



Resilience to foreign information manipulation and interference (FIMI)

- Case studies in Eastern Europe, the Western Balkans and Türkiye

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Resilience to foreign information manipulation and interference (FIMI) – Case studies in Eastern Europe, the Western Balkans and Türkiye

Andrei Richter



Foreword

The phenomenon of political manipulation by foreign powers can be traced back to the dawn of civilisation. To illustrate this point, we may consider the actions of Themistocles, the Athenian naval commander, who, through the use of fake field reports, deceived the Persian King Xerxes, thus enabling the Greek forces to achieve a decisive victory in the pivotal battle of Salamis (480 BC). Also, the importance of new technologies in spreading information is not new: one need only reflect upon the crucial role that the printing press played in the dissemination of the Reformation throughout Europe, without forgetting that the term 'propaganda' itself was first coined within the context of the *Sacra Congregatio de Propaganda Fide*, a counter-reformation initiative spearheaded by the Catholic Church with the objective of *propagating* the tenets of the faith around the globe.

Whilst the combination of political manipulation by foreign powers with the use of new technologies is by no means a novel phenomenon, it nevertheless cannot be denied that so-called foreign information manipulation and interference (FIMI) has reached unprecedented levels of sophistication and impact in the twenty-first century, thus necessitating the development of novel tools with which to combat it.

The present report, authored by Andrei Richter (Comenius University, Bratislava), aims to provide a comprehensive overview of the EU's counter-FIMI activities, with a particular focus on its external policy initiatives and the various efforts and projects that the EU and its partners are supporting in the Black Sea region and the Western Balkans in this regard.

The report begins by providing an introduction to the concept of FIMI and examines how this form of information manipulation threatens democratic processes and social cohesion, highlighting the growing complexity of hybrid information threats in Europe's eastern regions, contextualising the geopolitical aspects of FIMI, and underlining the EU's evolving approach to resilience as a core component of its enlargement and how neighbouring country policies seek to counter it. It also describes the EU legislation and policy, addressing in particular, the FIMI Toolbox, a comprehensive set of EU instruments aimed at boosting situational awareness, resilience building and international cooperation. It further showcases the Council of Europe's initiatives such as the Information Disorder report, Parliamentary Assembly resolutions on online media and propaganda, and the Recommendation on promoting a favourable environment for quality journalism in the digital age. The publication then provides a selection of case studies from Eastern Europe, the Western Balkans and Türkiye.

The report concludes that Europe's resilience to FIMI will depend on a balanced approach: combining legal safeguards, international coordination and grassroots empowerment. The author calls for continued vigilance, cross-sector collaboration, and sustained investment in media literacy and independent journalism across Europe.

Enjoy your reading!

Maja Cappello

IRIS Coordinator
Head of the Department for Legal Information
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1. Introduction

This research report covers the already familiar Black Sea region,¹ as well as the Western Balkans. It goes beyond audiovisual regulation into the new field of resilience-building in the face of the threats of foreign information manipulation and interference (FIMI) and explains how the European Union (EU) aims to strengthen resilience to FIMI in these parts of wider Europe.

Foreign information manipulation and interference is defined by the EU's European External Action Service (EEAS) as “a mostly non-illegal pattern of behaviour that threatens or has the potential to negatively impact values, procedures and political processes. Such activity is manipulative in character and is conducted in an intentional and coordinated manner, by state or non-state actors, including their proxies inside and outside of their own territory.”²

When it was formally introduced by the EEAS, the notion of FIMI was described with reference to disinformation. The two notions were “intentionally overlapping”, with FIMI “at the same time narrower and broader”. According to the EEAS, it is broader because it “does not require the information spread by threat actors to be verifiably false or misleading.” Thus, whether something can be considered FIMI or not depends on whether there is deceptive or manipulative behaviour rather than whether the content is false or misleading.³

FIMI is narrower than disinformation in the sense that the former is understood as limited only to “information manipulation by actors foreign to the EU and its member states”, and “not applying to domestic sources.”⁴ Such a narrow definition of the term “foreign” was almost immediately challenged by other counter-FIMI analysts from the European Union Institute for Security Studies, an EU think tank. First, they argued that the category seems to have “limited analytical value”, as media spaces tend to be highly porous, with no clear geographical boundaries. Second, they pointed to “complex questions of proximity, belonging and political allegiances.” In support, the analysts cited evidence from the Western Balkans, where “shared languages allow for almost direct uptake and fusion of content” across national borders. “More importantly, in some countries in the region, significant segments of the population identify [themselves] with ethnic groups that are

¹ Richter A., *Media law and policy in selected Black Sea region countries*, European Audiovisual Observatory, Strasbourg, September 2023; Richter A., *Media pluralism in selected Black Sea countries: the influence of European standards*, European Audiovisual Observatory, Strasbourg, October 2024.

² EEAS, *1st EEAS Report on Foreign Information Manipulation and Interference Threats - Towards a framework for networked defence*, February 2023, p. 4.

³ Ibid., p. 25.

⁴ Ibid.



the majority in neighbouring states.” They might not perceive likeminded media content or actors as foreign.⁵ Thus, FIMI has made way for DIMI (domestic information manipulation and interference), a still unchartered notion. This behaviouristic approach to the issues of media content regulation raises debate among international law experts,⁶ which makes it reasonable for EU DisinfoLab to conclude that “FIMI, in its current state, is not a functional definition but rather a mandate for action.”⁷

Today, the EU institutions have consistently adopted and implemented a large number of resolutions, strategic communications, conclusions and action plans aimed in particular at setting perimeter barriers for propaganda and hybrid threats. Taken together, these measures form a coordinated political response at EU level.⁸ While they are generally directed to set barriers for harmful propaganda and disinformation on the outer borders of the Union, some also aim to study, assist and prevent these phenomena globally: in Latin America, Africa and Asia, as well as countries in the EU’s neighbourhood.⁹

In addition, both with and within the United Nations and other international and regional organisations, the EU is working to develop international principles on disinformation and FIMI. Such principles are pledged to be “in full respect of human rights and fundamental freedoms and with continued strong emphasis on promoting freedom of expression, independent media, and the protection and safety of journalists and human rights defenders.”¹⁰

The EU policies suggest that, when dealing with comprehensive security matters in Europe and across the world, military and other hybrid threats can be resisted through media-related policies, as well as support and development actions worldwide. The latter, which are examined in this report, are generally directed to improve situational awareness within EU institutions and delegations, suggesting common response options, strengthening resilience capacities in the regions and enhancing cooperation within the Union, and both with and in its partner countries.

“Today, the Western Balkans, Türkiye, Ukraine, Moldova and Georgia have a historic window of opportunity to strongly bind their future to the European Union”, proclaims the 2023 Communication on EU Enlargement Policy, which also underlines that the enlargement is “a driving force for long-term stability, peace and prosperity across the

⁵ Morača T. et al., *Feeling the pulse: Countering foreign information manipulation and interference in Africa and the Western Balkans*, European Union Institute for Security Studies, October 2023.

⁶ For example, see Dias T., *Study on International Norms for Foreign Information Manipulation and Interference (FIMI)*, EU External Action, November 2023, and Proto, L., Lamoso-González, P. & García, L., *The EU’s FIMI Turn: How the European Union External Action Service Reframed the Disinformation Fight*, Media and Communication, volume 13 (2025), article 9474.

⁷ Disinfo.EU, *Tackling foreign information manipulation and interference in Europe*, June 2024.

⁸ Richter A., “*International legal responses to ‘propaganda for war’ in modern warfare*”, Journal of International Media & Entertainment Law, Volume 10, No. 1, 2024.

⁹ EEAS, *Information Integrity and Countering Foreign Information Manipulation & Interference (FIMI)*, 14 April 2025.

