more urgent challenge to address is the conformity to the government, which explains the major informational distortions on national airwaves. As shown in the previous section, national TV channels rely mainly on advertising revenue coming from the state budget and European programs. Representatives of the government and the ruling majority dominate both in terms of the number of appearances on air and the amount of airtime allocated to them in minutes (Human and Social Studies Foundation, 2021). Taken together, these factors, along with unregulated media ownership and a well-established disinformation infrastructure, lay the foundations for "post-truth" politics. In particular, they undermine "the demand for authenticity in democratic deliberation but also serves to undermine other basic rights and key tenets of liberal democracy" (Conrad, 2023, p. 4).

At the end of 2023, according to the Human and Social Studies Foundation (2024), more than 8,000 sources of disinformation are present on Bulgarian news sites and blogs (social media excluded). They are financially the most vulnerable, as advertising flows are directed primarily to national television and social networks. This vulnerability makes them particularly deceptive to Russian propaganda, which, from there, is disseminated to Facebook and other social media platforms. In 2023, the automated media monitoring system SENSIKA identified 229,800 articles spreading pro-Russian content, with over 600 articles circulating online on average daily.

The Human and Social Studies Foundation (2024) report further shows that, in 2022, the dissemination of Russian narratives increased significantly, supported by new technological approaches. A network of so-called "mushroom" (p. 1) websites, known as "the machine" (p. 1), emerged around the Bulgarian Blitz News Agency. This structure played a central role in amplifying Kremlin messaging.

Moreover, as the report points out, the network was publicly exposed in 2023, and the State Agency for National Security (SANS) launched an investigation that led to substantial changes in its activity. By early 2024, the network had been reorganised: It was largely purged of Russian propaganda and shifted its focus towards advertising. The number of interconnected websites declined, with some put up for sale and others becoming inaccessible online.

Overall, the report concludes that explicit Russian narratives have increasingly been replaced by other forms of anti-democratic propaganda. These take the form of national populist and national sovereigntist discourses marked by a distinctly "Trumpian flavour" (p. 3), often showing closer ideological affinities with Donald Trump and Viktor Orbán than with Vladimir Putin. While the overall volume of pro-Russian content in the Bulgarian online space has declined significantly since its peak in 2023, the report notes that it remains difficult to assess to what extent these alternative forms of anti-democratic propaganda are effectively substituting the earlier pro-Russian narratives. It is likely that new channels and methods of dissemination will be employed in this process.

Respondents in our study showed a high degree of consensus in their understanding of *disinformation as the presentation of information in an inaccurate, partial, or misleading manner, ranging from misinformation to outright falsehood*. For all the interviewees (see Appendix), the purpose of these practices, namely the harmful intent, is an important part of the definition. Using disinformation as an instrument of generating social conflict and divides, or personal, political, or economic benefit, becomes a key part of the definition. It is clear that for the understanding of disinformation, the respondents put stronger emphasis on the coordinated aspect of the distribution of the information, rather than on the character of it. The journalists viewed the close link between social media and disinformation as an essential element of its definition. False information often starts from a single source and is quickly spread through networks of fake profiles and phantom media sites. This shows that disinformation is organised rather than accidental and is closely linked to the way social media works. As one journalist put it, it is "an organised campaign of many lies".

Another journalist described these practices as constituting "an organised campaign of many lies". For some of the respondents (Interviewees 1 and 6), the distinction between *fake news* and *disinformation* hinges on the politicisation of the term *fake news*. One interviewee explicitly associated *fake news* with the political rhetoric of Donald Trump (Interviewee 6) and therefore regarded *disinformation* as a more accurate and encompassing concept. For another respondent, the distinction was even simpler: They used a single label to describe all such practices, characterising them broadly as lies (Interviewee 2).

Generally, the respondents (Interviewees 3, 5, 6, and 8) identify two sources of disinformation, which are both external to domestic politics. The first group of sources is closely associated with US conservative circles, particularly those linked to Donald Trump, as well as with more recently established Hungarian websites. The second group is connected to the Russian Federation; in many cases, the source can be traced directly to Russian ideological platforms such as the *Fund for Strategic Culture*. The remaining accounts focus less on identifying specific origins and more on analysing the websites, media outlets, or narratives themselves. While these respondents acknowledge that some of these narratives are also deployed for domestic political purposes (Interviewee 1), they nevertheless continue to emphasise their Russian origin (Interviewee 4).

Interviewees all agree that the goals of disinformation campaigns have changed. The initial goal of spreading doubt in democratic institutions and the decision-making process in general has been expanded and is being utilised as the basis of open propaganda. All those who were interviewed clearly identified specific media outlets that were clearly responsible for the circulation of disinformation narratives. However, the biggest concern expressed relates to the adoption of these narratives by extreme right/left but also mainstream politicians and political parties, their social media pages and a network organised around them. The journalists expressed a shared concern that social media are not the only networks through which such narratives are disseminated. Both private and, more importantly, public media outlets were also identified as contributing to this environment. One respondent noted that there have been cases in which members of the media regulator, the CEM, have themselves been involved in spreading disinformation, referring in particular to the former chairwoman of CEM, Sonya Momchilova (Interviewee 4).

