Commentary



The European Democracy Shield: A First Step Toward Stronger Democratic Resilience

13 November 2025

On 12 November, the European Commission presented its long-awaited European Democracy Shield, representing the EU's umbrella agenda for democracy support for the duration of this commission's mandate.

EPD, along with 65 other organisations, has been actively engaged in the development of this initiative, focusing on the inclusion of our targeted recommendations in the proposal. While we warmly welcome the initiative, we agree with Commissioner McGrath's statement at the dedicated press conference that the document presented is only a first step towards the protection and support of democracy across the European continent and will have to adapt to respond to a continually changing context.

The initiative is built on three pillars:

- 1. Safeguarding the integrity of the information space
- 2. Strengthening democratic institutions, free and fair elections, and free and independent media
- 3. Boosting societal resilience and citizens' engagement

Finally, the document includes a detailed section on the commitment to funding for democracy support and the acknowledgement that additional efforts and support are needed on this front.

Broadly speaking, the European Democracy Shield includes the explicit acknowledgement of a significant majority of our recommendations, albeit with varying degrees of proposed follow-ups. Nevertheless, the current Shield

represents a strong commitment by the European Commission to democracy support and marks a crucial first step towards concerted action in this field.

The European Partnership for Democracy will remain actively engaged with all of our members and partners to ensure that the Shield proposed today will indeed meet and exceed the goals it has set.

What follows is an overview of our recommendations and the extent to which the newly minted Shield has included them.

1. Protect and strengthen the EU Digital Rulebook

The EU's Digital Rulebook, key among them the Digital Services Act, AI Act, Regulation on the Transparency of Targeted Political Advertising, and the GDPR, has been taking hits from various sides in the last year.

Perhaps most visible is the pressure exerted by the current US administration to weaken the DSA and its attempts to push Very Large Online Platforms and Search Engines (VLOPSEs) to abide by democratic standards and contribute to a democratic information space. At the same time, there are growing concerns among civil society about the EU's current simplification agenda, taking away the digital rulebook's teeth, starting with the controversial trimming of the GDPR.

The Shield communication includes a strong statement of support for the existing rulebook, but lacks details on how to ensure its concrete impact.

For example, civil society has strongly pushed for greater user control over recommender systems. While this is mentioned in the Shield as an aim within the DSA, acknowledging that the tools already exist for the EU to take action on this front, there is no additional information on specific actions that will be taken to make it a reality. Swift action is needed on this point to counter the current polarising effect of targeted algorithmic recommender systems.

Commissioner McGrath highlighted the addictive design of dominant social media platforms, as well as the challenge presented by algorithmic manipulation. While important acknowledgements, there are insufficient indications of how the Shield would respond to these challenges.

2. Combating disinformation and introducing monetisation governance

Disinformation and foreign information manipulation and interference (FIMI) are rightfully a key focus of the Democracy Shield, presenting a great challenge for the information environment as the foundation of our democracies.

One of the very first commitments in the Shield proposal, as well as during the press conference, expressed by Executive Vice President Virkkunen is to work towards the demonetisation of disinformation, given the current profitability of this type of content – a central ask in our joint statement.

In order for the EU to be able to take action on this front, it will first have to have insight into the monetisation policies of VLOPSEs, something it currently does not have. While not mentioned in the Shield, the EU should use the DSA risk assessment procedure to gain insight into monetisation practices, as a first step towards building a monetisation governance framework. This will be particularly relevant in the area of political financing, which is highlighted in the initiative.

The Shield also contains a possibly disproportionate focus on Russian interference, which is not to negate the very real threat posed by Russia to the information environment. This narrative, however, risks ignoring the very real challenge presented by domestic disinformation, and the way VLOPSEs, many of them Western companies, facilitate its spread and monetisation.

