



# Joint Civil Society and Democracy Organisations' Priorities for the Defence of Democracy Package

March 2023

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## 1. Executive Summary

This paper contains the contributions and recommendations from 47 organisations based in Europe and active in the fields of democracy, human rights and the rule of law. In presenting our recommendations for an ambitious Defence of Democracy Package, we welcome the European Commission's initiative and underscore the need to take a wide view of how to defend our political systems.

On 13 September 2022, European Commission President Ursula von der Leyen announced that: **“We need to better shield ourselves from malign interference. This is why we will present a Defence of Democracy Package. It will bring covert foreign influence and shady funding to light. We will not allow any autocracy’s Trojan horses to attack our democracies from within.”**

We welcome the fact that discussions on the Defence of Democracy Package have expanded beyond an overwhelming emphasis on foreign interference. Challenges to democracy come from within Europe as well. We collectively insist that any measures made to tackle foreign interference, and in particular the proposal for legislation on common transparency and accountability standards for interest representation services directed or paid for from outside the EU and the legal form chosen (directive), must be made carefully and with due regard for international human rights law, the Charter of Fundamental Values, article 2 of the Treaty on European Union and European policy-making processes. Without clear assessments and definitions, there is a risk any proposal can be weaponised against pro-democratic actors by those seeking to undermine democracy. The risk is not theoretical - foreign interference has been used in many countries around the world already to stifle media, journalists, civil society and political opposition.

The European Commission should ensure that the legislative and non-legislative initiatives of the Package reinforce fundamental rights and go beyond reiterating existing policy initiatives. This contribution provides sets of recommendations in the following areas: civil society, civic space and active citizenship; European elections; disinformation; the online public sphere; independent media; and foreign interference.

We believe that effective action in all of these areas will be essential to protect democracy towards the 2024 European Parliament elections and they should therefore be covered by the Defence of Democracy Package.

### **We call on the Commission to:**

- Ensure a **pluralistic and open civil society space** by providing long-term, sustainable and operational funding, promoting the valuable work of civil society and removing the stigma attached to organisations receiving cross-border funding. The immense added value of civil society in defending Europe's fundamental rights values should be highlighted.

- Involve [citizens in decision-making processes and improve dialogue](#) with them by strengthening participatory democracy as a form of dialogue and co-creation at local, national and European level.
- Strengthen [civic education and confidence building](#) in the areas of active citizenship, democracy, European and national competences, populism, online and offline disinformation, news, media and digital literacy, EU fundamental rights and values, and respect for minorities. Develop innovative bottom-up approaches to engage citizens and effectively build on the recommendations of the Future of Europe Conference.
- Develop [regulatory options and non-regulatory support initiatives for the 2024 European Parliament elections and beyond](#), including non-legislative support for fair and ethical digital campaigning, cybersecurity in elections, political financing and practice sharing. The Commission should work closely with Member States to protect and expand the space for civil society organisations to monitor and report on electoral processes.
- Identify [vulnerabilities and risks around election information](#) and ensure context-appropriate measures. Ensure that the AI Act fully protects citizens from biometric mass surveillance, predictive policing and other practices that unduly restrict fundamental rights.
- Install a [standing, reinforced secretariat for the European Cooperation Network on Elections](#) and extend its role. This will complement the current ad-hoc cooperation, and facilitate more in-depth member state exchanges and expertise building including on new threats – digital, international, and domestic. Consider creating a similar European network that could be created for political finance oversight bodies.
- Consider [facilitating the adoption of a code of conduct for ethical online campaigning towards the 2024 European Parliament elections](#). The code could target European political parties, candidates and/or online platforms, following examples in various Member States. Agreeing on commitments for ethical online behaviour will complement the EU's planned rules for transparent online campaigning and foster citizens' trust in European elections.
- Enforce [existing legal frameworks in the fight against disinformation](#), including the General Data Protection Regulation (GDPR), the Digital Services Act (DSA) and the EU Code of Conduct on Disinformation. Actors who spread disinformation for financial or ideological reasons must be sanctioned in the same way as foreign actors who interfere in European democratic processes. All policy measures and legislative initiatives aimed at combating disinformation must be brought in line with fundamental rights and international human rights standards, and in particular the right to freedom of expression and information.

- Promote an [enabling environment for independent media](#) to flourish in Europe and beyond by building on the work on the Anti-SLAPP Directive and the proposed European Media Freedom Act. The protection of journalists and media professionals must be ensured through the establishment of independent, civil society-led regional reporting and monitoring platforms in all EU Member States. In times of geopolitical uncertainty, it is also crucial to better support journalists in exile and human rights defenders in the EU, while mainstreaming the promotion of quality journalism in the EU's external action.
- All efforts to [address foreign interference must be consistent with and protect fundamental human rights](#), including the right to transmit and receive information and the freedoms of assembly and association. Any measures that violate these laws in other jurisdictions, such as foreign agent registration laws, must be opposed. Dealing with and responding to hybrid threats to democracy must be coherent and comprehensive. As the defence of democracy begins at home, the focus should be on **strengthening the resilience of society as a whole to hybrid threats to democracy.**

## 2. Introduction

In 2023, democracy in the European Union and globally is once again facing various challenges. Russia's full-scale invasion of Ukraine has made the defence of democracy in Europe a top geopolitical, security and normative priority. At the same time, the still lingering economic consequences of the COVID-19 crisis and new economic uncertainties continue to test democracy on both socio-economic and political fronts.

Recent attacks on the foundations of democracy, such as the corruption scandal in the European Parliament, clearly demonstrate the need for more transparency at the EU level as well as the need for coordination and exchanges between EU Member States to foster the development of national frameworks. In view of the upcoming elections to the European Parliament in 2024 and beyond, the EU's commitment to defending democracy is more important than ever.