Thus, the impact of disinformation on journalism as a profession is recognised as an additional problem to the developing trends in the Bulgarian context. The profession is seen to be "delegitimised" as part of an ongoing process of decreasing quality of the media environment, media ownership's influence on editorial policy, economic and political dependency, self-censorship, and decreasing journalistic standards. One respondent (Interviewee 8) discussed what she described as the *de-professionalisation* of journalism, referring to a general decline in knowledge and skills among both recent graduates and practising journalists. This tendency was also recognised by other interviewees (3, 4, and 6) and was linked to a broader structural shift in journalism. According to the respondents, journalists have increasingly moved away from acting as professional mediators – through practices such as commentary and investigative reporting – towards merely reporting and retransmitting news. Moreover, even mainstream media outlets sometimes succumb to the pressure to publish information rapidly, which often results in reactive reporting without adequate fact-checking. This problem is further exacerbated by skill gaps among younger journalists and by the demands of new technologies, as the digital media environment requires additional competencies and forms of expertise.

Furthermore, interviewees pointed out that within the new generation of journalists, certain groups can be identified as being more susceptible to adopting

views, attitudes, and opinions shaped by or aligned with disinformation narratives. This specific combination of attitudes and beliefs, and lack of expertise and skills, poses another challenge in overcoming the impact of disinformation. As one of the respondents put it,

> the need to check the truthfulness of the information has always been at the heart of journalism. Yes, the lack of time has always been a challenge, but now there is an important condition missing – often they (the young journalist) will not even think of checking the information.
>
> (Interviewee 2)

Taken together, these factors contribute to declining trust in mainstream media and complicate efforts to reach audiences most susceptible to disinformation narratives. Mainstream media have themselves become targets of disinformation campaigns, which, building on historically rooted mistrust in official media, portray established outlets as part of a broader Western conspiracy to manipulate society. As a result, "alternative" sources are framed as inherently truthful by contrast. In recent years, the impact of disinformation on journalism has intensified, driven by the proliferation of dissemination channels – particularly social media – and the weakening of editorial gatekeeping. This erosion of journalistic mediation has created an environment increasingly vulnerable to propaganda, a trend further amplified by overlapping crises such as the refugee situation, the COVID-19 pandemic, and Russia's war in Ukraine. Structural weaknesses within the media sector, including insufficient professional training, limited institutional investment, and the instrumental use of disinformation by some media actors for strategic or private gain, further hinder the effective enforcement of professional standards.

Journalists' strategies to combat disinformation

When asked to reflect on strategies to combat disinformation, the respondents introduced a couple of new problems in the analysis. One idea expressed in the interviews is that the challenge is not so much the recognition or the identification of fake news, but the lack of active resistance on behalf of the journalists to spread disinformation, even in cases in which the owners of the media might be pushing for it (practically all respondents refer to the role of journalists in that respect). Secondly, there have been open campaigns and bullying against journalists and/or fact-checking institutions (Interviewee 6).

Respondents (practically all but specifically Interviewees 3, 4, 6, and 8) agree that the anti-disinformation practices align with traditional journalistic standards, which require thorough fact-checking, involving expertise and using new technologies to facilitate that task. Generally, the study found that the media under review have no officially established procedures or a strategy for fact-checking. The responsibility was placed on the journalists, their use of instruments to check images and sources, their willingness to rely on the expertise and experience of other journalists, and their willingness to compare sources and agencies.

The opinions converge that the personal responsibility of individual journalists plays the most crucial role, which is why most of the strategies to combat disinformation involve internal training that aims not only to increase the competencies of journalists (also with regards to identifying disinformation) but also to highlight the ethics and the professional standards that are crucial for addressing the problems related to disinformation. In light of these findings, we should point to the BNR, which developed an internal academy, with most of the other media developing similar training. The Association of European Journalists and *factcheck.bg* have developed a number of training sessions specifically dedicated to disinformation and media literacy for external stakeholders.

An important aspect of journalistic strategies was highlighted in a discussion with the interviewees about the *fact-checking rubrics* that the mainstream media (BNT and BNR) have established. There is general agreement on the importance of such activities, which are positively evaluated by all of the respondents; however, the question of adherence to journalistic standards is still raised in that context (Interviewee 7). The central concern regarding fact-checking rubrics is whether they stem from a genuine, deliberate strategy to counter disinformation or function primarily as a performative measure aimed at maintaining a positive public image. Respondents drew attention to the fact that, particularly in live interview settings, a noticeable discrepancy can be observed between the systematic verification of information originating from social media – where fact-checking initiatives are most commonly applied – and journalists' reluctance to directly challenge disinformation when it emerges in real time, whether in the studio or during event coverage within their own programmes. It is important to focus on re-establishing a firm policy focusing on journalistic freedom, allowing the journalist to express doubt and to choose their guests not purely for the sake of providing an "alternative" view, but for the purpose of informing, and/or educating the public by contextualising current event (McNair, 2011, p. 19–20).

There is comparatively more confidence in the external (to media) fact-checking services, which are seen by the respondents as a reliable source of information. However, as these initiatives operate outside the core news-production process, they have limited influence on how and where news is reported. Instead, they are primarily recognised as a positive development in terms of engaging external stakeholders. At the same time, issues related to financing – particularly long-term sustainability and the risk of external influence, including the careful selection of funding sources – require explicit and continued attention. The EU is recognised universally by journalists as one of the sources that guarantees such independence. Furthermore, the fact-checking formats are viewed as static. Respondents (Interviewees 6,7, and 8) identify the urgent need for these formats to exit the field of pure information and find a more attractive way to present their findings – videos, reels, explainers, etc. The aim behind such proposals is to offer not only truthful but also attractive and easy-to-consume content. A good practice is the partnership established between *Factcheck.bg* and one of the main private television channels (NovaTV) in Bulgaria in order to overcome that challenge.

However, respondents (Interviewees 2, 5, 6, and 8) express doubts that there will be an increase in the need for quality journalism in Bulgaria. Unlike global tendencies, a survey by the Reuters Institute is mentioned, according to which trust in social media is on the rise in Bulgaria, while trust in traditional media declines. All respondents therefore emphasise that the anti-disinformation practices need to be paired with investments in civic education and media literacy. In light of the above, it was argued that we need to change how we think of quality journalism. New and more attractive forms of how content is prepared and communicated in order to meet the expectations of a new type of citizen need to be developed.

