



European Fact-Checking  
Standards Network

# **The Moment of Truth for the Code of Conduct on Disinformation**

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# The Moment of Truth for the Code of Conduct on Disinformation

The 2022 Code of Practice on Disinformation officially became a code of conduct under the Digital Services Act (DSA) on July 1, 2025. Yet, the risk of the Code becoming irrelevant has never been higher as some of the same platform signatories that ignored their commitments for years are now officially abandoning them, but still presenting themselves as active members of this effort.

To be clear: [the Code itself](#) is still fit for purpose. It was the product of a consensus so wide that it included Big Tech, the European Commission, civil society, academics, and fact-checkers. It still represents the best action plan there is for a digital platform to fulfill its DSA obligations regarding disinformation—those “reasonable, proportionate and effective mitigation measures” the regulation demands.

For the independent fact-checking organizations of Europe, the Code represented an opportunity to empower users against disinformation and to help them navigate online threats to their health, their money, and their democratic rights. However, the EFCSN was clear from the beginning that, regardless of the measures the Code outlined, only their implementation would matter in the end.

That is why today it would be unconscionable for the EFCSN or any impartial witness to allow some platform signatories to claim they are doing their part, and much less to say that their participation in the Code should be considered as evidence of their compliance with the law. Far from that, in many cases, their disconnect from the Code is actual evidence of their noncompliance.

When negotiating and signing the Code, platforms agreed that they would sign up to “Commitments and Measures [...] that are pertinent and relevant” to their services. Platforms also recognized that, to benefit from the Code as a risk mitigation tool under the DSA, they agreed to “signing up to **all** Commitments and Measures relevant to their services”. As highlighted in their previous transparency reports, fact-checking was central to their mitigation efforts and their cooperation with fact-checkers was deep and meaningful, proving that fact-checking is “pertinent and relevant” to their services. The EFCSN consequently expects that all platforms covered in this report sign up and implement the fact-checking Commitments under the Code or accept to forgo the DSA protection offered by the Code.






















The following is an analysis of the major platforms’ last Code of Practice reports, published in 2025 but covering the second half of 2024. It specifies where each of them stands in relation to the commitments they took on fact-checking in 2022. As the Code becomes an official benchmark for DSA compliance on systemic risk mitigation, nothing would please the EFCSN more than having something more positive to say of the sincerity

of many platforms' commitment to the Code of Conduct and to the fight against disinformation as a whole.

Unfortunately, in the last couple of months, some platform signatories took steps that signal an opposite trend. For example, hidden in a developer blog earlier this year, Google announced that the company would [retire its ClaimReview based fact-checking snippet](#) in search results. It is important to note, that these more recent developments are not subject of this report and are not reflected in the ratings below.

### Ratings for Code of Practice compliance

based on platforms' transparency reports covering the second half of 2024

	C30 - Cooperation with the fact-checking community	C31 - Use and integration of fact-checking	C32 - Fact-checkers' access to relevant information
YouTube			
Google			
Bing			
LinkedIn			
TikTok			
Facebook			
Instagram			

## YouTube and Google

[Despite YouTube remaining one of the key actors in the spread of disinformation in Europe](#), both YouTube and Google [decided to unsubscribe from their Code of Practice commitments on fact-checking](#) last January, before the conversion to a DSA code of conduct took place. The move would allow YouTube, for example, to avoid being audited on the fulfillment of its commitments during DSA mandatory audits, which makes sense because YouTube never took any real steps towards fulfilling them.

### Cooperation with the fact-checking community

The difference with previous reports, however, is striking. [In our last review](#), we called once again on YouTube to stop misrepresenting its relationship with the European fact-checking community and reporting partnerships that were not such, a practice that reached its most absurd when [the platform reported agreements](#) with "EU-based

fact-checking organisations” that worked in countries such as Myanmar, Brazil, and Indonesia.

In their last report, however, both YouTube and Google just wrote “not subscribed” in the template. It was a surprising choice given that they indeed were still signatories to most of the measures in the fact-checking chapter during the relevant period to be covered in this report.

This is regrettable, as Google has cooperated successfully with fact-checkers and the EFCSN in the past. For example, the company funded the [Elections 24 Check](#) project in which over 40 European fact-checking organizations created a first-in-its-class live database of debunks, prebunking, and narrative reports addressing disinformation related to the election to the European Parliament; a resource that is being subject of ongoing research by academics a year later. The project ended in July 2024.

Beyond the commitment regarding agreements, fact-checking coverage, and fair financial contributions that it signed in 2022 and retracted in 2025, YouTube also has made no effort whatsoever towards integrating fact-checking in its platform to help its users. Also, while some new functionalities make YouTube monitoring by fact-checkers a bit easier than it used to be, our proposals to develop the commitment on data access have never been considered and no alternatives have been proposed by the video platform.

