

Joint Input for the European Democracy Shield

March 2025

As organisations working to support and develop democracy, we **welcome the European Commission's initiative to create a European Democracy Shield** as a coordinated effort to support democracy in and around Europe. This initiative is particularly relevant in the current context of global democratic backsliding.

Given the Shield's thematic focus on the information space, election integrity, and civic engagement, we see it as a natural successor to the [European Democracy Action Plan \(EDAP\)](#). EDAP saw the introduction of the European Media Freedom Act (EMFA), the Anti-SLAPP Directive, a revamped Code of Practice on Disinformation, and the Regulation on the Transparency and Targeting of Political Advertising (TTPA), among others, which are all vital steps towards creating healthier European democracies. Complementing the EDAP, legislation was passed such as the Digital Services Act (DSA), the Digital Markets Act (DMA), and the AI Act that regulate technological advancements in line with democratic standards.

Taking into consideration the Commission's core priorities on democracy, including the rule of law and fundamental rights, the Shield should use this legislative basis with increased determination and ambition, to achieve concrete improvements over the next mandate.

Priority areas

In order to ensure that the European Democracy Shield effectively responds to the challenges faced by democracy in Europe, it is vital that it addresses the following priorities:

1. The legislation to underpin the protection of democracy in Europe exists. **The European Democracy Shield should enable the swift and effective implementation and enforcement of existing legislation** in this domain – such as the Digital Services Act (DSA), Digital Markets Act (DMA) the Regulation on the Targeting and Transparency of Political Advertising (TTPA), the European Media Freedom Act (EMFA) and the AI Act.

- The Commission plays a vital role in enforcing the existing rules and elaborating on legislation through delegated acts, guidelines and Codes of Conduct. Both **political will and adequate resourcing** of the EU institutions and other democracy stakeholders is crucial for this.
- At a time of significant geopolitical uncertainty, it is of ever greater importance for **the EU to stand by the standards it has set**. Weakening them at this stage will embolden leaders with authoritarian tendencies and only increase the threats posed to European democracies in the short-run as well as in the long-run.
- The Commission should **promote safe harbour protections** for researchers examining online platforms and AI, in line with the above legislation, to prevent intimidation and legal risks from having a restrictive effect on research that is in the public interest. This can be done by developing Guidelines on non-prosecution - to be spearheaded by the Commission's DSA Unit or the AI office - and an exemption from civil liability similar to the protection of software vulnerability reporting.
- The Democracy Shield should be **coordinated with other work in the Rule of Law dialogue**, especially around checks and balances as provided by independent authorities, rule of law institutions, and parliamentary strengthening. Areas for specific coordination might include further promotion of political finance rules on campaigns and advertising, as well as campaign data.

2. **Combatting disinformation** is a necessary and inevitable component of the democracy support agenda. While the focus has often been on Foreign Information Manipulation and Interference (FIMI), equal importance should be given to countering domestic disinformation, which accounts for a significant portion of overall disinformation operations. The fight against disinformation however, must not come at the expense of free and independent journalism.

Given the vast proliferation of disinformation, structural solutions should be favoured over reactive ones. Ad hoc efforts are often too little, too late, and cannot address the magnitude of the problem.

- **Disinformation should be demonetised**. The business model of online platforms and online advertising currently incentivises the spread of disinformation given its

propensity to go viral and therefore generate revenue. This should be countered in advertising design to avoid the abuse of such models by specific platforms or opinion- and decision-makers. For-profit platform providers, however, will not take such measures by themselves, but rather adapt their internal policies according to the current political climate and profit considerations, such as in the case of [Meta's changes to their content moderation policies](#).