In 2022, the President of the European Commission, Ursula von der Leyen, unveiled plans for a new **Defence of Democracy Package** to deepen the actions of the European Democracy Action Plan (EDAP) by presenting a comprehensive framework and vision to protect European democracies and strengthen trust in the EU's values. The Package is an important opportunity for the EU to strengthen fundamental freedoms, civic space, free media and the rule of law as mutually reinforcing principles that underpin democracy.

The European Commission should ensure that the legislative and non-legislative initiatives of the Package are consistent and compliant with fundamental rights and international human rights law and go beyond reiterating existing policy initiatives. Ambitious policy innovations that provide a constructive follow-up to the EDAP, the EU rule of law reporting mechanism and the proposals of the Conference on the Future of Europe are urgently needed in the areas of **civic space and participation, disinformation and media literacy, news media and electoral processes**.

This paper contains the contributions, recommendations and approval of 47 organisations based in Europe and active in the fields of democracy, civil society, journalism, media and electoral support.

In presenting our recommendations for an ambitious Defence of Democracy Package, we welcome the European Commission's initiative, stress the importance of a structured and open civil dialogue and offer ourselves as resources and partners in defending democracy.

### 3. Contributors and co-signatories to the paper

Access Now

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Defend Democracy

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EDGE (Experts in Democracy, Governance and Elections)

Election-Watch.eu

EU DisinfoLab

European Association for Local Democracy (ALDA)

European Citizen Action Service (ECAS)

European Center for Not-for-Profit Law (ECNL)

European Digital Rights (EDRI)

European Federation of Journalists (EFJ)

European Movement International (EMI)

European Partnership for Democracy (EPD)

European Exchange (Europäischer Austausch gGmbH)

European Youth Forum (YFJ)

Foundation for European Progressive Studies (FEPS)

Fundacja Panoptikon

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Global Forum for Media Development (GFMD)

Green European Foundation (GEF)

Human Rights Cities Network

Hungarian Helsinki Committee

International Press Institute (IPI)

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Who Targets Me  
Young European Federalists (JEF)



## 4. Policy Recommendations

### 4.1. Civil Society, civic space and active citizenship

Civil society actors, who can act independently, are at the forefront of protecting and promoting stable democracy and human rights. They hold governments and EU institutions accountable by informing the public about policy debates that affect citizens' rights and quality of life, ensuring participatory access to decision-making, and strengthening, implementing and defending the rule of law. Civil society is also an important ally for the European institutions in developing and implementing citizen-centred policies. Policy-makers and institutions at all levels have a duty to enhance the resilience of civil society activism and, when needed, to protect human rights defenders. EU institutions also have a duty to implement civil dialogue as foreseen by art. 11.2 TEU.

In recent years civil society organisations (CSOs) are increasingly facing serious obstacles to perform their work, in some countries even experiencing or fearing retribution from state actors when expressing their views. Reports from public institutions, international organisations, and CSOs showcase how the enabling environment for civil society has been further deteriorating over the last years, also within the EU. In most cases, CSOs representing minorities or social groups face additional challenges - in the case of youth organisations, for example, young activists often lack established careers, financial opportunities and solid networks, making them more vulnerable to threats and retaliation.

The Defence of Democracy Package needs to guarantee a pluralistic and open civic space and secure the role of civil society and citizens' participation in EU democratic processes.

#### Key Recommendations

- Highlight the immense added value of associations and NGOs as a vivid component of democracy;
- Beyond consultations, reorganise civil dialogue (article 11.2 TEU) and organise it on an equal footing to social dialogue in the EU policy-making, in all areas of EU action and along all policy cycles. The European Commission should develop a Commission staff working document on the functioning and potential of European civil dialogue to bring coherence in the engagement practices across different DGs.
- Build the resilience of the civic sector through truly empowering funding policies which aim to shift the power to communities and those representing them, to ensure they respond to and meet real needs. EU funding policies for civil society should embed Human rights grant-making principles and principles of inclusive and participatory funding and budgeting;
- Focus and invest in civic education and trust building, especially in the field of digital democracy;
- Provide long-term, sustainable and operational funding for the development of a strong civil society that can promote European values. Project-based funding should include

provisions for indirect costs to ensure that CSOs can pay the material costs for their staff in accordance with national labour laws;

- Increase funding for initiatives to improve the training and capacity of policy makers in planning, implementing and evaluating participatory processes to engage citizens in policy making;
- Develop strategic partnerships with civil society organisations and umbrella organisations at European level to draw on expertise in training policy makers, planning and implementing participatory processes and reaching out to citizens;
- Promote and support the introduction of European labels in Member States, such as the Council of Europe's ELOGE programme, to encourage the assessment of local governance and the improvement of their capacities and knowledge;
- Reduce excessive bureaucratic hurdles for civil society access to EU funds to ensure that smaller civil society organisations, such as grassroots or youth organisations and initiatives, also have a chance to receive this support;
- Promote the good work of civil society organisations and address the stigma attached to non-government organisations receiving cross-border funding into a balanced and value-based approach;
- Make the transparency register mandatory for all persons who wish to meet officials of the European Commission, Members of the European Parliament or staff of the Permanent Representations of the Member States and ensure that the data is accurate and up to date;
- Implement the Council Conclusions on the application of the EU Charter of Fundamental Rights; The role of the civic space in protecting and promoting fundamental rights in the EU;
- Strengthen participatory democracy as a form of dialogue and co-creation with citizens at the local, national and European level;
- Improve the dialogue with citizens and young people in particular to discuss the future of Europe and to promote their participation in political processes. These spaces can take the form of consultation committees or citizens' assemblies;
- Approach democratic processes with an intergenerational perspective, starting with children and young people and ending with adults, by building partnerships with schools, educators and teachers in planning and implementing democratic processes aimed at them;
- Recognise the vital role of political foundations in bridging the gap between European institutions and citizens through the provision of political education and the promotion of promoting transnational spaces for political participation;
- Ensure an inclusive approach to democratic processes that takes into account the needs and aspirations of minorities;
- Step-up dialogue with local communities, both with local authorities and civil society with practice of citizens engagement and participatory democracy, following the lines of the Code of Good practices of citizens participation, of the Conference of the INGOs of the Council of Europe;
- Include 'umbrella' organisations on local democracy as leaders in the capacity building process for smaller organisations, with specially funded training and mentoring, and

onward funding.

