Public survey for European Democracy Action plan

Fields marked with * are mandatory.

Introduction

The Commission's Political Guidelines announced a European Democracy Action Plan under the headline ambition of a new push for European Democracy. The Commission intends to present the Action Plan towards the end of 2020.

The aim of the European Democracy Action Plan is to ensure that citizens are able to participate in the democratic system through informed decision-making free from interference and manipulation affecting elections and the democratic debate.

The Commission has started the preparation of the European Democracy Action Plan and would like to consult the public on three key themes:
- Election integrity and how to ensure electoral systems are free and fair;
- Strengthening media freedom and media pluralism;
- Tackling disinformation.

In addition, the consultation also covers the crosscutting issue of supporting civil society and active citizenship.

When providing your contribution, you may opt to fill in one or more of the four sections, according to their relevance to your areas of interest. Please note that a specific public consultation on the Digital Services Act package is open until 8 September 2020 and covers also elements relevant in the context of the European Democracy Action Plan.[1]

[1] https://ec.europa.eu/digital-single-market/en/news/consultation-digital-services-act-package

About you

* Language of my contribution
- ○ Bulgarian
- ○ Croatian
- ○ Czech
- ○ Danish

○ Dutch

◉ English

○ Estonian

○ Finnish

○ French

○ Gaelic

○ German

○ Greek

○ Hungarian

○ Italian

○ Latvian

○ Lithuanian

○ Maltese

○ Polish

○ Portuguese

○ Romanian

○ Slovak

○ Slovenian

○ Spanish

○ Swedish

* I am giving my contribution as

○ Academic/research institution

◉ Business association

○ Company/business organisation

○ Consumer organisation

○ EU citizen

○ Environmental organisation

○ Non-EU citizen

○ Non-governmental organisation (NGO)

○ Public authority

○ Trade union

○ Other

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*Surname

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mroczkowski@iabeurope.eu
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*Organisation name

255 character(s) maximum

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IAB Europe
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*Organisation size

- ○ Micro (1 to 9 employees)
- ● Small (10 to 49 employees)
- ○ Medium (50 to 249 employees)
- ○ Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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43167137250-27
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*Country of origin

Please add your country of origin, or that of your organisation.

○ Afghanistan	○ Djibouti	○ Libya	○ Saint Martin
○ Åland Islands	○ Dominica	○ Liechtenstein	○ Saint Pierre and Miquelon
○ Albania	○ Dominican Republic	○ Lithuania	○ Saint Vincent and the Grenadines
○ Algeria	○ Ecuador	○ Luxembourg	○ Samoa
○ American Samoa	○ Egypt	○ Macau	○ San Marino

- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- ● Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba

- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe

- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
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- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru

- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland

- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton

- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica

- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru

- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
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- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

◉ Cocos (Keeling) Islands	◉ Japan	◉ Philippines	◉ United States Minor Outlying Islands
◉ Colombia	◉ Jersey	◉ Pitcairn Islands	◉ Uruguay
◉ Comoros	◉ Jordan	◉ Poland	◉ US Virgin Islands
◉ Congo	◉ Kazakhstan	◉ Portugal	◉ Uzbekistan
◉ Cook Islands	◉ Kenya	◉ Puerto Rico	◉ Vanuatu
◉ Costa Rica	◉ Kiribati	◉ Qatar	◉ Vatican City
◉ Côte d'Ivoire	◉ Kosovo	◉ Réunion	◉ Venezuela
◉ Croatia	◉ Kuwait	◉ Romania	◉ Vietnam
◉ Cuba	◉ Kyrgyzstan	◉ Russia	◉ Wallis and Futuna
◉ Curaçao	◉ Laos	◉ Rwanda	◉ Western Sahara
◉ Cyprus	◉ Latvia	◉ Saint Barthélemy	◉ Yemen
◉ Czechia	◉ Lebanon	◉ Saint Helena Ascension and Tristan da Cunha	◉ Zambia
◉ Democratic Republic of the Congo	◉ Lesotho	◉ Saint Kitts and Nevis	◉ Zimbabwe
◉ Denmark	◉ Liberia	◉ Saint Lucia	

*Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

◉ **Anonymous**

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

◉ **Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

☑ I agree with the [personal data protection provisions](#)

Questions on election integrity and political advertising

Fair democratic debates and electoral campaigns as well as free and fair elections in all Member States are at the core of our democracies. The space for public debate and electoral campaigns has evolved rapidly and fundamentally, with many activities taking place online. This brings opportunities for the democratic process, public participation and citizen outreach but also challenges, inter alia concerning the transparency of political advertising online and possible threats to the integrity of elections. Ahead of the 2024 European Parliament elections, changes to the role of European political parties might also be considered.

(i) Transparency of political advertising

Q1 Have you ever been targeted[2] with online content that related to political or social issues, political parties (European or national), political programmes, candidates, or ideas within or outside electoral periods ('targeted political content')?

[2] Paid for ads and any form of personalised content promoted to the user

☐ 1. No, never

☐ 2. Yes, once

☐ 3. Yes, several times

☐ 4. I don't know

Q2. If you receive such targeted political content, are you checking who is behind it, who paid for it and why you are seeing it?

