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European Fact-Checking Standards Network

Fact-checking and related Risk-Mitigation Measures for Disinformation in the Very Large Online Platforms and Search Engines

A systematic review of the implementation of big tech commitments to the EU Code of Practice on Disinformation

December, 2024

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Summary

The European Fact-Checking Standards Network (EFCSN) has conducted an assessment of the new set of reports – September 2024 – submitted by the main online platforms and search engines Signatories of the Code of Practice on Disinformation. Moreover, given its relevance in the disinformation environment, insights on Telegram and former Signatory X/Twitter have been included.

The evaluation has been conducted on insights provided regarding Chapter VII on Empowerment of the Fact-Checking Community of the Code as well as regarding their response to the European Election 2024. In alphabetical order of the owner of the service, major findings include:

- **Google Search** (via Google) made possible the ambitious Elections24Check project implemented by the EFCSN, but it still relies entirely on the unfunded ClaimReview scheme, in direct contradiction with the Code of Practice. Google still reports its contributions to EMIF and the IFCN as agreements for fact-checking coverage.

- **YouTube** stopped reporting about the fact-checking organisations involved in their YouTube Partner Program, which previously listed partner organisations from non-EU countries as "EU-based fact-checking". The EFCSN believes Youtube is not fulfilling its commitment to cooperate with the fact-checking community.

- **Facebook** (via Meta) now has fact-checking coverage in 'all' EU countries and has begun accepting EFCSN certification as a prerequisite for consideration in their fact-checking programme in Europe.

- **Instagram** still displays significantly fewer fact-checking labels than Facebook, despite access to the same fact-checks. This suggests either data access issues for fact-checkers or inadequate scaling systems within Meta.

- **WhatsApp** has shown no progress in the last two reporting periods on the commitments signed, despite its crucial role in disseminating disinformation online.

- **Bing** (via Microsoft) has reported "additional fact-checking coverage" with organisations that have denied agreements in such terms. The EFCSN believes Microsoft is not fulfilling its commitment to cooperate with the fact-checking community.

- **LinkedIn** still relies on a single fact-checking organisation to cover 21 languages and more transparency is needed on the framework of these agreements. Despite claims of expanding geographical scope, the number of reviewed videos has decreased by over 80% from the previous year.

- **TikTok** has positively expanded its fact-checking coverage over four additional EU Member State countries, although improvements in transparency of the framework and fact-checkers' access to relevant information are still much needed.

In addition, X and Telegram have been taken into consideration because of their role in the spread of online disinformation.

- **X/Twitter**, alongside Telegram, is the online service that European fact-checkers most frequently identify as most concerning as host of harmful disinformation in their countries. According to a study by Maldita.es, X also ranked as the platform with the most viral unmoderated disinformation content ahead of the EU election.

- **Telegram** is an increasingly critical actor in spreading disinformation within the EU. EFCSN members report unmitigated false claims dissemination, pro-Russian propaganda hosting, and potential foreign manipulation and interference as specific threats identified in Telegram.

The EFCSN stresses the importance of the work of fact-checking organisations in order to provide an efficient, targeted and complete response to disinformation spreading online. Moreover, the need for accurate information in the reporting of all the commitments which should be improved overtime.

The organisation remains committed to the implementation of the Code and its conversion to the Code of Conduct under the DSA. The EFCSN is open to provide evidence to independent auditors for their assessment of services' risks and review of mitigation measures relevant to disinformation, aligning with the DSA's call for the involvement of independent experts and civil society organisations. We will offer the same support with compliance with the Code after its conversion.

About the EFCSN:

The European Fact-Checking Standards Network is a registered association that represents more than 50 independent fact-checking organisations from over 30 European countries that are committed to the highest standards of independence, transparency, and methodological quality as required by the European Code of Standards, and whose adherence to those is evaluated periodically by independent experts.

As a signatory of the Code of Practice on Disinformation, the EFCSN has committed to engage in conversations with other Signatories regarding relevant measures and solutions, to provide contextual information/impressions gathered from the European fact-checking community and to lead the work on the implementation of the Chapter on fact-checking. The Code's text also foresees the EFCSN as in charge of the governance of a European repository of fact-checks that we remain ready to develop along relevant Signatories.

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Introduction

In her [Political Guidelines for the Next European Commission 2024-2029](#), Ursula von der Leyen establishes among the cornerstones the protection of democracy through effectively countering disinformation and information manipulation. The document highlights the importance of the European fact-checking community to build societal resilience against disinformation.

The Code of Practice on Disinformation fully aligns with these priorities as a tool negotiated and agreed by relevant players. The Code reflects the commitment of various Signatories to take action against disinformation in several domains and cooperate and coordinate in their work for the interest of all. For Signatories designated as Very Large Online Platforms or Very Large Online Search Engines, engagement with the Code is as well relevant under the scope of the Digital Services Act and places obligations on risk mitigations within their services, including disinformation.

Within its commitments, **concrete measures are set out to articulate an efficient and fair collaboration between online services and fact-checking organisations** that benefits European users. These are (1) that platforms conclude agreements with independent fact-checking organisations to have complete coverage of the EU member states and official languages, (2) that they integrate or consistently use fact-checking in their services for the benefit of their users, and (3) that they provide fact-checkers with access to the data that they need to maximise the quality and impact of their work.

During the first six months of 2024 being reviewed, the EU Elections held in June 2024 served as a significant test of the capacity and readiness to uphold commitments to counter disinformation, particularly in the face of heightened risk of disinformation and information manipulation surrounding democratic processes.