#### 4.1.1. Initiatives, mechanisms and actions

- Make the European Citizens' Initiative (ECI) more accessible to all citizens by considering simpler and more uniform data requirements;
- Implement a clearer and more structured framework for civil society organisations and citizen participation by further implementing the actions enshrined in Article 11 of the Treaty on European Union;
- Expand the scope of the annual rule of law report by including a standalone chapter on the enabling environment for civil society, including country specific recommendations and follow up. Involve civil society, legal experts, journalists' organisations, media and other stakeholders. Regular reporting, as well as incident alerts should provide the European Commission with useful data for recommendations and, if appropriate, legal actions against governments violating EU law;
- Develop bottom-up and innovative formats for discussion that engage citizens, civil society experts and stakeholders from all sectors in the debate around Europe's future with focus on the follow-up of the consultations;
- Improve transparency of decisions made to assess the feedback received and accountability to the participants on how their different positions were balanced to inform the outcome/output of the consultation;
- Strengthen the tools and mechanisms for the protection of human rights defenders within the EU including emergency grants for the protection of HRDs at risk. The EU should build on lessons learned from external action programmes such as the old EIDHR programme, now NDICI, Protectdefenders.eu, the upcoming mechanism developed by DG INTPA to support civil society in external action, the Council of Europe platform for safety of journalist and the UN special procedures.
- Acknowledge and provide tailored support and safeguard mechanisms for specific sectors of civil society, such as youth organisations and minority rights organisations;
- Establish structured dialogue mechanisms between representative civil society platforms and relevant Directorate Generals and/or Executive Agencies on the implementation of EU programmes as a whole and related grants and funding streams in particular;
- As accessible and predictable funding is vital for civil society, there should be a reduction of the bureaucratic burden for European funding and the creation of a voluntary "Code of Practice" for national, private and philanthropic funders to standardise application and reporting procedures;
- Support the creation of safe online spaces for civil society to provide and receive help and expertise in responding to attacks or chilling effects; develop and support cross-border or national communities of vulnerable targeted CSOs (working with migrants, marginalised groups, on gender rights, etc.) to share

- best practices and resources in resisting shrinking space;
- Adhere to political groups' nominations for the post of President of the European Commission (the so-called 'Spitzenkandidaten' principle) to foster European political awareness of citizens.

#### **4.1.2. Civic education**

- Invest in formal, non-formal and informal civic education in the areas of active citizenship, democracy, European and national competences, populism and disinformation, news and media literacy, EU fundamental rights and values, and respect for minorities and their role in an inclusive democratic society.
- Put European policies, citizenship, culture and the functioning of the EU institutions more on the agenda of schools in order to promote the active participation of citizens and develop initiatives to raise awareness of EU politics and citizenship in schools;
- Include a strong emphasis on non-formal adult learning in the EU Citizenship Programme to promote the European idea and active citizenship;
- Tackle disinformation and misreporting in the media on EU issues by investing in digital and media literacy for citizens, training in journalism schools across Europe and supporting fact-based, pan-European media projects;
- Encourage individuals to become members of European political parties to give citizens a direct influence and chance to contribute to debates at the EU level.

#### **4.1.3. Building on the outcomes and recommendations from the Conference on the Future of Europe (CoFoE)**

- Ensure the credibility of the CoFoE by transparently translating proposals into constructive reforms and effective policy-making tools;
- Convene a European Convention, enshrined in Article 48 TEU, as the only legal way to change the way the EU operates;
- Ensure that treaty reform is accompanied by further strengthening of citizen participation and deliberative democracy to ensure that citizens feel involved throughout the process;
- Strengthen the expert role of organised civil society in broader participatory mechanisms through the introduction of civil dialogue at the same level as it is currently conducted with the social partners;
- Organise transparent and inclusive citizen consultations on an annual basis to increase citizen participation. This will allow for a meaningful dialogue between citizens and EU institutions and increase legitimacy and accountability of the democratic process;
- Support the citizens' recommendation to organise annual conferences on the rule of law following the publication of the annual rule of law report and recommend institutionalising the rule of law dialogue;
- Extend the good practice of impact assessments on all proposals and initiatives

affecting the fundamental rights and freedoms of European citizens and residents;

- Follow up on the proposal to ensure that all policy-making at EU level is seen through a youth lens by implementing a dedicated EU Youth Test impact assessment tool, which would evaluate new legislative proposals' possible impact on European youth.

#### **4.1.4. Active citizenship to fit the digital age**

In recent years, significant societal changes have taken place in Europe and around the world. On the one hand, a new model of deliberative and collaborative e-democracy is emerging worldwide. This model can contribute to a more open and inclusive form of policymaking by engaging citizens through the use of information and communication technology (ICT). On the other hand, we are faced with increasing threats that undermine the foundations and institutions of our democratic societies, such as populism and online disinformation. There is an urgent need to develop a more accurate understanding of how these new trends affect our societies and to promote civic engagement to increase the resilience of our democracy.

