

# 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*

Nicola

**\* Respondant's last name**

*100 character(s) maximum*

Frank

**\* Organisation's name**

*100 character(s) maximum*

European Broadcasting Union (EBU)

**\* Contact details**

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+32 2 286 91 11 / +32 2 286 91 02  
Avenue des Arts 56, 1000 Brussels

**\* Company/organisation website**

*100 character(s) maximum*

www.ebu.ch

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

*100 character(s) maximum*

European Broadcasting Union  
L'Ancienne-Route 17A  
Postal Box 45  
1218 Le Grand-Saconnex  
CH

**\* 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*

The EBU is the world's leading alliance of public service media. We support and strengthen public service media, provide first-class media services and offer our 73 Members (and 33 Associates) a centre for learning and sharing. The EBU also operates Eurovision and Euroradio services.

**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*

Aisbl EBU-UER (based in Brussels) is responding to this consultation on behalf of the European Broadcasting Union/Eurovision (based in Geneva). All responses in this questionnaire relate to the entire EBU organization.

**\* 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*

93288301615-56

**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*

Our Members operate almost 2,000 television, radio and online channels and services, and offer a wealth of content across other platforms. Together they reach an audience of more than one billion people around the world, broadcasting in more than 120 languages. Our Members' programmes include daily and evening news bulletins, current affairs programmes, children's news bulletins and documentaries.

The EBU also operates the Eurovision News Exchange which provides EBU Members with round-the-clock access to live and edited news stories, as they happen. <https://www.ebu.ch/news-exchange>

**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*

**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 share the general view that the notion of 'fake news' itself misrepresents the societal problem we have to deal with at present. 'Fake news' has always existed – as propaganda, shock headlines, fearmongering, or smokescreens, to name but a few examples.

What has changed today is the speed and scale at which inaccurate, fabricated or deliberately misleading news stories reach citizens. The emergence of the internet and social technology have brought about fundamental changes to the way information is produced, communicated and distributed. At this stage, it may be difficult to fully recognize and assess the scope of this phenomenon.

The EBU considers that the notion of 'information disorder', as coined in a recent report commissioned by the Council of Europe, better reflects the full extent of the current problem, where 'fake news' is only the tip of the iceberg. 'Fake news' is the most visible element in a broader context of an online information disorder.

It should be noted that the term 'fake news' has been used and mis-used in the political debate also to dismiss reports which politicians simply did not like. For the purpose of scoping the problem, we recommend to limit the notion of 'fake news' to the intentional creation and/or spreading of false or misleading news on social media and similar platforms, whether for political or other reasons. Generally, we prefer the term 'online disinformation', which is more precise and may serve to designate digital content which contains inaccurate information and which is presented, promoted or disseminated by one or more actors in the chain with the intention to cause harm or make a profit.

**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 checked="" type="radio"/>	<input type="radio"/>
Intentional disinformation aimed at influencing environmental policies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Intentional disinformation aimed at influencing immigration policies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Intentional disinformation aimed at influencing economy or finance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Intentional disinformation aimed at undermining trust in public institutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Intentional disinformation aimed at undermining public security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>

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

*300 character(s) maximum*

One should also consider as an additional category intentional disinformation which is aimed at undermining trust in traditional media, regardless of the medium through which it is conveyed.

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

*300 character(s) maximum*

All the above-mentioned categories are important – fake news may affect any subject which is part of the public debate or social discourse. However, one should also consider as an additional category intentional disinformation which is aimed at undermining trust in traditional media.

**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*

'Fake news' is the most visible element in a broader context of an online information disorder, where a small number of social media and other relevant platforms have huge influence on people's access to information. These platforms' unprecedented reach and economic power coupled with business models based on monetizing visibility, structuring and ranking the offer of information and content, based on algorithms and unilateral "community standards", have disrupted the traditional media system. The use of algorithms and the business model of monetizing content through advertising have the side effect of distributing and amplifying 'fake news', although this may be against the platform operator's own interest. The sensational nature of 'fake news' pieces attracts clicks and visibility, which boosts their appeal and virality. In turn, users' exposure to fake or unreliable news articles undermines trust in the media in general.

Moreover, the traditional legal framework to fight fake news - in particular libel and defamation law - which remains quite effective as far as the media are concerned – loses much of its effectiveness in the online world. Unlike in print and broadcast media, where there is a responsible editor who is responsible under media, civil and even criminal law for the content published, there is nobody who has an equivalent responsibility for other online content distributed on social media. Online intermediaries and aggregators generally reject responsibility for the content that they curate, evoking the liability exemptions for hosting service providers, whereas the authors and creators or sponsors of online fake news are often impossible or difficult to pursue. This is because their identity may be hidden behind pseudonyms, or may not be disclosed by intermediaries, or because they are simply unreachable in foreign jurisdictions.