- Fact-checking is important, but checking every piece of information available online is impossible. It must therefore be accompanied by **integrated media literacy programmes** so that people are taught how to critically assess information even when not fact-checked. The Commission should therefore support Member States in integrating flexible media literacy programmes into their education systems, which can adapt along with rapid changes in the information environment. While youth should be a key focus, media education must also be promoted as a [lifelong learning process](#), ensuring that all generations develop the necessary critical thinking skills to resist manipulation in an ever-evolving information landscape - this can be done in libraries, senior citizen centres, or in professional settings.
- The DSA and the TTPA should be enforced to **ensure that the models and tools used by online platforms are brought in line with existing legislation and democratic standards**. This is of particular importance to ensure the integrity of elections, as online platforms are increasingly determining key narratives in electoral campaigns through both framing and platforming - often in opaque ways. Examples include TikTok's disputed role in determining the Romanian presidential elections, and X's targeted promotion of Germany's AFD party ahead of the parliamentary elections. The current lack of transparency, accountability, and resources is a major obstacle to mitigating this risk.
- **Investing in alternative models is paramount and should be accompanied by a broader reflection on the business model of online platforms**. The current tracking ads-based for-profit model has been proven to enable the disproportionate spread of disinformation online, increase polarisation, and make it extremely difficult to tackle the issue without structural solutions. One example is creating digital public infrastructure in social media that is governed by and for citizens. These alternative models should be optimised for healthy public debates rather than stimulating user addiction for profit.
- Achieving **equal access to quality content moderation across all European languages** and communities is crucial for fostering an equitable environment for expression.

3. **A robust media sector working in the public interest is one of the strongest guarantees against the harmful effects of disinformation and polarisation.** Yet the space for media freedom is under threat around Europe and journalists face harassment, intimidation, and physical attacks for simply carrying out their work. The sector has also been struggling financially for a long time. This is exacerbated by the tracking ads industry favouring Very Large Online Platforms and having led to an estimated 50-70 percent decrease in advertising revenue for news publishers ([source](#)). At the same time, the sector faces increasing [media capture](#) (examples include [Hungary](#) and [Slovakia](#)) and threats to its independence through the consolidation of media ownership.

The growing challenge of countering the avalanche of disinformation has become an existential threat to many independent outlets. As such, it is of crucial importance for the EU to **allocate adequate resources to keep the independent sector operational** and able to hold its weight against disinformation narratives. This has become all the more important since the [US funding freeze](#), which significantly affected the media sector. The current Multi-Annual Financial Framework (MFF) includes 1.42 billion EUR for the media strand of the Creative Europe programme for 2021-2027. Meanwhile, Russia [spent the same amount on media in 2021 alone](#). It is clear that the independent media sector cannot be a robust counterbalance to the barrages of disinformation without stronger institutional support.

- **Commit to considerably increasing media funding.** Commissioner Kos' commitment to [doubling funding for media](#) in the European Neighbourhood is an important step in the right direction, but it is not enough compared to the level of funding provided by other foreign actors.
- **The types of funding given to the media should be reviewed and expanded.** While the majority of media support currently consists of project-based funding and business development support, there is a much broader range of support necessary to boost the sector and help it operate in a healthy way, conducive to its mission of informing the public and providing a counterweight to disinformation narratives. **Key among them is the need for more direct core support**, as stipulated in the [Media Viability Manifesto](#).
- Expand and strengthen the work of the European Commission to **further member states' efforts to improve the safety of journalists**, including through the ongoing implementation of the 2021 Safety of Journalists Recommendation.
- **Commit to redressing the current economic model to ensure sustainable media** by rebalancing the economic power between news media and the platforms who profit from their content, including by requiring platforms to pay for journalistic content and redressing the imbalance in the advertising market.

4. The European Union is not an isolated entity, and its information space is heavily affected by, and interlinked with, that of neighbouring regions. As such **the European Democracy Shield should encompass both an internal and external dimension**. Strengthening democratic standards in neighbouring regions will inevitably create a more stable environment for the European Union. Recent election campaigns in Moldova and Georgia heavily focused on the countries' European future, with disinformation significantly endangering it in the former, and creeping authoritarianism halting it in the latter.