Harnessing the potential of digital tools and methods of direct and deliberative democracy is key in increasing the transparency, accountability and legitimacy of political decision-making processes and people's trust in institutions. Decision-makers at all levels should complement traditional representative democracy with more collaborative elements of participatory democracy to transform the relationship between citizens and decision-makers into one of partnership that enables policy co-creation.

At the same time, there is a need to better understand how online platforms such as social media can influence the way people think, form their opinions and ultimately participate in democratic systems. A stronger focus on critical thinking, media literacy and digital education goes hand in hand with the transformation processes our society is going through.

However, a greater move towards online participation can also bring exclusion and division, as digital technology remains a privilege not enjoyed by all - low-income households and vulnerable people such as migrants, refugees, internally displaced persons, senior citizens, children, people with disabilities, rural populations and indigenous peoples who do not have equal access to the internet and lack the necessary digital skills. It is therefore necessary to provide inclusive and secure access to ICTs, together with non-digital forms of participation where possible.

## Key Recommendations

- Introduce innovative practices of participation of citizens in decision-making processes. This should be piloted both at the EU level, but also encouraged through lessons-sharing at the Member States level;
- Implement initiatives such as crowdsourcing of citizens' ideas for policy and legislative solutions and participatory budgeting as complementary initiatives to the current model of representative democracy in order to strengthen it;
- Encourage civic education on online disinformation as well as media and digital literacy.

## 4.2. Elections

The 2024 European Parliament elections provide an important opportunity to strengthen citizen participation in elections, improve trust and promote identification with democratic values. In addition, voter mobilisation and campaigning always provide an opportunity to build a collective advocacy agenda, improve inclusion and address equality issues for underrepresented groups, including women, people with disabilities and minorities. Elections need to become more inclusive, accessible, representative and transparent.

In light of new trends and challenges in elections that transcend the national borders of EU Member States, it is important to ensure the security and integrity of elections in the EU. The EU should lead the way with regulatory options and non-regulatory support initiatives for European elections. Important non-legislative support areas include fair and ethical digital campaigning, cybersecurity in elections, political finance and sharing of practices. Citizen election observation is one of the most important tools for building, supporting and defending democracy. It enables direct citizen participation in public life and promotes democratic reform and electoral integrity.

### Key Recommendations

- Cooperate with Member States to protect and expand the space for civil society organisations to operate, including by promoting participation in and funding monitoring and reporting on electoral processes, as well as monitoring and reporting on the role of ad tech platforms before, during and after elections;
- Create tools to financially support CSOs that evaluate electoral processes and monitor all aspects of the electoral cycle before and after election campaigns, including organisations involved in voter education;
- Develop a set of measures in the run-up to the 2024 European Parliament elections to strengthen the capacity of CSOs to observe various aspects of these elections and encourage Member States to take the necessary measures to fully implement OSCE commitments on citizen election observation;
- Strengthen structural exchanges with Member States on digital, internal and domestic threats to elections;
- Consider local elections as an important tool for strengthening democracy. Local elections involve not only political parties but also civic lists, which are often genuine expressions of civil society that organise themselves and where there is less opportunity for undue foreign influence;
- Establish a permanent reinforced secretariat for the European Cooperation Network on Elections (ECNE) and expand its role;
- Consider creating a similar European network for political finance oversight bodies. Cooperation in the area of political finance fills a gap in exchange between Member States, as oversight of money in politics is often carried out by bodies other than those responsible for elections;
- Reflect on the renewal of the European political system by reforming the rules for the

governance of European political parties so that they can act as an important bridge between European politics and European citizens;

- Consider reviewing the chapter on political advertising of the Code of Practice on Disinformation following the adoption of the Regulation on Political Advertising.

#### **4.2.1. Strengthening public engagement in the European elections, ensure ethical behaviour and enable European political parties**

In light of the recent corruption scandal in the European Parliament, additional efforts are needed to restore trust in European democracy and elections to the European Parliament. EU legislation cannot cover certain loopholes for political parties that exist at national level. A code of conduct can close this loophole. A European code could target European and other political parties, candidates and/or online platforms and follow the examples in different EU Member States.

#### **Key recommendations**

- Support civil society organisations in exercising their influence as facilitators and bridge-builders to improve citizens' outreach and engagement in politics through the use of new and creative communication tools throughout the political mandate;
- Continue the initiated electoral reform process in an inclusive, consultative and participatory manner involving civil society and citizen-led election observation organisations;
- Adopt an objective, fair, durable and transparent method for the allocation of seats in the European Parliament. The method should facilitate and include clear procedures on periodic review to reflect shifts in population numbers;
- Strengthen the overall transparency of campaign spending in the EU Member States by reviewing and further enhancing the rules for reporting and disclosure of campaign income and expenses;
- Increase voter mobilisation and putting effort into campaigning provide an opportunity to build a coherent agenda, improve inclusion and address issues for underrepresented groups such as young people;
- Consider facilitating the adoption of a code of conduct for ethical online campaigning towards the 2024 European Parliament elections. Agreeing on commitments for ethical online behaviour will complement EU's planned rules for transparent online campaigning and foster citizens' trust in European elections;
- Remove remaining barriers for persons with disabilities, including those related to restrictions on suffrage rights based on mental/intellectual disability and support independent and informed voting and decision-making by persons with disabilities;
- Consider additional common European minimum voter and candidate eligibility criteria to ensure the equality of the right to vote and to stand as a candidate across the EU;



- Discuss with Member States the options for ensuring the equality of opportunities in exercising the right to vote in and across Member States with common minimum requirements for the administration of alternative and advance voting methods, in particular with regards to the uniformity of voter eligibility criteria.
- Explore with Member States the possibilities for harmonising the requirements related to the minimum voting age, residency requirements, independent candidacy, permissible restrictions on suffrage rights, and measures to support equal participation of women and men;
- Help align different cut-off dates for voter registration to facilitate data exchange within a common timeframe and in a timely manner;

### 4.3. Disinformation

The fight against disinformation is crucial for the protection of democracy. The spread of disinformation is a tool used by autocrats to polarise societies, including through foreign interference, but disinformation is also spread from within, often disseminated by citizens who are unaware of it. The EU has taken some important initiatives to combat disinformation in recent years, but needs to reinforce these efforts through the Defence of Democracy Package in a way that upholds fundamental rights.

