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## **PUBLIC CONSULTATION FOR LEGAL ENTITIES ON FAKE NEWS AND ONLINE DISINFORMATION**

### **Consultation**

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**Media Governance and Industries Research Lab**  
*University of Vienna*

**February 2018**

**MEDIA GOVERNANCE**  
& INDUSTRIES RESEARCH  
**lab**

# Public consultation for legal entities on fake news and online disinformation

Fields marked with \* are mandatory.

## Public consultation for legal entities - "Fake news and online disinformation"

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The phenomenon of fake news and online disinformation is a source of deep concern for its potential effects on the reputation of public institutions, the outcome of democratic deliberations or the citizens' opinion-forming on important public policies such as health, environment, immigration, security, economy or finance.

Although not new, this phenomenon is often said to be more pervasive and impactful today than ever before because of the ease with which news can be posted and shared by anyone on social media, the velocity at which such news may spread online, and the global reach they might effortlessly attain.

For the purposes of defining appropriate policy responses, a broad distinction can be drawn between false information that contain elements which are illegal under EU or national laws such as illegal hate speech, incitement to violence, terrorism or child abuse, and fake news that fall outside the scope of such laws. This consultation only addresses fake news and disinformation online when the content is not per se illegal and thus not covered by existing legislative and self-regulatory actions.

When tackling fake news, the public intervention must respect and balance different fundamental rights and principles, such as freedom of expression, media pluralism and the right of citizens to diverse and reliable information.

The purpose of the consultation is to collect views from all parties concerned across the EU as regards the scope of the problem and the effectiveness of voluntary measures already put in place by industry to prevent the spread of disinformation online and to better understand the rationale and possible directions for action at EU and/or national level.

This questionnaire specifically targets **legal entities and journalists, including independent/freelance journalists**. There is another questionnaire for citizens.

Your input will be used by the Commission to nourish policy discussions at EU level on the spread of disinformation online.

The consultation process will be complemented with a Eurobarometer public opinion survey to be launched early 2018 to measure and analyse the perceptions and concerns of European citizens around fake news.

## Identification of respondents

**\* Please indicate your sector of activity**

- News media
- Online platform
- Fact-checking organisation
- Civil society organisation
- Academia Educational sector
- Public authority
- Other

**\* Respondant's first name**

*100 character(s) maximum*

Krisztina; Katharine

**\* Respondant's last name**

*100 character(s) maximum*

Rozgonyi, Dr. iur.; Prof. Dr. Sarikakis

**\* Organisation's name**

*100 character(s) maximum*

Media Governance and Industries Research Lab, University of Vienna

**\* Contact details**

*150 character(s) maximum*

krisztina.rozgonyi@univie.ac.at; katharine.sarikakis@univie.ac.at

**\* Company/organisation website**

*100 character(s) maximum*

<http://mediagovernance.univie.ac.at>

**\* Legal seat of the organisation you represent**

*100 character(s) maximum*

Vienna, Austria

**\* Countries in which your organisation is active**

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Extra-EU
- All around the World

**\* Brief description of entity's sector(s) of activity**

*300 character(s) maximum*

Academic research and education

**Number of employees**

- < 10
- 11-50
- 51-250
- > 250

**Turnover of your organisation in 2016**

- < 2 million EUR
- 2-10 million EUR

- 11-50 million EUR
- > 50 million EUR

**If part of a group of companies, please specify the identity of the group.**

*300 character(s) maximum*

**\* Is your organisation registered in the Transparency Register of the European Commission and the European Parliament?**

- Yes
- No
- Not applicable: I am replying as an individual in my personal capacity

**\* Please indicate your organisation's registration number in the Transparency Register.**

*100 character(s) maximum*

**For journalists: please briefly indicate the topics you cover**

*600 character(s) maximum*

**For media companies: please provide a short overview of your online and off-line news and information services.**

*600 character(s) maximum*

**For social media and online platforms: please provide a short overview of your core services. Please specify those enabling users to access news and information through your platform.**