The journalistic guild is divided almost evenly between journalists who know and have participated in international journalistic networks on the topic of disinformation and those who have not heard or participated in such collaborations. Some of the respondents (Interviewees 6 and 8) referred to the *Science+* network, a collaborative initiative focused on Central and Eastern Europe. The network initially emerged in response to disinformation related to scientific topics, such as COVID-19, and has since expanded to address a broader range of issues. In addition, *factcheck.bg* has collaborated with various organisations on specific topics, including the conflict in Gaza and the Ukrainian platform *StopFake*. The value of these cooperation initiatives for the respondents is in combining efforts and reducing the cost of overcoming narratives that are identical (Interviewees 6 and 8). Also, gaining access to journalists with extensive knowledge of the context as well as the local language is paramount for the fact-checking activity (Interviewees 6 and 8).

Going beyond the fact-checking service, the value of such networks is seen mainly in education, sharing good practices and the internalisation of traditional journalistic practices. These need to be internalised and become deliberate media policy. The pressure and the experience coming from such international collaboration may have a beneficial effect in developing media standards and policies in that area. However, there is a shared sentiment among all of the participants that such activities need not be too formalised, imposed from above, or become too dependent on regulations and financing restrictions and/or incentives. Instead, anti-disinformation activities should be driven by the self-initiative of journalists and the integration of media organisations into relevant networks. Even if it is recognised that "we need a network to fight a network", the respondents realise that such networks are perceived ambiguously in the Bulgarian context – as part of the conspiracy to manipulate the Bulgarian public space, a network of control and hiding the "truth". While there is an organised effort in building a comprehensive structure of instruments to spread disinformation (as shown above), it remains invisible to the larger population. Any organised effort to create an anti-disinformation network, however, is highly public. The combination of distrust in mainstream media and governmental institutions with circling conspiracy narratives undermines the efforts to establish a trusted "fake news" debunking authority.

Thus, the focus needs to be placed on internalisation of skills, professional standards and combining efforts of strengthening investigative and quality journalism, instead of viewing such collaborations as something extraordinary. Just like

with the anti-disinformation strategies, the solution is sought in the traditional old-fashioned journalism rather than in new and magical solutions.

Key stakeholders' perceptions of solutions to disinformation

As noted earlier, the CEM has a narrowly defined regulatory role, limited mainly to monitoring media content for compliance with licensing requirements and existing legislation. It operates under the Radio and Television Act (1998), which is widely regarded as outdated and poorly aligned with the contemporary media environment. Although the Council is now a full member of the European Board for Media Services and is expected to play a role under the European Media Freedom Act, its effectiveness remains constrained by the existing legal framework.

A key structural problem is that the current legislation focuses primarily on radio and television, while digital platforms and social media have become central to information dissemination and disinformation. This regulatory gap has complicated the implementation of the DSA, which, as an EU regulation, applies directly but still requires the clear allocation of powers at the national level. In Bulgaria, several draft laws were introduced in late 2023 and consolidated into a single legislative proposal in early 2024, but progress stalled due to political instability and elections. Although the law was eventually adopted in November 2025 and the CRC was designated as the national digital services coordinator, the absence of clearly defined powers meant that the Commission was unable to carry out its responsibilities during the reporting period.

Furthermore, all our respondents acknowledge that the current laws give CEM only limited power – the institution is underfunded. As a result, the low salaries make it difficult to retain qualified staff. Currently, the changes drafted in the RTA and EMA with regard to the functions of CEM in relation to DSA have been introduced to the Parliament, but both DSA and the Media Freedom Act have still not been fully implemented. Moreover, the changes hardly address the capability issue related to the functioning of the regulators,

A possibility to be explored when it comes to further regulation is to build CEM's capacity to serve as a mediator between fact-checkers and the media. Creating a platform in which fact-checking information can be systematised and organised in order to utilise both Bulgarian and European resources in that field. However, such an initiative has not seen significant internal support in the regulator itself, nor in the political arena.

CEM's role has been to conduct targeted monitoring of cases concerning compliance with their legal status (in particular, whether the Law on Radio and Television is being observed). In addition, the regulator reviewed specific broadcasts related to disinformation and hate speech, notably episodes of *Politically Incorrect*, hosted by Petar Volgin. Nevertheless, these reviews were not followed by taking any action. The institution also tried to put emphasis on the problem with a number of discussions highlighting the importance of the issue; however, its capacity is limited by its limited legal authority. Within its legal competences, CEM has also been involved in several Media literacy campaigns, such as developing guidelines

on how the media should use AI. They also developed official guidelines on how children should consume online media and what the recommended screen time is, together with a broad range of stakeholders, producing a document as an attempt to start a process of turning this campaign into a state policy.

As far as the institutional setting is concerned, the roles of CEM and the Commission for Personal Data Protection and the Commission for the Regulation of Messages will have to be clearly defined in relation to the new European legislation. Europe pioneered the thinking on how to deal with these challenges – "the legislation with regards the AI, the Code of Practice on Disinformation, the Digital Services Act, the Freedom of the Media Act" (Interviewee 9). As noted above, Bulgaria has legislative amendments pending since 2024. Logically, however, the regulatory framework will be as important as the implementation of the regulation and the established practice for dealing with the problem. Especially when it comes to trying to fight off disinformation and harmful content in the online space.