The first and most important point of action is to support civil society actors who are at the forefront of this fight. Civil society actors working against disinformation lack sustainable, long-term core funding to cover essential costs, which is not possible with short-term project funding. Funding would also enable organisations working in this field to adequately protect themselves from cyber-attacks, online harassment and legal costs they incur from strategic lawsuits against public participation (SLAPPs). This is what is needed to enable a true whole-of-society approach that is often featured in public discourse but rarely implemented in practice.

The EU also has to make sure that existing legal and guiding frameworks that could contribute to fighting disinformation are effectively enforced or implemented such as the General Data Protection Regulation (GDPR), the Digital Services Act (DSA) and the EU Code of Practice on Disinformation. The DSA offers promising tools that, if used properly, can have a lot of positive impact, such as user redress mechanisms, mitigation of systemic risks, including disinformation, and transparency measures that include access to data for research.

The DSA and the Code of Practice on Disinformation hold signatories accountable and aim to limit the negative impact of disinformation. Social media platforms are often misused for manipulative techniques therefore the measures highlighted in the Code of Practice on Disinformation should be made more enforceable under the DSA by creating clear and measurable indicators that create incentives for social media platforms to adhere more strictly to the measures. The focus should be on ensuring that they work and do not create loopholes in other relevant legislation, such as the forthcoming European Media Freedom Act (EMFA) and the media exemption currently on the table. Such attempts should be rejected. The existing relevant regulatory instruments need to be enforced both on the social platforms and on the actors organising and conducting disinformation campaigns.

Next to the foreign influence and interference in European democratic processes, the EU should also focus on the actors within the EU acting as proxies for foreign state and non-state actors intending to spread disinformation. Such actors, acting for financial or ideological incentives should be sanctioned in the same way as foreign actors interfering in the European elections. However, when it comes to internal actors, it is important to distinguish between actors deliberately spreading false news to impact civic discourse and democratic processes and those not disseminating such news on purpose in order to protect the freedom of speech. For cases of misinformation, different measures have to be applied including increasing

trust in public institutions, supporting fact-checking communities and pushing platforms to deamplify false messages.

Therefore, it is crucial to ensure that the spread of disinformation is neither profitable nor attractive by introducing an effective system of sanctions. Disinformation is not just a question of regulating social media. We need to look at the entire information ecosystem and infrastructure that can be used for disinformation campaigns. Sanctioning malicious actors must go hand in hand with other measures to combat disinformation, such as ensuring the accountability of social media platforms.

### **Key Recommendations**

- Provide sustainable, long-term core funding for civil society actors fighting disinformation;
- Ensure that policies and legislative initiatives aimed at tackling issues related to disinformation are aligned with fundamental rights;
- Enable a cooperation framework for CSOs and other stakeholders with diverse expertise to address emerging disinformation narratives by providing small, targeted and flexible financing opportunities. Identification of the emerging disinformation narratives can be provided through the European Digital Media Observatory (EDMO) regional hubs;
- Establish a support mechanism for CSOs countering and/or building resilience against disinformation and information manipulation, such as expert support in the matters of online and communication security, a toolkit of free campaigning and IT tools, training repository, and interaction space for organisations to seek and offer support;
- Member States, the Commission and EU bodies and agencies should ensure that there is effective enforcement of existing laws, in particular the General Data Protection Regulation (GDPR) and Digital Services Act (DSA);
- Establish a sanctions regime that would deter malicious actors from organising and running disinformation campaigns looking at the entire information ecosystem and infrastructure that is being used to spread disinformation in parallel with ensuring accountability of social media platforms;
- Focus on limiting the effect of internal actors spreading disinformation and interfering with elections and negatively impacting civic discourse, democratic processes, social cohesion and public security.

#### 4.4. Online public sphere

The protection of the online public sphere has been increasingly perceived as crucial to guarantee the exercise of fundamental rights and the political participation of citizens in our democracies. This acknowledgement has partly driven the European Commission to propose legislation that set out rules aimed at tackling market concentration online, the arbitrariness of decisions by platforms and their opaqueness as well as the protection of fundamental rights in the context of the development of artificial intelligence.

A number of the digital policies have recently been adopted (Digital Services Act, Digital Market Act) or have entered the final stage of the legislative process (Regulation on transparency and targeting of political advertising and Artificial Intelligence Act). Following the adoption of these landmark regulations, the European Commission should commit, as part of the Defence of Democracy Package, to ensuring that the implementation and enforcement of this legislation, as well as the General Data Protection Regulation, is done in an inclusive, transparent manner that enhances the protection of fundamental rights, civic discourse and electoral processes.

To achieve the aims of protecting the online public sphere, the Commission should commit as part of the Defence of Democracy Package to ensure the adequate enforcement of these Regulations, whose implementation poses serious challenges.

Additionally, the Commission should consider proposing legislation that bans online surveillance for commercial and advertising purposes and guarantees the privacy of communications. Last, extensive research is needed to identify vulnerabilities and risks in the electoral information environment so that appropriate, context-adapted measures can be taken. The EU should contribute to building knowledge in this area, channelling resources to research initiatives, acknowledge the existing and emerging research in this area and design its measures to protect elections and democratic processes online on this basis.

