



# COUNTERING DISINFORMATION AND HARMFUL CONTENT ONLINE

## Takeaways

### EURODIG pre-session

12 May 2025, Strasbourg

According to the Principle 7, [Reykjavik Principles for Democracy](#), “Disinformation or misinformation posing a threat to democracy and peace will be countered, in a manner compatible with international law including the right to freedom of expression and freedom of opinion”. While freedom of expression is a cornerstone of democracy, certain forms of disinformation and harmful content pose serious threats to public health, public order and safety, and even national security. This session, organised by the Council of Europe’s Division for Cooperation on Freedom of Expression, brought together media regulators, MPs, journalists, experts, researchers, online platforms, and other key stakeholders for a solutions-oriented dialogue on addressing these risks while safeguarding fundamental rights.



The discussion aimed to examine the current challenges in countering disinformation and harmful content online, share experiences from different countries, and explore potential solutions and policy approaches.

It highlighted the need for a multi-faceted, multi-stakeholder approach in countering and building resilience to disinformation. The role of regulators, governments, parliaments, courts, media, and international organisations was discussed.

Participants raised concerns about the unchecked power of big tech platforms and the need for more effective regulation. The discussion touched on the challenges of balancing freedom of expression with the need to counter harmful content, particularly in the context of Russian disinformation campaigns.

The importance of media literacy and supporting independent journalism was stressed, along with the need for international cooperation. Speakers also highlighted the challenges faced by journalists, especially women and minorities, who are often targets of online harassment and disinformation campaigns.

The discussion concluded with calls for continued efforts to combat disinformation, despite the complexities and challenges involved. Participants emphasised the need for creative, proactive approaches and the importance of defending human rights, democracy, and the rule of law in the digital age.

### Key Takeaways

**Participants identified several significant challenges in addressing online disinformation:**

- Inadequate Legal Frameworks: the lack of comprehensive legal structures and enforcement mechanisms in many countries, hindering effective action against disinformation.
- Proactive Content Creation: concentrating efforts on creating and disseminating truthful information rather than solely combating disinformation.
- Failure of Self-Regulation: self-regulation by tech platforms has largely proven ineffective, necessitating more robust government intervention.
- While the Council of Europe recommendations are very useful, the DSA requirements are not mandatory for the platforms outside of the EU.
- Resource Constraints: many regulators lack sufficient resources and capacity to tackle the scale of the problem.
- Algorithmic Bias: the algorithmic suppression of certain languages and content, particularly affecting the Belarusian language.
- Lack of Data Access: the difficulty in obtaining necessary data from platforms to effectively combat disinformation.
- Online threats to Journalists: the disproportionate targeting of women and minority journalists with online violence and harassment.
- Financial Motivations: the growing disinformation industry driven by financial gain, its global nature and the need for international cooperation to address it.

## Summary of interventions:

### I. Council of Europe Standards: Combating Polarisation and Disinformation

The Council of Europe [Guidance Note on countering the spread of online mis- and disinformation through fact-checking and platform design solutions in a human rights compliant manner](#) calls for comprehensive policy responses and resilience-building measures to counter polarisation and the erosion of public trust. The Guidance includes recommendations covering three key areas:

#### i. Fact-checking as a Core Practice

- Fact-checking is essential for identifying and countering disinformation.
- Online platforms are encouraged to cooperate with independent fact-checkers.
- Fact-checking organisations must operate free from state or commercial influence while being transparent about their methods and funding.

#### ii. Human Rights-based Platform Design solutions

- Platforms should integrate human rights impact assessments into design and operation.
- Content moderation must be transparent, subject to appeal, and aligned with principles of proportionality—content removal should be a measure of last resort.

#### iii. User Empowerment through Media Literacy

- Users need tools to control content, verify sources and challenge platform decisions that affect their rights.
- A sustained and inclusive effort is needed to promote media literacy across all age groups.

- ❖ Investment in resilient, reliable media ecosystems is crucial. Member states are encouraged to integrate these recommendations into national systems. Platforms must take meaningful steps to reform system design. Policy makers, researchers, governments, civil society, and tech companies should collaborate to evaluate the impact of these measures and adjust to new technological threats.

## II. Countering Russian propaganda and disinformation

### Ukraine:

Faced with hybrid aggression, including an information war, Ukraine took measures such as banning pro-Russian media—actions criticised by some but that were essential for national security. Most efforts of Ukraine to face Russian propaganda remain reactive rather than proactive. Key developments include:

- A 2022 media law expanding the powers of the National Council of Ukraine on Television and Radio Broadcasting to regulate both traditional and online/print media.
- Promotion of media literacy among journalists and collaboration of the National Council of Ukraine on Television and Radio Broadcasting with the Centre for Countering Disinformation to expose Russian narratives
- In October 2023, signature of a Declaration on Cooperation and Mutual Support in the Fight Against Disinformation in Warsaw. It was initiated by the media regulators of Ukraine and Poland. Media regulators from Latvia, Lithuania, Poland, Romania, and Ukraine joined this declaration.
- Creation by the Regulator of a working group to strengthen the role of media in countering disinformation during wartime.
- Organisation of series of journalist trainings and workshops on disinformation
- Production of global content in English to debunk Russian propaganda (English-language project “Hate Speech” of the National Council of Ukraine to counter Russian propaganda narratives).
- It would be necessary to consider mechanics that will allow non-EU CoE countries to get access to instruments of DSA/DMA.