The impact of widespread dis-information has damaged the reputation and public acceptance of legitimate news media, which are based on thorough research and driven by a fact-driven editorial approach. This loss of trust goes hand-in-hand with a loss of trust in public institutions. In turn, this lack of trust undermines initiatives – fact-checking or labelling – undertaken by 'serious' media or public authorities to identify and inform audiences about 'fake news' stories.

At the same time, the world of professional news media must also take its share of responsibility and transparency to keep for the quality of journalistic standards. It is important to support and uphold quality standards in the media sector.

**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 checked="" type="radio"/>	<input type="radio"/>
Personal life of public figures (e.g. politicians)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Show biz and entertainment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>
Personal life of public figures (e.g. politicians)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Show biz and entertainment	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

**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*

Public service media organizations – EBU Members – abide by their editorial standards to create news content on their websites. These editorial guidelines ensure that all news content provided on public service media organizations' websites is reliable, accurate, thoroughly-researched, fair and impartial, accountable, up-to-date and topical. News offered by public service media organizations sustains informed citizenship and contributes to the public debate.

## 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Mechanisms enabling readers to flag content that is misleading and/or fake	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Warnings to readers that a post or article has been flagged /disputed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Mechanisms to block sponsored content from accounts that regularly post fake news	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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*

Mechanisms to display information from different sources representing similar viewpoints does little to expand the perspectives at the disposal of audiences and tends to comfort their pre-established viewpoints.

Mechanisms enabling readers to flag content that is misleading and/or fake are seldom trusted by other users as many individuals will flag content which does not reflect their viewpoint, irrespective of whether the content is fake or misleading.

**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*

As major news providers to a majority of the EU population, European public service media are repositioning themselves and developing techniques to face up to the challenges of the multi-platform age. EBU Members are in the front line when it comes fighting the propagation of 'fake news' and disinformation. Quality journalism, media pluralism and unbiased reporting are not only part of the public service remit our Members abide

by; these are values which are at the heart of our Members' corporate culture and their contribution to society and democracy.

To fulfill this key role in informing citizens and addressing 'fake news', public service media need political independence, a flexible remit and sustainable funding, supported by an appropriate regulatory framework across the wider sector.

Providing trustworthy news programmes as well as documentaries and current affairs programmes, with a powerful outreach on their linear channels, non-linear services and websites and apps, as well as via third party platforms, is the most important contribution public service media organizations make to informed citizenship and countering the spread of disinformation.

Beyond the traditional news programming they offer across platforms, public service media organizations have developed a number of initiatives aiming to sustain informed citizenship and limit the impact of disinformation.

Examples include:

- Fact-checking of statements made by officials on their outlets notably during debates
- Interactive weekly Facebook Live with journalist showing people on the streets and FB audience fake reports trending on social media, catching their reactions and explaining
- Crowd sourced story verification
- Special fact-checking investigative reports in TV news bulletins and on a dedicated blog
- Creation of in-house wire news agency using own journalists to reinforce fact-checking
- Posts on own websites, blogs, online articles, social media
- Blog reports
- Dedicated Twitter feed
- Debunking logo on fact-checked hoaxes
- Fact-checking modules on dedicated YouTube channel
- Radio & podcasts fact-checking segments
- Collaboration with public authorities to develop awareness campaigns and joint initiatives

**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"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Peer reviews	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Flagging (by users)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Flagging (by trusted flaggers)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Automated content verification tools	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

\* Please explain which other tools you frequently use to assess the content uploaded on your platform/the quality of online information used to produce news content.

*600 character(s) maximum*

Public service media organizations overall count amongst the most trusted in Europe, while remaining aware that there is a pressing need to reach out to all audiences, develop new formats and continue setting the standards for quality journalism and drive innovation in how they gather, produce and distribute news. Public service media editorial guidelines aim to ensure that all news content listed on their websites are reliable, accurate, thoroughly-researched, fair and impartial, accountable, up-to-date and topical.

**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*

Renewed emphasis should be placed on media literacy by teaching readers how social algorithms produce filter bubbles, increasing awareness among the general population about the role of emotions when receiving news stories ('emotional skepticism') and critical assessment of statistical and quantitative statements. Media literacy initiatives should target and cater for the needs of both younger audiences and adults.

**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*

Public service media organizations have championed media literacy initiatives over the years and continue to be a leading source of actions aiming to help the public better understand the way news are reported and presented. The availability of online media literacy tools provided by public service media is a key asset. This key role must continue finding appropriate support by public authorities.

In a similar vein, children's programming by public service media can play a key role in boosting media literacy. Children's news bulletins, both online and offline, can help minors develop the necessary understanding and skills to navigate through information.

Fact-checking initiatives by EBU Members also aim to identify real news and filter out fake or false information.