#### Key Recommendations

- Effectively implement the Digital Services Act (DSA) through delegated acts, guidelines and codes of conduct, ensuring meaningful and accountable risk assessments by very large online platforms and meaningful inclusion of civil society in this process. Strong oversight and effective enforcement should be guaranteed by the Commission and national authorities through allocating significant financial and human resources. The Commission should set up an inclusive advisory expert group composed of civil society and independent experts which would support effective enforcement of the DSA and engage with civil society beyond the advisory expert group, and ensure that providers of very large online platforms and very large online search engines engage with scholars, civil society organisations adequately;
- Ensure the access to data for the civil society and research community in monitoring and sustaining civic processes on online platforms. The DSA will put forward a data access

regime including civil society researchers through its Article 40. More specifically the DSA will impose on providers of very large platforms and very large online search engines to provide access to public data to independent researchers via article 40(12). This aligns with commitments laid out in the Code of Practice on Disinformation. The Commission should ensure the effective implementation of these provisions, for instance through secondary legislation and guidelines and through supporting the necessary infrastructure for data sharing. It should also monitor the meaningful and effective implementation of data sharing provisions with the civil society research community by digital services;

- Ensure that the AI Act protects people from biometric mass surveillance, predictive policing and any other practices that unduly restrict fundamental rights. New EU rules for AI should apply equally when AI systems are developed or used for national security purposes, and should be consistent with human rights standards being developed by the Council of Europe's Committee on Artificial Intelligence. Prior to putting an AI system into use, deployers of AI, especially public authorities, should conduct and publish a fundamental rights impact assessment and meaningfully engage civic society and affected groups in the process;
- Protect privacy and confidentiality of communications, including the use of end-to-end encryption in all possible communications. In addition to the adoption of the long-delayed ePrivacy Regulation, the EU must refrain from passing legislation that restricts the enjoyment of private communications without the intervention of independent courts;
- Restrict or ban the use of technologies that lead to unlawful targeted or mass surveillance and generally to the criminalisation of dissent and interaction-based social media algorithms. Recent scandals, especially the Pegasus revelations, have raised the alarm around the impact of such practices on human rights defenders, journalists and politicians;
- Fund the development of Free and Open Source Software and hardware and promote decentralised alternatives to Big Tech platforms in order to ensure the digital sovereignty of the people and to start building a more just, open and resilient digital society. That includes non-profit and tracking-free technologies;
- Ensure accessibility of digital means (secure and quality internet connection) to young people and citizens everywhere, in order to shorten the digital divide and allow for equal access to digital services and online participation across the EU. This should be accompanied by EU-managed digital skills programmes in the Member States to foster digital competences from early on;
- Focus on the next legislative term on ensuring the enforcement of existing digital horizontal policies;

## 4.5. Media and Journalism

Media freedom and media pluralism in Europe have been subject to increasing pressures in recent years. Threats to journalists and media professionals are multiple and wide-ranging, including political interference, online harassment, and outright surveillance. Governments and other actors have also acted in more subtle ways to silence journalists, for example through strategic lawsuits against public participation (SLAPP) which have become more frequent across a number of EU Member States and unprecedented surveillance mechanisms, such as Pegasus spyware. These legal tactics are intended to suppress critical media coverage and censor journalists.

It is urgent to ensure the long-term viability of independent media so that they can continue to play their important democratic role. In Europe and around the world, the digital revolution has exacerbated long-term structural problems in the media industry and challenged its traditional business models. The Defence of Democracy Package must therefore foster an enabling environment for independent media to thrive in Europe and beyond

In this context, the Commission is well placed to advocate for media freedom and pluralism in the broadest sense - not only within the EU, but also in its external policies. As democratic norms and institutions around the world come under increasing pressure, support for independent, pluralistic and professional journalism should be at the heart of the EU's global democracy strategy.

### 4.5.1 Safety of journalists and the protection of media professionals

The Defence of Democracy Package must effectively build on the work on the Anti-SLAPP Directive and the European Media Freedom Act to ensure a free and independent media landscape in Europe. The following are a selection of recommendations based on the [Civil Society Call for Action](#) for improving the implementation of the UN Plan of Action on the Safety of Journalists and the Issue of Impunity.

#### **Tackle impunity for crimes against journalists**

- Across all Member States, monitor attacks on freedom of expression. Collaborate more closely with national parliaments, other EU institutions, as well as international human rights organisations to ensure prompt, independent, impartial, effective, thorough and transparent investigations of allegations of crimes against journalists, while safeguarding the physical and mental integrity of victims and witnesses. The Commission can support the creation of effective witness protection programs where necessary;
- Support the establishment and operation of independent, civil society-led national and regional reporting and monitoring platforms across EU Member States to collect and disseminate information about attacks against journalists and on media freedom in an accessible, easy to use and standardised manner.

These mechanisms should allow civil society to bring information about violations to the attention of state authorities and other duty-bearers in order to ensure proper response and accountability.

### **Help establish and sustain national safety mechanisms**

- Ensure the implementation of the [EU Commission Recommendation on the safety of journalists](#). The Commission should ensure the implementation of the Recommendation by Member States, in close cooperation with civil society actors, journalists' organisations and other EU institutions;
- Where national safety mechanisms do not exist, provide appropriate support to help develop them by facilitating discussions among relevant actors and promoting a multi-stakeholder approach. Include local civil society organisations and promote the capacity of natural leaders, such as national human rights institutions, to play a key role in anchoring the mechanism.

