

# FACT-CHECKING AS A POLICY FOCUS IN THE EU

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**ABSTRACT** *Fact-checking is a popular journalistic format that is widely used across the European Union to react to disinformation and other false narratives spreading both in social networks and traditional media. To foster its uptake, the European Commission has included the support of fact-checking organizations, as well as a request for the integration of their services in online platform content moderation, in a number of its policy documents. The watchdog activities of fact-checkers thereby become part of the EU's policy focus, allowing these organizations to shape policies – albeit not without certain impediments, given that many fact-checkers rely on funding from technology companies and the European institutions. The aim of this paper is to better understand the European fact-checking landscape and to identify in what ways these organizations interact with EU policymakers, the ways EU institutions and the fact-checking community may influence each other, as well as the power dynamics between fact-checkers and online platforms.*

## KEYWORDS

FACT-CHECKING, EUROPEAN UNION, PLATFORM GOVERNANCE, SOCIAL MEDIA, DISINFORMATION

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## INTRODUCTION

In the late 2010s and early 2020s, fact-checking, a technique used to assess the quality of journalistic work, has emerged as a popular journalistic format – and even more than that, a service provided by established private and public service media, news agencies, news start-ups, as well as newly emerging, dedicated fact-checking organizations. Fact-checkers regularly monitor the integrity of the information environment – especially its online segments – and rectify untrue narratives that can pose harm to society's well-being, might compromise political processes or endanger responses to natural disasters or public health emergencies.

The rationale for the prominence of such activities stems from the pivotal role disinformation plays in public policy discussions. The term refers to harmful content that is distributed across a multitude of channels, with a possibility of undermining political processes or posing threats to a democratic society. Following the definition of Wardle and Derakhshan (2017), disinformation is considered to be *intentionally spread* harmful and misleading content. At the same time, it has to be acknowledged that anti-disinformation action, as defined in the EU's policy documents, includes additional forms of content, such as misinformation, which Wardle and Derakhshan (2017) define, in contrast to disinformation, as false or misleading content that is spread *without the intent to harm*, as well as a range of tactics and techniques used to mislead audiences. While there is still no scientific consensus about the extent and kinds of harm that the sharing of false and misleading content can cause (see Altay et al. 2023), widespread fears about the integrity of elections (see, among others, Allcott & Gentzkow, 2017; Bader, 2018; Baptista & Gradim, 2022), manipulations of public opinion in the context of wars and crises (see Bachmann et al., 2019; European Commission, 2023a; Yablokov, 2022) and the effectiveness of public health measures (Springer & Özdemir, 2022) justify the increased attention of policymakers. The term “infodemic” (The Lancet Infectious Diseases, 2020) became part of our vocabulary when the global pandemic seemingly accelerated the spread of misleading or fabricated harmful content.

Fact-checking is “a fact-based methodology for evaluating policy claims” (Mena 2018), which involves the verification of facts, statistics, quotes, and other information, involving a detailed examination of primary and secondary sources (Amazeen, 2015; Graves, 2016). Despite some limitations (Nyhan & Reifler, 2010; Thorson, 2016; Jarman 2016), it has become a widely used tool to limit the spread of disinformation and promote a more informed public discourse (Weeks 2015; Pingree et al., 2014; Graves 2016). Although it is hardly a stand-alone solution (Caulfield, 2020), studies have found that fact-checking can reduce the spread of false information and incentivize politicians and other public figures to communicate responsibly (Wood & Porter 2018; Nyhan & Reifler, 2015). As such, the European Commission made fact-checking a key component of its European approach to disinformation (see among others COM/2018/236). This can be seen, for example, in the case of the *Code of Practice* (now *Code of Conduct*) *on Disinformation* (European Commission, 2022a), which assigns numerous commitments to its signatories – among them very large online platforms, such as YouTube, Facebook, or TikTok – to contribute to

online audiences' resilience towards information manipulation. One of its commitments is called "Empowering the Fact-Checking Community", which asks social media companies, among other things, to provide fact-checking organizations with transparent funding, as well as to integrate fact-checkers' insights into their services. In addition to the emphasis on the role of fact-checking in the previously mentioned soft law instrument, European institutions also provided monetary support for fact-checking activities, among other things, by creating and funding the European Digital Media Observatory (EDMO) and its regional hubs, providing funding to the European Fact-Checking Standards Network, and publishing dedicated grants for fact-checking organizations (see, for example, European Commission, 2022b; European Parliament, 2024a).