In combination with the Code and under the DSA, the European Commission published [guidelines](#) on recommended measures to VLOPs and VLOSEs to mitigate systemic risks online that may impact the integrity of elections. This document recommends mitigation measures and best practices which are relevant to the field of disinformation and aim to advise the actions of online platforms/search engines. For instance, "strengthening the cooperation with local fact-checkers during election periods, integrating and showcasing election-related fact-checking content" or reducing the prominence of disinformation linked to recommender systems "based on clear and transparent methods, e.g. regarding deceptive content that has been fact-checked as false".

The European Fact-Checking Standards Network (EFCSN), as a representative of over 50 European fact-checking organisations and an active part of civil society, believes in the importance of ensuring compliance with these available instruments.

It has assessed the information submitted under the Code of Practice on Disinformation reports since their first publication. In January 2024, the EFCSN released its first report analysing how the main online services were approaching the empowerment of fact-checkers under the Code of Practice on Disinformation. This first report reached a worrying conclusion: "most of the VLOPs and VLOSEs are still far from fulfilling their promises and do not have effective risk mitigation measures against disinformation in place, as DSA requires".

This report is the result of the EFCSN self-acquired commitment to evaluate and to offer context to the information submitted by these companies in newly published insights both in terms of cooperation with fact-checkers and, in this occasion, preparedness for EU Elections.

Methodology:

The EFCSN has produced this report through in-depth evaluation of how and if the VLOPs and VLOSEs are fulfilling their commitments by using their own reports under the Code along with public data from those companies' last DSA semiannual reports, the insights of the European fact-checking community, including the results of a survey to EFCSN members focused on agreements between fact-checkers and online services, integration of fact-checks and proper access to information, and Trustlab's structural indicators report.

For the assessment of preparedness for the EU Elections, we have taken into account Commission guidelines[1] on mitigation of systemic risks online that may impact the integrity of elections and Maldita.es report on platforms' response to disinformation content flagged by European fact-checkers through the Elections24Check project[2].

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[1] For this report, we have selected and evaluated according to information in the reports the following 14 main measures from the categories and subcategories proposed in the Commission guidelines: internal processes, official information, media literacy, contextual information, recommender systems, political advertising, influencers, demonetisation of disinformation, integrity of services, scrutiny and research, generative AI, cooperation, incident response mechanisms, and post electoral review.

[2] The disparities between Trustlab's report and Maldita.es' findings on label percentages in disinformation content arises from their differing purposes, methodologies, and scopes. Maldita.es analysed pre-debunked disinformation content (1,321 posts across 26 countries), which was made available via the Elections24Check platform; while Trustlab examined non-previously debunked keyword-based content (3,985 misinformation posts in 4 countries), therefore not pre-selected by relevance or virality and not made available before the analysis. Consequently, a higher percentage of action (i.e., labelling) is expected in the content analysed by Maldita.es. Moreover, Maldita's report differentiates between debunk labels and other types.

Service by Service Analysis

Google Search

With [over 370 million monthly signed-in users in the EU](#), Google Search is clearly the largest search engine. Its dominance makes it the most influential platform in determining what Europeans encounter when seeking information online. As explained in the previous report, European fact-checkers have warned Google Search that its anti-disinformation strategy, which depends on the ClaimReview markup, is unsustainable in the long term. This approach relies on the goodwill of fact-checking organisations contributing and marking up their content without any compensation. This practice contradicts Google's commitment to "provide fair financial contributions to independent European fact-checking organisations for their work to combat disinformation on their services."

Empowering the fact-checking community

Cooperation with the fact-checking community

- Since the baseline report, Google reports in this section on the contributions of the Google News Initiative (GNI) to the European Media and Information Fund (EMIF) and to the International Fact-Checking Network (IFCN) as a way of fulfillment of their commitment on formal agreements to provide fact-checking coverage. While this financial support is certainly appreciated, particularly when aimed at strengthening organisations' capacities on the global level, it is often either allocated to global initiatives rather than being specific for the EU, or they are directed towards activities other than fact-checking.

- Google also supported the [project Elections24Check](#) run by the EFCSN aimed at tackling misinformation during the 2024 European Elections, through a €1.5 million Google News Initiative grant. A pioneering database of 3,000+ fact-checks and associated metadata from 46 EFCSN member organisations across 36 countries and 34 languages is a reflection of the impact of adequate collaboration between platforms and fact-checkers.

- The project enhanced fact-checkers' effectiveness and provided valuable insights for stakeholders. Tools like AI-driven narrative detection helped monitor disinformation trends, and 30 researchers were granted access for further studies, including deep fakes detection and election watchdog activities. This project embodies the overarching goals of the Code and has acted as a pilot initiative, demonstrating the potential benefits that the Code's disinformation database can offer to a broad range of stakeholders. It also increased the positive perception of fact-checkers on Google's

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promotion of cross-border collaboration from a 40,7% from the first survey by the EFCSN to a 78,8% in this last reporting period.

- To align with transparent and fairly financed programs of cooperation with fact-checkers foreseen in the Code, there is willingness from fact-checking organisations (95,8%) to enter formal agreements with Google to provide fact-checking coverage on the country they operate in for that platform, given the platform provides a fair financial contribution for it.

Use and integration of fact-checking and access to relevant information

- The integration of fact-checking in Google Search is still uniquely reliant on ClaimReview Schema. The EFCSN has repeatedly put into question its viability. While it does offer a degree of empowerment to users by highlighting fact-checking snippets in search results, it certainly does not empower fact-checkers. Moreover, the system fails to fulfill its commitment of "full coverage of all Member States and languages". Google's own reporting reveals that in seven languages, no fact-checks are currently available, and in one language, the number of available fact-checks has even decreased over time. Despite these shortcomings, more than 12,000 new articles were made accessible in Google Search Fact Check Explorer over a one-year period without any financial compensation for the effort of fact-checkers.