### **Address digital threats to journalists' safety**

- All Member States should impose meaningful transparency and accountability obligations on technology platforms to require them to make their practices, policies and procedures reasonably available to everyone. Member States should also put in place systems that allow external researchers sufficient access to their operational information. Particular attention should be paid to how systemic and procedural obligations are applied to cases against journalists so that researchers can gain a better understanding of how their systems affect online violence against journalists, particularly gender-based violence, and make suggestions that can lead to improved responses and remedies. Civil society actors should be involved in the process of designing such mechanisms;
- Require tech companies to implement human rights due diligence and conduct risk assessments in line with standards outlined in the UN Guiding Principles on Business and Human Rights, including to identify and prevent or mitigate impacts on the work of women journalists and other journalists in vulnerable contexts.

### **Monitor violations of media freedom and the physical integrity of media professionals**

- Streamline the reporting on safety of journalists to EU, Council of Europe and UN mechanisms and strengthen the systematisation and sharing of inputs on the safety of journalists, including from civil society, to avoid duplication and to reinforce monitoring of the UNPA implementation;
- At EU level, diplomatic networks, embassies, and donors with a strong commitment to media freedom should coordinate their efforts and ensure smooth coordination across EU Member States and institutions as well as

alignment with UN efforts and with efforts initiated by national media and civil society organisations.

#### **4.5.2 Guarantee media pluralism and independence and ensure that media can work free from political interference**

Media plays a crucial role in shaping public opinion, informing citizens by providing information of public interest and acting as public watchdogs. To ensure media outlets and journalists operate free from political and private interference, media independence must be safeguarded.

Member States should pledge their support for the Commission's proposal for a Regulation establishing a common framework for media services in the internal market (European Media Freedom Act). The Commission and the Member States must strengthen the provisions of the proposed European Media Freedom Act and promote measures to encourage transparency of media ownership.

#### **Key Recommendations**

- Introduce limits on owners of media being able to access public tenders in other industries;
- Reduce economic barriers to independent media in media captured states;
- Ensure the implementation of the Commission's recommendation on internal safeguards for editorial independence and ownership transparency in the media sector;
- Guarantee protection of sources in line with Council of Europe standards and its case law as provided by Article 10 ECHR;
- Foster and reinforce the independence and transparency of national regulators and guarantee the independence of the new proposed European Board of Media Services.

#### **4.5.3 Support journalists in exile, human rights defenders, and exiled media**

Europe has welcomed numerous journalists and human rights advocates who have fled political repression, censorship, war or humanitarian crises in their home countries. Many have gone on to create their own media in the diaspora. Exiled journalists bring with them expertise and knowledge of their societies of origin that, if adequately tapped, can be a source of great creativity and human potential.

#### **Key Recommendations**

- Facilitate mobility for journalists in exile and human rights defenders. While immigration policy remains a prerogative of Member States, the Commission should engage with member state governments to promote the dialogue on



the rights of journalists living in exile. The Commission can propose legislation to facilitate mobility for foreign journalists within the EU, while providing them employment opportunities and other forms of support, including psychosocial support and professional training. Precedents for this exist. The Commission's proposal to activate the [Temporary Protection Directive](#) facilitated entry into Europe for displaced Ukrainians, including journalists. Ukrainians were granted temporary status, allowing them to live, move and work freely within the Schengen area while gaining access to healthcare, education and housing;

- Increase support for exile or diaspora media. The Commission can propose more funding or other forms of support to exile media, working through European-based media development organisations that work with diaspora media or refugee journalists.

#### **4.5.4 Mainstream support for ethical journalism and independent media in the EU's external action**

Internationally, it is in the EU's strategic interest to continue to be a credible player and donor across the media development landscape, promoting independent media that play a crucial role in strengthening democratic values, defending institutions and promoting information as a public good.

- Develop an overall media development strategy. Support for independent media and journalism as a public good should feature more prominently in the EU's overall aid cooperation strategy. At EU level, the Commission can work, in collaboration with the Council and the European External Action Service, to better coordinate and pool the efforts of Member States that are already working in the area of media support in non-EU countries;
- Reform funding programmes to mainstream support for independent media. International partnerships should prioritise long-term, programmatic funding for credible, independent, and professional media outlets, especially in regions of strategic interest to the EU or in countries affected by long-term conflict or democratic backsliding. The Commission should propose ways to streamline the multiple, sometimes overlapping funding programmes in the EU budget, while reallocating more resources to media support organisations and media development projects.

#### **4.5.5 Foster an enabling environment to promote the financial viability of media organisations and the future of journalism**

Over the past decade, big tech and social media companies have vacuumed up advertising revenues, affecting the already tight budgets of traditional media organisations. At EU level, advertising markets need to be restructured in a way that favours the financial viability of media organisations, both large and small.

## Key Recommendations

- Ensure effective enforcement of the existing applicable legislation, such as the GDPR, the DSA and the DMA, vis-a-vis large social media platforms and advertising intermediaries in order to limit their unlawful user data collection and profiling practices which lead to unfair competition in the area of advertising to the detriment of independent media;
- Promote new legislation to regulate big tech and restructure advertising markets. The Commission should continue efforts to engage with big tech on the issue of advertising revenues and unfair competition, while searching for binding ways to ensure that such revenues are fairly and equitably distributed to media companies, especially small and independent media organisations.

## 4.6. Foreign interference

Foreign interference in democratic processes is part of a much larger anti-democratic toolkit, whether called political warfare, active measures or hybrid threats. To adequately defend democracy, the Commission must take a coherent and comprehensive view of foreign interference and not limit it to elections, disinformation or information manipulation.