## METHODOLOGY AND ANALYTICAL FRAMEWORK

The analysis is based on a review of the existing literature, European policy documents, as well as a set of semi-structured interviews with people we considered key players in the European fact-checking landscape. Between August 2024 and January 2025, we conducted 19 interviews, mainly with representatives of fact-checking organizations, but also members of the policy community. We were aiming to speak with the representatives of those fact-checking organizations that were most active in European projects, such as the European Digital Media Observatory and the European Fact-Checking Standards Network, but also with fact-checkers who were not, or were only loosely, connected to such projects, in order to understand the motivations of both those that engage with the European Commission and those that do not. Most interviewees agreed to be quoted, while three people were anonymized, as their organizations only allowed official spokespeople to speak on the record. We referred to these anonymous interviewees by the gender-neutral pronoun "they". The interviews lasted, on average, 70 minutes, and were, in turn, analyzed with the grounded theory method. The texts were first approached through open coding, which allowed for the development of initial concepts, followed by categorizing the data through substantive categories that helped better understand the perceived positions of interviewed actors.

Interviewees were asked about their personal background, their experience with the craft of fact-checking, the perceived role of fact-checkers in the journalistic and the policy field, the funding and sustainability of fact-checking organizations, ways to maintain independence from state and private actors, as well as the possible advantages and disadvantages of international cooperation. Based on the interviews, we also aim to understand the extent of autonomy the relatively new fact-checking organizations enjoy in a field that leaves them dependent on the holders of economic capital (European institutions, states, online platforms), and to what extent their cultural and social capital, as well as their legitimacy, or the lack thereof, as described by Champagne (2005), allow them to shape the functioning of their own and other fields (see Bourdieu, 2005).

According to Bourdieu, the field of journalism is a "microcosm" where actors cooperate and compete to produce content; the rules of this microcosm are "comparable to a field

of physical forces" (Bourdieu, 2005, p. 30). We argue that fact-checking can be considered a similar field to that of journalism, or a relatively autonomous sub-field of it, which is shaped by internal and external forces, but can also try to influence neighboring fields, namely those of policymaking and the operation of online platforms. The actors in the field of fact-checking possess different forms of capital that determine their freedoms and abilities. While *economic capital* refers to the ownership of material resources, *cultural capital* incorporates (academic) education and general knowledge, and *social capital* refers to social connections and networks within a group. Bourdieu argues that these categories are not fixed, with time they can be converted or transformed into each other. He states that cultural and social capital become symbolic capital "once they are perceived and recognized as legitimate" (Bourdieu, 1986, p. 4). Champagne (2005) refers to symbolic capital as the legitimacy of a media outlet – this capital can be considered more valuable than just the sum of its parts, as it establishes the standing of an organization inside and outside of its community. Fact-checkers bring first and foremost cultural capital to the table, as their familiarity with journalistic research methods allows them to effectively verify content, while their commitment to ethical codes and journalistic standards allows them to be perceived as unbiased agents that can conduct an objective assessment of the veracity of content. At the same time, the increasing internationalization of fact-checking and cooperation in groups of fact-checking organizations can be considered a form of *social capital*, that visibly increased over the past years and became a means to facilitate an effective exchange of views inside the community but also across other players involved in platform policy. Finally, *economic capital* means the revenues generated by fact-checkers, which includes funding that was made available to a large part by technology companies as well as the European Commission.

Actors in a field of cultural production, such as that of journalism or fact-checking can, at times, influence the happenings of fields that are considered more dominant. Bourdieu's prime example is the French writer Émile Zola, who held his government to account for falsely convicting the officer Alfred Dreyfus of treason in an open letter published in the newspaper *L'Aurore* in 1898. With this letter, he entered the field of politics to influence its inner functioning without becoming a politician himself (Bourdieu, 2005, p. 46). While Zola is seen as a successful agent, to a large part due to the autonomy provided by the high standing of literature and journalism at the time, Bourdieu cautions that in the late 20th century, the journalistic field had low autonomy (Bourdieu, 2005, p. 41-43). Similarly to Zola, fact-checkers can try to enter the fields of policymaking and platform governance to influence certain aspects of online platform policy, despite the fact that the fact-checking field's economic capital largely stems from those fields. They can do so because the widely used term "platform governance" refers to an evolution of regulation, in which a range of new actors participate in the shaping and enforcement of rules, including private companies and civil society actors (Flew, 2021). As the insights of interviews will show, fact-checkers are seen as part of this "civil society" that is given a chance to shape the ways in which regulation evolves. The subsequent analysis demonstrates how interview findings reveal fact-checkers leveraging the EU policy framework to build this "symbolic capital".