*600 character(s) maximum*

**For civil society organisations: please explain the corporate mission of your organisation and briefly describe its activities, including those designed to reduce disinformation.**

*600 character(s) maximum*

**For the educational sector: please clarify whether primary/secondary/higher, and indicate whether your institute teaches media literacy.**

*600 character(s) maximum*

**For academia: please briefly describe your field of research and its relevance for a better understanding of the phenomenon of fake news.**

*600 character(s) maximum*

The Media Governance and Industries Research Lab researches urgent and long standing policy problems and processes of governance in the field of communication, media, culture and technology. Chaired by Prof Sarikakis is a 17 member strong team of international researchers addressing some of the most pressing issues of European societies.

**For public authorities: please briefly describe whether and how your organisation is involved in reducing the impact of disinformation.**

*600 character(s) maximum*

**\* Your contribution,**

Note that, whatever option chosen, your answers may be subject to a request for public access to documents under Regulation (EC) N° 1049/2001

- can be directly published with your personal information** (I consent to publication of all information in my contribution in whole or in part including, where applicable, my name/the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- can be directly published provided that I/my organisation remain(s) anonymous** (I consent to publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that this is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication).

## Scoping the problem

"Fake news" represents an ill-defined concept encompassing different types of disinformation, such as misrepresentation of reality or distortion of facts. In the context of this questionnaire, the focus is on **news that is intentionally created and spread online to mislead the reader** (e.g. for political or economic reasons). Generally, individual opinions, satire and pure journalistic errors are not considered as fake news. While the spread of certain fake news may constitute an illegal conduct under EU and/or national laws (e.g. as illegal hate speech, incitement to violence, terrorism or child abuse defamation, libel, etc.), in many other cases fake news may have harmful effects on society without being necessarily illegal. The following sub-set of questions is aimed at enabling the Commission to scope the problem and assess the mechanisms that may contribute to the spread of fake news which are not deemed illegal.

**1. In your opinion, which criteria should be used to define fake news for the purposes of scoping the problem?**

*2000 character(s) maximum*

We among other academics, news media representatives and human rights actors find it inherently problematic to suggest that fake news can be defined. For e.g., who is it who determines whether or not factual errors were designed to deliberately spread fake news as opposed to an innocent journalistic mistake. The term fake news is fundamentally problematic, especially since it has now been adopted by institutions such as the European Commission, after being coined by Donald Trump, emulated by many political actors around the world, and used by populists even within still democratic countries to discredit bona fide mainstream media outlets. We suggest rather focusing on definitions of what professional journalism is - i.e. seeking to ensure verification of facts before airing or publication, not knowingly reporting unverified or false facts etc. As for efforts by state and other actors to undermine democratic and other processes such as elections, we would suggest that we call the deliberate distribution of falsehoods that which it is, and always has been: a form of propaganda. So-called fake news is not a new phenomenon. The term fake news is.

For policy-purposes we suggest to refer to the typology offered by the European Association for Viewers Interests on Misleading News' (Available at: <<https://eavi.eu/beyond-fake-news-10-types-misleading-info/>> ) which also takes into consideration (likely) motivation behind each category and their (likely) impact.

**2. Are the following categories of fake news likely to cause harm to society? Please answer on a scale from 1 to 4: 1 (no harm), 2 (not likely), 3 (likely) to 4 (highly likely).**

	No opinion	1	2	3	4
Intentional disinformation aimed at influencing voting decisions at elections	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intentional disinformation aimed at influencing health policies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intentional disinformation aimed at influencing environmental policies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intentional disinformation aimed at influencing immigration policies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intentional disinformation aimed at influencing economy or finance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intentional disinformation aimed at undermining trust in public institutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intentional disinformation aimed at undermining public security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Intentional disinformation aimed at generating advertisement revenues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other categories of intentional disinformation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

\* Please specify which other categories of fake news are more likely to cause harm to society.

*300 character(s) maximum*

The deliberate spreading of falsehoods to discredit critical journalists and other human rights actors.