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

During the reporting period, Google Search continued to integrate fact-checks through showcasing those marked up with the ClaimReview schema when users search explicitly for a debunked claim. Nevertheless, the company quietly announced it was [killing this key anti-disinformation feature](#) in June 2025, without informing the Code of Conduct Permanent Task Force. However, Google’s decision was communicated to the European Commission by the EFCSN.

The EFCSN has not been shy at explaining that ClaimReview fact-check snippets had existed because fact-checkers have been providing them for free and out of a sense of civic duty, but still this decision by Google effectively ends [one of the most successful anti-disinformation integrations](#) ever to happen on a VLOPSE, one that resulted in over 120 million fact-check impressions every six months in the EU, according to Google’s own Code of Practice reports.

In a very brief explanation, Google and YouTube said in their report that they unsubscribed from both the fact-checking chapter and the political ads chapter of the Code because those commitments are “not relevant, practicable or appropriate for its services”.

## Microsoft

### Bing Search

Bing Search remains the 2<sup>nd</sup> [most used search engine](#) in Europe in 2025, with [approximately 129 million average monthly active users](#), far behind Google. During the reporting period, the use of Bing Search was also enhanced with new GenAI features by the launch of Microsoft Copilot, with Copilot integrated in Bing (as a replacement of Bing Chat).

### Cooperation with the fact-checking community

In [our last report](#), we mentioned how Microsoft “exaggerated some of the misleadingly reported fact-checking agreements in the EU in order to prove cooperation with the fact-checking community.” An agreement with AFP was notably quoted 41 times in Microsoft’s report, claiming that a subscription to AFP’s fact-checking wire was sufficient to cover most of the countries in Europe with a fact-checking program. Several other EFCSN members, such as Maldita or EFE, were also quoted as fact-checking partners. The EFCSN pushed back against this way to present Microsoft’s actions as active cooperation with the fact-checking community.

Likely as a result, no fact-checking organization is listed anymore in Microsoft’s new report for the period June-December 2024, except in relation to LinkedIn. On page 161, Microsoft states that “Bing entered agreements with independent organizations to improve language coverage across EEA Member States and languages”. No numbers are given in relation to these partnerships, nor any names. This undoubtedly makes the allegation difficult to verify and is counterproductive to the spirit and the letter of the Code, which establishes the periodical reports as a way to measure progress in its implementation.

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

Bing Search continues to use a ClaimReview integration approach to fact-checking, going as far as calling it “Bing Search’s ClaimReview fact check program” (page 164). Bing claims

to integrate fact-checking data and sources in Bing Answers and Bing News Carousels. No usage data is shared in Microsoft's report; fact-checking organizations are invited to use Bing Search Webmaster's tools for any more specific user data. As mentioned in the EFCSN's previous reports, relying on ClaimReview data, an open-source system not involving any financial compensation for the fact-checkers as purveyors of the data, is unsustainable in the long run. This reliance falls short of the commitments of the company to empower fact-checkers and to enter in fair compensation agreements with them.

Microsoft Copilot explains, when asked, that it does not rely on ClaimReview data. With a foreseeable increase in the use of Microsoft Copilot, and AI conversational bots more generally, it might be interesting to better understand how this GenAI feature integrates the work of fact-checkers to ensure that reliable and verified information is integrated in the bots' replies. It has to be noticed that Microsoft Copilot quotes sources in its replies and uses links to various media organizations. This practice could be mutually beneficial if linked to the work of fact-checkers in this context.

In addition to ClaimReview, Microsoft asked for and was given access to the EFCSN's database around the European Elections in 2024, Election24Check, and was recently also granted access to the EFCSN's database on climate disinformation, [EuroClimateCheck](#). We are still waiting on Microsoft's feedback on the use of this data, but we believe that, with a fair compensation, this kind of partnership could be fruitful in the future for a healthier online environment when it comes to information integrity.

## LinkedIn

Microsoft [reports](#) “an estimated monthly average of: 52,000,000 logged-in users visited LinkedIn's services in the EU; and 142,500,000 site visits to LinkedIn's services from EU-based users occurred in a logged-out state” for the reporting period.

LinkedIn continues to be regarded as a “trusted” platform when it comes to disinformation, but a recent [study](#) shows what the EFCSN already observed and wrote in previous reports: that the feeling of trust is actually allowing blind spots when it comes to detecting manipulated content.

More concerning, Microsoft Bing unsubscribed from the commitments of the fact-checking chapter of the Code in January, alleging they do not “host user content” as if search engines were somehow exempt from promoting disinformation, which we know to be false and which is why the Code included search-engine specific provisions, after negotiating it with other signatories including Microsoft. Ironically, Microsoft's LinkedIn does host user

content, but also unsubscribed from the fact-checking chapter under the pretext that “is not proportionate to their risk profile”.