- Google reports new developments in the Fact-Check Claim Search API and the publication of a research paper on ClaimReview. We welcome the investment in new tools, evidence-based research, and the involvement of fact-checking organisations in the evaluation of the conclusions. Nonetheless, we reiterate that this database that can bring relevant insights to the table owes its value to the voluntary contributions of fact-checking organisations. These measures fail to tackle the systematic obstacle, which is the lack of formal, transparent and sustainable agreements between the company and fact-checking organisations that can provide adequate coverage.

Response during the EU Election 2024

- **The good:** The main effort seems to be on "working with the wider ecosystem on countering misinformation", where the strategy has been to finance and co-finance a number of projects via Google, such as the Global Fact Check Fund, the Brussels Fighting Misinformation Online event, the European Media and Information Fund, or Google's Priority Flagger Program. Of note is its funding of the Elections24Check project, which served to increase cross-country collaboration in detecting and debunking European electoral disinformation. Google Search has also reported concrete actions such as expanding its Political Content Policies, funding media

literacy initiatives, monitoring malicious actors through the Google's Threat Analysis Group (TAG), or surfacing authoritative election results in user searches.

- **What was missing:** In some areas of action with direct and important implications on the fight against disinformation, such as on integrating contextual information, addressing the role of recommendation systems, establishing specific internal incident response mechanisms, or performing a post-electoral review, Google Search has not reported any action.

- **The view of the fact-checkers:** Despite having reported substantially in terms of cooperation, only 5 out of the 9 fact-checking organisations that reported bilateral agreements with Google indicated that these included specific actions aimed at preparing for elections. The remaining four organisations stated that there were no specific actions taken for electoral readiness. Furthermore, none of the fact-checking organisations have deemed the mitigation measures implemented or planned by Google as "sufficient" to effectively combat election-related disinformation. Some organisations have highlighted the threat posed by sponsored disinformation, particularly from "powerful agents", and noted that much of the disinformation debunked was easily searchable and identifiable through Google Search.

YouTube

YouTube has reported [over 465 million monthly signed-in users in the European Union](#), which makes it the biggest platform in Europe. YouTube has significantly contributed to the spread and monetisation of disinformation worldwide, fueling the growth of conspiracy theories and polarisation. The fact-checking community has consistently reached out to YouTube, both publicly and privately, to address these concerns. [An investigation by Maldita.es](#) found that, among the largest online platforms, YouTube took the fewest visible actions to address disinformation ahead of the EU elections. Worryingly, 75% of debunked disinformation content on YouTube received no visible action.

Empowering the fact-checking community

Cooperation with the fact-checking community

- The main effort reported by YouTube are those reported as well on Google Search, where the strategy has been to finance and co-finance a number of projects via Google, such as the Global Fact Check Fund, the Elections24Check project, the European Media and Information Fund, or Google's Priority Flagger Program, among others.

- However, none of the EFCSN fact-checking organisations consulted reported having an agreement with YouTube, which points to a lack of specific cooperation to combat disinformation on its own platform.

- Following the last EFCSN reaction report, which questioned YouTube for including organisations from countries like Myanmar, Brazil, and Indonesia in their reporting on the EU Code of Practice, YouTube has since ceased sharing the list of fact-checking organisations involved in their YouTube Partner Program (YYP). This initiative "gives creators greater access to YouTube resources and monetization features" but falls short of meeting the expectations for cooperation in line with the Code.

- Similarly, "supporting" fact-checkers in creating content or proposing training sessions does not align with the goal of the commitment. These measures could be more impactful if they were to include financing of fact-checking videos or to be pushed by the recommendation system on the platform, in addition to frameworks of cooperation as defined in Commitment 30.

- Nonetheless, 97% of fact-checking organisations surveyed declared to be "interested in entering an agreement with YouTube to provide fact-checking coverage of [their] country for that platform, provided the platform provides a fair financial contribution for it". This reflects the willingness of most fact-checking organisations to establish a formal collaboration with YouTube.

Use and integration of fact-checking and access to relevant information

- In every report since January 2023, YouTube reports the use of fact-check panels integrated into the platform and powered by ClaimReview scheme. Nevertheless, it has failed to provide any quantitative data on their impact (e.g. number of impressions, number of fact-checks displayed) which very much call into question the real usage of this mechanism.

- While 90.9% of fact-checking organisations surveyed believe the amount of disinformation in YouTube in the territory they operate in is concerning, 87.9% of them claim that YouTube does not provide them with access to information that would help to facilitate their work. The platform reports no progress on access to data for fact-checkers even if the EFCSN flagged this issue on its past report, suggesting possible and valuable measures such as interfaces that enable keyword searches on the transcription of videos, data on consumption patterns or insights of monetization of specific channels or pieces of content.

Response during the EU Election 2024

- **The good**: As with Google Search, the main effort seems to be on cooperation, where the strategy has been to finance and co-finance a number of projects via Google. In other areas such as media literacy, official electoral information, internal processes, or generative AI, YouTube has taken concrete actions such as prebunking initiatives ahead of the EU elections, surfacing electoral content from authoritative sources on the homepage and in search results, monitoring malicious actors through Google's Threat Analysis Group (TAG), or introducing a new tool in their Creator Studio to label synthetic content, including election-related content.