## RESULTS: THE POLICY LANDSCAPE AND FACT-CHECKING INITIATIVES

### The EU approach on disinformation

The European Union has been designing policies to tackle disinformation for the last decade, initially emphasizing safeguarding fundamental rights while tackling disinformation. It had been advocating for a European approach in order to avoid a fragmented European policy landscape in light of a border-crossing problem (European Commission, 2018a; Nenadić, 2019). The EU's approach to tackling, in particular online, disinformation rests on the notion that legal content, even if considered harmful, "is generally protected by freedom of expression and needs to be addressed differently than illegal content" (European Commission, 2018b, p. 1). The comprehensive approach on the EU level started with the establishment of the High-Level Expert Group on Fake News and Online Disinformation (HLEG). This initiative enabled discussion between scholars, the industry, civil society, and policymakers, with the aim of defining the path towards European policy initiatives to deal with the threat of disinformation. In its March 2018 report (HLEG, 2018), the group advocated for a multidimensional approach that emphasized the transparency of online news production, the health and diversity of news media markets, the importance of media literacy measures, recommended that online platforms develop tools that empower their users, and asked for more research on disinformation. The document already asked online platforms to support the work of fact-checkers and to rely on their expertise when mitigating the disinformation challenges but did not highlight such organizations in its dedicated recommendation section at that time.

The following month, the European Commission communication *Tackling online disinformation: a European Approach* was published, ascribing a key role to fact-checkers in "verifying and assessing the credibility of content" but also highlighted their ability to "analyse the sources and processes of information creation and dissemination". The communication also mentioned that the Commission will support the creation of an independent fact-checking network, and to establish a database on fact-checks (European Commission, 2018b). Another important policy document, the European Commission's *Action Plan against Disinformation* was published in the same year, which assigned great value to facilitative approaches that involve co-operations with tech companies and civil society. The action plan emphasized in its pillars that 1) the EU should increase its capabilities to detect disinformation, 2) strengthen its responses (for example, through the establishment of a rapid alert system), 3) mobilize the private sector to take action against disinformation, and 4) raise awareness in society (see also Abbamonte & Gori, 2023, p. 139-140). The last pillar included a recommended action for EU member states to foster the creation of independent fact-checking teams.

Also in 2018, the self-regulatory Code of Practice on Disinformation (CoP) (European Commission, 2018c) was passed, ahead of the following year's European Parliament elections, with the aim of limiting the spread of disinformation in the EU. As part of this ground-breaking effort, some of the largest online platforms committed to obligations

that were otherwise not required from them by law: they promised to prevent purveyors of disinformation from generating revenues through their services, limit the use of bots, improve the transparency of political advertising, while at the same time empowering platform users and researchers. However, this first version of the CoP assigned only a limited role to the fact-checkers, as part of the actions envisioned by the broader research community.

The spread of disinformation during the COVID-19 pandemic has increased the demand for fact-checked information, but, in this context, the Code of Practice turned out to have limited impact due to a lack of compliance and oversight. The Commission communication *Tackling COVID-19 disinformation: getting the facts right* (European Commission, 2020a) and the Commission's *Guidance on Strengthening the Code of Practice on Disinformation* (European Commission, 2021) have both highlighted the greater need for increased support to fact-checking. In 2022, a new *Strengthened Code of Practice on Disinformation* (European Commission, 2022a) was published to address some of the problems experienced during the first iteration of this self-regulatory exercise. It included *clear* metrics and monitoring mechanisms. The new text also included a set of commitments that specifically focus on fact-checkers, under the heading of 'Empowering the Fact-Checking Community'. Online platforms were recommended to cooperate with fact-checking organizations, integrate fact-checks in their services and enable fact-checkers' access to relevant information. The Strengthened Code had a broader group of signatories than its predecessor – among them also fact-checking organizations who committed "to operate on the basis of strict ethical and transparency rules, and to protect their independence". Its text also clarified that the focus of the EU's anti-disinformation policy should be broader than just intentionally spread misleading content: measures addressing Disinformation (with a capital D) should take into consideration misinformation and a range of other information disorders as well.

