



EAVI's Opinion on fake news and online Disinformation for the European Commission Consultation

February 2018

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"

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

Paolo

*** Respondant's last name**

100 character(s) maximum

Celot

*** Organisation's name**

100 character(s) maximum

EAVI - the European Association for viewers Interests

*** Contact details**

150 character(s) maximum

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*** Company/organisation website**

100 character(s) maximum

www.eavi.eu

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

100 character(s) maximum

EAVI

Rond Point Schuman 9/16

1040 Brussels

*** 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

EAVI is the non-profit organisation which worked the longest on media literacy at EU level. We contribute to research (authored four EU-wide studies), policy advice, practices such as conferences, training, resources, publications. We participate and advise to EC, CoE, EAO, UNAOC works.

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

EAVI's general aim is to promote public interests in the field of media. Established in 2005 EAVI's groups of activities are: (1) Engaging EU institutions and decision makers (as such, for instance, we contributed to reverse the decision to remove media literacy from the AVMSD) and (2) Promoting to the general public, media literacy and full citizens participation to public life through the media. Within the above we have been active in research, European affairs, conferences, experts' groups, networking, producing content and communicate on social networks, blog and run ad hoc projects.

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 agree to differentiate mis-information from dis-information based on the publisher deliberate intention to harm. Having said that while for scientific and research purposes, the above differentiation is correct, it could create confusion to the general public. Therefore, we would be in favour of using 'disinformation' (instead of fake news) as a general term to be used in the general discourse to define a media message (in any format) designed to look genuine but published with the intention to deceive. We certainly find inappropriate using the term 'fake news' to define this issue.

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

We may mention for instance intentional disinformation aimed at the functioning of international organisations including charitable bodies.

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

300 character(s) maximum

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

The more recent debate on fake news seems more promising to advance European citizens interests and media literacy initiatives.

Otherwise, from a policy point of view, we find that the trend in policy papers, documents and debates focuses essentially or even solely on economical and technical aspects, even though at European level for instance, media literacy was (or still is) a priority for EU policy makers.

Therefore, when the analysis considers fake news and media literacy under its preeminent social and political value, rather than (or in addition to) its technical or economic implications, it can be observed that an adequate policy implementation at European level has lagged well behind expectations.

While one can only speculate about the interests and motives underlying this impasse, with the concrete suspicion that the (social) media industry is driving funding and interests, the way it has come to happen can be clearly comprehended. It can be observed that media literacy policy showed a growing focus on markets and on simple online access skills at the expense of more critical aptitudes such as the ability to evaluate media messages. This shift in focus is mainly due to the power of better-organised economic interests.

As an example, so far Europe has been unable to claim tax payment legally due to European countries from USA or elsewhere based social platforms when operating in Europe. Currently, the big social media companies are based in the US and are able to use tax loopholes to pay taxes in the US for their business activities in Europe by sending profits back to the US mother company. This means that they end up paying negligible taxes to EU member states. Now if social media companies in Europe were obliged to pay the full amount of tax due in the EU to EU member states then that money could be used to fund media literacy programmes or to create technical tools to fight fake news.

If with existing rules, these huge big tech corporates have been able to escape those fundamental duties, we remain sceptical that any other rule would be effective in disciplining their behaviour. The power of lobbying for strong economic interests far exceeds the possibility of people and civil society organisations to be heard. So true that cigarettes, which clearly kill smokers and people, and should have been banned long time ago, are still on sale.

Maybe, online platforms should pay a fair rate of tax in Europe, which could be plugged into addressing the very issues they have helped to create - funding civil society organisations, research and public bodies.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Personal life of public figures (e.g. politicians)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>
Science and technology (e.g. fake or misleading studies)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Personal life of public figures (e.g. politicians)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>
Economy and finance (e.g. market rumours)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Science and technology (e.g. fake or misleading studies)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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

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

Other than self-statements, there is no evidence proving any significant impact for those measures.

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

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

While those possibilities should be given better visibility, our brain works in a way to bypass complex and long processes such as verifying sources. People will simply not do it. Behavioural science studies investigations should be taken in much more consideration. Social platforms are well aware and base their marketing strategies on those results.

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

While media literacy is essential, it is not a panacea for all evils. Action should be taken on the distribution of (fake) news. Social platforms should be more transparent and institutions more rigorous to defend public interests.