**3. If you have remarks on these categories, please explain why and/or suggest additional categories of fake news.**

*300 character(s) maximum*

Despite of earlier assertion that we should be wary of seeking a definition of 'fake news', it is clear that the dissemination of false facts and untruths, as part of a deliberate propaganda effort, in the age of exponential exposure snowballing is enormous.

**4. In your opinion, what are the main economic, social and technology-related factors which, in the current news media landscape, contribute to the increasing spread of fake news? For instance, you can address reading behaviour, advertising revenues, the changing role of journalists and/or the impact of sponsored articles.**

*3000 character(s) maximum*

1) The emergence of a parallel information world online, particularly on Facebook, YouTube and Twitter, allowing for an exponential snowballing effect in terms of exposure, with respect to the (deliberate) dissemination of falsehoods, especially as part of a state (or other) propaganda effort.

2) The financial crisis that has for years plagued mainstream media, leading to falling advertising revenues and existential business model threats, and as a consequence the creeping replacement of balanced factual news, with so-called branded content.

3) Propaganda-driven misinformation fuelled by both State and non-State actors is an emerging trend interfering with elections typically. However, this kind of misinformation has to be noticeably distinguished within the broad category of 'fake news'. (See also: OSCE Representative on Freedom of the Media, Organization of American States (OAS) Special Rapporteur on Freedom of Expression, and African Commission on Human and Peoples' Rights Special Rapporteur on Freedom of Expression and Access to Information 2017.)

**5. In which media do you most commonly come across fake news? Select the most relevant options.**

- Traditional print newspapers and news magazines
- Traditional online newspapers and news magazines
- Online-only newspapers
- News agencies (e.g. Reuters, ANSA, AFP)
- Social media and messaging apps
- Online blogs/forums
- TV
- Radio
- News aggregators (e.g. Google News, Apple news, Yahoo news)
- Video sharing platforms (e.g. YouTube, DailyMotion, Vimeo)
- Information shared by friends or family
- No opinion

**6. Indicate which of the following dissemination mechanisms, in your opinion, have the highest impact on the spread of fake news in the EU? Select the most relevant options.**

- Online sharing by human influencers / opinion makers
- Online sharing done by bots (automated social media accounts)
- Sharing among social media users

- Recommendation algorithms used on online platforms
- Media editorial decisions
- Others

**7. Which of the following areas have, in your view, been targeted by fake news during the last two years? Please, for each area, use a scale from 1 to 4; 1 (not targeted), 2 (marginally targeted), 3 (moderately targeted), 4 (heavily targeted).**

	No opinion	1	2	3	4
Political affairs (e.g. elections)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Personal life of public figures (e.g. politicians)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Show biz and entertainment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Immigration (e.g. refugees)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Minorities (e.g. religious, ethnic, sexual orientation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Health (e.g. vaccines)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment (e.g. climate change)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Economy and finance (e.g. market rumours)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Science and technology (e.g. fake or misleading studies)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**8. In your view, has public opinion been impacted by fake news in the following areas during the last two years? Please for each area use a scale from 1 to 4: 1 (no impact), 2 (some impact), 3 (substantial impact) to 4 (strong impact).**

	No opinion	1	2	3	4
Political affairs (e.g. elections)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Personal life of public figures (e.g. politicians)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Show biz and entertainment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Immigration (e.g. refugees)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Minorities (e.g. religious, ethnic, sexual orientation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Health (e.g. vaccines)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment (e.g. climate change)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Economy and finance (e.g. market rumours)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Science and technology (e.g. fake or misleading studies)

**9. If you are an online platform or a news organisation, please explain the criteria you use to rank news content on your platform/online website and a description of their impact on the ranking of other sources of news.**

*3000 character(s) maximum*

### Assessment of the measures already taken by online platforms, news media organisations and civil society organisations to counter the spread of disinformation online

Concrete steps have been taken by online platforms, news media organisations and civil society organisations (e.g. fact checkers) to counter the spread of disinformation online. For instance measures have been taken to deprive fake news websites of online advertising revenue, to close fake accounts, and to establish flagging mechanisms (by readers and trusted-flagger organisations alerting the platforms about content of dubious veracity) and collaborations with independent fact-checkers adhering to the International Fact-Checking code of principles.