While, at the time of the research, the Code of Practice itself is only a self-regulatory instrument, in February 2025, it was adopted as a co-regulatory code of conduct under the Digital Services Act (DSA) (European Commission, 2025), thereby serving as a guidance for platforms' mandatory risk mitigation efforts under Arts. 34 and 35 (European Commission, 2022c). Although not specifically disinformation-focused, the DSA is a regulation that establishes a framework for transparency and clear accountability on online platforms, especially those that are referred to as "very large online platforms" (VLOPs),<sup>1</sup> such as X, which is not a signatory anymore to the CoP, or the services operated by Alphabet (Google) and Meta (Facebook). The DSA, considers disinformation to be one of the systemic risks that platforms need to identify and mitigate, calls for a code of conduct for online advertising, and requires VLOPs to undergo a yearly audit on their own expenses. Fact-checkers are not mentioned in the DSA, but they can be considered possible actors that help platforms identify risks to the integrity of the information environment. This aspect has been highlighted in the Commission's guidelines to mitigate systemic risks, which were published ahead of the 2024 European elections (European Commission, 2024a). This communication reiterates the desirability of platforms' cooperation with

<sup>1</sup> As well as "very large online search engines" or VLOSEs.

fact-checking organizations and recommends adding fact-check labels or deprioritizing content that such organizations found to be unreliable.

Additional protections of the online information environment in the EU can be found, among others, in the *Digital Markets Act*, the *Artificial Intelligence Act*, and the *Regulation on the transparency and targeting of political advertising* (European Commission, 2022d, 2024d, 2024e). These regulatory texts aim at safeguarding the integrity of information landscapes, either by preventing anti-competitive behavior, prohibiting certain harmful behaviors and introducing new transparency measures. An explicit mention of fact-checkers can be found in the *European Media Freedom Act* (EMFA) (European Commission, 2024b), a regulation that protects the independence of news media, which sees a role for fact-checking organizations in identifying which media outlets could receive preferential treatment by content moderators, according to Art. 18 of the regulation.

Apart from legislation, the European institutions also provided financial and organizational support to fact-checking organizations. As an outcome of the Commission communications, the Social Observatory for Disinformation and Social Media Analysis (SOMA) was launched in 2018, with the aim of bringing together organizations interested in mapping disinformation, among them fact-checking organizations, as well as creating a repository of fact-checks. As a follow-up, in 2020, the European Digital Media Observatory (EDMO) was established as a permanent structure to support the work done under the CoP with the involvement of media literacy, fact-checking and research organizations – by 2022, it had established local hubs that represented all EU member states, and, at the time of writing, had a network of 53 fact-checking organizations that covered all EU member states (Edmo.eu, 2025).

In order to contribute to the funding of fact-checking organizations, grants were made available by the European Commission and the European Parliament. Apart from funding projects to monitor disinformation and verify content (see, for example, European Commission, 2022b; European Parliament, 2024a), they also enabled the establishment of the European Fact-Checking Standards Network (EFCSN), which operates as a network and representation of fact-checking organizations in the EU and its neighborhood (European Commission, 2021). Anti-disinformation measures are also part of the EU's foreign policy. Untrue narratives are addressed as part of the measures against FIMI (Foreign Information Manipulation and Interference), which refers to a wide range of manipulative efforts by foreign governments, and identifies its targets not based on content but the behavior of actors, the so-called "tactics, techniques and procedures" (Hénin, 2023). The next sections examine the insights collected through interviews to understand how relevant actors see the role of this policy landscape in the work of fact-checkers.