3. Support for public interest media and journalists

One of the strongest points of the Shield is its commitment to public interest media and journalists, and its announcement of increased funding for the sector. For the first time, it mentions the need for more core funding for media, given the way that the media sector's financial model has been decimated by the advertising and monetisation model applied by VLOPSEs. It is also encouraging that the announced Media Resilience Programme will start under the current MFF. This funding is also expected to increase within the AgoraEU programme of the upcoming MFF for 2028-2034.

The document further stresses the need to properly implement the <u>European Media</u> <u>Freedom Act</u>, which came into force in August 2025.

There is a welcome commitment to modernising advertising rules, taking into account new players, such as influencers, who are increasingly affecting political narratives and election campaigns. However, the voluntary commitments proposed in the Shield cannot be expected the redress the associated risks of the current model. More ambitious action should be taken in the future, such as increased transparency of paid partnerships of influencers and the labelling of paid political content in line with the TTPA.

4. Candidate countries

In our advocacy, we warned that the Democracy Shield would be forged with a crack down the middle if enlargement countries were not covered by its protections.

The current inclusion of candidate and future candidate countries throughout the Shield is highly encouraging, with Commissioner McGrath rightfully commenting that 'Democracy does not thrive in isolation. It grows stronger, safer, and more resilient when surrounded by other democracies.'

A particularly important step is the prioritisation of democracy-related issues in the funding of the enlargement facilities, which was not previously the case.

As highlighted in our joint input, enlargement countries have much expertise to share regarding the fight against authoritarianism, whether in their recent past or current situation. It is therefore an important step that the Centre for Democratic Resilience envisions the inclusion of enlargement countries, with dedicated opportunities for mutual learning.

This commitment is already illustrated by the inclusion in the Shield communication of the 2025 Moldovan election as a case study on how to safeguard elections across the EU and its neighbourhood.

5. Enabling environment for civil society

Currently, the legitimacy of civil society to participate in policy making, to play its watchdog role, and to act in the public interest is being undermined. It is crucial for the EU to show a stronger commitment to ensuring an enabling environment for civil society to operate in and for citizens to mobilise and make their voices heard.

This was done in the form of the Civil Society Strategy – a long-standing ask from civil society. The Strategy aims to engage, protect, and support civil society, but woefully little was shared on the details. There was a mention of highlighting the existing availability of funds, without acknowledging the growing need for financial support in the wake of the near-total departure of the United States from the field of democracy support.

The Strategy also envisions increased legal support for civil society in case of targeted attacks. However, this reads more like a response to a closing civic space, rather than boosting the enabling environment for CSOs.

6. Democracy as defence

The Shield also included our suggestion of using defence spending to boost democratic resilience. A strong democracy is one of the greatest security indicators, which has been insufficiently acknowledged in the current discussions around defence spending and boosting the EU's security capabilities.

This changed with the Shield communication, with Commissioner McGrath adding that "Strong democracies are not only a moral imperative, we know they are essential to our physical and economic security, social cohesion and our long-term stability."

7. Need for coordination

A central element of the European Democracy Shield is the Centre for Democratic Resilience, which is expected to focus on countering disinformation and FIMI. However, a key role of the Centre was announced to be the coordination between existing efforts to boost democratic resilience. This will hopefully prevent the siloisation of democracy support and ensure its inclusion across the work of the European Commission and the Member States.

The proposal of a Stakeholders' platform within the Centre to engage with a broad range of actors, including civil society, is therefore also an encouraging step.

8. Democratic innovation

Finally, the European Democracy Shield acknowledges the need for democratic innovation to reinvigorate European democracy. In doing so, the European Commission has incorporated two of our recommendations, namely:

A commitment to developing the EU's digital sovereignty; the EU can no longer afford to be entirely dependent on foreign technology and digital services. The current dependence opens the EU up to blackmail and undue interference. While the concept is not further elaborated on, it is our strong recommendation for the Commission to support European tech alternatives that are aligned with EU democratic values and standards.

The Shield also commits to boosting the EU's civic tech sector. This should contribute to making sure that the current boom in the tech sector also works to strengthen democracy. In order to do so, the Shield will set up a Civic Tech Hub and organise a Civic Hackathon.