Unlike the journalistic belief in the profession as a remedy, the stakeholders (Interviewee 9) express a strong pessimism about the future of journalism in Bulgaria, highlighting the increasing financial precarity of news organisations and the lack of a stable and sustainable business model. Logically, the solutions suggested here go more in line with systematic and principle-based financing of independent media, as an instrument to ensure quality and ethical journalism. Even if not directly linked to disinformation, it will be extremely effective in combating it. Bulgaria has formally established a Radio and Television Fund, but in practice, it is not functioning. In order to deal with issues of governmental control, censorship and favourable content imposition, establishing such a fund on an EU level will be even more effective (Interviewee 9).

Both journalists and stakeholders place great value on an educational reform that incorporates media literacy as a crucial element in building resilience against disinformation. While the crucial role of all media organisations and civil society in combating disinformation is recognised, an effective instrument to address the issue of disinformation requires a proactive governmental strategic communication that addresses misleading narratives in the early stages of their development.

A key concern raised by both journalists and stakeholders is finding the balance between combating disinformation and imposing censorship. Setting standards for content regulation that do not risk harming freedom of speech is a difficult task, which compromises the legitimacy of such regulation, especially when dealing with opinions that might be deemed harmful. The effectiveness of any measure should be considered carefully against the protection of freedom of speech. An example derived from the Bulgarian case is the review by CEM against the broadcaster Volgin. While there have been numerous complaints, and CEM has managed to start an investigation, the main dilemma remains – how to legally and ethically stop such practices, even if there is evidence that they do not serve the public good. There are still no adequate responses to this regulatory challenge in the case of Bulgaria.

Overall, efforts by the CEM have been made to find a collaborative approach, establishing a strong mechanism for information sharing and collaboration between

fact-checkers, media organisations, and regulatory bodies, while pointing to a need for a unified platform to coordinate fact-checking efforts, rather than duplication of work across different entities. Within the regulatory body, European Regulators Group for Audiovisual Media Services (ERGA) is seen as an agency that facilitates the exchange of information and good practices.

A notable example of good practice in countering disinformation can be found in the work of the Human and Social Studies Foundation (HSSF). As already mentioned earlier, HSSF first exposed the existence and scale of the so-called "machine of mushroom websites" in its 2022 report, published in early 2023, and subsequently monitored its operation in detail through its quarterly bulletins. From the end of 2023, the issue began to receive broader attention not only from Bulgarian and international media but also from research organisations. These included the Center for the Study of Democracy, which traced ownership links between several domains, as well as Georgi Angelov from Radio Free Europe and the Atlantic Council's DFRLab, which focused on the network's activity on Facebook and other social media platforms.

This growing publicity significantly increased pressure on the network, prompting those managing the "mushroom" websites to adjust their behaviour. By late 2023, they attempted to rebalance their content, and in early 2024, they began actively deleting Russian propaganda materials. Pressure intensified further after an interview (conducted on February 24, 2024) on BNR, in which Dimitar Vatsov explained the origins of the network and linked it to earlier waves of Russian propaganda in Bulgaria. Three days later, Delian Peevski formally notified the Ministry of Interior, the SANS, and the prosecutor's office, leading SANS to launch a full investigation. While no official findings have been made public, the network's conduct in 2024 suggests the impact of these actions: It removed earlier pro-Russian content, ceased publishing on Russia after April 3, 2024, shifted towards attacking Peevski's political opponents, and ultimately appears to have ceased operations by October–November 2024 (Human and Social Studies Foundation, 2024).

The analysis demonstrates that strategies to counter disinformation in Bulgaria remain fragmented and fragile, and that they rely heavily on individual journalistic responsibility rather than on systemic safeguards. Journalists generally locate the remedy in the preservation of traditional professional standards, including rigorous fact-checking, ethical reporting, and editorial independence. Stakeholders, by contrast, emphasise the need for structural solutions such as sustainable financing, updated regulatory frameworks, and proactive strategic communication. Both perspectives nevertheless converge on the importance of media literacy and education as a long-term investment in societal resilience.

Despite the presence of some encouraging practices, including the development of internal training programs, the establishment of fact-checking rubrics, partnerships with external verification initiatives, and participation in international collaborations, these efforts often lack institutional anchoring and consistent application. A key weakness is the absence of comprehensive media policies. Fact-checking remains largely reactive and uneven in its implementation, regulatory bodies such as CEM continue to operate under outdated legislation with limited capacity, and viable

business models for independent journalism remain underdeveloped. The erosion of public trust in traditional media, combined with the growing reliance on social media as a primary source of information, further exacerbates these challenges.

Conclusion

The Bulgarian case highlights the profound challenges that journalism faces in navigating the conditions of post-truth politics in new and fragile democracies, which we consider Bulgaria to be representative of. Structural vulnerabilities in the media system – ranging from high ownership concentration and political parallelism to financial dependence on state and EU advertising – create fertile ground for disinformation and weaken journalism's critical function in society. These conditions are compounded by long-standing historical legacies, particularly pro-Russian sentiment and the authoritarian patterns of Bulgaria's communist past, which continue to shape both public attitudes and the resilience of institutions against propaganda.

Regulatory institutions (CEM and CRC) lack independence and effectiveness, being subject to political quotas and instability. Implementation of the EU DSA has been stalled by weak institutional capacity and Bulgaria's prolonged political crisis, which has prevented needed legislative reforms. Disinformation, particularly Russian propaganda amplified by populist actors, further distorts the information environment. Although Bulgaria has slightly improved its press freedom ranking, systemic risks persist: Poor safeguards for editorial autonomy, politicised regulation, lack of ownership transparency, and high market concentration all continue to endanger media pluralism and democracy.