¹⁰ Council of the EU, *Council Conclusions on Foreign Information Manipulation and Interference*, 18 July 2022, paragraph 4.



continent”, as well as “a powerful tool to promote democracy, the rule of law and respect for fundamental rights.”¹¹

At the same time, according to the Strategic Compass for Security and Defence, a policy plan of action for strengthening the EU’s security and defence policy by 2030, stability and safety of the Black Sea region and the Western Balkans are severely impacted by the Russian aggression against Ukraine, “in particular because of the increasing foreign information manipulation campaigns.”¹²

The following sections attempt to provide a policy panorama of the EU’s counter-FIMI activities, in particular its external policy activities, as well as to map examples of the efforts and projects that the EU and its partners support in the Black Sea region and the Western Balkans in this regard.

¹¹ European Commission, *2023 Communication on EU Enlargement Policy*, Communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions (8 November 2023), p. 2.

¹² EEAS, *A Strategic Compass for Security and Defence* (a plan of action for strengthening the EU’s security and defence policy by 2030), approved by the Council on 21 March 2022, pp. 18-19.

2. Elements of European law and policy to counter FIMI

2.1. Historical overview

For decades, EU standard-setting activities generally followed the Council of Europe in matters related to human rights, including commitments on freedom of expression. Its own regulations, primarily grounded in the principle of free movement of goods and services within the internal market, focused on rules for the production and dissemination of audiovisual content, initially through broadcasting and later online.

This approach started to shift with the adoption of the Charter of Fundamental Rights of the European Union, proclaimed by the EU institutions on 7 December 2000.¹³ Its legal status was clarified with the entry into force of the Treaty of Lisbon on 1 December 2009, which granted the Charter binding legal force. The Charter stipulates the right of everyone to freedom of expression. The scope of this right largely follows the Council of Europe's European Convention on Human Rights (ECHR), stating that it "shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers."¹⁴

In the following years, EU policies on freedom of expression started to be discussed through the prism of harmful disinformation and propaganda. Within the EU, harmful disinformation has been generally countered by (1) improving the capabilities of the EU institutions to detect, analyse and expose it; (2) strengthening coordinated and joint responses to disinformation (including establishing a rapid alert system); (3) mobilising the private sector to tackle disinformation; and (4) raising awareness and improving societal resilience.¹⁵

This response was articulated in a series of policy documents and legislative initiatives, including the Action Plan on Strategic Communication,¹⁶ the European Parliament's resolution on EU strategic communication to counteract propaganda against it by third parties,¹⁷ the European Commission's Communication "Tackling online

¹³ EU, *Charter of Fundamental Rights of the European Union*, 2012/C 326/02.

¹⁴ Compare Article 11 of the EU Charter of Fundamental Rights ("Freedom of expression and information") and Article 10 of the Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR).

¹⁵ EEAS, *Factsheet: Action Plan against Disinformation*, 3 May 2019. See more in Richter A., *Sanction law against Russian and Belarusian audiovisual media*, IRIS Extra, European Audiovisual Observatory, Strasbourg, 2022.

¹⁶ EEAS, *Action Plan on Strategic Communication*, 22 June 2015, East Strategic Communication Task Force (Western Balkans Task Force and Task Force South were added later).

¹⁷ European Parliament, *Resolution (2016/2030(INI))* on EU strategic communication to counteract propaganda against it by third parties, 23 November 2016.

disinformation: A European approach”,¹⁸ the Code of Practice on Disinformation,¹⁹ the European Commission’s Action Plan against Disinformation,²⁰ the European Commission’s Communication “Tackling COVID-19 disinformation - Getting the facts right”,²¹ the European Commission’s European Democracy Action Plan²² and the Digital Services Act (DSA).²³ The latter converted the Code of Practice on Disinformation into the Strengthened Code of Practice on Disinformation²⁴ which was then formally integrated into the DSA.²⁵ The most recent relevant document in this context is the European Media Freedom Act.²⁶

The “hard” response to disinformation and FIMI has taken the form of modern media sanctions, which have been effective in the EU since 2013.²⁷ The precedent for EU media sanctions was set following human rights violations in Belarus after the 2010 presidential elections. Then, entry to and assets in the EU were restricted for several Belarusian journalists and state media actors²⁸ who were involved in spreading Minsk propaganda against the democratic opposition. Following the annexation of Crimea in 2014, broad economic restrictions were imposed against Russian individuals, including one media actor, Dmitry Kiselyov, CEO of the state-run RS media holding.²⁹

Following the full-scale invasion of Ukraine by the armed forces of the Russian Federation in March 2022, the EU significantly expanded the range of media sanctions, first in relation to the state-owned media outlets RT and Sputnik (parts of the same RS holding), and their subsidiaries. Subsequently, the sanctions were extended to a growing number of other media outlets under state control, as well as media individuals found to be

¹⁸ European Commission, *Tackling online disinformation: A European Approach*, Communication to the European Parliament, 26 April 2018.

¹⁹ European Commission, *Code of Practice on Disinformation*, 26 September 2018.

²⁰ European Commission, *Action Plan against Disinformation*, Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, 5 December 2018.

²¹ European Commission, *Tackling COVID-19 disinformation - Getting the facts right*, Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, 10 June 2020.

²² European Commission, *European Democracy Action Plan*, Communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, COM/2020/790 Final, 3 December 2020.

²³ EU Regulation 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (*Digital Services Act*).

²⁴ European Commission, *2022 Strengthened Code of Practice on Disinformation*, 16 June 2022.

²⁵ Ibid. See also: Hermanns O., “*Commission and EBDS endorse the integration of the Code of Practice on Disinformation into the DSA*”, IRIS 2025-2/3.

²⁶ EU Regulation 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (*European Media Freedom Act*), OJ L, 2024/1083, 17 April 2024.

²⁷ EU, *Council Implementing Regulation No 1054/2013* of 29 October 2013 implementing Article 8a(1) of Regulation (EC) No 765/2006 concerning restrictive measures in respect of Belarus.

²⁸ For the notion of “media actor”, see Council of Europe, *How to protect journalists and other media actors?*, Extended, 2023.

²⁹ EU, *Council Regulation No 269/2014* of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. See more in Richter A., “*Sanction law against Russian and Belarusian audiovisual media*”, *IRIS Extra*, European Audiovisual Observatory, Strasbourg, 2022.

responsible for supporting and promoting the aggression.³⁰ These sanctions are to be maintained “until the aggression against Ukraine is put to an end, and until the Russian Federation, and its associated media outlets, cease to conduct propaganda actions against the Union and its Member States”.³¹

2.2. The FIMI Toolbox

Both within and outside the EU, one of the key policy reference points in relation to strengthening resilience to foreign information manipulation and interference (FIMI) is the FIMI Toolbox. This should be seen as complementary to other EU toolboxes, in particular the broader EU Hybrid Toolbox, which provides a framework and a catalogue of preventive, cooperative, stability, restrictive, assistance and solidarity measures.³²

The FIMI Toolbox was developed in line with the Strategic Compass for Security and Defence to strengthen common response options, resilience capacities and cooperation both within the EU and in support of partner countries, and to improve situational awareness.³³ Formally, it came as a response to the disinformation targeting EU civilian and military (Common Security and Defence Policy, CSDP) missions, in particular in the EU’s Eastern neighbourhood.³⁴ By seeking to damage the reputation of CSDPs and mislead the public in partner countries about their role and mandate, FIMI “can negatively impact the ability of the missions to attain their objectives” and at times put the lives of their personnel at risk. They are supported by the EEAS with the help of relevant instruments of the FIMI Toolbox, such as “situational awareness, capacity building and advice”.³⁵ The FIMI Toolbox is basically a catalogue of instruments, many of which are in constant implementation, to tackle and respond to FIMI operations.³⁶ It includes short-, medium- and long-term measures from prevention to response. It is constantly evolving, ready to adapt to the continuous evolution of threats.