☐ 1. No, I am not interested

☐ 2. I don't know how to do it

☐ 3. Yes, occasionally

☐ 4. Yes, all the time

☐ 5. I don't receive targeted political content

Q3. To what extent do you agree with the following statements related to targeted political content you have seen online?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply

1. Targeted content was labelled in a clear manner	○	○	○	○	○	○
2. It was easy to distinguish paid for targeted content from organic content	○	○	○	○	○	○
3. It was easy to identify the party or the candidate behind the content	○	○	○	○	○	○
4. The content included information on who paid for it	○	○	○	○	○	○
5. The information provided with the content included targeting criteria	○	○	○	○	○	○
6. The ad was linked to a database of targeted political content	○	○	○	○	○	○
7. The targeted political content offered the possibility to report it to the platform	○	○	○	○	○	○

Q4. Which of the following initiatives/actions would be important for you as a target of political content?

	Not at all	A little	Neither a lot nor a little	A lot	Absolutely	Don't know
1. Disclosure rules (transparency on the origin of political content)	○	○	○	○	○	○
2. Limitation of micro-targeting of political content, including based on sensitive criteria, and in respect of data protection rules	○	○	○	○	○	○
3. Creation of open and transparent political advertisements archives and registries that show all the targeted political content, as well as data on who paid for it and how much	○	○	○	○	○	○
4. Political parties to disclose their campaign finances broken down by media outlet	○	○	○	○	○	○
5. Prohibit foreign online targeted political content	○	○	○	○	○	○
6. Prohibit online targeted political content altogether	○	○	○	○	○	○

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
7. Rules limiting targeted political content on the election day and just before	◉	◉	◉	◉	◉	◉
8. Other	◉	◉	◉	◉	◉	◉

Q5. Online targeted political content may make use of micro-targeting techniques allowing advertisers to target with high precision people living in a specific location, of a certain age, ethnicity, sexual orientation or with very specific interests. Do you think that:

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Micro-targeting is acceptable for online political content and it should not be limited	◉	○	○	○	○	○
2. Criteria for micro-targeting of political content should be publicly disclosed in a clear and transparent way for every ad	○	○	◉	○	○	○
3. Micro-targeting criteria should be strictly limited	○	○	◉	○	○	○
4. Micro-targeting criteria should be banned	○	○	○	○	◉	○

Please explain

While IAB Europe's constituency remains primarily invested in brand advertising, we fully recognise that advertising may take different forms and shapes, and we are therefore strong advocates for any digital advertising – including non-commercial such as political advertising – meeting relevant legal and self-regulatory requirements.

Political advertising can be characterised by the fact that it will be political actors themselves, such as politicians, political parties, etc., that assume a role of the advertiser. As with any advertising, the onus for the delivered campaign is ultimately on the advertiser. It must remain the same in case of political advertising. There should however be an agreement by political actors across the EU Member States, on what constitutes a political advertisement and how any rules pertaining to political advertising can be applied without prejudice to binding national-level electoral laws.

In terms of digital political advertising, it should be noted that personal data revealing political beliefs is within the GDPR's scope. Processing of such data is generally prohibited, albeit lawful processing can be allowed under certain conditions. Moreover, any restrictions on political advertising should be carefully assessed in light of fundamental rights, such as the right to freedom of expression guaranteed by Article 10 of the European Convention on Human Rights. Against this background, in Bowman v UK, Application No. 24839 /94, Merits and Just Satisfaction, 19 February 1988, the Court held that 'publishing information with a view to influencing' voters is an exercise of freedom of expression' (para. 47). On this basis, it could be reasonably claimed that microtargeted digital political advertising is in scope of the definition of freedom of expression.

On a related note, we appreciate the challenge with defining the so-called 'issue-based' advertising whereby certain 'issues' are discussed in the context of elections can be regarded as a reminder of the fact that many of our public discussions can be viewed as politicized. Given our expertise in the field of brand advertising, we would respectfully advise that any future definition of 'issue-based' advertising must clearly exclude commercial advertising and business-oriented activity of brands that engage with their prospective clientele, and even take views on certain societal issues.

Finally, on the topic of databases of digital political advertising, we applaud efforts to devise approaches that allow for better understanding of political advertising targeting European citizens. Notwithstanding, as the industry body that promotes industry collaboration to deliver frameworks, standards and industry programmes, we would like to respectfully point out that the added value of open standards and joined-up approaches manifests itself by the fact that these enable participation of all market players. In the specific example of a political ad library, creation of databases covering all EU media appears to be mostly problematic given the fragmented and unclear election legal framework.

For reference, please see IAB Europe's full comments on the consultation on the European Democracy Action Plan (15 September 2020) under the following link: https://iabeurope.eu/wp-content/uploads/2020/09 /20200915_IAB-Europe_EDAP_comments.pdf

Q6. EU countries regulate offline political advertising on traditional media (e.g. press, television) in the context of local, national or EU elections. These rules limit the amount of airtime or maximum expenditure permitted for political advertising on broadcast TV or print media. Do you think similar rules should also apply to online targeted political content?

☐ 1. Yes

☑ 2. No

☐ 3. I don't know

Please explain your answer

As mentioned, any restrictions on political advertising should be carefully assessed in light of fundamental rights, such as the right to freedom of expression guaranteed by Article 10 of the European Convention on Human Rights. Moreover, we advise against introducing rules that will be difficult to enforce and may lead to blanket prohibitions that could also impact other forms of advertising.