The following subset of questions is aimed at collecting information needed to better identify the positive impact, and the drawbacks, of current measures to counter the spread of disinformation online.

**10. To what extent, if at all, have the following measures reduced the spread of fake news? Please evaluate each of the following statements on a scale from 1 to 4; 1 (no contribution), 2 (minor contribution), 3 (appreciable contribution), 4 (great contribution).**

	No opinion	1	2	3	4
Pop-up messages on social media, encouraging readers to check news and sources	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mechanisms to display in prominent position information from different sources representing similar viewpoints (e.g. "related articles" button)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mechanisms to display in prominent position information representing different viewpoints (e.g. "other sources say" button)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mechanisms enabling readers to flag content that is misleading and/or fake	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Warnings to readers that a post or article has been flagged /disputed	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fact-checking through independent news organisations and civil society organisations (explaining why a post may be misleading)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Mechanisms to block sponsored content from accounts that regularly post fake news	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Closing of fake accounts and removal of automated social media accounts (based on the platforms' code of conduct)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

For the measures you have rated equal or below 2 in the previous question please specify why, in your opinion, they are not so effective

*600 character(s) maximum*

Because the online 'alternative facts' world is in essence an echo chamber or a combination of echo chambers, feeding certain kinds of people, or people with certain kinds of views, what they want to hear or may want to hear, warnings serve no effective purpose. Just as warnings on cigarette packages are ineffective in dissuading people from smoking the same is true for warnings and other mechanisms related to 'fake news'. Closing down accounts that are non to be part of a fake news propganda effort is slightly more helpful, but of course does not deal with the issue: new accounts pop up.

**11. If you are an online platform or a news organisation and you have adopted measures aimed at countering the spread of disinformation on your online platform, news media or website, or on those operated by third parties, please explain the measures you took. Please provide a short description of their characteristics as well as their results.**

*3000 character(s) maximum*

**12. If you are an online platform or a news organisation, which tools do you use to assess the content uploaded on your platform/the quality of online information used to produce news content? Please evaluate each of the following measures on a scale from 1 to 4; 1 (rarely), 2 (occasionally), 3 (often), 4 (always).**

	No opinion	1	2	3	4
Fact checking (human fact checkers)	<input type="radio"/>				
Peer reviews	<input type="radio"/>				
Flagging (by users)	<input type="radio"/>				
Flagging (by trusted flaggers)	<input type="radio"/>				
Automated content verification tools	<input type="radio"/>				
Other	<input type="radio"/>				

**13. In your view, are readers sufficiently aware of the steps to take to verify veracity of news, when reading and sharing news online (e.g. check sources, compare sources, check whether claims are backed by facts)?**

- Yes

- No  
 No opinion

You are welcome to provide a comment on readers' awareness on the precautions they should take when reading and sharing news online

*600 character(s) maximum*

This is the issue of news literacy, which is decreasing, not increasing because of the echo chamber phenomenon.

**14. If you are an online platform or a news organisation, what does your organisation do in order to inform readers about the precautions they should take when reading and sharing news online (e.g. periodic notifications, media literacy programmes) ? How do you help them assess a specific article/post (tools to investigate the source, links to facts & figures, links to other sources etc.) ?**

*3000 character(s) maximum*

## Scope for possible future actions to improve access to reliable information and reduce the spread of disinformation online

It is sometimes argued that the mechanisms put in place so far by online platforms and news media organisations to counter the spread of fake news only capture a small fraction of disinformation, and that this involves labour-intensive human verification of content and does not prevent virality of fake news through social media. Moreover, concerns have been voiced about the risks of censorship and the need to ensure a more diversified and pluralistic ranking of alternative news sources on social media. The following questions are aimed at collecting information on additional actions which may help to provide a comprehensive and effective response to the phenomenon of fake news.

**15. Do you think that more should be done to reduce the spread of disinformation online?**

- Yes  
 No  
 No opinion

You are welcome to comment on what should be done to reduce the spread of disinformation online.