The FIMI Toolbox presents a non-exhaustive inventory of instruments intended to give an overview of their diversity in the following four areas: 1) situational awareness, 2) resilience building, 3) EU external action and 4) disruption and regulation (see figure 1).

³⁰ Pingen A., “[Council Sanctions against Russia and Belarus](#)”, *Eucrim*, 11 August 2022; EU, [Council Regulation 2022/350](#) of 1 March 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, Annex; and [Council Decision \(CFSP\) 2022/582](#) of 8 April 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, Annex.

³¹ EU, [Council Regulation \(EU\) 2022/350](#) of 1 March 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, recital 10.

³² Lasoen K., *Realising the EU Hybrid Toolbox: opportunities and pitfalls*, Netherlands Institute of International Relations, 2022.

³³ EEAS, *A Strategic Compass for Security and Defence*, op. cit.

³⁴ EEAS, *Annual Progress Report on the Implementation of the Strategic Compass for Security and Defence*, March 2024, p. 15.

³⁵ EEAS, *Information Integrity and Countering Foreign Information Manipulation & Interference (FIMI)*, March 2025.

³⁶ EEAS, *3rd EEAS Report on Foreign Information Manipulation and Interference Threats - Exposing the architecture of FIMI operations*, March 2025.



Each of these areas comprises different types of instruments, with the potential to either prevent or lower the impact of FIMI, deter actors from pursuing these activities and respond to them. Existing instruments may be complemented by new ones where appropriate.³⁷

Situational awareness revolves around an analytical model to shape global understanding of FIMI threats. This model has been used by international networks of counter-FIMI defenders, government partners and NATO, fostering increased data exchange and collaboration. Through its annual “FIMI Threat” reports, which provide insights, tools and frameworks, the EEAS is progressively building and refining its analytical methodology.

Resilience building is implemented by supporting independent media and fact-checking networks across the globe; building capacity for stakeholders and partners, such as through training and collaboration with EU institutions; empowering civil society; and enhancing digital, media and information literacy to critically assess information and detect manipulation techniques, mitigating the impact of FIMI.

EU external action includes engaging partners globally under the counter-FIMI agenda. The EEAS exchanges information and coordinates political action with political partners, including exposure of FIMI actors, notably through the Collective Response Framework (established by the G7 countries to counter foreign threats to democracy), and with NATO.³⁸

In relation to **disruption and regulation**, the FIMI Toolbox mentions the EU Digital Services Act (DSA), the Code of Practice on Disinformation and the European Media Freedom Act (EMFA).

An important reason for the adoption of the **Digital Services Act** in 2022 was the intention to establish a stronger framework for resisting disinformation. The DSA created a crisis mechanism that enables governments, in times of crisis involving threats to national security, to impose a state of emergency on social media sites, search engines and online marketplaces, and to intervene in platforms’ policies.³⁹ The DSA classifies platforms or search engines that have more than 45 million users per month in the EU as very large online platforms (VLOPs) or very large online search engines (VLOSEs). Once a platform is identified and designated as a VLOP or VLOSE, it has to comply with the DSA. For example, it needs to be transparent as regards advertising, recommender systems or content moderation decisions.

VLOPs and VLOSEs (or VLOPSEs if taken together) must identify, analyse and assess systemic risks that are linked to their services by looking, in particular, at risks related to public security and electoral processes, public health, protection of minors, and mental and physical wellbeing.

Once the risks are identified and reported to the European Commission, VLOPSEs are obliged to put measures in place that mitigate these risks by adapting the design or

³⁷ EEAS, *2nd EEAS Report on Foreign Information Manipulation and Interference Threats - A Framework for Networked Defence*, February 2024, p. 14.

³⁸ EEAS, *Information Integrity and Countering Foreign Information Manipulation & Interference (FIMI)*, 14 March 2025.

³⁹ Meaker M., *Ukraine War Prompts Europe’s New Emergency Rules for the Internet*, WIRED, 26 April 2022.



functioning of their services or changing their recommender systems. They also have to establish an internal compliance function that ensures that the risks identified are mitigated.⁴⁰

The Code of Practice on Disinformation complements these rules through certain commitments taken by online platforms, players in the advertising industry, fact-checkers, research and civil society organisations in relation to the demonetisation of disinformation, political ads, fact-checking, user empowerment and so on.⁴¹ The code's current signatories include more than 40 VLOPSEs (including Facebook, Instagram, LinkedIn, Bing, TikTok, YouTube and Google Search).⁴² They report on the code's implementation in individual annual reports submitted to the Transparency Centre.⁴³ Since 1 July 2025, the Code of Practice on Disinformation has been officially integrated into the framework of the DSA. As such, it is “a relevant benchmark for determining DSA compliance regarding disinformation risks for the providers of VLOPs and VLOSEs that adhere to and comply with its commitments.”⁴⁴

In the context of this review, greater attention should be paid to **the European Media Freedom Act (EMFA)** since, despite being an instrument of the FIMI Toolbox, it is rarely mentioned as such.

As stated in its opening article, the EMFA lays down common rules for the proper functioning of the internal market for media services, while safeguarding the editorial independence and pluralism of media services.⁴⁵ It further adjusts the focus of European regulatory efforts on media pluralism and provides certain additional standards of media regulation.

Placing the EMFA within the FIMI Toolbox is well justified, including for the wider Europe. It is therefore not surprising that the European Commission, even at the early stage of both the EMFA's implementation and several countries' accession processes, already refers to the need to ensure “compliance with the European Media Freedom Act” in national media law.⁴⁶

The EMFA establishes a novel and firmer legal basis for countering foreign propaganda. It divides media into three categories:⁴⁷

- 1) quality media services;

⁴⁰ European Commission, *DSA: Very large online platforms and search engines* (undated).

⁴¹ European Commission, *Code of Practice on Disinformation*, 2022. See also: Hermanns O., “Commission and EBDS endorse the integration of the Code of Practice on Disinformation into the DSA”, *IRIS* 2025-2/3. Here

⁴² European Commission, *Signatories of the 2022 Strengthened Code of Practice on Disinformation*, press release, 16 June 2022.

⁴³ Transparency Centre, *Reports* (undated).

⁴⁴ European Commission, *The Code of Conduct on Disinformation*, press release, 13 February 2025.

⁴⁵ EU, Regulation 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (*European Media Freedom Act*), OJ L, 2024/1083, 17 April 2024.

⁴⁶ European Commission, *Commission staff working document, Republic of Moldova 2023 Report*, SWD(2023) 698 final, 8 November 2023, pp. 6 and 34.

⁴⁷ For further details about this breakdown, see Richter A., *Media pluralism in selected Black Sea countries: the influence of European standards*, op. cit., p. 27.

- 2) rogue media service providers; and
- 3) all other media services.

Quality media services are described in the EMFA as those that enjoy editorial freedom, fulfil their vital public watchdog role, provide reliable (trustworthy) information, act in an independent manner and in line with ethical and journalistic standards, accept self-regulation and (in the case of public service media) are impartial. They therefore act as a shield against FIMI.⁴⁸ The European Board for Media Services (EBMS), established under the EMFA, monitors adherence to self-regulatory initiatives which aim to protect users from harmful content, including disinformation and FIMI.⁴⁹ The European Commission ensures that such monitoring includes detailed analysis of media markets in all member states, including risks of FIMI.⁵⁰

The notion of “quality media services” follows the concept of “quality journalism” as developed at the Council of Europe by the Committee of experts on quality journalism in the digital age (MSI-JOQ) in 2018-19.⁵¹ The work of the MSI-JOQ resulted in two documents, subsequently adopted by the Council of Europe: first, the Declaration by the Committee of Ministers on the financial sustainability of quality journalism in the digital age,⁵² and, after the Russian Federation (which had opposed its adoption) was excluded from the Council of Europe, the Recommendation on promoting a favourable environment for quality journalism in the digital age (see below).⁵³

At the other end of the spectrum, “rogue” media service providers include “those controlled by certain third countries, that systematically engage in disinformation or information manipulation and interference, and use the internal market freedoms for abusive purposes, thus thwarting the proper functioning of market dynamics.”⁵⁴ They are clearly targets of the counter-FIMI tools.