### Moldova:

- The country is also facing the challenge of balancing national security concerns with media freedoms, being disproportionately targeted by Russian disinformation campaigns.
- During the recent referendum on EU accession, harmful propaganda networks have been exposed by journalists.
- Moldova is considered as one of the most targeted countries from disinformation campaigns. Russia has spent about €200 million, equal to 1% of Moldova's GDP, on propaganda campaigns over the last three years. Paid influencers spread pro-Russian narratives.
- Moldovan authorities are debating the regulation of online activity while safeguarding freedom of expression and avoiding censorship. Legislation is currently under revision.

### Concerns of the Western Balkan regulators on countering illegal content online:

- In Bosnia and Herzegovina and other Western Balkan countries, regulatory authorities face increasing disinformation campaigns but lack jurisdiction to act directly in that respect. Efforts focus on strengthening media literacy. Inadequate legal frameworks are a problem: the current legal framework dates back to 2001.
- The biggest challenge is to define what falls under the competence of the regulatory services. Regulators need clarity on their mandates, improved internal capacity, and regional cooperation. See: [The Role of Regulators in Countering Harmful Content](#) [Western Balkans Regional Peer Exchange for Regulatory Authorities](#), Report prepared within the action ‘Protecting Freedom of Expression and of the media in The Western Balkans’ (PRO-FREX).
- Another key challenge—and potential avenue for reform—is the need to move beyond the current regulatory and self-regulatory framework towards a more co-regulatory model. It was very useful to learn about the models of regulation of harmful content online discussed in the Council of Europe Study : [“Towards coregulation of harmful content online in Bosnia and](#)

[Herzegovina. A study of European standards and co-regulatory practices for combating harmful content online](#)".

## Belarusian media in exile: challenges of working with search engines and social networks to ensure visibility of independent media channels

- The unique challenges faced by Belarusian media in exile include algorithmic suppression of content in the Belarusian language and the struggle to reach audiences inside Belarus.
- Belarus is one of the most dangerous countries in Europe for journalism. At least 39 journalists are imprisoned, including 11 from [Belsat](#), the TV channel



- broadcasting from Poland. There is practically no independent mass media left in Belarus, as 88 % of them have been shut down. 500 Belarusian websites were labelled 'extremist' by the government, including Belsat. 15,000 internet resources have been blocked, forcing media to use mirrors and other ways to bypass restrictions and reach their audiences. About 45 independent media outlets operating in exile cover around a third of Belarus' population of nine million.
- Not only has independent journalism itself been criminalised, but the consumption of independent news has been too, so it remains secretive.
- Independent media struggle to establish a community due to low audience engagement. Algorithms hinder visibility of content in Belarusian language, and the platforms in fact empower the Lukashenka regime.
- The tech platforms need to start supporting national and minority languages and ensure visibility of exiled media. Quality journalism in local languages is vital for a resilient, democratic media space.
- There is a need for international support for exiled media and journalists who play a crucial role in countering disinformation

### III. How Platform Impunity Fuels Online Violence and Disinformation

- Since the 2020 UNESCO study "[Balancing act: countering digital disinformation while respecting freedom of expression: Broadband Commission research report on 'Freedom of Expression and Addressing Disinformation on the Internet'](#)", the global situation has worsened.
- [The Chilling Report](#) reveals that 73% of women journalists have encountered online violence in relation to their work, with 41% believing they have been targeted in coordinated disinformation campaigns. Women and minorities are the most at risk of and the most targeted in online violence campaigns.
- Tech giants failed to make safe products and to self-regulate, with devastating consequences to democracy and human rights globally. Risk management is being offloaded to civil society and media.
- There is an urgent need for the regulation at the pan-European-level, for the legal accountability for platforms, and support for victims of online violence, including through strategic litigation.

#### IV. The European Court of Human Rights: recent case law

- States have a wide margin of action, especially in cases concerning national security, territorial integrity and public safety, to prevent disorder or crime, for the protection of health and morals as it happened in several cases relating to COVID as well.
- It is mentioned in the case law of the Court that the aim of interference and sanctions should not totally discourage open debate of matters of public concern but rather the aim is to take robust measures to protect freedom of expression and public discussion space whether offline or online from harmful influences of disinformation and propaganda.
- Relevant recent cases:
  - *Kirkorov v. Lithuania*<sup>1</sup>, (2024) where the Court referred, directly, to Russian disinformation and propaganda.
  - *Vyacheslavova and Others v. Ukraine*<sup>2</sup>, (2025), where the Court underlined that “disinformation and propaganda might have had an impact on the tragic events in the present cases” (par.336).