Examples of fact-checking / media literacy programmes and initiatives by EBU Members:

Germany - Faktenfinder - <http://faktenfinder.tagesschau.de/>

Regional members of the German public broadcasting consortium ARD contribute multimedia fact checks and explainers to investigate widely spread claims and rumors from across the country and around the world.

The UK's licence fee funded public service broadcaster BBC has a new News literacy project, which will offer mentoring to up to 1,000 schools - in class, online, or at events - from some of the most respected and well-known BBC journalists .

In Italy, "Decalogo BastaBufole" offers a guide for students on how to deal with today's information disorder and detect fake news. The project is the result of a cross-sectorial collaboration between Rai, the Italian Ministry of Education and Research (MIUR), the Federation of Publishers (Fieg), Confindustria, Facebook and Google. The successfully developed guidelines have been promoted in secondary schools for a total of over 4 million students in Italy.

In France, #Danslatoile is an animated series aiming to give for 6-10 year olds the keys to think critically and

better understand the digital environment.

Denmark - Detektor - <https://www.dr.dk/tv/se/detektor-tv>

Latvia - Melu Detektors (Truth Teller) - <http://www.lsm.lv/lv/temas/melu-detektors/>

Germany - ZDF tivi "App+on" - <https://www.zdf.de/kinder/app-und-on/fakenews-106.html>

Switzerland – Fact Checks - <http://www.swissinfo.ch/eng/in-depth/fact-checks-by-swissinfo-ch>

Norway - Faktisk - <http://faktisk.no/>

## 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*

The EBU is in favour of a holistic and comprehensive approach by public authorities, which addresses the online 'information disorder' and strengthens the media system and which does not solely focus on the fight against 'fake news' or disinformation, i.e. the 'tip of the iceberg'.

This should include an appropriate legal framework for online information platforms which ensures accountability and transparency, measures to prevent unfair or discriminatory treatment of media service providers, a fair sharing of revenue and data, transparency of ranking systems, prominence of general interest content including PSM, and protection of content integrity.

Intervention of public authorities is in many regards necessary to create the right framework conditions for digital intermediaries and for the media so that they can together ensure that all citizens continue to have access to trustworthy information in the online world, without being flooded by hate speech and 'fake news'. This should include measures to facilitate the creation, distribution and findability of quality content as well as measures in order to create a more level playing field between media service providers and platform operators. It is also essential that public authorities sustain and where appropriate reinforce the role of public service media, as an important and well-established part of the solution.

We would however advocate great caution when it comes to targeted measures by public authorities aimed at dereferencing, blocking or removing 'fake news', to avoid unintended and disproportionate consequences for freedom of expression.

Any adequate response to fight dis-information must also bring together actions by and be based on close collaboration between the various actors who are in the front row in fighting 'fake news'. The exercise of 'soft power' by public authorities should include incentives and encouragement of such collaboration as well as measures aiming to boost media literacy in the digital age. In this light, it is important to support fact-checking and debunking websites aiming to counter disinformation, which have developed rapidly over the past couple of years alongside coordination and collaboration between these initiatives at international level.

**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*

It appears of primary importance that digital intermediaries and aggregators act in a responsible way that is commensurate with the impact their activities have on the exercise of citizen's human rights and on public opinion forming. They should increase the transparency of their activities as information intermediaries and accept a basic level of public accountability. Providing basic transparency regarding the source of content provided by digital intermediaries and regarding the source of sponsorship would help end-users make better informed choices. In this light, we would suggest the following:

- Transparency of sources: clear branding and attribution is essential to enable users to identify reliable content on a platform. Intermediaries could also include a link to the information provider's impressum, which could consist of basic information on the information provider, i.e. its name, location of establishment, contact details and where applicable, the name of the competent supervisory or complaints bodies
- Transparency of sponsorship: information intermediaries could include cover identification of the natural or legal person that has made a (financial or other) contribution to ensure distribution on a platform or to improve the ranking or visibility of particular information or content.

PSM also require prominence; content integrity; access to data to monitor and understand the usage of its content; transparency on algorithms and fair business practices. See also Q. 15 and Q.22 on the role of public authorities.

Social networks should clearly reflect on their role as key intermediaries which enable those writing sensationalist dis-information and 'fake news websites' to reach large audiences. Social networks should refuse to provide 'sponsored' links to such websites, which will in turn prevent the monetization of 'fake news' generated by visits to those websites.

Users should be given the chance to consciously change the algorithms that populate their social feeds and search results. For example, they should be able to choose to see diverse political content or a greater amount of international content in their social feeds. Platforms should aim to ensure that algorithms used for ranking content expose users to a diverse and pluralistic offer of news. In addition, algorithmic tweaks or the introduction of machine learning techniques can lead to unintended consequences, whereby certain types of content is de-ranked or removed. There needs to be transparency around these changes so the impact can be independently measured and assessed.