The basic reason for creating these three categories is that “quality” media services should be supported and promoted by the EU, not just inside the Union but globally. “Rogue” media services, on the other hand, should be kept at bay, while EU policy towards all other media services remains neutral (as it was before the adoption of the EMFA).⁵⁵

⁴⁸ EU, [European Media Freedom Act](#), recitals 14, 19 and 27.

⁴⁹ *Ibid.*, Article 19.

⁵⁰ *Ibid.*, Article 26.

⁵¹ Council of Europe, [MSI-JOQ Committee of experts on quality journalism in the digital age](#) web site.

⁵² Council of Europe, [Decl\(13/02/2019\)2](#), Declaration on the financial sustainability of quality journalism in the digital age (Adopted by the Committee of Ministers on 13 February 2019 at the 1337th meeting of the Ministers' Deputies).

⁵³ EU, [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 (Adopted by the Committee of Ministers on 17 March 2022 at the 1429th meeting of the Ministers' Deputies). On 25 February 2022, the Committee of Ministers suspended Russia's rights of representation at the Council of Europe. On 16 March 2022, Russia was excluded from the organisation due to its blatant violations of the Council of Europe Statute.

⁵⁴ EU, [European Media Freedom Act](#), recitals 4, 44 and 49.

⁵⁵ EU, [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.



Figure 1. Visual presentation of the FIMI Toolbox⁵⁶



⁵⁶ EEAS, *2nd EEAS Report on Foreign Information Manipulation and Interference Threats - A framework for networked defence*, February 2024, p. 13.

2.3. Input from the Council of Europe

As part of the European response, the Council of Europe institutions have significant input in the countering of propaganda, disinformation and manipulation. The starting point here seems to be the Resolution of the Parliamentary Assembly of the Council of Europe (PACE) entitled **“Online media and journalism: challenges and accountability”**.⁵⁷ The Resolution referred to a line “between what could be considered a legitimate expression of personal views in an attempt to persuade readers” and disinformation or manipulation. It noted with concern the growing number of online media campaigns designed to misguide sectors of the public through intentionally biased or false information, hate campaigns against individuals and personal attacks, often in a political context, aimed at harming democratic political processes.⁵⁸ The Resolution suggested a number of steps to be taken by national authorities, such as inclusion of media literacy in school curricula, support for awareness-raising projects and targeted training programmes to promote the critical use of online media, and support for professional journalistic training.⁵⁹

In another of its earlier resolutions, the PACE acknowledged that the internet “belongs to everyone; therefore, it belongs to no one and has no borders” and stressed the need to preserve its openness and neutrality. It also noted that the internet “intensifies the risk of biased information and manipulation of opinion.” As such, it “must not be allowed to become a gigantic prying mechanism, operating beyond all democratic control” or “a *de facto* no-go area, a sphere dominated by hidden powers in which no responsibility can be clearly assigned to anyone.”⁶⁰ The PACE recommended that the Council of Europe member states consider actions that would prevent the risk of information distortion and manipulation of public opinion, mostly through coherent regulations and/or incentives for self-regulation concerning the accountability of the major internet operators.⁶¹

In 2017, the Council of Europe published a widely referenced report entitled **“Information Disorder: Toward an interdisciplinary framework for research and policy making”**.⁶² The document examined the way in which “information disorder” (an umbrella term) and disinformation campaigns in particular have become widespread and, heavily relying on social media, contribute to a global media environment of information disorder. This report provided a new framework for the three elements of information disorder for policy-makers, legislators, researchers, technologists and practitioners working on the related theoretical and practical challenges. They were:

- 1) *misinformation*, when false information is shared, but no harm is meant;

⁵⁷ Parliamentary Assembly of the Council of Europe, *Resolution 2143 (2017)*, “Online media and journalism: challenges and accountability”. Text adopted on 25 January 2017.

⁵⁸ Ibid., paragraph 6.

⁵⁹ Ibid., paragraph 12.1.

⁶⁰ Parliamentary Assembly of the Council of Europe, *Resolution 1970 (2014)*, “Internet and politics: the impact of new information and communication technology on democracy”. Text adopted on 29 January 2014, paragraphs 12 and 14.

⁶¹ Ibid., paragraph 19.9.

⁶² Wardle C. and Derakhshan H., *Information disorder: Toward an interdisciplinary framework for research and policy making*, Council of Europe, Strasbourg, October 2017.



- 2) *disinformation*, when false information is knowingly shared to cause harm; and
- 3) *malinformation*, when genuine information is shared to cause harm, often by moving information designed to stay private into the public sphere.

Adopted in 2022, the **Recommendation on promoting a favourable environment for quality journalism in the digital age** dealt prominently with measures to counteract disinformation in the media and the harm it causes to trust in the media. The **Guidelines on promoting quality journalism in the digital age** were also approved, stating that democracies have experienced “growing threats posed by the spread of disinformation and online propaganda campaigns, including as part of large-scale co-ordinated efforts to subvert democratic processes.” The document pointed out that “Concerted national and/or transnational efforts to address disinformation and propaganda should receive full support from States in a manner that does not undermine their independence”. The Guidelines recommended studying the impact of the considerable efforts made by some online platforms “to prevent the use of their networks as conduits for large-scale disinformation and manipulation of public opinion, as well as to give greater prominence to generally trusted sources of news and information.” Media and information literacy (MIL) throughout the media sector, transparency of advertising, fact-checking, and upskilling of journalists and other media actors were identified in the Guidelines as tools to prevent and counter disinformation in the media.⁶³

At the most recent **Conference of Ministers responsible for Media and the Information Society**, held in 2021, the member states pledged to address the challenges of increasing disinformation, misinformation and malinformation at domestic level. They expressed particular support for a “media ecosystem based on a plurality of independent media actors and other relevant organisations that represent the whole diversity of the society.” Such media actors, however, are expected to:

*(i) share commitment to truth seeking and reporting in line with journalistic ethical guidelines, (ii) adopt transparent journalistic practices that enable individuals to assess information and develop trust in both the media and the content provided, and (iii) empower individuals, through widely available content of public interest across all platforms, including public service, to make autonomous decisions about their life, work and public participation.*⁶⁴

Recent documents also include the PACE Resolution on “**Propaganda and Freedom of Information in Europe**”, in which the Assembly “recommends that member States develop

⁶³ EU, [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 (adopted by the Committee of Ministers on 17 March 2022 at the 1429th meeting of the Ministers’ Deputies).

⁶⁴ Council of Europe, [Resolution on the changing media and information environment](#), European Ministerial Conferences on Mass Media Policy & Council of Europe Conferences of Ministers responsible for Media and new Communication Services: Texts Adopted, Council of Europe, Strasbourg, 2021, p. 80.



holistic strategies to counter illegal propaganda and provide effective responses to the spread of harmful, though legal, propaganda”, and provides elements of such strategies.⁶⁵

⁶⁵ Parliamentary Assembly of the Council of Europe (PACE), [Resolution 2567\(2024\)](#), Propaganda and freedom of information in Europe, 1 October 2024, paragraphs 12.1 to 12.18, and accompanying report: PACE, [Propaganda and freedom of information in Europe](#), Rapporteur: Mr Stefan Schennach, Austria, SOC, Doc. 16034, 9 September 2024.