Journalists themselves are acutely aware of the dangers posed by disinformation, often framing it as a coordinated campaign with harmful intent rather than merely inaccurate reporting. Yet their capacity to resist these pressures is constrained by systemic problems: precarious funding models, limited investment in professional training, restrictive newsroom cultures, and weak legal protections. As a result, the profession risks further de-professionalisation, with journalistic gatekeeping giving way to the rapid circulation of unverified content.

The study found a growing recognition of the importance of professional standards rooted in traditional journalistic ethics – such as rigorous fact-checking, reliance on expertise, and ethical responsibility. Initiatives such as the BNR's internal academy and fact-checking training programs by the Association of European Journalists and factcheck.bg are important responses. While fact-checking initiatives and professional standards remain important bulwarks, their impact is hindered by a lack of institutional support and uneven adoption across the sector. Innovative and visually engaging formats (e.g., explainers and reels) are increasingly seen as necessary to effectively counter disinformation and reach younger or disengaged audiences.

The protection of journalists and the safeguarding of freedom of expression represent further priority areas. The adoption of anti-SLAPP legislation would constitute a significant step towards preventing intimidation through litigation, while reforms in

defamation law are needed to align national practice with ECHR standards. Measures aimed at enhancing the digital safety of journalists and reducing the climate of self-censorship would further strengthen the democratic function of the press.

Addressing the challenges facing the Bulgarian media sector requires a combination of regulatory, financial, and institutional reforms. A central issue is the high level of media concentration and lack of transparency in ownership structures, particularly in the online sector. To mitigate these risks, it is necessary to develop a sector-specific legal framework on media market concentration and to enforce stricter rules on the mandatory disclosure of media ownership. Such measures would enhance transparency and allow for more effective monitoring of plurality in the media landscape.

The independence and effectiveness of regulatory institutions such as the CEM and the CRC must be reinforced. The CEM, currently operating under a political quota system, requires restructuring to safeguard its independence and, consequently, the editorial autonomy of public broadcasters. Legislative reforms should also be advanced to strengthen the institutional capacity of both the CEM and the CRC, particularly in light of their role in implementing the European DSA. Without these reforms, the bodies responsible for monitoring and regulating the media will remain ineffective and politically compromised.

Financial reforms are equally vital: Transparent allocation of state advertising and the introduction of subsidies or other forms of support for local and regional outlets would reduce political dependence and enhance pluralism. The financial reforms are largely attributed to European independent sources, guaranteeing the transparency and sustainability of such efforts.

Finally, the fight against disinformation on the European level requires not only regulatory oversight but also sustained investment in civic education, media literacy, and professional training for journalists, alongside more engaging formats for fact-checking that can reach new audiences.

From a broader perspective, the Bulgarian experience illustrates the entanglement of journalism and disinformation in the age of post-truth politics in a country where media independence and freedom rank lower. In a fragile democracy, disinformation not only distorts public narratives but also undermines journalism's legitimacy, public trust, and capacity to serve as a democratic safeguard. The Bulgarian case thus confirms that in post-truth conditions, vulnerabilities in media structures and professional practice are systematically exploited, while crises accelerate the spread of propaganda and anti-democratic narratives.

The extent of Europeanisation in the Bulgarian media landscape demonstrates both the promise and the limitations of the EU's norm diffusion as a corrective force. Formal alignment (transfer of norms) with European legislation – through the DSA, the Media Freedom Act, and participation in European regulatory networks – has shaped discourse and institutional agendas. However, political instability, resource constraints, and entrenched domestic practices have delayed or undermined their adaptation and internalisation. Thus, Europeanisation is visible primarily at the formal and discursive level, while its transformative impact on journalistic practice and media independence remains partial and incomplete.

Taken together, these findings underscore the need to reconceptualise journalism's role in an era marked by disinformation and declining trust. Combating disinformation in Bulgaria requires moving beyond isolated initiatives towards a more integrated approach that combines journalist-driven professional standards with structural reforms in regulation, financing, and education. Building resilience requires not only regulatory reform and European-level support but also a reinvestment in journalism as a profession grounded in ethics, expertise, and public responsibility. Building sustainable platforms for collaboration among journalists, fact-checkers, regulators, and civil society will be essential to reducing duplication, enhancing credibility, and strengthening democratic resilience. The Bulgarian case demonstrates that without such commitments, journalism risks further erosion under the pressures of post-truth politics – an outcome that has profound implications not only for Bulgaria but for the health of democracy across Europe.

Notes

1 Electronic Communications Act, Republic of Bulgaria, available at: https://www.cem.bg/infoen/83
2 Protection of Competition Act, Ministry of Finance, Republic of Bulgaria, available at: https://www.minfin.bg/upload/39100/Protection_of_Competition_Act.pdf
3 Petar Volgin is a long-standing radio host and journalist, especially known for his work at Bulgarian National Radio (BNR). He became controversial with his radio talk show *Politically Incorrect*, where he pushed openly pro-Russian, often xenophobic and anti-EU narratives. Currently, he is a Member of the European Parliament from the pro-Russian party Vuzrajdane.