- **The protections ensured through the European Democracy Shield should be extended to candidate countries** in order to allow for the better protection of democracies in the European Neighbourhood. This will also be a clear sign of commitment from the EU to the enlargement process, which is particularly necessary in the Western Balkans where the level of scepticism regarding enlargement keeps increasing.
- At the same time, **knowledge transfers should be enabled from outside the Union**, given that pro-democracy actors from the European Neighbourhood and beyond have significant experience in fighting disinformation and other threats to democracy.

5. A pluralistic European civil society¹ is crucial to upholding democracy as well as the values outlined in Art. 2 TEU. There should be a **stronger commitment to ensuring an enabling environment for civil society** to operate in, and for citizens to mobilise and make their voices heard. The legitimacy of civil society to participate in policy making, to play its watchdog role, and to act in the public interest is being questioned and in some contexts the very existence of an independent civil society and activism is under threat.

- Through the Shield, the EU Commission should **set up robust monitoring and protection mechanisms for civic space within the EU**, including a focus on rapid response protection for human rights defenders, and other vulnerable and marginalised groups. It should also coordinate with the announced Civil Society Strategy in order to ensure synergies.
- **Acknowledge that existing administrative procedures for civil society serve the purpose of transparency and impartiality.** Further attempts at increasing the

¹ This includes civil society organizations / actors specifically working on the promotion of democracy itself or seeking to influence political decision-making processes, as well as civil society actors working on strengthening the social fabric within European societies as a whole (and independent of political influence).

administrative burden for CSOs should be seen as a restriction of civic space by redirecting resources away from the protection of democracy and towards bureaucratic compliance, which is to the detriment of European democracy.

- This should be accompanied by **dedicating adequate funding to support civil society in its mission**, including core funding. Civil society will be a key partner in forging the Democracy Shield and adequate resourcing will therefore increase the impact of the initiative.

i. As with SMEs, the Commission should consider using the proposed 28th Regime for companies to simplify EU-wide operations by non-profits.

- The Shield should **reaffirm the legitimacy and importance of civil society in policy making** through inclusive, transparent and open-structured civil dialogue.

6. **As a foundational value of the EU, democracy should be at the core of the EU's security and defence strategy.** Such a strategy must ensure that fundamental rights and democratic standards are not sacrificed in the name of strengthening Europe's security. While existing within the democracy/security nexus, the European Democracy Shield should at all levels align with and uphold the fundamental principles of the EU, as stipulated in Article 2 of the Treaty on European Union (TEU). The human security literature shows that democratic resilience, social welfare and adherence to human rights standards increase the security of a nation. Investing in democracy is therefore a direct investment in Europe's security.

7. Democracy is the foundation of the European Union, as such its destabilisation poses an existential threat to all aspects of the Union. **The European Democracy Shield should help create interlinkages and strategic coordination between different Directorates, Departments and Agencies** (DG JUST, DG CNECT, DG CLIMA, DG ENEST, DG MENA, DG INTPA, DG BUDG), the EEAS and the Service for Foreign Policy Instruments to ensure a holistic approach to democracy support.

- This could be implemented by **Directorates having a clear contact point for matters relating to the European Democracy Shield** to facilitate coordination. There should be clarity on the specific responsibilities of different institutions with regards to the Shield, e.g. monitoring, reporting.

8. **Innovate democracy.** Another key threat to European democracy these days is the growing disconnect between decision-making processes and the citizens they affect. For example, [in the Netherlands](#), trust in parliament has declined from 58% in 2020 to 25% in 2023. This has fostered a pervasive distrust in public institutions and has exacerbated the gaps between those who govern and those who are governed. **Democratic politics** must be strengthened by implementing and investing in new democratic practices and technology, focused on citizen participation and inclusion.

- European public spaces - both online and offline - must be as open, constructive and safe as possible to ensure that citizens can voice their opinions effectively. Initiatives such as the renewed European Commission “Have Your Say” portal have already laid important groundwork in this regard. Yet, the European Commission should **strive to enhance accessibility to these platforms**, ensuring they are inclusive of diverse voices, particularly those from marginalised groups.
- Support investment in democracy-enabling and human-centric technologies, and in hackathons, incubators, accelerators and scale-ups in the sector. This can also **contribute to Europe building a competitive advantage in the civic tech sector**.