3. EU projects to strengthen resilience in wider Europe

While many countries have adopted laws and/or policies on foreign media and “false news”,⁶⁶ they often lack resources to analyse and build single-handed resilience to FIMI. As countering FIMI remains its policy priority, the EU provides assistance “to protect democratic institutions and the integrity of a free, diverse and open information space.”⁶⁷ EU cooperation with and support for the work of civil society organisations (CSOs), independent journalists and fact-checkers worldwide are central to this. To counter FIMI threats and fortify its own defences, the EU has additionally mobilised initiatives reflected in an array of projects inside the Union intended to analyse, educate and empower policy frameworks.⁶⁸

3.1. Eastern Europe and South Caucasus

Following applications by Ukraine, the Republic of Moldova and Georgia in 2022, the EU granted candidate status to Ukraine and Moldova, with accession negotiations opening in June 2024. Georgia was granted candidate status by the European Council on 14 December 2023, contingent on taking the relevant reforms outlined by the European Commission. However, progress for Georgia has since encountered significant challenges as the authorities proposed and the Parliament passed the Law on Transparency of Foreign Influence, the so-called “foreign agent law”, deemed “incompatible with EU values and standards.”⁶⁹

With the decision to recognise a European perspective for Ukraine, Moldova and Georgia, “these three countries have been the target of a new wave of FIMI campaigns, mainly aiming to discredit aspirations to join the EU and blame the West for the current situation in the region. In Georgia, a specific strand of disinformation attempted to imply that the West seeks to open a “second front” against Russia from Georgia.”⁷⁰

In our eastern neighbourhood”, says the Strategic Compass, “while Ukraine is being directly attacked by the Russian armed forces, also the Republic of Moldova, Georgia and other

⁶⁶ Richter A., *Media pluralism in selected Black Sea countries: the influence of European standards*, op. cit., pp. 28-32; Richter A., *Media law and policy in selected Black Sea region countries*, op. cit., pp. 24-26.

⁶⁷ EEAS, *3rd EEAS Report on Foreign Information Manipulation and Interference Threats - Exposing the architecture of FIMI operations*, March 2025, p. 38.

⁶⁸ Disinfo.EU, *Tackling foreign information manipulation and interference in Europe*, June 2024.

⁶⁹ Kovalčíková N., De Agostini L. and Catena B., *Strengthening resilience in the East: How the EU can empower countries against foreign interference*, European Union Institute for Security Studies, April 2025.

⁷⁰ Ibid.



countries in the South Caucasus are continuously facing strategic intimidations, direct threats to their sovereignty and territorial integrity and are trapped in protracted conflicts.”⁷¹

As part of resilience-building initiatives, the EU has supported “approximately 2 500 local CSOs, 120 independent media outlets and 2 000 journalists” across the Eastern Partnership region.⁷²

In addition, a regional hub of the EU-funded European Digital Media Observatory (EDMO),⁷³ one of the elements of the Action Plan against Disinformation,⁷⁴ was launched in 2025 to support Ukraine and Moldova. The hub, named FACT (Fighting Against Conspiracy and Trolls), brings together a cross-border and multidisciplinary community of researchers, fact-checkers and experts in media literacy from Romania, Moldova, Ukraine, Lithuania, Latvia, and Estonia to detect and analyse manipulation and disinformation campaigns, particularly Russian disinformation. It is coordinated by Context Platform, an independent media start-up in Romania, with partners including Expert Forum (EFOR), Investigative Reporter Project Italy (IRPI), Kyiv Independent, Re:Baltica, Rise Moldova and the Association for Technology and Internet. As part of its mission, FACT monitored the latest parliamentary electoral campaign in Moldova, helping to ensure its integrity.⁷⁵

3.1.1. Georgia

The EU-funded project “**Supporting accountable and human rights oriented security sector through research, advocacy and inclusive dialogue**”⁷⁶ was implemented between 2022 and 2025 by the CSO Social Justice Center in partnership with the Caucasus Research Resource Center (CRRC) Georgia and the Georgian Young Lawyers’ Association.⁷⁷ The project aimed, in particular, to enhance human rights standards in the security system by increasing analytical, advocacy and awareness capacities. Among the deliverables was the report “The spread of anti-Western narratives coming from authorities on Facebook: Social media analysis”, published in Georgian and English.⁷⁸ In the report, CRRC Georgia, a non-profit research CSO, detected anti-Western narratives and investigated their dissemination on Facebook in 2022 and 2023. Other analytical papers on the effects of disinformation in Georgia were published as part of the project.⁷⁹

⁷¹ EEAS, *A Strategic Compass for Security and Defence*, op. cit., p. 19.

⁷² Kovalčíková N., De Agostini L., and Catena B., op. cit.

⁷³ See *EDMO Hubs*.

⁷⁴ European Commission, *Action Plan against Disinformation*, op. cit.

⁷⁵ European Commission, *New European Digital Media Observatory hub fights disinformation in Ukraine and Moldova*, press release, 15 July 2025.

⁷⁶ Social Justice Center, *Supporting accountable and human rights oriented security sector through research, advocacy and inclusive dialogue*, 1 January 2022.

⁷⁷ Caucasus Research Resource Center – Georgia, *Supporting accountable and human rights oriented security sector through research, advocacy and inclusive dialogue* (undated).

⁷⁸ Caucasus Research Resource Center – Georgia, *The spread of anti-Western narratives from the government on Facebook: Social media analysis*, 2024.

⁷⁹ Cole E., *Disinformation in Georgia: Challenges and Solutions*, Social Justice Center, 2024.



In another recently completed project, **“Strategic Communications, Disinformation and Violent Extremism”**, the International Centre for Counter-Terrorism (ICCT), a think-and-do tank based in The Hague, examined the increasing use of disinformation by violent extremists and terrorist organisations. According to the ICCT, “the true speed, scale and multidimensional nature of these disinformation efforts are still poorly understood. This makes it difficult to detect and resist extremist disinformation narratives that drive radicalisation and recruitment.”⁸⁰ The project involved desk research and fieldwork to map the threats posed by terrorist groups spreading disinformation, especially in South Caucasus and the Western Balkans. The ICCT organised consultation processes among the stakeholders, running a workshop, carrying out interviews and engaging with EU institutions and relevant regional counterparts to compile approaches and harmonise perspectives. The aim of the project was to draft a Global Guidance Document on countering terrorist disinformation. The document aims to improve future EU programming on disinformation, support EU delegations and implementing partners engaged in strategic communications, contribute to preventing and countering online radicalisation, and strengthen community resilience.⁸¹

An ongoing project (2025-2027), **“SAFIMI Georgia: Georgian Society Against FIMI, Disinformation and Coordinated Inauthentic Behaviour”**,⁸² forms part of the Regional Communication Programme of the EU Eastern Partnership.⁸³ The programme is operated through a partnership between the Brussels-based GOPA Consulting Group (GCG) and Partners in Action for Change and Engagement (PACE).⁸⁴ This particular project aims to mitigate the societal impacts of disinformation and create long-term resilience within Georgia’s information ecosystem. It will be implemented through strengthened cross-sectoral collaboration and awareness on FIMI threats among media, civil society, government and the public. “SAFIMI Georgia” is a multi-stakeholder effort with CSO partners including the Media Development Foundation,⁸⁵ Transparency International Georgia⁸⁶ and Maldita.es.⁸⁷ Promoting research and better understanding of disinformation challenges, the project team fosters collaborative networks and engages the public in awareness campaigns. Key initiatives include creating the “SAFIMI community” – a platform for cooperation among media, CSOs and public authorities – and delivering region-specific

⁸⁰ ICCT, *Strategic Communications, Disinformation and Violent Extremism* (undated).

⁸¹ Ibid.