### The development of European fact-checking

The organizations involved in fact-checking are very different in size, activities, and operations. The number of their employees can be somewhere between a handful and more than a hundred. Some operate as departments of private media outlets, public service media or news agencies, while others are standalone outlets that consider fact-

checking their main activity. Graves and Cherubini (2016) observed that fact-checkers are more likely to be non-profit start-ups in Southern and Eastern Europe. Some interviewees also mentioned that their organization had dedicated departments working on media literacy projects or developing software to help verify content. In certain cases, training activities for journalists were also considered important. All interviewees saw fact-checking as a form of journalistic work – or a genre of it – similar to investigative journalism. Nevertheless, not all interviewees had a journalistic identity. This includes some of those with a non-journalistic background and those working on tasks other than content verification. Interviewees mentioned that the main characteristics of the fact-checking profession were the rigorous methodology of verification and the strict rules that organizations follow. Many of them highlighted that the community of fact-checkers was highly professionalized, despite the fact that most of the organizations were established only in the last decade. At the time of the interviews, many European fact-checkers considered themselves to be part of an international, or at least Europe-wide, community that exchanged best practices, regularly met at conferences and networking events, and often collaborated on shared projects.

The history of fact-checking projects in Europe goes back to the early 2000s (Graves & Cherubini, 2016), but, according to the recollection of interviewees, the focus of the projects of the time was different from the verification of content on social media, as envisioned by the Commission in its communications. The Italian *Pagella Politica* and the Spanish *Maldita* were influenced by the U.S. fact-checking networks that gained prominence around the 2012 election campaign, focusing on verifying statements made by politicians (see Graves, 2016). The Austrian *Medizin Transparent* was set up to correct unfounded medical statements in print media and popular websites (Kerschner, personal communication, November 19, 2024).

The Russian Federation's occupation of Crimea in 2014, the Brexit referendum and the U.S. election campaign of 2016 were seen as wake-up calls, indicating that holding politicians to account alone is not sufficient for fact-checking organizations, since false narratives were spread by multiple accounts on social media. Policymakers, civil society actors, and commentators believed that such content could manipulate public opinion, compromise the outcome of votes, or influence political decision-making (Henkel, 2021; Nitszke, 2022). Multiple incentives contributed to fact-checking organizations becoming involved in the activities related to the so-called “debunking” (verification) of false narratives spreading on social media. Carlos Hernández-Echevarría, Associate Director of *Maldita*, explained it with his organization's interest in reaching the wider society, as the verification of politicians' statements was a topic that was rather consumed by people who were already avid followers of political developments (personal communication, August 26, 2024). The role of the policy field was also evident as interviewees mentioned the European Commission's expression of interest in having a stronger culture of debunking, the example of American fact-checking organizations focusing more on conspiracy theories and online disinformation campaigns, as well as the emerging opportunity to get funded for such exercises by tech companies.



Cooperation played an important role in elevating fact-checkers' symbolic capital. The first collaborative effort in Europe was First Draft's *CrossCheck* project in 2017, ahead of the French presidential election. It brought together 37 media organizations and technology companies to monitor and verify information spreading on social media related to the election campaign. The French news agency AFP (*Agence France-Presse*) was responsible for the editorial workflow of this project and for finalizing the common investigations that were cross-checked by the participating media. AFP has since become one of the biggest fact-checking operations worldwide, with 150 journalists working in 26 languages (Bohner, personal communication, November 27, 2024).

As shown in the previous section, the European Commission's interest began around 2018, with the establishment of the HLEG, as well as a number of policy documents published in the same year. Initially, both the representatives of the European Commission and fact-checking organizations were cautious about collaborating. The Commission did not want fact-checkers to be seen as "an instrument in the hand of the public authorities" (Cesarini, personal communication, December 9, 2024), while Alexios Mantzarlis, who represented the International Fact-Checking Network at the HLEG, was initially not sure whether engagement with the European policy community was helpful or rather detrimental to fact-checkers in Europe. As motivation for his participation in the expert group, he said, "I wanted to make sure that nothing [...] that would have strange consequences on fact-checkers made it into the text" (personal communication, November 8, 2024). One of his fears was that EU institutions would expect from fact-checkers to reiterate the European Commission's messages in their work.

Due to the initial skepticism of some fact-checking projects, a "climate of trust" had to be created, said Paolo Cesarini, then unit leader at the European Commission (personal communication, December 9, 2024). It began with the creation of SOMA in 2018, the first EU project to involve fact-checkers. Cesarini added that, at the time, disinformation policy and platform governance was a new topic in the EU, thus, it was not initially clear what role fact-checkers could play in this policy setting. Still, the policy documents of the Commission already indicated that the insights of fact-checking organizations could be relevant when online platforms took action against disinformation content. The SOMA project was followed two years later by a larger collaborative exercise, called EDMO, which involved Pagella Politica as the coordinator of fact-checking activities. Its task was to create synergies in fact-checking and disinformation communities and to provide data collection and analysis said Paula Gori, Secretary General of EDMO (personal communication, October 30, 2024). Its role became more prominent in the following years. Even at that stage, the creation of a European network of fact-checkers and a repository of fact-checks was high on the the Commission's agenda.