*3000 character(s) maximum*

News literacy should be a matter of primary education. Students should from an early age be taught about the history and value of professional journalism, and about the challenges it faces in the digital age. Also examples of disinformation snowballing and having huge impact.

**16. In your view, which measures could online platforms take in order to improve users' access to reliable information and prevent the spread of disinformation online?**

*3000 character(s) maximum*

Removing content that is not illegal and hate speech etc laws is censorship. It is usually not illegal to share or even deliberately spread disinformation. Online platforms should however make strong efforts to take

down content that is illegal under existing democratic laws, i.e. incitement to violence, hate etc. At the same time they must be very careful not to indulge political actors who want them to censor content, shrouding it as 'fake news'.

Moreover, they should actively engage with preventing the operation of False Amplifiers (Coordinated activity by inauthentic accounts with the intent of manipulating political discussion - see Facebook 'Information Operations and Facebook' 1.0 – Initial Public Release, 27APR2017).

We support the recommendations of the Joint Declaration (OSCE Representative on Freedom of the Media, Organization of American States (OAS) Special Rapporteur on Freedom of Expression, and African Commission on Human and Peoples' Rights Special Rapporteur on Freedom of Expression and Access to Information 2017) in regards to responsibilities of 'Intermediaries' to act according to clear, pre-determined policies based on objectively justifiable criteria and respect minimum due process guarantees. We also suggest to consider the role of national regulators and of the courts in overseeing conduct of those intermediaries.

**17. How effective would the following measures by online platforms be in preventing the spread of disinformation? Please evaluate each action on a scale from 1 to 4; 1 (no impact), 2 (low impact), 3 (moderate impact), 4 (strong impact).**

	No opinion	1	2	3	4
Rank information from reliable sources higher and predominantly display it in search results or news feeds.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide greater remuneration to media organisations that produce reliable information online	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allow more control to users on how to personalise the display of content.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allow direct flagging of suspicious content between social media users.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Invest in educating and empowering users for better assessing and using online information.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide buttons next to each article that allow users to investigate or compare sources.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inform users when certain content was generated or spread by a bot rather than a human being.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Inform users about the criteria and/or algorithms used to display content to them (why they see certain content).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support civil society organisations to improve monitoring and debunking of fake news.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Employ fact-checkers at the online platform.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Further limit advertisement revenues flowing to websites publishing fake news.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Improve and extend to all EU Member States online platforms' current practices, which label suspicious information after fact-checking.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Invest in technological solutions such as Artificial Intelligence to improve the discovery and tracking of fake news.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Develop new forms of cooperation with media outlets, fact-checkers and civil society organisations to implement new approaches to counter fake news.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**18. In your view, which measures could news media organisations take in order to improve the reach of reliable information and prevent the spread of disinformation online?**

*3000 character(s) maximum*

As mentioned earlier, there must be a continued focus on what professional journalism is and means for a democratic society and fundamental freedoms. Continued focus should be on how to finance such journalism in the future, because the less professional factual balanced reporting there is the bigger the vacuum for disinformation.

In addition, efforts should be made to think about how to reach the people not being reached by professional media outlets, and instead wallowing in the echo chambers of propaganda and disinformation. Teaching media literacy is a start. Fact checking platforms working in conjunction with civil society and mainstream news platforms are another. BUt funding future journalism business models is vital. Platforms like BUzzfeed News, Vox, Mic etc are crucial because they reach younger readers who are vulnerable to the disinformation phenomenon. Delivering factual news on social media platforms where younger generations are engaged, such as Snapchat, is also crucial.

The 'fake news' phenomenon is addressing a much wider problem of TRUST in media of citizens. As the findings of the Reuters Study (2017) has clearly indicated, "from an audience perspective, fake news is only in part about fabricated news reports narrowly defined, and much more about a wider discontent with the information landscape" (Reuters Institute "News you don't believe": Audience perspectives on fake news Rasmus Kleis Nielsen and Lucas Graves; October 2017). We believe any policy initiative by the EC should consider the wider context and narrowly design any measures in regards to purported disinformation and misinformation.