⁸² EU Neighbours East, *SAFIMI Georgia: Georgian Society Against FIMI, Disinformation and Coordinated Inauthentic Behaviour* (undated) EU-funded Regional Communication Programme for the Eastern Neighbourhood (“EU Neighbours East”).

⁸³ GOPA-PACE, *About us* (undated).

⁸⁴ GOPA-PACE, *EU Neighbours East: Regional Communication Programme* (undated).

⁸⁵ Established in April 2008 by a group of professional journalists, the *Media Development Foundation* (MDF) is a Georgian CSO aiming, in particular, to promote critical thinking and conscious media consumption. It runs a fact-checking platform, *Myth Detector*. See also: *SAFIMI Georgia: Georgian Society Against FIMI, Disinformation and Coordinated Inauthentic Behaviour* (undated).

⁸⁶ Transparency International Georgia, *SAFIMI Georgia: Georgian Society Against FIMI, disinformation and coordinated inauthentic behavior* (undated).

⁸⁷ *Maldita.es* is a Spanish independent journalistic CSO dedicated to countering disinformation through fact-checking and data journalism techniques.

training for the stakeholders. Public awareness is raised through fact-based content, further supported by campaigns and social media engagement.

Another project forming part of the same programme, **“Quality Media and Conscious Media Consumption for Resilient Society – ConMeCo”** (2023-2025), was recently completed. It was related to FIMI, as its priorities included to “organize hackathons around media consumption and literacy”, as well as “a series of MIL workshops for young consumers in Tbilisi and regions of Georgia.”⁸⁸ The project was implemented by the Deutsche Welle Akademie (Germany) *in cooperation with the above-mentioned Media Development Foundation and the Human Rights Center.*⁸⁹ *Co-funded by the EU and the German Federal Ministry for Economic Cooperation and Development (BMZ), it provided subgrants for content creation to partners that counter disinformation.*⁹⁰

It should be noted that Georgian civil society organisations, including the Human Rights Center, recently came under attack by local media in relation to the nature of their cooperation with the EU.⁹¹ The media reports, based on information from the European Parliament, claimed that large sums were being provided “to encourage disorder”, mentioning the ConMeCo project (see above) in particular.

3.1.2. Moldova

The situation in Moldova is the focus of the latest EEAS annual report on countering FIMI. The report notes that Russia’s operations there aim “to undermine democratic processes and sabotage EU enlargement by portraying European integration as a threat to Moldova’s economic and political sovereignty. FIMI narratives claimed that EU membership would turn the country into a dependent state controlled from abroad. These messages were reinforced by election fraud allegations and leadership delegitimization (...)”⁹²

In a special resolution, the European Parliament urged the EU “to further strengthen cooperation with Moldova through targeted measures in order to enhance the country’s resilience to hybrid threats, including by improving strategic communications about the EU, supporting journalists and civil society in countering

⁸⁸ EU Neighbours East, *Quality Media and Conscious Media Consumption for Resilient Society – ConMeCo* (undated) EU-funded Regional Communication Programme for the Eastern Neighbourhood (‘EU Neighbours East’).

⁸⁹ The *Human Rights Center* is a local CSO dedicated to protection and promotion of human rights, rule of law and peace in Georgia.

⁹⁰ DW Akademie, *Call for application: Content production grants*, 20 September 2023.

⁹¹ Human Rights Center, *Human Rights Center Statement on Another Disinformation Campaign Against Georgian Civil Society Organizations*, 17 July 2025.

⁹² EEAS, *3rd EEAS Report on Foreign Information Manipulation and Interference Threats - Exposing the architecture of FIMI operations*, March 2025, p. 30.

disinformation, promoting independent Russian-language media content” and “supporting media literacy and media independence” in Moldova.⁹³

Today, there is an abundance of EU-funded projects countering manipulative campaigns that target Moldova. **“Top-down and bottom-up resilience-building in Moldova”** (2025-2027), another project implemented as part of the EU Eastern Partnership’s Regional Communication Programme, is designed to strengthen the resilience of local youth (aged 16 to 30) and the ability of public institutions to communicate effectively and transparently. Its title is explained by the combination of two complementary approaches. The first focuses on grassroots efforts to improve media literacy, especially among young people, through journalism, education on FIMI tactics, techniques and procedures (TTPs) by trained peer mentors or “disinfo-gurus,” and support for regional media.⁹⁴ It has started by inviting students, young teachers, bloggers and content creators, who “believe in truth, transparency and education and are determined to fight against disinformation” and are ready to become future mentors.⁹⁵ The second approach targets civil servants, enhancing their strategic communication skills to better explain public policy to citizens.⁹⁶ The project is being implemented by GLOBSEC, a think-tank-type CSO based in Slovakia and committed to enhancing security, prosperity and sustainability in Europe.⁹⁷ In Moldova, the implementing partner is Association Media-Guard, a Chisinau-based CSO.⁹⁸

Another Regional Communication Programme project was entitled **“Supporting Independent Media and Information Resilience (SIMIR) in Moldova”** (2022-2023). Implemented by international CSO Internews, SIMIR contributed to stability through improved resilience to disinformation by supporting independent media and promoting local voices. It essentially provided emergency grants to some 20 Moldovan media to produce uninterrupted credible content for the public. It was also one of a number of projects designed to modernise the Audiovisual Council of Moldova, the national media regulator, to “improve its media monitoring and better react to gaps in publicly important disinformation in programming.”⁹⁹ As the media regulators in Moldova and elsewhere in the region are political institutions, and with the aim not to compromise their fragile independence, EU assistance includes a technical support mechanism to enable the national regulator to perform with expertise and precision, for example by supplying it with software and monitoring equipment.

Combating disinformation and promoting critical thinking is an important theme of another ongoing project, **“Resilient Media for Informed Citizens”** (2024-2025).¹⁰⁰ This project is being implemented by the Czech CSO People in Need, “founded on the ideals of

⁹³ European Parliament, [Resolution 2024/2821\(RSP\)](#) of 9 October 2024 on strengthening Moldova’s resilience against Russian interference ahead of the upcoming presidential elections and a constitutional referendum on EU integration, paragraph 18.

⁹⁴ EU Neighbours East, [Top-down and bottom-up resilience-building in Moldova](#) (undated).

⁹⁵ Media-Guard, [Media-Guard te invită să te înscrii la Tabăra de Reziliență Informațională pentru Tineri](#) (Media-Guard invites you to apply for the Information Resilience Camp for Youth), 4 July 2025.

⁹⁶ EU Neighbours East, op. cit., [Top-down and bottom-up resilience-building in Moldova](#) (undated).

⁹⁷ GLOBSEC, [Who we are](#) (undated).

⁹⁸ Media Guard, [Despre noi](#) (About us) (undated).

⁹⁹ EU Neighbours East, [Supporting Independent Media and Information Resilience \(SIMIR\) in Moldova](#) (undated). “

¹⁰⁰ EU Neighbours East, [Resilient Media for Informed Citizens](#)” (undated).

humanism, freedom, equality, and solidarity.”¹⁰¹ In particular, it aims “to strengthen the advocacy and organizational management capacities of the Association of Independent Press (API) to respond effectively to the evolving challenges and needs of the independent media in the Republic of Moldova”.¹⁰² Its objectives include to increase API team skills in advocacy, improve the API’s capacity to monitor and evaluate projects, as well as “attract new members and funding by developing and distributing promotional materials and organizing meetings with independent media outlets and donors.”¹⁰³ This approach culminated in the API launching an “Institutional Development and Advocacy Strategy for 2025–2029, reaffirming its role as a leader in supporting independent media in the Republic of Moldova.”¹⁰⁴

3.1.3. Ukraine

According to the EEAS, “Ukraine remains the main target of Russian FIMI attacks.”¹⁰⁵ In fact, Ukraine benefits the most from the EU’s efforts to increase the resilience of its population and public authorities to FIMI. In 2023 alone, the EEAS reported on projects worth over €30 million to help Ukrainian civil society, media and its government’s Centre for Strategic Communication and Information Security (CSC)¹⁰⁶ resist disinformation and propaganda.¹⁰⁷

In their June 2024 joint security commitments, the European Union and Ukraine agreed, in particular, to strengthen cooperation on resilience to hybrid and cyber threats and FIMI.¹⁰⁸

One example of EU-supported projects is “**Strengthening Information Resilience in Ukraine**” (2024-2025), which supported the activity of the Kyiv-based CSO Ukraine Crisis Media Center (UCMC).¹⁰⁹ In partnership with the International Practitioners’ Partnership Network, or PractNet (Estonia),¹¹⁰ it provided monitoring and analysis of Russian hybrid threats, debunking disinformation and promotion of Ukrainian narratives by publishing articles, podcasts and short YouTube videos explaining propaganda and its effects. It ran

¹⁰¹ People in Need, *About us* (undated).