- **What was missing**: However, in some other areas of action with direct and important implications on the fight against disinformation, such as on integrating contextual information, addressing the role of recommendation systems, ensuring the demonetization of disinformation, clearly indicating when influencers display political ads, establishing specific internal incident response mechanisms, or performing a post-electoral review, YouTube has not reported any concrete action.

- **The view of the fact-checkers**: All fact-checking organisations that responded to our questionnaire expressed concerns regarding YouTube's efforts to mitigate disinformation related to elections. Three organisations indicated that they were unable to assess the mitigation measures implemented or planned by YouTube. Meanwhile, six organisations (60% of respondents) characterised these measures as either weak or nonexistent, with none labelling them as "sufficient". Additionally, several organisations noted the presence of pro-Russian propaganda and prominent disinformation disseminators/malign actors on YouTube, identifying these as threats

to the integrity of election-related information on the platform. According to [Maldita.es investigation](), among five very large online platforms investigated, YouTube was the one who took less percentage of visible actions to tackle disinformation content ahead of the EU election (75% of disinformation content debunked received no visible action).

Facebook

Facebook has reported having [over 260 million monthly users in the EU](), the most popular service among those considered strictly as social media. After being at the forefront of initial large-scale controversies surrounding online disinformation, Facebook became the first major digital platform to establish a global partnership with fact-checking organisations in 2016. This collaboration led to the creation of a third-party fact-checking program.

Empowering the fact-checking community

Cooperation with the fact-checking community

- Meta had built a robust program of third-party fact-checking for their services with all but one Member State covered prior to becoming Signatory of the Strengthened Code of Practice. For the first time ever since, the company has announced an expansion of its program by entering into three new agreements with fact-checking organisations with strong local expertise. 78.8% of fact-checkers surveyed believe Meta offers a fair financial contribution to their organisation for the work they do combating disinformation on their services.

- In line with 'whereas (e)' of this Chapter of the Code – "recognise that for fact-checkers to be effective at fighting Disinformation, fact-checking organisations need to be verifiably independent from partisan institutions and transparent in their finances, organisation and methodology", Meta now accepts the European Fact-Checking Standards Network (EFCSN) as fulfilling a prerequisite for joining Meta's Third Party Fact-Checking Programme (3PFC) for Europe-based fact-checking organisations. This decision recognises the high standards and best practices designed with the participation of 40 fact-checking organisations.

- Outside fact-checking coverage, the company also promoted media literacy initiatives in collaboration with the EFCSN, aimed at training fact-checkers and raising public awareness about misleading content.

Use and integration of fact-checking and access to relevant information

- The EFCSN has expressed in past reactions that the 3PFC program's combination of proactive flagging to ensure partners' independence and the use of labels with evidence on content assessed to contain disinformation is an approach respectful of freedom of speech that also empowers users. It also contributes to putting a break to virality, as Facebook reports that 46% of EU users who saw the warning chose not to further share. This percentage has been consistent across Meta's full period reports (i.e. without baseline report), always above 37%.

- The level of commitment given to both achieving fact-checking coverage in all EU Member States and increasing their impact is reflected in the data provided under this measure. Every MS received at least over 110,000 fact-check labels, and the 150,000 distinct fact-checking articles published in the EU by partners have resulted in over 30,000,000 labels deployed.

- During the reported period, Meta began the onboarding of fact-checking organisations taking part in its 3PFC program to the new Content Library Tool.

Response during the EU Election 2024

- **The good**: Some of Facebook's (via Meta) key initiatives, in line with the Commission guidelines, were the establishment of an Elections Operations Centre that coordinated cross-company efforts for election integrity and real-time risk management. Meta also published a comprehensive post-electoral review on the mitigation of systemic risks for the European elections following the recommendation of the guidelines. Meta has also reported substantial initiatives in areas such as media literacy, integrity of services, or cooperation. For instance, such as labelling state-controlled media and AI-generated content, through funding and supporting an EFCSN project ahead of the EU election which gathered 12.7 million impressions and covered 19 countries and 27 languages.

- **What was missing:** In categories such as recommender systems, demonetization of disinformation, influencers, or internal incident response mechanisms, Facebook has not reported any particular action.

- **The view of the fact-checkers**: Three organisations expressed either a lack of awareness about the mitigation measures put in place by Meta to countering disinformation on elections or described them to be poor. In contrast, two organisations declared to be a good/strong start. Some organisations suggested improvements, such as adapting measures to national or local contexts, and extending these measures to cover national elections. Additionally, several organisations highlighted the restriction on fact-checking politicians as a common concern related to election disinformation. Others identified key threats, including pro-Russian disinformation, sponsored content, insufficient moderation in the Hungarian language, a lack of transparency regarding advertisers in the Ads Library, and limited access to data.

Instagram

Instagram also has [over 264 million monthly users](#) in the EU and the platform is also covered by Meta's Third-Party Fact-Checking Program. Instagram has previously shown to play a significant role in the [spread and amplification of harmful disinformation](#). Its focus on images and short videos makes it particularly challenging for fact-checkers to monitor and address disinformation on the platform effectively.

Empowering the fact-checking community

Cooperation with the fact-checking community

- Same as Facebook, Meta had built a robust program of third party fact-checking for their services with all but one Member State covered prior to becoming Signatory of the Strengthened Code of Practice. For the first time ever since, the company has announced an expansion of its program by entering into three new agreements with fact-checking organisations with strong local expertise. 78.8% of fact-checkers surveyed believe Meta offers a fair financial contribution to their organisation for the work they do combating disinformation on their services.