### Increased role of the community

The push for a greater role of fact-checkers came with the Commission's communications during the COVID-19 pandemic and the assessment of the impact of the first Code of Practice on Disinformation. "There was an impression that the platforms

did not take into account sufficiently the knowledge generated by fact-checkers”, said Paolo Cesarini (personal communication, December 9, 2024). This became evident in the context of EDMO, where it was shown that fact-checking has a potential to reach wider audiences, as it is either done or covered by news media (Gori, personal communication, October 30, 2024). Thus, the new disinformation policies placed greater emphasis on fact-checkers, including the Strengthened Code of Practice on Disinformation in 2022.

At the same time, a call was published to facilitate the creation of an international fact-checking body (European Commission, 2021), which resulted in the European Fact-Checking Standards Network (EFCSN). Aside from the idea of the network, the policy community gave full ownership to the fact-checkers that formed the winning coalition. “On the specifics, we had zero input from the Commission, so we didn’t have any suggestion whatsoever in terms of how to organize the association internally, [and] what to write in the code [of standards],” said Giovanni Zagni, one of the members of the founding consortium (personal communication, October 23, 2024). The network acts as a representation of its certified members and one of its main objectives is “to ensure that standards are being complied with in the fact checking community”, said Stephan Mündges, Coordinator of the EFCSN (personal communication, September 23, 2024). The Code of Standards includes rules on the transparency of the funding and organizational structure of fact-checking organizations, as well as a robust methodology that members need to follow when doing their work (EFCSN, n.d.). While an international organization with similar standards already existed – the International Fact-Checking Network – it was important for the Commission to foster the creation of a European equivalent. According to interviewees, this was a priority because a European network could foster stronger collaboration between organizations in EU member states, and the European context allowed for the introduction of stricter rules than the ones existed internationally, such as transparency of funding, as European fact-checkers do not have to fear the repercussions of authoritarian governments.

Among interviewees, there was a consensus that the standards of the EFCSN were the most demanding in the profession. In order to become a member, fact-checking organizations need to undergo a review by two experts in the field, who make a detailed assessment on whether the organization in question successfully complies with these criteria. Members consider this an important certification of quality and trustworthiness in an environment in which both journalism and fact-checking are constantly targeted by smear campaigns from illiberal forces. Moreover, the EFCSN, alongside the EU-funded grants and projects that put an emphasis on collaboration between fact-checkers of different countries, has strengthened the international character of fact-checking. Out of our sample, only the representative of the German Volksverpetzer expressed a preference not to participate in international projects or apply for any other form of funding other than donations coming from readers. The outlet’s founder, Thomas Laschyk, justified this with a decision to prioritize fact-check production over grant applications, administrative tasks and coordination with other organizations. He also noted that reader-generated revenue is first and foremost dependent on journalistic output. At the same time, he mentioned that he had attended a number of calls with other German-language fact-

checking organizations, thus being informed about the relevant developments in the community (personal communication, November 20, 2024). This is not the only example in which the EU fact-checking community showed to be influential beyond the highly engaged fact-checkers of EU countries. The EFCSN had 56 members at the time of writing, as well as a group of mentees in its incubator program, a number of which were from the EU neighboring countries. Moreover, many interviewees viewed the standard-setting role of the fact-checking community as one that can have an effect on the broader journalistic field – as fact-checkers highlighted a significant deterioration of journalistic standards in their national contexts.

### Fact-checkers' influence on the policy field

Despite being a journalistic activity, some interviewees from the policy community – and also one of the fact-checkers – considered fact-checking organizations to be part of “civil society”. By this, they referred to the role these organizations play within the disinformation policy landscape: as part of a wider community of private, mainly non-profit, organizations that ensure the integrity of the policymaking process. In the European Commission's work outside of the EU, the term “media communities” is also used as a value-neutral term in environments in which governments are hostile towards activists, journalists or fact-checkers (Anonymous, personal communication, November 19, 2024).