About the effectiveness of actions, here follows one example out of many. At around 20h00, on 9 November 2016, Eric Tucker posted onto Twitter a photo of buses in Austin, Texas. He incorrectly (but not maliciously) asserted that they had been used to bus in protesters for the anti-Trump demonstrations taking place in the city. He had 40 followers.

On 10 November, Tucker's tweet was posted onto the main Reddit community as a headline. Over the next 9 hours, the tweet was spread thousands of times, through social media. Later that morning, the owner of the bus company released a statement denying any connection to the protests. The allegation and the denial were both covered on Fox News. The story was covered by the mainstream media, through the angle of "allegations of fake protesters".

On 11 November, fact checking websites debunked the original claim that the buses were linked to the protests. By midnight, with over 8,500 shares, Tucker deleted his initial tweet. Shortly afterwards, he posted a copy of it with the word "false" stamped over it. The second tweet was shared 29 times.

This nugget has become an exemplar of how fake news spreads. At no point after the original tweet was posted was there an opportunity for anyone, not the mainstream news, social media platforms or legislators, to put the Genie back in the bottle. Once it had been read, and once it had been believed, it would not be unbelieved.

Research supports the assertion that, in the case of fake news and propaganda, inoculation is better than cure. Convincing someone after the fact that they have believed a lie is very difficult. Because of the way fake news and misinformation behaves online, it is almost impossible to stop once it has begun.

To stop incidents like this happening in the future is important (but not sufficient) to educate and empower individuals of all demographics to recognise fake news themselves and to respond to it appropriately. In large numbers, they can fact check, they can not share and so stem the spread, they can join the great debate taking place on social media and drown the lie in the truth.

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

Social platforms are private, for profit organisations. Their aim is legitimately to make money. Their business model is to grab our attention for free and resell it for money to advertisers. It is a wishful thinking to hope that social platform will take any significant action in the name of public good if they are not obliged to do so. Political propaganda works similarly in the interest of a few. Citizens, both as consumers and voters, in the long term are victims of this process and democracy is at risk.

One thing for instance could be to oblige them to share the data they collect with the public and civil society

organisations (for improving public health, easing research and so on). They have a huge power, the solution is not to give them even more. But in order to ensure impact their collaboration is necessary.

Online platforms currently act as media companies and news aggregation sites but are not burdened by any of the legislative or regulative responsibilities that come with that role. The definition of "content creator" is nebulous.

We are sceptical about self-regulation. Recent actions, for instance by Facebook, to dodge the bullet by creating a separate newsfeed for news and another for user-created content is no fix at all. All this means is that responsibly-sourced media content will find it harder to make its way into users' consciousness, while Pedro's photo-shopped images will be spread far and wide without hindrance or accountability.

Social media has also created a rather corrupt echo-chamber of ideas because of the way their algorithms work. The creation of filter bubbles, in order to make users feel comfortable and safe so that their soft underbelly is exposed for advertisers, makes for a lack of plurality of opinion is unhealthy and creates a warped view of the world.

While on the one hand, it creates communities and safe-spaces, it also creates a perfect petri-dish for anti-European, regressive ideas to fester and grow. Online platforms must be more transparent in the way algorithms work, and indeed their entire business model, so that their users would be more aware that they are the product being sold. They would have a strategic interest and benefit to work with civil-society organisations, including financially contributing, to launch their own media-literacy training services.

They could also require a licence system - much like that a drivers' licence - whereby users are required to pass a test on how to spot fake news (for instance) and how to react to it, with suspension or limited functions on a users' account until they pass.

Online platforms must be held more accountable for the content they share, they must accept a duty of care for their users not to be exposed to mis- and dis-information on their platforms and be held accountable when they fail in that duty of care - this includes anything from hosting fake news articles to allowing bots and fake-profiles to operate as users.

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

	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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase cooperation with other media organisations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 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

Misinformation poses an existential threat to the EU and progressive values, individuals are being militarised by nefarious and greedy groups and individuals. They must be made media literate in order to act as empowered agents rather than passive victims.

With more resources and funding, civil society organisations need to figure out how to speed up research and project reports and set initiatives in motion more rapidly in order to counter threats as in response to their arrival, not establishment. There should be constant reportage and analysis of trends in order to predict behaviours and trends and ways to counter them.