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Appendix

List of Interviewees:

Interview Code	*Position/Role*	*Organisation*	*Date*	*Mode*
Interviewee 1	Reporter/part of the fact-checking service	Electronic media	22.02.2024	Zoom
Interviewee 2	Editor	Internet media	23.02.2024	In person
Interviewee 3	Producer	Electronic media	23.02.2024	Zoom
Interviewee 4	Deputy Chief Editor	Monthly journal	23.02.2024	In person
Interviewee 5	Editor-in-Chief	Daily journal, Internet media/ freelancer	24.02.2024	Zoom
Interviewee 6	Host – publicist,	Electronic media, freelancer	27.02.2024	Zoom
Interviewee 7	Reporter, Host – publicist	Electronic media	27.02.2024	Zoom
Interviewee 8	Editor in Chief/ Assistant Professor	Fact-check organisation/ University professor	01.03.2024	Zoom
Interviewee 9	Member	Regulatory body	10.12.2024	In person
Interviewee 10	Podcast Host	Internet media	15.12.2025	Zoom
Interviewee 11	Journalist, University Professor	Electronic media, freelance journalist	16.12.2025	Zoom
Interviewee 12	Expert	University Professor	05.12.2025	Zoom

Conclusion

Stakeholder perceptions, Europeanised norms and where we should go from here

Martin Moland, Jacopo Custodi, Hans-Jörg Trenz and Tine Elisabeth Brøgger

Returning to the questions posed in the introduction, this concluding chapter asks what this book's analysis reveals about Europe's ability to respond to post-truth politics while sustaining media freedom and pluralism. Across seven distinct media systems, the chapters in this book trace how journalists and media regulators navigate disinformation, digital platforms and evolving political and economic pressures within their national contexts yet increasingly do so within an expanding European framework. Taken together, the case studies show journalists grappling with accelerated production cycles, fragile business models and declining public trust, while regulators operate within an expanding European Union (EU) legal framework for media pluralism and information integrity. The resulting picture is not one of neat convergence or simple divergence, but of patterned pluralism: Similar problems and repertoires recurring across different settings yet refracted through long-standing media traditions and institutional capacities.

However, the book's aim goes beyond simple description. It sought to evaluate whether key stakeholders in journalism and media across the countries studied conceptualise post-truth politics – and its potential policy responses – in ways that align with Europeanisation as a process of norm diffusion and creation. In doing so, it contributes not only to debates on EU member states' compliance with European law and how such compliance differs across countries (Börzel, 2021; Zhelyazkova et al., 2016), but also to a broader assessment of the post-truth challenge: How it is normatively interpreted by key actors in the field, which solutions they propose to combat disinformation, and how they understand Europe as a community of values and democracy.

We find evidence that both the definition of the problem and its normative implications, as well as the policy responses offered to combat post-truth politics, are becoming increasingly Europeanised in normative terms among journalists and media actors. In other words, even in the absence of a fully consolidated European regulatory framework on disinformation, a European "way of thinking" around these issues appears to be emerging.

In what follows, we briefly assess some of the perceptions of journalists across countries, as well as those of regulators tasked with the national implementation of EU policies. Overall, our findings point to a Europeanisation of norms that is substantial but uneven: Problem definitions and preferred solutions converge across

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media systems, yet EU-level standards are far more deeply embedded in regulatory arenas than in everyday newsroom practice. Finally, we briefly outline the normative and policy implications that could help mitigate the challenges posed by post-truth dynamics in the public sphere.

Europeanisation as norm diffusion and promotion: Journalists' perceptions of post-truth and its challenges

The chapters in this book present empirical studies from a range of countries that differ in state–media relations, reading habits and their relationship with the EU. Taken together, these case studies point to a growing convergence among media actors across member states in how they define and problematise disinformation and fake news and, albeit to a lesser extent, in the solutions they regard as desirable. This finding is consistent with the definition of norm diffusion as not only legal harmonisation, but also as a process through which EU-level values, norms and rules are translated, albeit unevenly, into national practices and professional understandings (Schimmelfennig, 2010). In addition to norm diffusion, we also find that media actors are defining their role more actively as norm entrepreneurs promoting an updated vision of journalism's role in democracy and how it can meet the challenges of the digital age.

The convergence on normative standards is evident in how the journalists we interviewed frame the challenges posed by disinformation and fake news. Rather than calling for a wholesale reinvention of journalism, they argue that future media institutions should double down on traditional professional values such as accuracy, independence and contextualisation. Crucially, this shared understanding of journalism's democratic role, echoed by policymakers across different EU member states, is mobilised proactively to present high-quality journalism as the best response to disinformation and post-truth politics. This is reflected in a broad consensus that news organisations must strengthen core routines such as double-checking sources, triangulating information and incorporating additional perspectives on current events.

This form of norm promotion suggests a Europeanisation in the form of shared ideas, problem perceptions and joint solutions, which has occurred even as the EU's regulatory response to these issues has remained relatively limited. In this sense, journalists do not merely absorb EU-level norms; they reaffirm and promote professional standards that increasingly align with the EU's emerging regulatory agenda. This process includes redefining the rights of European citizens in relation to big tech companies and strengthening the regulatory competence of the EU and other transnational agencies.

Despite significant geographical, historical, political and cultural differences, professional journalists across member states articulate remarkably similar views of their role. Precisely because the professional standards governing journalism's functioning in a democracy are already quite established and widely recognised across Europe, Europeanisation in this field appears less as norm diffusion than as norm promotion. This shared normative vision is crucial for redefining journalism's

role in the age of digital democracy, particularly when formulating policies that align with principles of sound information governance and media freedom.

Journalists across the countries we studied also described themselves as confronting many of the same challenges in their daily work. Many identified the deteriorating financial situation of media organisations (Franklin, 2014; Olsen et al., 2024) as a key driver of the spread of disinformation and fake news. They frequently pointed to a mechanism linking growing financial precarity to more prominent post-truth discourses: An ever-faster news cycle that leaves journalists with less time for reporting before publication. This, in turn, means less time to do the legwork needed to fact-check statements and seek out complementary sources. What emerges is a shared worry that current media economics are pushing them away from a watchdog role and towards a more reactive observer role (Willnat et al., 2019).