¹⁰² API, *Independent Media and Resilience for Informed Citizens* (undated).

¹⁰³ Ibid.

¹⁰⁴ People in Need, *Independent Press, Strengthened by Strategy: API Launches the 2025–2029 Development Plan with Support from the European Union*, 27 June 2025.

¹⁰⁵ EEAS, *3rd EEAS Report on Foreign Information Manipulation and Interference Threats - Exposing the architecture of FIMI operations*, March 2025, p. 9.

¹⁰⁶ *Centre for Strategic Communication and Information Security (CSC)* website.

¹⁰⁷ EEAS, *EU support to information resilience in Ukraine*, 1 October 2023.

¹⁰⁸ European Council press release, *Joint security commitments between the European Union and Ukraine*, 27 June 2024.

¹⁰⁹ UCMC, *Who we are*.

¹¹⁰ The International Practitioners’ Partnership Network (PractNet) is a non-profit organisation that designs and implements training and advisory programmes to share Estonia’s democratic transition experience with EU partner countries specialising in capacity-building for strategic communication, resilience development and countering foreign manipulation and disinformation. See: *Who We Are* (undated).

public awareness campaigns that included expert talks, round tables and strategy sessions with activists, officials and civic groups in order to share expertise and counter threats. Among the topics discussed were European integration¹¹¹ and Russian propaganda on certain national heritage issues.¹¹² Based on the UCMC-led study on debunking myths surrounding common historical events and developments in the south and east of Ukraine,¹¹³ a number of educational events were also held. The key research arm of the UCMC is the Hybrid Warfare Analytical Group (HWAG), which provides assessments of propaganda around the globe.¹¹⁴ Part of the UCMC deals with Uchoose.info, a web resource for nurturing critical thinking, combating misinformation and promoting MIL. It offers straightforward explanations, and attempts to soothe public anxiety and dismantle falsehoods and populist narratives.¹¹⁵

The Estonian Centre for International Development (ESTDEV), a state body established to advance relevant government objectives, partnered with the UCMC in another counter-FIMI project. The objectives of this project, entitled **“Support to Ukraine’s Efforts in Tackling Disinformation”** (2022-2024),¹¹⁶ included strengthening the competence of the staff of the CSC, which was established in March 2021. According to its website, created with the support of another EU-funded project, the CSC is one of the main mechanisms to counter FIMI in Ukraine, in particular information attacks by the Russian Federation.¹¹⁷ This project’s objectives were achieved through three main activities:

- Building capacity to counter hostile foreign disinformation narratives
- Facilitating development of strong partnerships between Ukraine, Estonia and other EU member states to promote a consolidated response to hostile disinformation
- Increased access to information to improve resilience to hostile disinformation narratives

The Council of Europe project **“Safeguarding Freedom of Expression and Freedom of the Media in Ukraine – Phase II”** (SFEM-UA – Phase II) aims to address the pressing needs of key Ukrainian media stakeholders in the context of Russia’s ongoing war of aggression against Ukraine and in the post-war period. In particular, it supports the enhancement of European standards and media legislation in Ukraine as part of its accession process. The project is a continuation of a four-year initiative launched under the Council of Europe’s 2023-2026 Action Plan for Ukraine entitled “Resilience,

¹¹¹ Ukraine Crisis Media Center, *European integration: complex issues explained in simple terms*, 7 June 2024; *Ukraine – EU: what has been done on the path to the EU, and how to tell people about our goal*, 18 May 2024.

¹¹² Ukraine Crisis Media Center, *Manipulating the Past: Do Russian Propaganda Myths about Zaporizhzhia and the Region Live on Today?*, 1 July 2025; *The history of Dnipro and Sicheslavshchyna proves the falsity of pro-Moscow myths*, 29 May 2025.

¹¹³ UCMC, *What history says: experts refute Russian myths*, 24 June 2024.

¹¹⁴ UCMC, *Hybrid Warfare Analytical Group*, (undated).

¹¹⁵ UCMC, *2024 Ukraine Crisis Media Center Annual Report*, p. 4.

¹¹⁶ ESTDEV, *Support to Ukraine’s Efforts in Tackling Disinformation* (undated).

¹¹⁷ Siehe Centre for Strategic Communication and Information Security, *About us* (undated).

Recovery, and Reconstruction”. Within the project, around a dozen legal opinions were provided by Council of Europe experts,¹¹⁸ while assistance was also provided to the media regulator, the National TV and Radio Broadcasting Council of Ukraine. The project focuses on building regulatory capacities and adopting necessary policies, particularly those applicable in wartime, in line with Council of Europe standards and EU regulatory trends.

Aside from the primary focus of Phase II to continue strengthening regulation, the project also focuses on promoting media independence and pluralism by implementing measures to ensure the safety and security of journalists, encouraging a diverse and independent media landscape and improving the media environment by increasing media literacy and resilience to disinformation.

Under this component, support is provided to media professionals, with a particular emphasis on developing new skills and competencies in media management, as well as content production. Local and hyperlocal media receive technical and expert assistance to help them operate effectively during wartime.

Additionally, targeted support will be offered to Ukrainian journalists and media CSOs to counter Russian propaganda and advance media literacy initiatives. Expert and technical assistance will also continue for the internal management and regulatory structures of the public broadcaster **UA:PBC** to safeguard its independence, enhance operational efficiency and ensure long-term sustainability.¹¹⁹

3.2. Western Balkans

The spread of hostile disinformation narratives is also increasing in this part of Europe. According to a European Commission report, “These are particularly effective in Serbia, where part of the local media and some mainstream political forces disseminate pro-Russian narratives, including throughout the Western Balkan region. Despite considerable efforts, resilience towards these threats remains weak due to low media literacy, low trust in institutions, limited independent and professional journalism and a low level of media freedom.”¹²⁰

Bosnia and Herzegovina was one of the pilot countries in the global project “**Social Media 4 Peace (SM4P)**” (2021-2024). Funded by the EU and implemented by UNESCO, the project aimed to build societies’ resilience to online harmful content, including disinformation and hate speech, while safeguarding freedom of expression and

¹¹⁸ See, CoE, official website of Ukraine, [Council of Europe Legal Opinions and Policy Advice Documents](#).

¹¹⁹ CoE, official website of Ukraine, [Safeguarding Freedom of Expression and Freedom of the Media in Ukraine – Phase II](#) (SFEM-UA – Phase II) (undated).