In this regard, we would also draw attention towards the work undertaken by the Tow Center for Digital Journalism on algorithmic transparency which points at what kind of algorithmic information could be rendered more transparent to enhance public accountability, covering various aspects (summary here: <https://towcenter.org/towards-a-standard-for-algorithmic-transparency-in-the-media/> )

**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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Provide greater remuneration to media organisations that produce reliable information online	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Allow more control to users on how to personalise the display of content.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Allow direct flagging of suspicious content between social media users.	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Provide buttons next to each article that allow users to investigate or compare sources.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>

\* Please specify other.

600 character(s) maximum



As stated above, professional news media organizations need more transparency from online platforms regarding algorithmic tweaks.

It is also of particular importance to protect the integrity of content that is provided under the editorial control and responsibility of media service providers. Protecting content integrity safeguards viewers' trust in specifically regulated audiovisual media. Viewers must be able to rely on the integrity and authenticity of media service providers' programmes and services also when they are distributed over online platforms.

**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*

Part of the solution to fake news is to ensure that quality and trusted news are available in the online space. PSM take a two-pronged approach of our long-standing role providing all audiences with impartial and accurate news services and content on online platforms, complemented by specific initiatives to address 'fake news' and support media literacy.

More generally, established news organizations have acknowledged their role as sources of correct information. They continue to implement measures to reduce the risk of mistakes to the minimum when reporting news and should create transparent systems allowing the investigation of claims relating to the appearance of false information on their network. An overall review of standards and ethical guidelines can be helpful to ensure that established media are ready for the ever-changing online environment. It is also important to have strong online platforms under their own editorial control.

Media organizations invest in interdisciplinary fact-checking groups and verification teams that are specialized in identifying fake news and train journalists in a way that they can verify information in this changing (technological) landscape. Public Service media organizations have championed media literacy programmes and will continue playing a strong role in this area. Media literacy can create the conditions to slow down and limit the spreading of fake news.

Initiatives and campaigns can be used to explain the editorial standards that established media meet and teach users how to assess the different sources of information that they can find online.

**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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input checked="" 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*

Civil society organizations play a valuable role, which we welcome, for example by:

- promoting fact-checkers committing to minimum standards of non-partisanship, fairness and transparency of an internationally recognized code of conduct, such as International Fact-Checking Network's code of principles, included by submitting to the verification process.
- working with academia, news industry for maximum leverage and effectiveness in addressing disinformation, as well as working toward greater bundling, incentives for sharing best practice and sharing online space.
- identifying and updating best practice standards, building on existing work such as by the European Audiovisual Observatory or ET2020 Working Groups, promote one another's methods for max efficiencies across EU national borders/languages. Depending on the country's educational system, non-governmental organisations can play an important, auxiliary role in the system.
- working with academia, educational psychology professionals and the media industry, formulating age-specific media-literacy approaches and monitoring their effectiveness.

**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 checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
An observatory is not useful for the public	<input checked="" 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*

Above all, legislators and regulators should set the right framework conditions to protect freedom of expression and information, also protecting the rights of users and third parties vis-à-vis information intermediaries, and to support media freedom and pluralism, allowing ethical and trustworthy media to remain viable and to flourish.

In this light, any intervention by public authorities to counter the spread of fake news must be proportionate to actual threats, which may vary from country to country and may arise during certain sensitive periods (e.g. elections).

In the specific case of public service media, its key contribution to public information must be adequately recognized by national governments who determine the governance, levels of funding and remit, which should be sufficiently broad and dynamic to support innovation and agility.

More generally, financial support mechanisms and public investment in training, at national and EU level, is key to a sustainable news media industry and maintaining high standards.

To improve the right framework conditions, we welcome and strongly support first steps which have been taken or envisaged to regulate platforms, and which can help to reduce the 'information disorder'.

This concerns in particular new rules in the AVMS Directive, such as the new rules for video sharing platforms which have been proposed by the European Commission and which the European Parliament and Council have proposed to extend; these rules can help to fight hate speech and re-balance the regulatory asymmetry. We also strongly support proposed clarifications in the Directive which recognize the possibility of Member States to introduce so-called 'prominence' measures, which can make reliable news and information easier for viewers to find and access. We equally support the proposal from the European Parliament to protect the integrity of media content when it is distributed over different platforms. All these measures help to improve citizens' access to trustworthy information and trust in the media.

While we generally believe that legislative initiatives should give priority to a sector-specific approach, we also welcome horizontal initiatives which address harmful platform-to-business practices, which apart from harming competitors can also negatively affect freedom of expression and media pluralism. Such practices may include unilateral decisions by platform operators reducing the media's access to audiences, lack of transparency and foreseeability, preferential treatment of own (or partners') services and retention of audience data by platforms.

**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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