Instead of limiting political advertising in the digital world, one could helpfully invest in ensuring the highest level of transparency into political advertising possible, an approach with which we sympathise and that we would encourage. The standard ad disclosure and transparency rules should be rigorously observed in case of political advertising. That enables citizens to immediately recognise when a paid-for communication is an ad. Moreover, the identity of the advertiser should be easily ascertainable. Finally, disclosures should be prominent and understandable to consumers. There exist industry-wide approaches to enhance transparency in non-EU jurisdictions that could be considered relevant in the EU. For instance, to enhance transparency, the US and Canadian markets saw introduction of a self-regulatory 'Political Ad Icon' initiative which serves as an immediate, simple, and intuitive tool for people to get information about the political ads covered by the Self-Regulatory Principles of Transparency & Accountability to Political Advertising. Under the Digital Advertising Alliances in the US and Canada Political Ads Programs, the Political Ad icon and/or wording should be used to provide clear, meaningful, and prominent notice that an ad is an express advocacy political advertisement for the election or defeat of a candidate for federal or certain statewide elected office. Such approaches could be considered as relevant in the EU.

For reference, please see IAB Europe's full comments on the consultation on the European Democracy Action Plan (15 September 2020) under the following link: https://iabeurope.eu/wp-content/uploads/2020/09/20200915_IAB-Europe_EDAP_comments.pdf

(ii) Threats to electoral integrity

Q1. Do you believe the following are real and existing threats to the electoral process in the EU and its Member States?

	Yes	No	Don't know
1. Intimidation of minorities	⊙	⊙	⊙
2. Intimidation of political opposition	⊙	⊙	⊙
3. Micro-targeting of political messages, that is messages targeted to you or a narrowly defined group	⊙	⊙	⊙
4. Information suppression, that is the purposeful lack of information on a topic	⊙	⊙	⊙
5. Disinformation or fake accounts run by governments, including foreign governments	⊙	⊙	⊙
6. Divisive content, that is content created to divide society on an issue	⊙	⊙	⊙

7. The amplification of content that makes it difficult for you to encounter differing voices	○	○	○
8. Intimidation of women candidates	○	○	○
9. I or someone I know has been targeted based on sensitive criteria such as gender, ethnicity or sexual orientation	○	○	○
10. Content where I could not easily determine whether it was an advertisement or a news post	○	○	○
11. Other	○	○	○

[IF Q1=11: Please define]

Q1.1 IF Q1=YES for any answer option
- ☐ 1. Have you felt personally intimidated/threatened by targeted political content?
- ☐ 2. Could you tell us more about your experience?

Please explain your answer

(iii) European Political Parties:

Q1. Is there scope to further give a stronger European component to the future campaigns for EU elections? Please list initiatives important to you in this regard

	Not at all	A little	Neither a lot nor a little	A lot	Absolutely	Don't know
1. Better highlighting the links between the national and European Political Parties, for example by displaying both names on ballot papers and in targeted political content	○	○	○	○	○	○
2. More transparency on financing (e.g. information about how much national parties contribute yearly to the European Politicla Parties budgets)	○	○	○	○	○	○
3. Bigger budgets for European Political Parties	○	○	○	○	○	○

4. Strengthening the European campaigns by European Political Parties in Member States	○	○	○	○	○	○
5. Better explaining the role of European Political Parties in the EU	○	○	○	○	○	○
6. Other	○	○	○	○	○	○

Please explain

>

(iv) European Elections

Q1. In your opinion what initiatives at national level could strengthen monitoring and enforcement of electoral rules and support the integrity of European elections (multiple selections possible)?

- ☐ 1. Strengthened sharing of information and monitoring activity across borders and between authorities
- ☐ 2. Technical interfaces to display all political advertisements as defined by online service providers
- ☐ 3. Technical interfaces to display all advertisements (political or not)
- ☐ 4. Clear rules for delivery of political ads online in electoral periods, similarly to those that exist in traditional media (TV, radio and press)
- ☐ 5. Independent oversight bodies with powers to investigate reported irregularities
- ☐ 6. Enhanced reporting obligations (e.g. to national electoral management bodies) on advertisers in a campaign period
- ☐ 7. Enhanced transparency of measures taken by online platforms in the context of elections, as well as meaningful transparency of algorithmic systems involved in the recommendation of content
- ☐ 8. Privacy-compliant access to platform data for researchers to better understand the impact of the online advertisement ecosystem on the integrity of democratic processes
- ☐ 9. Greater convergence of certain national provisions during European elections
- ☐ 10. Stronger protection against cyber attacks
- ☐ 11. Higher sanctions for breaches of the electoral rules
- ☐ 12. Other – please specify

Please explain your answer

> [text input box]

Q2. In your opinion what initiatives at European level could strengthen monitoring and enforcement of rules relevant to the electoral context?

- ☐ 1. Strengthened sharing of information and monitoring activity across borders and between authorities
- ☐ 2. European-level obligations on political advertising service providers
- ☐ 3. European-level shared online monitoring and analysis capability being made appropriately available to national authorities
- ☐ 4. Cross border recognition of certain national provisions
- ☐ 5. Other

Please explain your answer

> [text input box]

Questions on strengthening media freedom and media pluralism

Freedom of expression and freedom and pluralism of the media are enshrined in the Charter of Fundamental Rights of the European Union (Article 11), and their protection is underpinned by Article 10 of the European Convention on Human Rights. They are essential elements of a healthy democratic system. Whilst in general the EU and its Member States score well on a global scale, there are signs of deterioration (as shown by the Media Pluralism Monitor) and the sector is facing challenges from threats to the safety of journalists (including strategic lawsuits against public participation – 'SLAPP lawsuits') to the transformation of the sector, with digital technologies and new players transforming the established business model of advertising revenue. The COVID-19 pandemic has worsened the situation, both in the EU and outside of the EU, from restrictive national legislation to critical loss of revenues for the media sector.