Looking at fact-checkers as part of a broader civil society, rather than simply as journalism practitioners, becomes especially relevant if we take into consideration that many representatives of fact-checking organizations are also becoming vocal in policy discussions. Interviewees mentioned many different activities that could fall into the category of policy-work. These can be grouped into three main categories: a) contribution to the execution of policies on online platforms; b) assessment of narratives and disinformation trends to inform policy; and c) shaping of policies that have an impact on the work of fact-checkers.

Work with platforms started through the third-party fact-checking program of Meta (see Bélair-Gagnon et al., 2023). At the time of the interviews, many interviewees also reported working for TikTok. Their task was to fact-check pieces of content, so that platforms could take appropriate action. While platform governance includes the removal or (de-)amplification of content (Reviglio et al., 2025), fact-checkers see the use of their work by platforms not as a content moderation effort. As Giovanni Zagni explained, “the aim of fact checking is not so much to remove, censor, cancel, control content as it is to provide context to the reader” (personal communication, October 23, 2024). This work with platforms will be discussed in more detail in the section addressing power relations between fact-checkers and platforms.

Participating in the work of the European Digital Media Observatory (EDMO) meant that fact-checking organizations worked on a regular assessment of the most common false narratives circulating in Europe – with a special focus on mis- and disinformation spreading ahead of elections. Bastien Carniel also sees a role in “observing compliance

with EU and self-regulation” – an example is the development and testing of “structural indicators” (Nenadić et al., 2024). These indicators help assess how impactful the Code of Practice (CoP) has been when it comes to limiting the spread of disinformation. The data and methodologies used by fact-checkers, and their methodology employed to determine whether a piece of content can be considered mis- or disinformation, can be helpful when assessing the extent of harmful content in the information environment (personal communication, September 25, 2024). As part of the EFCSN, fact-checkers assessed how platforms were complying with their duties under the CoP (EFCSN, 2024a) and called out technology companies when they intended to scale back their commitments to support fact-checking (EFCSN, 2025b).

In the context of EDMO and the CoP, fact-checkers also worked on monitoring disinformation narratives during elections, as well as contributed to the work of the CoP’s rapid response system (EDMO, 2024). It was seen as a success that the fact-checkers of the Bulgarian-Romanian Observatory of Digital media (BROD) conducted an analysis of the Romanian election campaign, which brought the issue to the attention of the College of Commissioners. Interviewees believed that this contributed to the increased awareness about campaign manipulation in Romania that led to the Romanian Constitutional Court’s decision to cancel the country’s presidential elections (see Anghel, 2024).

The shaping of policies takes place through participation in policy discussions but also through campaigns on dedicated topics. After the European Commission announced its intent to strengthen the CoP, some fact-checking organizations decided to join the self-regulatory mechanism as signatories. This allowed them to have a say in the formation of commitments. The most visible contribution of the fact-checking community has been its active resistance against the so-called “media exemption” or “media privilege”, which was first proposed in the context of the Digital Services Act and became later, in an altered form, Article 18 of the European Media Freedom Act<sup>2</sup> (see, for example, EU DisinfoLab, 2021). The initial amendment proposals of the European Parliament’s Committee on Culture and Education (CULT, 2021), and Committee on Legal Affairs (JURI, 2021) argued that media providers should be exempted from platforms’ “supervisory function”, as they are already subject to regulation or self-regulation in the countries they operate. Fact-checkers considered this special status of media outlets a possible risk, as there are many examples of media outlets publishing disinformation (Tsfati et al., 2020) – either on purpose or by accident – and such an arrangement would leave such content unaddressed. They voiced their opposition at public events and bilateral meetings, as well as through the publication of statements (see EFCSN, 2023).

The representatives of fact-checking organizations that participated in policy discussions or campaigns argued that the work they did was justified by the fact that developments in the field of disinformation policymaking had an impact on the fact-checking profession as well. They also emphasized that the problems related to disinformation were complex and constantly evolving, thereby needing non-traditional actors in the policymaking process. Moreover, being part of the discussion allowed them

<sup>2</sup> In the EMFA proposal, it was Art. 17.

to increase the impact of their fact-checking work. As Carlos Hernández- Echevarría of Maldita said: “We [...] understood as an organization, as a foundation, that we couldn’t just publish the fact-checks and let them be there for people to consume. We needed to amplify our impact in other ways and make sure we have better laws around disinformation and more accountability from platforms and all that” (personal communication, August 26, 2024).