The Code's preamble, signed by LinkedIn, mentions that platforms should subscribe to **all** Commitments and Measures that are "pertinent and relevant" to their services but makes no mention of "proportionality" as a reason to not subscribe to a Commitment, making it at best unclear whether LinkedIn's rationale for unsubscribing meets the spirit and letter of the Code.

## Cooperation with the fact-checking community

As in previous reports, LinkedIn relies on one fact-checking organization, Reuters, an IFCN signatory, to cover 21 languages in Europe. Since Reuters is not currently a member of the EFCSN, it is worth noting that the EFCSN standards require a meaningful connection to the countries and languages covered by a fact-checker 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 by the platform.

The fact that LinkedIn is sharing live links with its fact-checking partner is a positive aspect to meaningful cooperation and transparency, as it “allows partners to easily determine whether that content was thereafter removed by LinkedIn” (page 171).

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

The analysis of the last reports of Microsoft in the context of the Code of Practice on Disinformation shows that, in SLI 31.1.1, the number of content pieces reviewed by fact-checkers continues to decrease, now falling to only 106. As underlined in our last report, the baseline report of Microsoft started at 252, and was already falling to 146 in the last report. This seems to be a recurring, and unaddressed, issue.

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## TikTok

TikTok continues to grow quickly in Europe, now [reaching 159 million “active recipients” in the EU](#) between July and December 2024, which is 9 million more than in the last reporting period. TikTok has a fact-checking program in place and remains a signatory of the fact-checking chapter of the Code, but its subscription document in January 2025 included



an asterisk conditioning that commitments on other platforms' subscriptions, which is a concern for the EFCSN. Another major concern for the EFCSN is that TikTok's fact-checking program remains in the app's back office moderation process, and is thus not resulting in any public-facing fact-checking work.

## Cooperation with the fact-checking community

TikTok continued to expand its fact-checking program in wider Europe, now covering Albania, Kosovo, Moldova and Serbia. Some of the fact-checkers are verified members of the EFCSN, but not all of them. The fact that TikTok names the organizations covering each of the newly covered countries has to be noticed as a transparency effort – as most of the time TikTok either refers to its partners or to the countries covered but rarely matches both lists, which leaves a level of uncertainty in the assessment of the European coverage of TikTok's fact-checking program. More clarity on this matter would be welcome in the next report.

TikTok has launched media literacy projects with fact-checking partners around Europe in the second half of 2024, notably around the EU Elections but also around other national elections. This is highly appreciated as it allows the fact-checking partners of TikTok to have some visibility in the app, for the users. The fact-checking program itself still remains entirely in the back office of the platform. It might be interesting, from this perspective, to have metrics about the impact of these media literacy videos on the app in the transparency reports.

In terms of metrics, TikTok continues to measure removals of videos by their moderation team, comparing the results of the removals linked to fact-checking assessments and the ones occurring because of policy guidelines. The EFCSN wants to stress again that fact-checkers are not in favor of removals, as we believe that the users should be provided with more information rather than less. The percentage of removals linked to fact-checking assessments remains extremely low (less than 1% in most cases). TikTok's fact-checking partners are continuing to ask for more data on the impact of their work, to be able to measure it for their own records but also to share it with their audiences for increased transparency.

TikTok is allowing for more proactive detection of misinformation in the app by its fact-checking partners, notably with the former trend reports, now misinformation leads and insight reports - reports on major disinformation trends spotted by the active monitoring of TikTok's fact-checking partners on the platform. This goes in the direction of enhanced editorial independence for the fact-checking partners, which is highly

appreciated. It would make sense, in the continuation of this effort and for more efficiency, to give access to TikTok's fact-checking repository for fact-checking partners. TikTok's fact-checking repository is indeed listed in the chapter on "empowering fact-checkers", but fact-checkers do not have access to it. Any tool which would facilitate the monitoring of TikTok content in the app would be of immense value to the fact-checking community – and thereby improve the efficiency of the implementation of TikTok's efforts to fight deceptive content.

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

TikTok reports on the "share cancel rate" in the chapter on "empowering users". This rate, under SLI 21.1.1, is described as follows: "The share cancel rate (%) following the unverified content label share warning pop-up indicates the percentage of users who do not share a video after seeing the label pop up. This metric is based on the approximate location of the users that engaged with these tools." This rate increased a little since the last period of reporting, from 29,7% within the EU to 32,24% in the reporting period from July to December 2024. The EFCSN advocates for more labels such as the "unverified" one, rather than removals. Labels play at the same time on users' behaviors, provision of reliable information and increased moderation transparency. The EFCSN remains at TikTok's disposal to discuss further processes to improve the fact-checking program with this in mind.