Another sign of a converging problem description concerns social media. Many of the journalists we interviewed identified social platforms as one of the main vectors for the spread of post-truth discourses. They saw them as crucial channels through which hostile states, commercial interests and other non-state actors disseminate false information. Journalists also described social media as a key reason why disinformation and fake news now circulate more easily than in the pre-digital era, due in particular to the algorithmic tailoring of content distribution.

The journalists expressed the greatest support for expanding EU regulatory competences with respect to the regulation of social media companies and digital technologies. Once again, we see a process of norm promotion, rather than norm diffusion, as the objective of the measures they propose is to extend the standards of professional journalism also to social media. While the journalists we interviewed suggested a range of possible policy measures, from more European funding for quality journalism to outright criminalisation of disinformation and fake news, what united them was the support for EU intervention to address disinformation on social media. This position was underpinned by the belief that national governments lack the capacity to effectively regulate powerful transnational digital conglomerates, thereby reinforcing the perception of the EU as a more capable supranational regulatory authority. Some journalists commended the EU for measures already implemented in this domain, such as the Digital Services Act (DSA), while others were only superficially familiar with these initiatives and regarded them as positive but of limited practical effect. Nevertheless, most acknowledged the merits of these measures and simultaneously called for more robust and impactful EU action in this direction. For example, some journalists contended that European digital regulations should move beyond simply requiring major platforms to filter disinformation, as such an approach risks further consolidating these platforms' power. Instead, they called for complementing this regulatory framework with stronger public oversight of algorithms. In their view, algorithms are deliberately designed to amplify polarising content by prioritising engagement over accuracy and balance. This dynamic, they argued, exacerbates harmful trends in the media landscape, including the spread of clickbait, the growing reliance on polarising and emotionally charged language to maintain profitability, and an overall decline in the quality of news coverage.

We thus find evidence of Europeanisation along two dimensions. First, journalists across several of the member states share overlapping values and goals that guide their professional practice. The journalists are clear that they see their jobs as being about finding truth, even as they navigate multiple conflicting accounts of current events and put established facts in a broader context. Policies that enable reporters to properly fulfil this more investigative function of their multiple professional roles are likely to be seen as both highly legitimate and desirable by journalists as policy stakeholders. Secondly, we find evidence of what we call a Europeanised problem description and solution. The one factor that is pointed to with the greatest frequency is the emergence of social media networks that allow for the algorithmically tailored dissemination of fake news and disinformation, and that the EU should play a part in combating it. Similarly, the emergence of the online news ecosystem is identified as a key reason why journalists have less time to produce quality journalism.

Implementation of the Digital Services Act and the European Media Freedom Act

The preceding section discussed evidence of norm diffusion and norm promotion among journalists, who increasingly adopt similar perceptions of the key problems posed by post-truth politics and similar views on how to address them. However, our empirical chapters also reveal a distinct – and in some respects more advanced – Europeanisation of ideas and norms among national media regulators and policymakers. This form of Europeanisation applies both to the belief that the EU should play a role in addressing disinformation, and to the ways these issues are framed and debated in national political arenas.

This book shows that, like journalists, national regulators and civil servants look to the EU to tackle the transnational challenges created by the spread of fake news and disinformation. Regulators see themselves as part of a Europeanised administrative system (Trondal, 2025) in which goals and policies stem not only from national political leadership but also from European-level initiatives. They are deeply engaged with recent regulations, in particular the DSA and the European Media Freedom Act (EMFA), and see themselves in their role as implementers of EU rules as part of a broader European project to safeguard democracy in the digital age.

Interestingly, this embeddedness also characterises the only non-EU states included in our empirical study. Norway and Iceland have yet to fully adopt and implement the DSA and EMFA, which means we could not examine their translation into domestic regulation. Nonetheless, we see a clear Europeanisation of norms among media actors there as well. In Norway, for example, the fact that both acts arguably lie outside the scope of the country's formal agreements with the EU has not prevented the government from seeking ways to implement the DSA in national law. As the country chapter shows, Norwegian authorities regard compliance with the act as important for their broader relationship with the EU, illustrating how Europeanisation can extend beyond formal membership.

The media systems in Croatia, Poland and Bulgaria differ markedly from those of the more consolidated democracies in our sample. Croatia's media system has been characterised as a "politicised media model", with low democratic standards, a high degree of politicisation of public broadcasting, and substantial control over public radio and television by political actors (Dobek-Ostrowska, 2015). Similar concerns appear in the Polish case. One might therefore expect key stakeholders in these fragile democracies to conceptualise post-truth politics in very different terms. However, interviews with key stakeholders suggest that Europeanised problem descriptions and solutions are crucial in these contexts as well. Post-truth politics and disinformation are defined primarily as coordinated campaigns with harmful intent, rather than as mere inaccuracies in reporting. At the same time, interviewees in these countries emphasise particular vulnerabilities that flow from fragile democratic institutions: They highlight the need for journalistic education and training, stronger legal protections, better working conditions and enhanced personal safety – all understood as prerequisites for providing high-integrity information.

Evidence from Spain and Italy also reveals a striking internal differentiation within media systems. Journalists are, for the most part, unfamiliar with the details of the DSA and EMFA, whereas professionals in regulatory bodies are highly informed. This discrepancy reflects different roles: Regulators work in environments that require expertise in media law and EU regulation, while journalists are primarily concerned with day-to-day news production. Conversely, the fact that journalists' views on how to combat disinformation are broadly similar both within and across the seven states we studied is indicative of norm diffusion that cuts across very different media systems, democratic trajectories and relationships with the EU. Overall, this pattern points to a Europeanisation of norms that is institutionalised and diffused, yet only weakly internalised at the professional level. EU-level standards are visible and operational among regulators and policymakers and, to a lesser extent, in broader professional cultures, but remain only thinly embedded in newsroom routines and everyday journalistic work.