#### Interventions from the floor

Interventions from the floor focused on:

- De-monetising the disinformation industry.
- Public Service Broadcasting: the importance of strengthening public service media, particularly highlighting the role of the BBC World Service, as a reliable source of information.
- EDMO’s (European Digital Media Observatory) activities in coordinating fact-checking efforts and research on disinformation across Europe can be helpful.

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<sup>1</sup>The case concerned the ban on the applicant, a popular singer and music producer in Russia, from entering Lithuania because he was considered a threat to national security. The Lithuanian authorities found in particular that he was a tool for Russia’s propaganda in States of the former USSR and that, by regularly giving concerts in Crimea, he supported the Russian State’s policy of aggression.

<sup>2</sup> The present cases concern a massive violent confrontation between the “pro-Euromaidan” and “anti-Euromaidan” activists that took place in Odesa on 2 May 2014. On that day the anti-Euromaidan activists, who opposed the recent ousting of President Yanukovich from power as a result of the protest movement known as “Euromaidan” (or “Maidan”), clashed with the pro-Euromaidan activists, who were holding a rally in support of those changes.[1] Forty-eight persons were reported dead and over two hundred injured in connection with the relevant events. Several sets of criminal proceedings were instituted into the events, most of them currently ongoing. The present cases were lodged by thirty-one applicants who either lost a relative or sustained injuries in the aforesaid confrontation, as participants on either side or by-standers. The applicants whose relatives were killed allege that the State authorities had failed to protect their lives and the applicants who suffered injuries allege that they had failed to protect them from ill-treatment.

## Panelists:

- **Andrin Eichin**, Senior Policy Advisor on online platforms, algorithms, and digital policy at the Swiss Federal Office of Communications (OFCOM), Switzerland, Chair of the Committee of Experts on the Implications of Generative Artificial Intelligence for Freedom of Expression of the Council of Europe (MSI-AI)
- **Valentyn Koval**, First Deputy Chair of the National Council of Television and Radio Broadcasting of Ukraine
- **Aneta Gonta**, Deputy Chair of the Audiovisual Council of the Republic of Moldova, member of the CDMSI, Council of Europe
- **Amela Odobasic**, Head of Broadcasting, Communications Regulatory Agency of Bosnia and Herzegovina
- **Alina Koushyk**, Director of the Belsat TV, Belarusian media outlet in exile
- **Julie Posetti**, Professor, Global Director of Research, International Centre for Journalists & Professor of Journalism at City, University of London



## Moderator:

- **Alina Tatarenko**, Head of Division for Cooperation on Freedom of Expression, Council of Europe-

## Interventions from the floor:

- **Pavlo Pushkar**, Head of Division of the Execution of the Judgments of the European Court of Human Rights, Council of Europe
- **Mykyta Poturaiev**, Head of the Ukrainian Parliament Committee for Humanitarian and Informational Policies
- **Jordan Ogg**, Representative from Ofcom (UK's independent communications regulator)
- **Giovana Fleck**, Representative from RNW Media
- **Marilia Maciel**, Director of Digital Trade and Economic Security at Diplo Foundation
- **Luljeta Aliu**, Member of the Independent Media Commission in Kosovo
- **Oksana Prykhodko**, Representative from European Media Platform (Ukraine)
- **Giacomo Mazzone**, Member of the European Digital Media Observatory (EDMO)
- **Oleksandr Shevchuk**, Institute of International Relations, Ukraine

## Eurodig moderator:

- **Daniel Michos**

### Further reading:

- ▶ [Guidance Note on Countering Online Mis/Disinformation through Fact-Checking and Platform Design solutions in a human rights compliant manner \(2023\)](#)
- ▶ [Recommendation CM/Rec\(2022\)13 of the Committee of Ministers to member States on the impacts of digital technologies on freedom of expression](#)
- ▶ [Recommendation CM/Rec\(2022\)16 of the Committee of Ministers to Member States on combating hate speech](#)
- ▶ [Recommendation CM/Rec\(2022\)4 of the Committee of Ministers to Member States on promoting a favourable environment for quality journalism in the digital age](#)
- ▶ [Recommendation CM/Rec\(2022\)12 of the Committee of Ministers to Member States on electoral communication and media coverage of election campaigns](#)
- ▶ [Resolution 2255 \(2019\) on the Role of Public Service Media in the Context of Disinformation and Propaganda](#)
- ▶ [Resolution 2567 \(2024\) on Propaganda and Freedom of Information in Europe](#)
- ▶ [Resolution 2590 \(2025\) on Regulating Content Moderation on Social Media to Safeguard Freedom of Expression](#)
- ▶ [PACE Report on Foreign interference a threat to democratic security in Europe](#)
- ▶ [Article 10 of the European Convention on Human Rights and relevant Case-law of the European Court of Human Rights](#)