- In line with 'whereas (e)' of this Chapter of the Code – "recognise that for fact-checkers to be effective at fighting Disinformation, fact-checking organisations need to be verifiably independent from partisan institutions and transparent in their finances, organisation and methodology", Meta now accepts the European Fact-Checking Standards Network (EFCSN) as fulfilling a prerequisite for joining Meta's 3PFC for Europe-based fact-checking organisations. This decision recognises the high standards and best practices designed with the participation of 40 fact-checking organisations.

- Outside fact-checking coverage, the company also promoted media literacy initiatives in collaboration with the EFCSN, aimed at training fact-checkers and raising public awareness about misleading content.

Use and integration of fact-checking and access to relevant information

- Similarly to Facebook, the percentage of reshares attempted that were not completed after seeing a fact-check label is consistent across reporting periods, increasing from 38% to 43% in the past six months.

- Although the third-party fact-checking program covering Facebook is equally applicable to Instagram, the implementation of fact-check labels on the two platforms is starkly different. For every 30 fact-check labels displayed on Facebook, only one appears on Instagram. According to the survey conducted by the EFCSN, 69.7% of fact-checkers believe that the amount of harmful disinformation on Instagram is

concerning within their respective regions. This suggests that the disparity in label usage between the platforms is not primarily due to a lower prevalence of disinformation on Instagram, but rather other factors may be contributing to the insufficient application of fact-check labels.

- Surveyed fact-checking organisations that believe they have efficient tools supported by Meta for monitoring disinformation on Instagram have increased from 34.6% to 55.7% compared to the last reporting period. This could hint at better discoverability specifically for this service through new tools offered by Meta.

Response during the EU Election 2024

- **The good**: As in the case of Facebook, among the most prominent actions, Instagram (via Meta) has taken substantial initiatives in media literacy, internal processes, generative AI, integrity of services, cooperation, or post-electoral review.

- **What was missing:** As described for Facebook, on recommender systems, demonetization of disinformation, indicating when influencers display political ads, or on the establishment of internal incident response mechanisms, Instagram has not reported any particular action.

- **The view of the fact-checkers:** As described for Facebook, the evaluation of Meta's measures to counter disinformation on elections revealed mixed responses from organisations. Three noted a lack of awareness or described the measures as poor, while two considered them a good/strong start. Suggestions for improvement included lifting restrictions on fact-checking politicians, tailoring measures to local contexts, and extending them to national elections. Common concerns included the restriction on fact-checking politicians, as well as threats from pro-Russian disinformation, sponsored content, inadequate Hungarian language moderation, lack of advertiser transparency in the Ads Library, and limited data access.

WhatsApp

As an "interpersonal communication service," WhatsApp is not classified as a very large online platform or search engine under the DSA. Consequently, it is not subject to various requirements, such as reporting the number of average monthly users in the EU. However, like other similar services, it remains to be seen whether its public channels could be considered a platform under the law. Notably, WhatsApp is the only service to have signed the Code of Practice on Disinformation's specific commitment to "curb disinformation on messaging apps". However, WhatsApp has not reported any progress on the commitments signed.

- Meta has reported no progress on the commitments signed for WhatsApp in the last two reporting periods. This way, much of the information on grants or the impact of their initiatives is now outdated or non-existent.

- In the latest reaction report, the EFCSN highlighted the need for close monitoring of potential disinformation risks associated with the, back then, recently introduced 'channels' functionality. The EFCSN emphasized that these channels, due to their distinct structure and mode of operation, differ significantly from other parts of the platform, presenting unique challenges that call for tailored measures. Nevertheless, there is no mention of this functionality in Meta's report.

- From the fact-checking organisations consulted, six of them reported agreements with WhatsApp. Most of these foresee fact-checking coverage/assistance through interaction with users and with all of them assessing the overall impact of the agreement as beneficial for their organisation.

- In terms of cooperation, from the 33 fact-checking organisations consulted, only six reported agreements with WhatsApp. Moreover, 45.5% out of the 33 consider that WhatsApp is not contributing "at all" to fostering cross-border collaboration between fact-checking organisations and another 42.4% to be "not enough". Despite not being considered a VLOP, 51.5% of the fact-checking organisations agree or strongly agree that "WhatsApps plays an important role in hosting/disseminating/promoting disinformation" in the territory they work.

Response during the EU Election 2024

- **The view of the fact-checkers**: Despite WhatsApp's pivotal role on the distribution of disinformation content, the company has not reported any specific measure to prevent disinformation ahead of the EU election.

Bing

Bing is the second most popular search engine in the EU, attracting an <u>average of 132 million monthly users</u>. Like Google Search, Bing employs a ClaimReview-based approach to fact-checking. European fact-checkers have repeatedly cautioned Microsoft about the risks of relying on this model, which expects contributions without compensation. This approach contradicts Microsoft's own commitment, as stated in the Code of Practice, to "provide fair financial contributions to independent European fact-checking organisations for their work in combating disinformation on their services." Moreover, Microsoft seems to have exaggerated some of the misleadingly reported fact-checking agreements in the EU in order to prove cooperation with the fact-checking community.