**19. How effective would the following measures by news media organisations be in strengthening reliable information and tackling fake news? Please evaluate each actions on a scale from 1 to 4; 1 (no impact), 2 (low impact), 3 (moderate impact), 4 (strong impact).**

	No opinion	1	2	3	4
Invest more in new forms of journalism (i.e. data-based investigative journalism) to offer reliable and attractive narratives.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increase cooperation with other media organisations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Help readers develop media literacy skills to approach online news critically	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Help readers assess information when and where they read it (e.g. links to sources)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Support civil society organisations and participative platforms (for instance using the model of Wikipedia/Wikinews) to improve monitoring and debunking of fake news.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Invest in technological solutions to strengthen their content verification capabilities, in particular for user-generated content, in order not to contribute to the proliferation of fake news.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**20. In your view, which measures could civil society organisations take in order to support reliable information and prevent the spread of disinformation online?**

*3000 character(s) maximum*

Continue to raise awareness about the fundamental difference between innocent factual errors in professional journalism, and deliberate state or other sponsored attempts to spread propaganda and disinformation to for eg sway outcomes of elections for geostrategic and socio/political cultural reasons. Continue to advocate against the slide into accepting the term 'fake news' as a legitimate one, since it is a term coined by someone with the specific aim of deligitimising professional critical mainstream news outlets, and has been adopted by undemocratic leaders and politicians around the world. Continue to raise warning signals about endowing state and other actors with the right to determine what fake news is and to sanction people and media platforms over it. Work together with mainstream media outlets to run fact checking platforms and to then spread the findings of such platforms across innovative social media platforms and media outlets so that culnerable younger info consumers are pulled back from the brink of falling into the cynical echo chamber disinformation campaigns.

**21. How do you rate the added value of an independent observatory/website (linking platforms, news media organisations and fact-checking organisations) to track disinformation and emerging fake narratives, improve debunking and facilitate the exposure of different sources of information online? Please evaluate each of the following statements on a scale from 1 to 4; 1 (strongly disagree), 2 (disagree), 3 (agree), 4 (strongly agree). If you find it useful, you can voice suggestions for independence hereunder - e.g. academic supervision, community-based structures or a hybrid such as Wikipedia.**

	No opinion	1	2	3	4
The public would benefit from an independent observatory that acts like a knowledge centre, gathering studies and providing general advice on how to tackle disinformation online.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The public would benefit from an independent observatory that looks at popular social media posts, asks fact-checkers to look at them, and provide warnings (to platforms, public authorities, etc.) that they need to be flagged.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The public would benefit from an independent observatory /website that looks at popular social media posts, researches the facts and develops counter-narratives when necessary.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>The public would benefit from an independent observatory /website that does not look at posts, but instead helps to gather factual information (and possibly user ratings) for each source, to help create a factual snapshot of each source's activity and reputation</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>An observatory is not useful for the public</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**22. What actions, if any, should be taken by public authorities to counter the spread of fake news, and at what level (global, EU, national/regional) should such actions be taken?**

*3000 character(s) maximum*

As noted earlier we should be very careful about granting states or any other institutions the right under any kind of law to define fake news and sanctions the alleged purveyors of it. The slope is too slippery and there is no question that such powers would be abused to stifle legitimate factual criticism. What should happen is that at an institutional level more attention should be paid to press freedom, voices should be more loudly raised when certain countries even within the EU seek to stifle independent factual journalism. The best way to fight so called fake news and disinformation and propaganda campaigns is to enable professional journalists to counter it with factual professional democracy upholding watchdog journalism. If that journalism is absent the fake news wins.

In regards to role of intermediaries in controlling purported misinformation and disinformation the role of national regulators and of the courts in overseeing conduct of those intermediaries needs to be reconsidered and EU-level regulatory measures are necessary to avoid MS individual action and fragmentation thereof.

**23. Please provide any comment and/or link to research that you consider useful to bring to the Commission attention.**

*3000 character(s) maximum*

**Contact**

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