Foreign interference in EU-internal democratic processes by authoritarian state actors and anti-democratic non-state actors should be clearly identified as a security threat. Although foreign authoritarian actors use their assets for information operations, they very often rely on domestic actors within the EU who act on behalf of authoritarian states for ideological or financial reasons. The EU should support research that helps to understand the links between authoritarian states and their proxies in the EU, and focus on countering anti-democratic and democracy-undermining narratives with effective and authentic strategic communication to limit the impact of such operations in the EU.

Hybrid or political warfare targets vulnerabilities, divides democratic societies and seeks to fuel polarisation. As a result, it is clear that strengthening democratic resilience in the EU by promoting citizen participation, ensuring transparency and accountability of democratic institutions, improving the integrity of democratic processes and ensuring a not-for-profit public, civic, pluralistic information space is of the utmost importance. Civic education and civil society action to combat polarisation are essential for strengthening the resilience to foreign interference in Europe. It is therefore crucial to support civil society organisations working to defend democracy against foreign interference as part of hybrid warfare with sustainable, long-term core funding to cover essential costs and move away from short-term project funding. Funding would also enable organisations working in this field to adequately protect their online and physical security. This is necessary to enable a true whole-of-society response to hybrid threats, which is often mentioned in security strategies and policies but rarely put into practice.

Policy efforts aimed at curbing foreign interference must be coherent and strengthen the framework for the protection of fundamental rights that underpins democracy. This includes the right to freedom of expression and the right to transmit and receive information, as well as freedom of assembly and association, which must be strengthened and not curtailed. Therefore, measures that violate these rights in other jurisdictions, such as foreign agent registration laws, must be opposed.

### Key Recommendations

- Do not create a European equivalent to the US Foreign Agents Registration Act or any legislation that unduly restricts access to human, material and financial resources for civil society organisations seeking to carry out their functions effectively in- and outside the EU. Such legislation can have devastating impacts on the freedom to seek, obtain and use such resources, which is an integral part of the right to freedom of association, as stated

in the recent Council Conclusion on Civil Society Space;

- Invest in whole-of-society resilience to hybrid threats to democracy, including by providing sustainable, long-term core funding for civil society actors working to build this resilience;
- Convene and facilitate a multi-stakeholder working group, bringing together the public, private and civic sector to collaborate on whole-of-society resilience to hybrid threats to democracy;
- Build on the [recommendations](#) of the European Parliament’s Special Committee on Foreign Interference, EEAS [Strategic Compass 2022](#), EU Council [conclusions](#) on a Framework for a coordinated EU response to hybrid campaigns, the European Centre of Excellence for Countering Hybrid Threats and relevant national security strategies;
- Adapt a strategy not focusing exclusively on foreign authoritarian states, but also on their proxies within the EU;
- Develop a comprehensive monitoring system framework to track anti-democratic developments in the EU and beyond its borders based on a comprehensive democracy assessment framework;
- Invest in cybersecurity in elections and other democratic processes, including for political parties and candidates. Political parties need to be protected during election campaigns;
- Build a comprehensive democracy assessment framework and keep track of anti-democratic developments in the EU and outside its borders to inform its democracy action.

#### **4.6.1. Foreign Information Manipulation and Interference (FIMI)**

[FIMI](#) describes a pattern of usually non-illegal behaviour that threatens or has the potential to negatively influence values, procedures and political processes, and that is manipulative in nature and carried out in a deliberate and coordinated manner. The actors in these activities may be state or non-state actors, including their proxies within and outside their own territories.

FIMI should be understood in the broader context of hybrid threats. It is a key global challenge that must be addressed with respect for fundamental rights such as freedom of speech, freedom of expression and freedom of the media.

#### **Key recommendations**

- Invest more in understanding the Tactics, Techniques, and Procedures (TTPs) used to manipulate information environments in an intentional, harmful and coordinated manner;
- Create appropriate means to share TTPs with different stakeholders and ensure that adequate human and financial resources are provided to attribute TTPs to specific actors. This would allow democratic governments to impose costs and efficiently disrupt the ‘supply chain’ for manipulated information.

#### 4.6.2. Strengthening the link between the internal and external dimensions of democracy defence and support

Defending European democracy against foreign interference requires a careful assessment of the origin of threats aimed at undermining democratic processes in the EU. Authoritarian governments often engage in foreign interference. The Defence of Democracy Package should therefore clearly identify authoritarianism as a threat to democratic societies, their security and the international order. Some EU Member States already name the problem in their national security strategies.

All efforts to defend democracy at home are linked to the question of how the EU's external action can affect foreign interference. For too long, the EU and its Member States have sacrificed their democratic agenda abroad for reasons of national security, economic interests or global stability. Even very innocuous and routine interactions between pro-democracy states and authoritarian states can help prop up highly repressive regimes. This can only be countered if the EU becomes more political in pursuing its democracy agenda and adopts a more integrated approach to democracy support measures.

#### Key Recommendations

- Adopt an integrated EU approach to democracy internally and in external relations. The EU should be clear about the objectives of its democracy support activities and how its various democracy support efforts are interrelated. Such an integrated approach could focus on supporting and linking essential conditions for democracy in a non-prescriptive and contextual way. EU interventions would benefit from a comprehensive democracy assessment framework to capture trends and support the development of calibrated responses in partner countries;
- Mainstream democracy and democratic values more consistently in external policies and action. The EU should develop a policy framework explaining how it balances its democracy values and goals with its other interests. This framework should also describe how to intensify its collaboration with other democracies in bilateral and multilateral settings, and how it aims to encourage weak democracies and hybrid regimes towards democratic progress;
- Fully align the Defence of Democracy Package with the goals and ambitions of the EU Action Plan on Human Rights and Democracy and complement its proactive approaches with preventative methods and increased resilience.

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