Empowering the fact-checking community

Cooperation with the fact-checking community

- Microsoft's report on Bing includes an announcement of an agreement with Agence France-Presse (AFP) "to provide additional fact-checking coverage" as its primary new initiative, yet this claim is far from accurate. According to AFP, a verified member of the EFCSN, this so-called agreement is a subscription to AFP's fact-checking wire, a data licensing arrangement for access to their editorial content rather than an active partnership focused on fact-checking. Despite this, Microsoft has used the subscription to claim fact-checking coverage in 18 different languages, thus "the vast majority of Bing's EU users". This approach clearly falls far from the objective outlined in Measure 30.1 of the EU Code, which states the set up of agreements between Signatories and independent fact-checking organisations to achieve fact-checking coverage in all Member States. By relying on a passive subscription model rather than fostering collaborative partnerships with fact-checkers, Microsoft's actions appear to misalign with their commitment.

- In continuation of its slightly misleading reporting under Commitment 30, Microsoft reports having agreements with four different fact-checking organisations. This appears to be related to its relationship with third party providers for indications of narratives or disinformation trends, some of them supposedly including fact checking coverage, according to Microsoft. Microsoft acknowledges that these agreements are "not strictly for fact-checking services" and therefore states that it does "not reflect these agreements in this SLI".

  As a way to contextualize this figure, EFE Verifica, an EFCSN verified member listed by Microsoft, clarifies that the agency does not participate in the integration of fact-checking into Microsoft's platforms. This vagueness blurs the lines between disinformation monitoring through cooperation and genuine fact-checking

partnerships. The latter can easily be convened in the future, as over 56% of fact-checking organisations surveyed by the EFCSN would be generally interested in entering into an agreement with Bing to provide fact-checking coverage of their country.

- Regarding their commitment to "provide fair financial contributions to the independent European fact-checking organisations for their work to combat Disinformation on their services", Microsoft mentions their support of the ClaimReview protocol, which does not remunerate organisations for their input, and "news partnership arrangements", which, even if beneficial to the wider information ecosystem, are not specifically designed or tailored to address disinformation on Bing.

- While the EFCSN considers that, as for now, Microsoft is failing to comply with Commitment 30 on cooperation with the fact-checking community, it puts in doubt its compliance with commitments on the reporting exercise of the Code.

Use and integration of fact-checking and access to relevant information

- The EFCSN has repeatedly alerted on the doubtful sustainability entailed by a scheme like ClaimReview, which relies on the voluntary ingestion of data by fact-checkers for the benefit of search engines. It is also difficult to assess Bing's use of this system as the metrics they report on – Fact Check URL and Fact Check Impressions – are dependent on the searches of users. Nevertheless, it is relevant to highlight disparities between Member States: in 14 of them, the number of times URLs containing a ClaimReview tag appeared on the first page of Bing search results to a user located is below five.

- Microsoft is unable to report on the use of fact-checking outside ClaimReview, suggesting that its subscription to a fact-checking wire does not fulfill its commitment to "integrate, showcase, or otherwise consistently use fact-checkers' work" across its services.

- Microsoft does not report any meaningful information that shows their compliance with their commitment to provide fact-checkers with prompt access to information in relation to its service Bing.

Response during the EU Election 2024

- **The good**: Among Bing's significant efforts, the establishment of a Situation Room allowed it to monitor election-related threats. The platform also implemented defensive search interventions to ensure that users receive accurate electoral information and reported further specific internal measures and risk assessments on election-related content. These proactive measures were complemented by special

informational panels that direct users to high-authority sources about elections and specific actions on generative AI content. As for LinkedIn, Bing has reported multiple cooperation initiatives via Microsoft.

- **What was missing:** Areas such as media literacy lack specific actions, and actions on third party scrutiny, research, and data access are not well defined in the information reported by Bing in this area. On the other hand, although Bing reports having undertaken internal post-election reviews, it does not seem to have made them available for third party scrutiny.

- **The view of the fact-checkers**: The only organisation that has reported having an agreement with Bing has declared that this agreement does not include any specific actions to prepare for elections while suggesting "it would be great to have anything more specific [to tackle disinformation on election]".

LinkedIn

Microsoft reports that LinkedIn, which may have [over 192 million users in the EU](#), is not typically used by members to post disinformation. However, the ratio of discoverability reported in Trustlab's Structural Indicators does not substantially differ from that of other platforms. There is well-documented evidence of fake accounts being used to promote goods and services, along with more common forms of disinformation related to election integrity and conspiracy theories. Currently, LinkedIn still has only one fact-checking partner and, despite apparently expanding their coverage, the number of reviewed posts has drastically decreased.

Empowering the fact-checking community

Cooperation with the fact-checking community

- Ever since their baseline report published in January 2023, Microsoft reports one single fact-checking partnership to comply with its commitment. In its latest response to the submitted reports, the EFCSN raised concerns about the effectiveness of one organisation providing fact-checking coverage in six different languages, emphasizing the critical need for localized expertise to effectively address disinformation tailored to specific cultural and linguistic contexts. In this reporting period, the same organisation has expanded its coverage to an additional 15 languages, bringing the total to 21. The EFCSN standards require a meaningful connection to the countries and languages covered to ensure the necessary depth and contextual understanding required to combat disinformation. Programs such as this one make the assessment of these conditions difficult because the fact-checks are not made public.

Use and integration of fact-checking and access to relevant information

- The concern highlighted above is further exacerbated by Microsoft's SLI 31.1.1, which reveals that only 146 pieces of content were reviewed by fact-checkers globally over a six-month period. This figure is notably lower when compared to Microsoft's baseline report, which disclosed that 252 pieces of content were reviewed within the EU alone during a single month. For the first half of 2023, however, Microsoft shifted to reporting video reviews on a global scale rather than providing EU-specific data, a change that drew criticism from the EFCSN given the EU-focused nature of the Code. Despite the extended time frame and expanded geographical scope, the number of fact-checked videos did not grow as anticipated. Now, when comparing the data from the first half of 2024 to the previous year, the number of reviewed posts has sharply declined by more than 80%, further raising concerns about the effectiveness and commitment to maintaining robust fact-checking efforts in the EU under this initiative.