Initiatives to strengthen media freedom and media pluralism will build in particular on the analysis and areas covered by the upcoming Rule of Law Report, with a focus on improving the protection of journalists, their rights and working conditions. Please note that the Commission also intends to propose, by the end of the year, an Action Plan for the Media and Audiovisual sector to further support the digital transformation and the competitiveness of the media and audiovisual sectors and to stimulate access to quality content and media pluralism.

(i) Safety of journalists / conditions for journalistic activities

Q1. Are you aware of issues regarding safety of journalists and other media actors or conditions for journalistic activities in your country?

☐ 1. Yes (please justify)

☐ 2. No (please justify)

☐ 3. I do not know

Please explain your answer

[ ]

Q1.1 If yes, what kind of issue?

☐ 1. Lack of proper sanction applied to perpetrators of attacks against journalists– Yes/No

☐ 2. Abuse of defamation laws or other laws aiming at silencing journalists and news media – Yes/No

☐ 3. Lack of legal safeguards for journalistic activities – Yes/No

☐ 4. Lack of institutions to protect journalists – Yes/No

☐ 5. Online hate speech – Yes/No

☐ 6. Cyberbullying – Yes/No

☐ 7. Physical threats – Yes/No

☐ 8. Other – please specify

Please explain your answer

[ ]

Q2. Are you familiar with the concept of 'strategic lawsuits against public participation' (SLAPPs)?

☐ 1. Yes

☐ 2. No

☐ 3. Don't know

Q2.1 If yes, are you aware of such lawsuits in your own Member State?

☐ 1. Yes

☐ 2. No

☐ 3. Don't know

Please explain your answer

[ ]

Q3. In your opinion, on which SLAPP related aspects should the European Union-level action be taken (multiple answers possible):

☐ 1. Regular monitoring of SLAPP cases in the European Union

☐ 2. Financial support for journalists facing SLAPP lawsuits

☐ 3. Rules on legal aid for journalists facing SLAPP lawsuits

☐ 4. Cross-border cooperation to raise awareness and share strategies and good practices in fighting SLAPP lawsuits

☐ 5. EU rules on cross-border jurisdiction and applicable law

☐ 6. None of the above

☐ 7. Other – please specify

Please explain your answer

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Q4. Do you think that the EU should act to strengthen safety of journalists and other media actors / improve conditions for journalistic activities?

☐ 1. Yes (please justify)

☐ 2. No (please justify)

☐ 3. I do not know

Please explain your answer

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Q4.1 If yes, how?

☐ 1. By issuing guidance – Yes/No

☐ 2. By setting up dedicated structured dialogue with Member States – Yes/No

☐ 3. By providing financial support – Yes/No

☐ 4. Other – please specify

Please explain your answer

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Q5. Are you aware of any issues regarding the protection of journalistic sources in your country?

☐ 1. Yes (please provide concrete examples)

☐ 2. No

☐ 3. I do not know

Please explain your answer

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[                                                                    ]
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Q6. Are you aware of any difficulties that journalists are facing when they need access information / documents held by public authorities and bodies in your country?

☐ 1. Yes (please provide concrete examples)

☐ 2. No

☐ 3. I do not know

Please explain your answer

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[                                                                    ]
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(ii) Media independence and transparency

Q1. How would you characterise the situation with regards to independence of media and journalism in your country?

	Not at all	To a limited extent	To a great extent	Don't know
1. The government controls or exerts pressure on media outlets	◎	◎	◎	◎
2. Powerful commercial actors control or influence editorial policy of media outlets	◎	◎	◎	◎
3. Journalists are afraid of losing their job or of other consequences and avoid voicing critical opinions	◎	◎	◎	◎
4. News media, in particular public broadcasters, provide balanced and representative information, presenting different views, particularly in times of electoral campaigns	◎	◎	◎	◎

Q2. How important is the support for independent journalism (including free lance journalists and bloggers/web journalists) and the protection of the safety of independent journalists to supporting democracy in the EU and internationally?

☐ 1. Very important

☐ 2. Important

☐ 3. Not important

☐ 4. Don't know

Q3. Do you feel sufficiently informed about the ownership of the media outlets you are consulting?

☐ 1. Yes

☐ 2. No (please explain)

☐ 3. I do not know

Please explain

[   ]

Q4. Should it be mandatory for all media outlets and companies to publish detailed information about their ownership on their website?

☐ 1. Yes (please explain)

☐ 2. No (please explain)

☐ 3. I do not know

Please explain

[   ]

Q5. Should content by state-controlled media, where governments have direct control over editorial lines and funding, carry specific labels for citizens?

☐ 1. Yes (please explain)

☐ 2. No (please explain)

☐ 3. I do not know

Please explain

[   ]

Q6. Do you think information from independent media and trustworthy sources should be promoted on online intermediary services (such as search engines, social media, and aggregators)?

☐ 1. Yes (please explain)

☐ 2. If yes, please give examples of how it could be achieved and how to distinguish sources to be promoted?