Civil society organisations could promote media literacy for all Europeans, working with mainstream media organisations, online media platforms, regulatory bodies and individuals themselves to enable individuals to better navigate the new media environment. Better efforts should be made to reach out also to older demographics so that can be acclimatised to the idea that the media is not as it was even 10 years ago. Civil society organisations could also promote conscientious media use as a civic responsibility and a European value.

Civil society organisations should also be empowered to look at the environmental conditions that precipitate media behaviours - looking at the root cause of why fake news and propaganda appeals to certain groups and demographics. They are then best placed to figure out how to reach individuals once they have been lied to. Currently, presenting a believer with a fact only entrenches them further in their belief, causes them to become defensive and hostile, and creates animosity. There should be more research, evidence and greater understanding into countering fake news and propaganda once an idea has taken hold.

These organisations should also be free to take risks. Currently, the dogmatic thinking in response to the crisis new media has created is simply old solutions to new problems - better self-regulation in the media,

business ethics for online platforms, out-of-date research conducted by people who don't even have social media accounts, or experts who share articles on twitter reading only their title, let alone understand how and why social media functions. This is a new problem, it was created innovatively, and civil society groups should be better equipped, and feel safe in doing so, to create innovative solutions, approaching it from innovative angles.

This includes funding and resourcing civil society organisations to develop technological tools, creative apps and programmes to counter fake news. There is a huge scope for technology to help solve problems technology has helped create - even algorithms can be used to counter the damage caused by algorithms.

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

While certain member states have introduced legislation to fight illegal (fake news/hate speech) content, this is still experimental and not sufficient. EU should not get away claiming that social networks will fix the problem. Nor should avoid its responsibility in the name of freedom of press and censorship. All measures should strike a balance between freedom of speech and privacy and responsible and ethical use.

Free competition in the single market and democracy in Europe are under pressure. If people become

increasingly skeptical and will not know what to trust, they will discard everything. But the pre-requisite for the functioning of a democracy is precisely to get informed first in order to shape one's opinion, vote and participation to public life.

Action must be taken along side initiatives that focus on the production (journalists) and the reception of the message/news (users). Therefore while media literacy is an essential component, it is necessary to intervene also in the distribution of the message. It means that online platforms should be convinced to be more cooperative and transparent.

If Europe is serious about fake news, this should also be reflected in the EU budget. Member States will not necessarily have the same interests of the EU and some Governments will be difficult to be convinced to cooperate because they actually benefitted from this state of affairs and from the relationship media and power.

Otherwise EU governments should put lots of money into free media literacy programmes for all age groups. Using media literacy to fight fake news should be a priority of the EU as fake news poses an existential threat to the EU. They should also look into innovative pieces of legislation that hold social media who disseminate fake news responsible for doing this.

It is very unfortunate to notice that, when it comes to what really matters to advance citizens' interests (i.e. Policy and Budget lines) the decisions of the EU institutions are sometimes not in line with previous announcements about the much claimed importance of protecting minors, children or users and consumers' rights.

EAVI believes that investing properly in media literacy competences would offer the EC an opportunity to reconquer some citizens' trust in the future. Media and citizenship policy, research and practice development play a fundamental role to facilitate that investment.

In conclusion, in order to fight fake news, to promote media literacy should be a strategic priority of the EU. Consequently appropriate financial resources should be found. The momentum is propitious to contribute to the new Multiannual Financial Framework, as current EU funded projects are largely insufficient to address the fake news issue properly.

Possibly existing European and international bodies and Europe-wide associations could also help to coordinate and channel initiatives at national level.

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

3000 character(s) maximum

The importance of media literacy has been highlighted for years in innumerable previous policy documents as a crucial issue when dealing with media policy in the future. European-wide studies including by UNESCO, OECD, the Council of Europe, and the European Commission itself, have highlighted the significance of a critical consumption of media content. We may cite here some Europe-wide studies that EAVI has authored on behalf of the EC:

- 1) Assessing media literacy levelled and the European Commission Pilot Initiative - <http://bit.ly/2sQ0wZ1>
- 2) Testing and Refining Criteria to Assess Media Literacy Levels in Europe - <http://bit.ly/2CEU2fa>
- 3) Study on Assessment Criteria for Media Literacy Levels. <http://bit.ly/2sO6aLh>

A comprehensive view of the concept of media literacy and an understanding of how media literacy levels in Europe should be assessed

4) European Media Education Study and best practices - <http://bit.ly/2EOc8BG>

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