- Microsoft does not reflect the impact of their use of fact-checking as it could through metrics such as the pieces of content actioned as a result of the assessment of their fact-checking partner.

- Nevertheless, this information is shared in real time with their fact-checking partner. This transparent approach is welcomed and ideally scaled as their fact-checking agreements grow in the near future.

Response during the EU Election 2024

- **The good**: Among LinkedIn's initiatives, the actions related to generative AI include efforts to combat deepfake technologies, particularly during elections, and developing tools to authenticate content. In the area of internal incident response mechanisms, LinkedIn has implemented enhanced crisis response processes and 24/7 escalation paths to address election-related issues and misinformation, with Microsoft establishing a Situation Room to monitor and protect the integrity of European elections. In terms of cooperation, Microsoft has reported actions such as a global training program aimed at election campaigns and authorities, informing them about the risks of deceptive AI in elections, collaboration with the Institute for Nonprofit News and DeleteMe to safeguard journalists' personal information during election periods, or partnership with True Media to provide tools that help verify AI-generated content.

- **What was missing:** Despite LinkedIn declaring that it "works with globally-recognised fact-checkers to receive their independent judgement regarding user-generated content", 100% of the European fact-checking organisations consulted reported not to have an agreement with LinkedIn. Again, LinkedIn only reported one agreement responsible for 21 languages on the Chapter on Empowerment of Fact-checkers. Furthermore, in areas such as media literacy, contextual information, recommender systems, integrity of services and third-party scrutiny, research, and data access, LinkedIn has not reported any actions.

- **The view of the fact-checkers**: On data access, 30.4% of the consulted fact-checking organisations agreed or strongly agreed with the statement: "LinkedIn does not provide my organisation with access to the information that would help us maximise the quality and impact of our fact-checking." In contrast, only 6.1% (2 organisations) disagreed with this statement. According to their own investigation, one fact-checking organisation reported that LinkedIn failed to enforce its misinformation policies.

TikTok

TikTok has reported [150 million 'monthly active recipients' in the EU](#), being the most popular platform among European youth, with [over half of them](#) using the service. TikTok has progressively improved its fact-checking partner program in the EU since the first report. However, the platform lacks transparency and access to data for impact assessment that would enhance its program and still opts for the removal of disinformation content rather than integrating fact-checking efforts to provide users with contextual information.

Empowering the fact-checking community

Cooperation with the fact-checking community

- During the last two reporting periods, they have incorporated three fact-checking organisations with demonstrated local capacities and expertise to specific countries into their program.

- The positive impact of these agreements is clearly visible in the case of Poland. In the first half of 2023, only four videos were moderated as a result of the assessment of a fact-checker in this country – even if TikTok reported fact-checking coverage – while this figure a year later, and following an agreement with a local partner, has gone up to 171.

- Interestingly, during this reporting period, one organisation was onboarded from a country that was previously listed as already having fact-checking coverage. A country-by-country comparison of this report and that of March 2024 reveals that fact-checking coverage has now been extended to four additional countries. However, it remains unclear which specific agreements facilitated this expansion. Further clarification on the relations between partnerships and specific countries covered would provide valuable insight. This would facilitate the assessment of the progress of TikTok in their commitments, given the EFCSN's concern about reliance on organisations based outside the country they cover.

- In general, consulted fact-checking organisations declared that TikTok "does not contribute at all" through its actions to foster cross-border collaboration between fact-checking organisations (66.7%). The EFCSN remains open to discussing ways in which the company can develop initiatives that serve to better comply in future reporting periods with this commitment they signed up.

Use and integration of fact-checking and access to relevant information

- Half of the organisations with a fact-checking coverage agreement with TikTok do not have clear knowledge of how TikTok uses the fact-checks they provide. This is a result of TikTok's lack of transparency and their use of fact-checkers' assessment, which only informs internal moderators when deciding whether or not to moderate.

- The main action that the platform reports related moderation of disinformation content is removal. The EFCSN has repeatedly expressed its concerns over this practice, which fails to provide transparent reasoning for why a particular video is flagged as disinformation and that it should be ideally reserved for illegal content.

- The case of the deployment of "unverified" labels during crises, or when fact-checkers don't reach conclusive assessments, is a clear example of the potential of this type of approach, even when lacking evidence, in reducing virality. Despite the number of these warning tags used during this reporting period growing by more than 15k, there has been a slight increase in the proportion of users choosing not to share content after encountering such warnings, with the percentage rising to 29.7% within the EU. The EFCSN advocates for the use of context/fact-check labels to moderate disinformation instead of the complete removal of the content.

- Among the surveyed organisations that currently have an agreement with TikTok in place, half of them do not believe they have efficient tools in place to monitor the platform or data to measure the impact of their work. From the wider group of fact-checkers, many report that TikTok's Ad Library is dysfunctional or is not working properly, making it difficult to detect disinformation in paid ads.

Response during the EU Election 2024

- **The good**: Some of TikTok's key initiatives include the establishment of the Mission Control Centre (MCC) in Dublin, which provided dedicated coverage of potential election-related issues. The platform launched an in-app Election Centre for each EU Member State that directed users to reliable voting information. Furthermore, TikTok engaged in media literacy campaigns in collaboration with fact-checkers to improve users' skills in identifying misinformation. Additionally, TikTok has taken steps to address issues related to generative AI. The platform prohibits misleading AI-generated content (AIGC) and has implemented measures to ensure creators label realistically generated content. It became the first video sharing platform to put Content Credentials into practice.