☐ 3. No (please explain)

☐ 4. I do not know

Please explain

[   ]

Q7. Do you think further laws or institutions should be put in place in your country to strengthen media independence and transparency in any of the following areas?

☐ 1. Transparency of state advertising and state support to news media / journalism – Yes/No

☐ 2. Transparency of media ownership – Yes/No

☐ 3. Promotion of information from independent media and trustworthy sources– Yes/No

☐ 4. Ownership limitations of commercial actors – Yes/No

☐ 5. Ownership limitations of political actors – Yes/No

☐ 6. Rules to prevent foreign (extra-EU) based manipulative and hate-spreading websites from operating in the EU - Yes/No

☐ 7. Other – please specify

☐ 8. No, what is in place is sufficient

☐ 9. No

☐ 10. I do not know

Please explain your answer

[   ]

Q8. Do you think that the EU should act to strengthen media independence and transparency in any of the following areas? (Multiple answers possible)

☐ 1. Transparency of state advertising and state support to news media / journalism – Yes/No

☐ 2. Transparency of media ownership – Yes/No

☐ 3. Promotion of information from independentmedia and trustworthy sources– Yes/No

☐ 4. Ownership limitations of commercial actors – Yes/No

☐ 5. Ownership limitations of political actors – Yes/No

☐ 6. Other – please specify

☐ 7. No

☐ 8. I don't know

Please explain your answer

> [ ]

Q9. If you answered yes to some of the options of the previous question, how should the EU act in these areas?

☐ 1. By issuing guidance – Yes/No

☐ 2. By setting up dedicated structured dialogue with Member States – Yes/No

☐ 3. By providing financial support – Yes/No

☐ 4. By adopting legislation – Yes/No

☐ 5. Other – please specify

Please explain your answer

> [ ]

Q10. EU countries have rules applying to media content such as news or current affairs, in general (e.g. rules on editorial independence, objectivity/impartiality), and in particular during elections (rules on scheduling and the balance of the programmes, moratoria on political campaign activity, opinion polls). Do you think similar rules should apply online?

☐ 1. Yes

☐ 2. No

☐ 3. I don't know

Please explain your reply.

> [ ]

Q11. Should the role of and cooperation between EU media regulators in overseeing respect for such standards, offline and online, be reinforced?

☐ 1. Yes

☐ 2. No

☐ 3. I don't know

Please explain your reply.

(iii) Cross-border cooperation, media and press councils, self-regulation

Q1. Are you aware of the existence of a press or media council or another media self/co-regulation body supervising journalistic ethical standards and conduct in your country?

- ☐ 1. Yes
- ☐ 2. No

Q1.1 If yes, what are the main activities of a press or media council or another media self/co-regulation body in your country?

- ☐ 1. Please specify
- ☐ 2. I do not know

Please explain your answer

[   ]

Q1.2 Do you think press or media councils should be established in all EU countries?

- ☐ 1. Yes (please explain)
- ☐ 2. No (please explain)

Please explain

[   ]

Q1.3 In order to address the challenges in the media sector, which activities should be prioritised by press and media councils or other media self/co-regulation bodies?

- ☐ 1. Incentivising exchanges of best practices and promoting journalistic standards, in particular online – Yes/No
- ☐ 2. Providing support for journalists in the process of digitalisation of media sector – Yes/No
- ☐ 3. Ensuring effective complaints handling mechanisms – Yes/No
- ☐ 4. Establishing links between journalists and citizens to increase trust – Yes/No
- ☐ 5. Contributing to the fight against disinformation online – Yes/No

☐ 6. Other - please specify

Please explain your answer

[   ]

Q2. What role, if any, should the EU play to facilitate cross-border cooperation?

☐ 1. Provide financial support to media councils or other media self/co-regulation bodies – Yes/No

☐ 2. Set up an EU-level coordination network – Yes/No

☐ 3. Promote citizens' awareness about their activities – Yes/No

☐ 4. Other (please specify)

☐ 5. No role

Please explain your answer

[   ]

Questions on tackling disinformation

Designed to intentionally deceive citizens and manipulate our information space, disinformation undermines the ability of citizens to form informed opinions. Disinformation can also be a tool for manipulative interference by external actors.

(i) Scope

Q1. The April 2018 Commission Communication on Tackling online disinformation: a European Approach defines disinformation as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm.[4]

Do you think this definition should be broadened and complemented to distinguish between different aspects of the problem?

[4] Public harm includes threats to democratic processes as well as to public goods such as Union citizens' health, environment or security. Disinformation does not include inadvertent errors, satire and parody, or clearly identified partisan news and commentary.

☑ 1. Yes (please specify)

☐ 2. No (please specify)

☐ 3. Don't know

Please explain your answer

The digital advertising industry is committed to tackling the issue of disinformation. IAB Europe endorsed the EU Code of Practice (CoP) on Disinformation, recognising that legitimate digital infrastructure can be misused by bad actors to deceive and confuse citizens, making it more difficult for them to make fact-based judgments, and ultimately undermining our democracies.

Though all manifestations of online disinformation do not leverage, or relate to, advertising, digital advertising may facilitate the creation and propagation of disinformation, for example, by inadvertently enabling the placing of legitimate advertising on websites enabling disinformation. Reducing such ad misplacement can be indeed improved by investment in brand safety tools.