¹²⁰ European Commission, [2023 Communication on EU Enlargement Policy](#), Communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, 8 November 2023.

contributing to peace narratives through social media.¹²¹ As in other pilot countries, it included the launch of a national Coalition for Freedom of Expression and Content Moderation in 2023. The coalition aims to encourage cooperation between civil society and digital platforms, and to advocate for more adequate and transparent management of harmful content, providing a stronger response to the voices of local communities in Bosnia and Herzegovina. When it was launched, it brought together 17 CSOs, academic institutions, journalist associations, self-regulatory media bodies, media associations, activists, MIL organisations, and human rights activists and experts.¹²²

This project also included the publication of a guide to content moderation and freedom of expression by the London-based CSO ARTICLE 19. Noting the disconnect between the practices of tech giants and local communities, the handbook includes specific examples and cases to illustrate the various standards and policies related to content moderation. It reflects ARTICLE 19's longstanding call for measures responding to problematic content, such as disinformation, to always conform with international standards on freedom of expression.¹²³ Almost simultaneously, UNESCO published a report on legal frameworks and content moderation practices of social media platforms, also as part of this project.¹²⁴

The SM4P project was superseded by a project entitled **“Building Trust in Media in South-East Europe: Support to Journalism as a Public Good”** (2023-2026). Implemented by UNESCO across the Western Balkans and Türkiye, the project aims to promote free, independent and pluralistic media by “recognising journalism as a public good and tackling disinformation”, “reinforcing [...] the circulation of accurate information by an increasing rights-based regulation of digital platforms and online media”, and integrating policies on media and information literacy into formal education.¹²⁵

The project **“Combating disinformation in the Western Balkans (CDWB)”** (2022-2024) specifically focused on tackling FIMI. Covering Bosnia and Herzegovina, Kosovo,¹²⁶ Montenegro and Serbia, the project sought to mitigate disinformation influence in the region by combining four approaches: 1) analysis of disinformation patterns and improving media integrity and accountability; 2) public awareness campaigns and media literacy; 3) improvement of legal regulation; 4) fostering fact-checking skills.¹²⁷ Coordinated by the Brussels-based European Partnership for Democracy (EPD), a network of organisations “with a global remit to support democracy”, it was implemented by the *Agence française de développement médias* (CFI), ARTICLE 19, *Club de Madrid* (all constituent members of the EPD) and local CSO partners the Atlantic Council of Montenegro (ACM), the Centre for Civic

¹²¹ UNESCO, *Social Media 4 Peace* (undated).

¹²² UNESCO, *UNESCO supports the launch of a Coalition for Freedom of Expression and Content Moderation in Bosnia and Herzegovina to create a free and healthy online environment for citizens*, 20 June 2023.

¹²³ ARTICLE 19, *Social Media 4 Peace: A handbook to support freedom of expression*, 24 August 2023.

¹²⁴ UNESCO, *New report published by UNESCO sheds light on the efficiency of self-regulatory and regulatory framework in place to curb online harmful content in Bosnia and Herzegovina, Kenya, and Indonesia*, 20 September 2023.

¹²⁵ UNESCO, *Building Trust in Media in South-East Europe: Support to Journalism as a Public Good*, 17 October 2023.

¹²⁶ This designation is without prejudice to positions on status and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

¹²⁷ EPD, CDWB: *Combating disinformation in the Western Balkans* (undated).

Initiatives (CCI) in Bosnia and Herzegovina, the Center for Research, Transparency and Accountability (CRTA) in Serbia, and the New Social Initiative (NSI) in Kosovo.¹²⁸ As part of the project, four national citizens' assemblies, presented as “a key innovative tool to support democracy and combat disinformation in the Western Balkans”, were held. The implementing partners developed a comprehensive roadmap for regional cooperation on combatting disinformation with nine key challenges and 36 actionable points.¹²⁹

3.3. Türkiye

In addition to the project “Building Trust in Media in South-East Europe: Support to Journalism as a Public Good” (see above), several others have been implemented in Türkiye. The project “**Early Warning System to Combat Fake News and Hate Speech (SAHNE)**” (2021-2024) aimed to develop mechanisms that would inform the public and relevant stakeholders about the harmful effects of hate speech and fake news. It was implemented by the Türkiye Europe Foundation (TAV), a Turkish CSO established “to protect and develop the common values of humanity and in this framework, the principles of human rights, democracy, freedom and supremacy of law.”¹³⁰ TAV and its partners produced reports¹³¹ that focused on social polarisation through the detection of disinformation and hate speech with the use of artificial intelligence (AI). Such identification, based on keyword and account monitoring in defined categories, was conducted across social media platforms, particularly on X (Twitter). The early warning system, integr <https://de.netdocuments.com/neWeb2/goid.aspx?id=2758-4044-8015>ated with the detection algorithm, focused on the manner and speed with which hate speech and disinformation spread on social media. The project also developed training programmes for local journalists and CSOs to contribute to the prevention of hate speech, and provided subgrants to support social peacebuilding.¹³²

At around the same time, another project, “**Utilizing digital technology for social cohesion, positive messaging and peace by boosting collaboration, exchange and solidarity**” (2022-2025) was implemented by the Hrant Dink Foundation in partnership with the Friedrich Naumann Foundation (Germany) and two universities in Türkiye. The project aimed to create a partnership between experts in linguistics, computer sciences, informatics and social sciences, and civil society in Türkiye to combat hate speech, discrimination and disinformation in the digital space.¹³³ Activities included a series of awareness-raising and capacity-building seminars (such as on the relationship between conspiracy theories and disinformation, essential digital verification skills, algorithmic design, digital literacy and

¹²⁸ EPD, *Who we are*” (undated).

¹²⁹ EPD, *Combating Disinformation in the Western Balkans: Final Conference*, October 2024.

¹³⁰ Türkiye Europe Foundation, *About Türkiye Europe Foundation (TAV)* (undated).

¹³¹ bianet, *Media plays a role in the spread of hate speech*, 24 July 2024.

¹³² SAHNE, *homepage* (undated).

¹³³ Hrant Dink Foundation, *Utilizing Digital Technology for Social Cohesion, Positive Messaging and Peace by Boosting Collaboration, Exchange and Solidarity* (undated).



becoming a fact-checking influencer), as well as the development of open-source hate speech detection software and production of podcasts and multimedia products.¹³⁴

¹³⁴ Friedrich Naumann Foundation, *Activities* (undated). Hrant Dink Foundation, op. cit.

4. Conclusions

In conclusion, it can be noted that, over the last decade, European policy documents have recognised disinformation and FIMI as not just a media and communication challenge but a serious security threat requiring comprehensive countermeasures and “prebunking”.¹³⁵ The Strategic Compass reminds the EU’s European External Action Service that the world is full of situations where the Union faces hybrid tactics, intimidation and coercion. The tools of power are not only soldiers, tanks and planes but also disinformation and foreign interference operations.¹³⁶

These countermeasures, explained in the second part of this research report, point to particular detectable patterns often repeated in the regions of wider Europe. EU-supported external projects mostly fall under the “resilience-building” and “situational awareness” dimensions of the FIMI Toolkit.

Resilience is typically built through: public campaigns and events; training, especially among young people; support from independent media and fact-checkers; the creation of networks of counter-FIMI defenders and “gurus”; and media and information literacy activities, including within formal education curricula.

Situational awareness is established through: adoption of a common framework and methodology to detect and analyse FIMI; monitoring of malign campaigns with the help of common tools; information sharing and impact assessment in the interests of both the EU and partner countries.

“Disruption and regulation” and “EU external action” play their role as the other two dimensions, although they are not project-based. On the other hand, the EMFA, with its focus on the European quality principles for media services, seems to be on the periphery of external project activity. The Act’s potential for standard-setting is as great as its ability to advance European values and counter FIMI-related activities abroad.

¹³⁵ Kovalčíková N., De Agostini L. and Catena B., *Strengthening resilience in the East: How the EU can empower countries against foreign interference*, op.cit.

¹³⁶ EEAS, *A Strategic Compass for Security and Defence*, op. cit., foreword, p. 5.

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