- **What was missing:** Despite these positive initiatives, TikTok did not report any measures in areas such as reducing the prominence of disinformation in recommender systems, ensuring the demonetization of disinformation, clearly indicating when influencers display political ads, establishing internal incident

response mechanisms, or undergoing post-electoral reviews. Moreover, it still shows very limited access, if any, to data for non-academic researchers and civil society organisations, including fact-checkers.

- **The view of the fact-checkers:** In terms of cooperation, of the eight fact-checking organisations that reported agreements with TikTok, half of them answered that these did not include specific actions to prepare for elections. A few organisations reported negative results on the mitigation measures put in place by TikTok to counter disinformation in relation to elections. One organisation reported that, for months, the Ad Library did not work properly, making it hard to detect disinformation and/or political content. Another organisation reported videos ahead of the EU Elections were only available when searching keywords such as "elections", limiting its potential reach. Another organisation informed that there were many disinformation videos on the platform ahead of the elections and another one that there were no mitigation measures in place. Several organisations reported diverse threats observed in relation to disinformation on elections. Among them, the growing use of TikTok by politicians to address voters directly, sometimes spreading disinformation, despite TikTok's policies; the use of TikTok to sell drugs and blackmail people; and the use by domestic and external malign actors, particularly pro-Russian, to spread disinformation.

Non-signatories

There are two online platforms worth assessing given both their high number of users and their role in the disinformation ecosystem: X and Telegram. The EFCSN would encourage both X's return to the Code and Telegram's participation, as both their users and the current Signatories would undoubtedly benefit from it. For Telegram, this is especially pertinent given its growing user base and its reported figures within the EU (currently being investigated) being very close to the threshold that would classify it as a VLOP under the DSA. As a VLOP, Telegram would face heightened responsibilities for addressing systemic risks, including disinformation. By aligning with the established commitments under the Code, Telegram could proactively adopt effective mitigation strategies for disinformation, an area where it currently lacks robust measures.

X/Twitter

- The company reports over 105 million monthly active users in the European Union.
- **The view of the fact-checkers**: None of the 33 EFCSN fact-checking organisations that responded to the survey have agreements with X, although 78.8% would be interested given fair financial compensation. 84.9% are concerned about harmful disinformation on X (the highest percentage together with Telegram), with 87.9% agreeing it plays a significant role in disseminating disinformation. 90.9% say it's easy to accidentally access disinformation on the platform, and 84.9% report disinformation campaigns often go unaddressed. 87.9% believe X doesn't take the disinformation problem seriously. Regarding election disinformation, organisations note Community Notes are insufficient and lack professional fact-checking standards. Some even claim X promotes misinformation and hate speech. Observed threats include unchecked spread of Russian-language disinformation, promotion of climate and health misinformation, and algorithmic amplification of propaganda and disinformation campaigns. According to a Maldita.es investigation based on data from the Elections24Project, among the 20 most viral debunked posts that received no visible action by the platforms ahead of the EU election, 18 were hosted in X with over 1.5 million views each.

Telegram

- The company does not publicly share the exact number of average monthly active users in the EU as it used to while the EU's Joint Research Centre revises its actual reach. In February 2024, Telegram reported 41 million.
- **The view of the fact-checkers**: 84.9% of the fact-checking organisations surveyed by the EFCSN are concerned about harmful disinformation on Telegram, with 75.8%

agreeing it plays a significant role in disseminating disinformation. 81.8% report disinformation campaigns often go unaddressed, and 84.9% believe Telegram doesn't take the disinformation problem seriously. Specific threats include uncontrolled disinformation spread, hosting of pro-Russian propaganda in some regions, and potential foreign information manipulation and interference incidents. Despite this, 75.8% are interested in agreements with Telegram, given fair financial compensation were to be provided.

Afterword:
Taking the EU Code of Practice Seriously

Most of the very large online platforms and search engines continue to lack robust mechanisms to mitigate the spread of disinformation, especially during crucial events such as the EU election. Most of them have failed to demonstrate an effective implementation of their commitments under the EU Code of Practice on Disinformation on fact-checking and have just partially followed a limited number of measures from the European Commission guidelines on mitigation measures during elections.

The principles outlined in the Code promote an environment where independent fact-checkers are empowered to act effectively. This involves not only formal agreements with fact-checkers but also genuine integration of their insights into their moderation systems and providing the necessary data access to maximise the impact of their work.

A true commitment to these principles is essential for restoring trust in digital platforms, ensuring a healthy information ecosystem and limiting the impact of disinformation in our democracies. To do so, it is paramount that these platforms adopt a proactive and comprehensive approach towards combating disinformation, rather than merely meeting minimum compliance standards. This call extends also to platforms like X and Telegram, which although are not signatories to the Code, continue to be major sources of concern for fact-checkers due to the prevalence of disinformation on their services.

Therefore, the EFCSN urgently calls for the platforms to change their overall strategy in the fight against disinformation, establishing lasting partnerships with the fact-checking community, fully integrating their work in their moderation systems and giving adequate access to relevant data to effectively combat disinformation. In this manner, platforms could definitely demonstrate their full commitment with the principles and spirit of the Code, in line with the overarching goal of implementing effective risk mitigation measures against disinformation, as the DSA requires. This is of particular relevance as the Code of Practice on Disinformation will serve as a benchmark for the mitigation of the systemic risk of disinformation under the DSA once it is converted to a Code of Conduct.