That said, we believe that there may be an added value in continued reflection on what constitutes disinformation, with a view to further delineate the term. The breadth of the current definition has posed several challenges to-date, and potentially prevented usage of scalable technological solutions. It is unrealistic to expect every single webpage on the internet to be thoroughly examined. The digital advertising industry cannot serve as a ministry of truth of any kind, we do not want to be and are not the arbiters of truth. That said, an industry-adopted, legislator-supported definition is vital to help the commercial entities to take on our fair share of work in tackling the phenomenon.

For reference, please see IAB Europe's full comments on the consultation on the European Democracy Action Plan (15 September 2020) under the following link: https://iabeurope.eu/wp-content/uploads/2020/09/20200915_IAB-Europe_EDAP_comments.pdf

Q2. So far, the European Commission has addressed the spread of disinformation through a self-regulatory approach, which has resulted in a Code of Practice on Disinformation being subscribed by major online platforms and trade associations representing the advertising industry. Do you think that this approach should be:[5]

[5] This question complements the questionnaire for the public consultation on the Digital Services Act, which focuses on illegal content

☐ 1. Continued as it is currently pursued (status quo)

☑ 2. Pursued but enlarged to a wider range of signatories

☐ 3. Pursued but combined with a permanent monitoring and reporting programme

☐ 4. Pursued but on the basis of a substantially reviewed Code of Practice

☐ 5. Pursued but accompanied by a regulatory framework fixing basic requirements for content moderation, data access and transparency, as well as respective oversight mechanisms

- [ ] 6. Pursued but accompanied by a regulatory package fixing overarching principles applicable to all information society services and establishing more detailed rules for dealing with disinformation under such general principles
- [ ] 7. Replaced by special regulation on disinformation
- [ ] 8. abandoned altogether, as all forms of restriction or control on content posted online by internet users and which is not illegal in nature (e.g. illegal hate speech, incitement to terrorism) could endanger freedom of speech
- [ ] 9. Other (please explain)

Please explain your answer

Looking to the future, IAB Europe fully supports the self-regulatory regime in the field of disinformation, given major concerns regarding the impact of any legislative influence on fundamental rights, including the freedom of speech and media. The agility and flexibility of voluntary commitments are critical, especially given the nature of an ever-changing online landscape.

Based on the experience of drawing up of the CoP, and efforts to ensure uptake thereof, we would like to observe that the aforementioned have shown up the critical importance of enlisting the broadest possible scope of well-meaning actors, if one has any hope of successfully tackling disinformation. There are limits to what we will be able to achieve if these efforts are not collective.

From the digital advertising ecosystem perspective, any successful action must be a collective effort share by the whole digital and media supply chain, requiring investment from all parties involved: marketers, agencies, publishers and technology companies alike.

The above should not preclude other actions given the fact that disinformation is a multifaceted problem, addressing which requires a comprehensive policy approach. We are also most supportive of continued EU-level investment in research to better understand the scope and nature of online disinformation, and in consumer education, notably in the area of media literacy, to increase people's ability critically to assess information they receive.

For reference, please see IAB Europe's full comments on the consultation on the European Democracy Action Plan (15 September 2020) under the following link: https://iabeurope.eu/wp-content/uploads/2020/09/20200915_IAB-Europe_EDAP_comments.pdf

Q3. Have you ever encountered the following measures to reduce the spread of disinformation on social media platforms?

	Yes	No	Don't know
1. Alerts when attempting to share or publish content that has failed a fact-check by journalists or a fact-checking organisation	◉	◉	◉

2. Notifications to users who have previously engaged with content or sites that have failed a fact-check by journalists or a fact-checking organisation	◉	◉	◉
3. Clear labels above content or sites that have failed a fact-check by journalists or a fact-checking organisation	◉	◉	◉
4. Mechanisms allowing you to report disinformation	◉	◉	◉

Q3.1 If yes, on which platforms have you encountered this?

☐ 1. Google

☐ 2. Facebook

☐ 3. Twitter

☐ 4. YouTube

☐ 5. WhatsApp

☐ 6. Other (Please specify)

Please explain your answer

_____

(ii) Disrupting the economic drivers for disinformation

Q1. What type of measures should online platforms and advertising networks operators take in order to demonetise websites that create, present or disseminate disinformation?[6]

[6] Please note that this question refers to monetisation of websites that systematically publish false or misleading information, which is not illegal in nature. Monetisation via advertisement placements of web sites publishing illegal content is addressed within the context of a separate questionnaire for the public consultation on the Digital Services Act.

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and publish them	●	○	○	○	○	○
2. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and remove the ad accounts concerned	○	●	○	○	○	○
3. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and temporarily suspend the ad accounts concerned	○	●	○	○	○	○
4. Establish and regularly update lists of websites identified by fact-checkers as occasional sources of disinformation (grey list approach) and give the advertisers the possibility to selectively exclude such websites	●	○	○	○	○	○
5. Block ad accounts only for those websites that engage in deceptive behaviour (e. g. spamming, misrepresentation of identity, scraping content from other sources, containing insufficient original content, etc.)	○	●	○	○	○	○

6. Ensure a systematic scrutiny of websites providing advertisement space and limit ad placements only on those websites that are considered trustworthy by reputable indexes (white list approach)	○	●	○	○	○	○
7. Ensure transaparency of platforms vis-à-vis advertisers and provide for third-party verification (e.g. position of the ads, the content the ads are run next to, metrics)	●	○	○	○	○	○
8. Other	○	○	○	○	○	○

Q2. Paid-for content on issues of public interest is promoted on social media platforms both during and outside electoral periods. Due to the special prominence given to such paid-for content in news-feeds and other systems for displaying content online, users may be misled as to its credibility or trustworthiness, irrespective of the veracity of the content. Do you think that issue-based advertising / sponsored content of political context:

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Should be systematically labelled	◉	○	○	○	○	○
2. Should be systematically labelled and collected in public, searchable repositories	○	○	◉	○	○	○
3. Should be subject to the same rules as on political advertising (see above section)	○	○	○	○	◉	○
4. Should not be regulated	○	◉	○	○	○	○

(iii) Integrity of platforms' services

Q1. Do you think there should be targeted regulation at EU or national level to prohibit deceptive techniques such as the use of spam accounts and fake engagement to boost posts or products?