Even where the EU is regarded as an important venue for tackling disinformation and fake news, our study also highlights the risk of "differentiated implementation" of common rules(Princen et al., 2022; Zhelyazkova et al., 2016). This concern is particularly evident in the case of affiliated non-members such as Norway and Iceland, but it is also relevant within the EU, where regulations must be implemented in countries with divergent traditions of press freedom, media economics and state–media relations. This makes it difficult for the EU to articulate a coherent policy agenda that can be applied uniformly across contexts.

A further complexity arises from the fact that the EMFA and the DSA, although formally regulations, are in some respects sui generis – functioning, as one national regulator put it, as "regulation-directives". The EMFA, for instance, sets out binding principles and obligations for member states while granting them some discretion in how to comply. Although the enforcement of these regulations does not require formal transposition, as is the case for directives, it often necessitates targeted adjustments to national laws, procedures and the mandates of domestic authorities. The effective implementation of principles such as ensuring the independence of public

broadcasters frequently requires new parliamentary legislation and therefore depends on how these principles are interpreted in national political contexts.

While differentiated implementation is not inherently problematic, it must not become a pretext for outright non-compliance with EU rules designed to strengthen media freedom and protect citizens' digital rights. This concern is particularly salient against the backdrop of democratic backsliding in some EU countries. In Hungary, for example, the government has amended media ownership laws in ways that allow numerous outlets to be consolidated under strongly pro-government control (Griffen, 2020). Although Hungary is not among our case studies, it vividly illustrates that some member states may be prepared to erode press freedom in ways that hinder efforts to combat post-truth politics.

Regulating the public sphere: Key challenges and opportunities

This book's empirical findings suggest several policy directions likely to be both effective and perceived as legitimate. First, they highlight the importance of confronting the structural conditions that make media systems vulnerable to disinformation. Accelerated news cycles, precarious employment and weakened editing routines are not merely side effects of digitalisation; they are central mechanisms through which mis- and disinformation enter mainstream news. Policies that stabilise the economic foundations of independent media, support investigative reporting and strengthen editorial safeguards should therefore be understood as core instruments of disinformation policy, not as peripheral cultural subsidies.

Second, the chapters suggest that financial support for quality journalism should be understood as a European responsibility. Member states differ widely in their capacity and willingness to address the market failures that characterise today's media economics. Market-corrective measures in the media and communications sector have become necessary not only to tackle inequalities and high levels of ownership concentration, but also to safeguard pluralism and democratic life in the EU and its member states. This is part of Europeanisation as norm-setting and promotion: A shift away from a purely market logic that rewards attention-maximising content towards an assessment of how journalism contributes to democratic citizenship (Murschetz, 2020; Walters, 2022).

Designing such democracy-enhancing mechanisms is not straightforward. To be effective, they must meet two preconditions. First, they need to be sensitive to the path dependencies of national media policy frameworks, including existing traditions of public funding for media and long-standing relationships between the state and professional journalists. Second, the criteria for allocating funding must promote journalism that is highly independent from the governments it covers, as well as from major commercial interests, and oriented primarily towards informing – rather than merely entertaining – its audience (Murschetz, 2020). The most realistic way to strengthen such programmes, even in countries with little prior experience of public funding for media, is to channel resources through national institutions that already hold a media policy mandate, while coupling this national infrastructure with pan-European criteria designed to protect and enhance

independent, pluralistic and critical journalism. This is essential to prevent member states from using European funds to bolster pro-government media outlets.

Bolstering the economic stability of independent media is not only a matter of improving journalists' working conditions. It also strengthens the epistemic rights of ordinary citizens (Nieminen, 2024), understood as their right to information about what is happening in the society they belong to. Citizens' right to information about society that enables them to participate meaningfully in democratic processes is a bedrock principle of both EU transparency law and the EU's regulatory approach to combating online disinformation and fake news (Bouza García & Oleart, 2024; Roberts, 2002). Our argument is that strengthening high-quality journalism for all Europeans will enhance citizens' access to these epistemic rights, which are critical for a functioning democratic society. This involves deepening the legal force of the EU's regulatory approach to social media – centred on rights, transparency and accountability – and extending it to the broader news and information ecosystem.

Moreover, artificial intelligence is poised to unsettle many of these issues once again. The governance of generative AI and algorithmic systems will be central to Europe's response to post-truth politics. The regulatory challenges stemming from generative AI are substantial: As Becker et al. (2025) show, news organisations have begun to adopt AI policies, but these remain fragmented; and as Tallberg et al. (2024) argue, AI regulation in the EU is shaped by complex interactions between states and non-state actors that are largely non-European. Journalists in our study are only beginning to reflect on how their own use of, for instance, AI-powered search engines and automated tools may affect sourcing, verification and bias. Addressing this requires not only regulating large platforms but also developing professional guidelines and support structures that help newsrooms integrate AI in ways that strengthen, rather than undermine, professional standards.

Ultimately, high-quality, fact-based journalism – while steering clear of absolutist claims to "truth" that could undermine pluralism – is vital to the public sphere and, by extension, to democratic health. In practical terms, when journalism declines in quality, democracy declines with it. At the same time, the pressures associated with "post-truth" politics are also generating renewed expectations for rigorous reporting and for the revitalisation of professional standards (Michailidou & Trenz, 2021). The findings of this book indicate that Europeanisation may contribute to the legal and normative conditions needed for such a renewal; whether this potential is realised, however, will hinge on Europe's capacity to convert institutional and normative commitments into the everyday routines, practices and responsibilities of journalism.

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