## Meta platforms

Facebook has 262.3 million EU users and Instagram has 274.6 million EU users. At the time of writing, long-standing partnerships between those Meta-owned platforms and European fact-checkers remain operational in Europe. However, Meta's January 2025 announcement that it would dismantle its fact-checking program "starting in the US" raises the question whether the company is considering to also scrap its European program, replacing it with a volunteer-run Community Notes program modelled after X/Twitter's. This system [has clear methodological issues](#), and it [has not proven](#) in practice to be an effective replacement for professional fact-checking. [Early reports](#) point to Meta's system displaying the same shortcomings as X/Twitter's, although lack of public data has so far prevented systemic analysis.

Meta platforms' transparency reports highlight this uncertainty, mentioning in their fact-checking chapter that: "In keeping with Meta's [public announcements on 7 January](#)

[2025](#), we will continue to assess the applicability of this chapter to Facebook and Instagram and we will keep under review whether it is appropriate to make alterations in light of changes in our practices, such as the deployment of Community Notes”.

While, for the time being, Meta’s fact-checking partnership program remains best-in-class in many respects, the EFCSN expresses deep concerns about its future.

## Cooperation with the fact-checking community

Both Facebook and Instagram list partnerships with 29 European fact-checkers covering 26 EU Member States (Malta being the exception). The countries’ most widely-spoken official language is systematically covered, while other official languages are often covered. Meta does not report on its partnerships with non-EU European Economic Area countries which are covered by the Code (Iceland, Norway, Liechtenstein). Meta has not onboarded any new fact-checking organizations.

## Use and integration of fact-checking in signatories’ services

The fact-checking program, as it is currently structured, allows for significant editorial independence in choosing which content is fact-checked, which the EFCSN considers a best practice. However, the carve-out for politicians (who cannot be fact-checked) remains problematic. As highlighted in previous reports, the EFCSN welcomes Meta’s policy of labeling (as opposed to removing) content found to be unreliable.

Fact-checking flags work in curbing the virality of misinformative content, with Facebook reporting that 47% (vs. 46% in H1 2024) and Instagram 46% (vs. 43% in H1 2024) of attempted shares of content rated as false or misleading were dropped after the platform displayed a fact-checking warning.

Facebook reports that a total of 150,000 fact-checking articles served as a basis to label over 27 million pieces of content in H2 2024 across the EU. Compared to other forms of automated content moderation, this fact-checking-based claim matching is more precise, as it relies on human-reviewed assessments before labels are applied. Meta’s own [Digital Services Act \(DSA\) Transparency Reports](#) underscore this point: The percentage of successful organic content demotion complaints for fact-checked misinformation is by far lower than for almost all other categories.

Instagram reports that a total of 43,000 fact-checking articles served as a basis to label over 2.2 million pieces of content in H2 2024 across the EU. The difference with Facebook in terms of the breadth (number of articles used) and depth (number of pieces of content

labeled) of the labeling suggests that the image- and video-first nature of Instagram makes content harder to label at scale.

## Fact-checkers' access to relevant information

As Meta proceeded to replace Crowdtangle with the Meta Content Library, European fact-checkers have been onboarded onto this new data platform, which provides many useful features to track and research disinformation on Facebook. In particular, data quality and consistency appear higher than Crowdtangle's and text-in-images is now searchable.

However, some serious impediments remain, such as the Meta Content Library's absence of a usable API and limitations on the content returned in the graphical user interface (e.g. no information about whether a post has been fact-checked).

## Conclusion

Fact-checkers in Europe would love to have a more positive evaluation of most platforms' current commitment to the Code of Conduct, but the reality is what it is. Over the last two years, most platforms have become more and more reticent towards taking meaningful action against disinformation on their services and thus are less inclined to collaborate with independent fact-checkers or to fulfill their commitments under the Code.

The promise of the Code, which was that it would serve as a guide for effective risk mitigation under the DSA, has been broken by some of its major signatories. It is therefore regrettable that those same companies would benefit from a signatory status that has become largely irrelevant to their actions.

## About the EFCSN

The European Fact-Checking Standards Network (EFCSN), an association representing over 60 independent fact-checking organizations in most European countries. The EFCSN is the voice of European fact-checkers who uphold and promote the highest standards of fact-checking and media literacy in their effort to combat misinformation for the public benefit.

The EFCSN and its verified members are committed to upholding the principles of freedom of expression. They work to promote the public's access to fact-checked trustworthy data and information and to educate the public in how to assess the veracity of information in the public sphere.