The European Democracy Shield is an opportunity for the European Union to take concerted action at a time when authoritarian forms of governance are increasingly favoured by the EU’s neighbours and partners. The Shield should therefore consist of a strong response, in terms of framing, funding, and follow-through.

We are committed to work with the European Commission and other stakeholders to ensure that concerns and recommendations from civil society are integrated into the Shield’s framework, laying the foundation for strong cooperation on democracy support in this mandate.

Signatories

Europe

1. Alliance4Europe
2. ARTICLE 19
3. Bulgarian Institute for Legal Initiatives Foundation (BILI)
4. Center for Countering Digital Hate (CCDH)
5. Center for Democracy and Technology
6. Centre for Public Policy Providus (Latvia)
7. Centrul de Politici și Reforme (CPR Moldova)
8. CFI Développement Médias (CFI)
9. Civil Liberties Union for Europe
10. Club de Madrid
11. Committee to Protect Journalists (CPJ)
12. Croatian Platform for International Citizen Solidarity (CROSOL) (Croatia)
13. The Daphne Caruana Galizia Foundation
14. Democracy Reporting International (DRI)
15. Democratic Society
16. Demos Helsinki
17. DW Akademie
18. Egmont Institute
19. Europe Jacques Delors
20. European Association for Local Democracy (ALDA)
21. European Centre for Press and Media Freedoms (ECPMF)
22. European Federation of Journalists (EFJ)
23. European Partnership for Democracy (EPD)
24. Fondazione Openpolis (Italy)
25. Free Press Unlimited (FPU)
26. Fund Safe Ukraine 2030
27. Global Forum for Media Development
28. The Good Lobby
29. Human Rights Monitoring Institute (Lithuania)
30. ILGA-Europe (European region of the International Lesbian, Gay, Bisexual, Trans and Intersex Association)
31. ImplicarePlus.org (Romania)
32. Institute for Strategic Dialogue (ISD)
33. International Foundation for Electoral Systems
34. International Federation for Human Rights (FIDH)
35. International Media Support (IMS)
36. International Press Institute (IPI)
37. International IDEA

38. Kofi Annan Foundation
39. Lie Detectors (LD)
40. Make.org
41. Media Diversity Institute
42. Netherlands Helsinki Committee (NHC)
43. Netherlands Institute for Multiparty Democracy (NIMD)
44. Network of Estonian Non-Profit Organisations (NENO) (Estonia)
45. Open Government Partnership
46. Open Society Foundation Bratislava (Slovakia)
47. Open Source Politics
48. Open Technologies Alliance - GFOSS
49. Ossigeno per l'Informazione
50. People in Need
51. People Powered (PP)
52. Political Parties of Finland for Democracy – Demo Finland
53. Portuguese Platform of Development NGOs
54. Raskrinkavanje (Bosnia and Herzegovina)
55. SOLIDAR
56. TRAC FM International (Netherlands)
57. Transparency International EU
58. UG Zašto Ne (Bosnia and Herzegovina)
59. Vouliwatch (Greece)
60. WHAT TO FIX

Global

61. African Digital Democracy Observatory (ADDO)
62. African Fact-Checking Alliance (AFCA)
63. Code for Africa (CfA)
64. Fundacion B77
65. HuMENA for Human Rights and Civic Engagement
66. One More Percent

The following organisations contributed to drafting this position: Alliance4Europe, ARTICLE 19, CFI Développement Médias (CFI), Civil Liberties Union for Europe, Committee to Protect Journalists (CPJ), Democratic Society, European Centre for Press and Media Freedoms (ECPMF), European Federation of Journalists (EFJ), Europe Jacques Delors, European Partnership for Democracy, Free Press Unlimited (FPU), International Press Institute (IPI), Lie Detectors (LD), Make.org, Open Government Partnership.