☐ 1. Yes
☐ 2. No
☐ 3. Don't know
☐ 4. Other

Q1.1 If you replied yes to the previous question, what do you think should be the most appropriate measures to tackle the above-mentioned manipulative techniques and tactics?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Label the content as artificially promoted	○	○	○	○	○	○
2. Demote the content to decrease its visibility	○	○	○	○	○	○
3. Suspend or remove the content because the use of manipulative techniques is contrary to platforms' terms of service	○	○	○	○	○	○
4. Suspend or remove the accounts engaging in manipulative techniques	○	○	○	○	○	○
5. Invest in internal intelligence systems to detect manipulative techniques	○	○	○	○	○	○
6. Invest in artificial intelligence to detect manipulative techniques	○	○	○	○	○	○
7. Other	○	○	○	○	○	○

Please explain

(iv) Enhancing users' awareness

Q1. Do you agree that the following kinds of measures would help enhance user's awareness about how platforms operate and prioritise what users see first?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree
1. Promoting content from trustworthy sources	○	○	○	○	○
2. Promoting factual content from public authorities (e.g. on election date)	○	○	○	○	○

3. Providing tools to users to flag false or misleading content	○	○	○	○	○
4. Demoting content fact-checked as false or misleading	○	○	○	○	○
5. Labelling content fact-checked as false or misleading without demoting	○	○	○	○	○
6. Platforms should inform users that have been exposed to fact-checked content	○	○	○	○	○
7. Removing content which is found false or misleading and contrary to terms of service (e.g. threatening health or public safety)	○	○	○	○	○

Which sources do you consider as trustworthy?

Q2. In your opinion, to what extent, if at all, can the following measures reduce the spread of disinformation?

	No contribution	Minor contribution	Little contribution	Major contribution	Don't know
1. Demotion of posts or messages that have failed a fact-check by journalists or a fact-checking organisation in the newsfeed	○	○	○	○	○
2. Alerts if attempting to share content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	○
3. Notifications to users who have previously engaged with content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	○
4. Clear labels above content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	○
5. Mechanisms enabling readers to flag content that is misleading	○	○	○	○	○

6. Mechanisms to block sponsored content from accounts that regularly post disinformation	○	○	○	○	○
7. Closing of fake accounts and removal of automated social media accounts like bots	○	○	○	○	○
8. Closing of accounts that continuously spread content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	○
9. Allowing more diversity in suggestion algorithms designed to find videos, posts or sites that you might be interested in	○	○	○	○	○
10. Other	○	○	○	○	○

Q2.1. IF your answer=10, Please specify:

Q3. To what extent, if at all, do you support the following measures to reduce the spread of disinformation?

	Do not support at all	Do not support	Neither support nor discourage	Support	Support fully	Don't know
1. Demotion of posts or messages that have failed a fact-check by journalists or a fact-checking organisation in the newsfeed	○	○	○	○	○	○
2. Alerts if attempting to share content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	○	○
3. Notifications to users who have previously engaged with content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	○	○

4. Clear labels above content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	○	○
5. Mechanisms enabling readers to flag content that is misleading	○	○	○	○	○	○
6. Mechanisms to block sponsored content from accounts that regularly post disinformation	○	○	○	○	○	○
7. Closing of fake accounts and removal of automated social media accounts like bots	○	○	○	○	○	○
8. Closing of accounts that continuously spread content that has failed a fact-check by journalists or a fact-checking organisation	○	○	○	○	○	○
9. Allowing more diversity in suggestion algorithms designed to find videos, posts or sites that you might be interested in	○	○	○	○	○	○
10. Other	○	○	○	○	○	○

Q3.1 IF your answer=10, Please specify:

What safeguards and redress mechanisms do you consider appropriate and necessary to avoid errors and protect users' rights?

Q4. Which information would you like to receive when reading the information on social platforms:

	Yes	No	Don't know
1. Better information about the source of the content	○	○	○
2. Whether the content is sponsored or not	○	○	○
3. Information about the micro-targeting (why the information is addressed to you)	○	○	○

4. Whether there are advertisements linked to the content	⊙	⊙	⊙
5. Liability of the provider for supplying false or misleading information	⊙	⊙	⊙

Other: please list

Q5. As a user, when you come across information that you perceive as false or misleading, which options should be available to deal with such content (more than one reply is possible)?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Removing that content from your feed	⊙	⊙	⊙	⊙	⊙	⊙
2. Removing that content from your feed and excluding similar content from being algorithmically promoted in your feed	⊙	⊙	⊙	⊙	⊙	⊙
3. Flagging the content to the platform for fact-checking	⊙	⊙	⊙	⊙	⊙	⊙
4. Receiving feed-back about the action taken by the platforms after flagging, including possible demotion	⊙	⊙	⊙	⊙	⊙	⊙
5. Flagging the content to competent authorities	⊙	⊙	⊙	⊙	⊙	⊙

Q6. End-to-end encrypted messaging services (such as WhatsApp, Telegram or Signal) can be used to spread false and harmful content. In your view, should such platforms introduce measures to limit the spread of disinformation, with full respect of encryption and data protection law (more than one reply is possible)?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply

1. Introduce easy-to-find reporting or flagging system for users	○	○	○	○	○	○
2. Limit the possibility to forward the same content to many users	○	○	○	○	○	○
3. Limit the amount of people in a discussion group	○	○	○	○	○	○
4. In exceptional cases, proactively contact users about potential disinformation wave or promote authoritative conent (e.g. in cases like Covid-19 pandemic)	○	○	○	○	○	○
5. Other (please elaborate)	○	○	○	○	○	○

Please explain

Q7. Do you easily find information about how content is fact-checked on online platforms, and by whom?

- ☐ 1. Yes
- ☐ 2. No
- ☐ 3. Don't know

Q8. If your post is being fact-checked or labelled, do you know how to contest this if you do not agree?

- ☐ 1. Yes
- ☐ 2. No
- ☐ 3. Don't know

Q9. Which information should online platform publish about their factchecking /content moderation policy?

	Yes	No	Don't know
1. If they pay directly the factcheckers or if they work with an external factchecking organisation	○	○	○
2. How they decide which posts are factchecked	○	○	○

3. How many posts are factchecked	○	○	○
4. How to flag posts to be factchecked	○	○	○
5. Other, (please specify)	○	○	○

Please explain

Q10. Do you think it should be mandatory for online platforms to offer oversight bodies that enable users to seek recourse in case their account has been locked or content they have posted has been deleted?

☐ 1. Yes

☐ 2. No

☐ 3. Don't know

Q11. Do you think it should be mandatory for online platforms to provide points of contact for each Member State in their language?

☐ 1. Yes

☐ 2. No

☐ 3. Don't know

Q12. What kind of data and/or transparency tools do users/researchers/fact-checkers need to be better able to detect and analyse disinformation campaigns, including by foreign state and non-state actors? Please specify.

Q13. How should the EU respond to foreign state and non-state actors who interfere in our democratic systems by means of disinformation (multiple answers possible)?

	Yes	No	Don't know
1. Analyse and expose state-backed disinformation campaigns	○	○	○
2. Conduct public awareness-raising campaigns	○	○	○
3. Support independent media and civil society in third countries	○	○	○
4. Impose costs on state who conduct organised disinformation campaigns	○	○	○

5. Develop more effective public outreach and digital communication strategies	⚪	⚪	⚪
6. Other, (please specify)	⚪	⚪	⚪

Please explain

[   ]

Q14. In your opinion, should content by state-controlled media outlets be labelled on social media?

☐ 1. Yes

☐ 2. No

☐ 3. Don't know

Questions on supporting civil society and active citizenship

As a crosscutting issue, civil society faces increasing pressure, but plays a key role in the democratic system, holding those in power to account and stimulating public debate and citizen engagement, as well as in combatting some of the identified threats. In addition to this, participatory and deliberative democracy gives citizens a chance to actively and directly participate in the shaping of planned or future public policies. A major element in the context will be the upcoming Conference on the Future of Europe.

Q1. Do you think civil society is sufficiently involved in shaping EU policies, notably through consultation?

☐ 1. Yes

☐ 2. No

☐ 3. Don't know

If Q1=2 What more could be done?

[   ]

Q2. Do you think civil society should be more involved in concrete EU-level actions to promote democratic debate?

☐ 1. Yes

☐ 2. No

☐ 3. Don't know

Please explain your answer

Q3. Do you think actions should be taken at EU level to strengthen cooperation among civil society actors across borders?

☐ 1. Yes

☐ 2. No

☐ 3. Don't know

Please explain your answer

Q4. Do you think the EU should provide more financial support for civil society (for example under the 'Rights, equalities and citizenship' programme)?

☐ 1. Yes

☐ 2. No

☐ 3. Don't know

Q5. Are you aware of measures to increase media and information literacy/develop media literacy skills? What type of action do you deem to be most efficient/most appropriate in this area:

☐ 1. Formal education in school/university

☐ 2. Education online via social media platforms

☐ 3. Life-long learning

☐ 4. Exchange of best practices in expert fora

☐ 5. Don't know

Q6. Do you think that more participatory or deliberative democracy at the European level, with more possibilities for public deliberation and citizen engagement, beyond public consultations, would be:

☐ 1. A good thing

☐ 2. Neither good nor bad

☐ 3. A bad thing

☐ 4. Don't know

Please explain your reply

Q6.1 If given the opportunity, would you take part in a European participatory or deliberative democracy event?

- ☐ 1. Yes, absolutely
- ☐ 2. Yes, probably
- ☐ 3. Maybe
- ☐ 4. Probably not
- ☐ 5. No, not at all
- ☐ 6. Don't know

Q7. Are you familiar with the European Citizens' Initiative?

- ☐ 1. Yes, I have taken part in one before
- ☐ 2. Yes, but I have not taken part in one before
- ☐ 3. Not sure
- ☐ 4. No, I do not know what a European Citizens' Initiative is

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