Hernández-Echevarría remembers the start of his organization’s engagement with policy as follows:

There were not a lot of fact-checkers that could really devote resources to [policy work], but Maldita was one of them. So, I became very involved in the negotiation of the actual content of the Code of Practice, because we all had in mind at the time that [the CoP] was gonna be a code of conduct under the DSA. And the DSA was [...] an opportunity to ensure that disinformation was a bit more of a priority for the platforms and we wanted [it] to be meaningful, to make sure this protected freedom of speech. We saw this as an opportunity to have a say in what the commitments for the large platforms may become. (personal communication, August 26, 2024)

Hernández-Echevarría added that his organization has a broad understanding of the policy topics that are relevant to his organization. While other interviewees mentioned that they only look at topics that impact the work of fact-checkers, Maldita’s representative considered the accountability of online platforms and the implementation of the DSA as the “key issues”. He continued by saying: “We also do a lot of policy work around media self-regulation and generally anything that touches on disinformation or could have a significant impact on disinformation. It is on our radar when it comes to policy work” (personal communication, August 26, 2024).

Jelena Berković, Policy Advisor at Faktograf, explained that she joined the policy discussions because she had realized that there was a momentum in the European Union to shape policy – she saw this as a “watchdog” activity and an act of “advocacy in the name of journalism as public good”. As a representative of an organization from Croatia, a country that joined the European Union only in 2013, the work on policy-relevant issues had not been new to her. As the country was democratizing and implementing new laws to comply with the EU’s recommendations, the input from representatives of the journalistic profession was sought by the policy community in Brussels, in order to assess whether the local environment is conducive to quality journalism (personal communication, November 20, 2024).

Using its strong network, Commission support, as well as its expertise in monitoring and debunking disinformation, the fact-checking community could thus turn its cultural and social capital – hence their legitimacy – into a tool to influence online platforms’ policymaking. While there might still be risks that the work on policy may compromise the activity of fact-checkers, even the interviewees who abstained from policy discussions did

not view the current activities as problematic. It was mentioned that the wider journalistic community is also represented through journalistic associations, such as the European Federation of Journalists and Reporters Without Borders, that share their positions on policies that might affect the journalistic profession. In addition, it was noted that the integrity of the fact-checking profession can be safeguarded through a clear separation between editorial and policy activities of the outlets. As Vincent Couronne said: "I'm the CEO of Les Surligneurs. So, I do policy, and I have an editor-in-chief, to whom I cannot give any instruction on what topics to cover" (personal communication, January 13, 2025). Finally, Alexios Mantzarlis added that power relations also play a role when assessing the legitimacy of policy activities. In his opinion, if the attempt comes "from little power trying to influence big power, which is the EU regulators, then I think that's fine" (personal communication, November 8, 2024).

### **Fact-checkers in the fields of power: between the Commission and platforms**

While fact-checkers have developed their own social and cultural capital, the economic capital they relied on came from fields that they needed to scrutinize. In the following paragraphs, we will therefore first assess fact-checkers' relationship with the European Commission and then the dynamics between fact-checkers and online platforms. We will also address possible risks and proposals to mitigate them.

Funding from public entities is controversial in a profession that derives its legitimacy from its independence – especially American stakeholders are distancing themselves, while in Europe there is more of a tradition of public support for the media (Murschetz, 2020; Neff & Pickard, 2024; Pickard, 2011). At the time of writing, the investigative journalism network Organized Crime and Corruption Reporting Project was criticized by some members of the journalistic community, as it received a significant share of its finances from the US State Department (Philippin & Candea, 2024). Many interviewees mentioned that they would not be willing to accept support from the governments of the countries in which they operate,<sup>3</sup> but the European Commission was considered an acceptable source of funding by almost all of them. As justification, they mentioned the European Commission's good track record, as it did not try to interfere with the work of the fact-checking community, the Commission's distinctness from national governments and the specific conditions in Europe. Alexios Mantzarlis, for example, highlighted that the multiple state borders and the languages spoken in Europe require the creation of networks that are costly to maintain, while funding is scarce, as fact-checking organizations cannot generate sufficient reader revenues, and Europe also lacks the philanthropic landscape that American fact-checkers can rely on. "The countries where independent journalism has less of a strong history, including my own of Italy and Greece, the fact-checking organizations came out of nonprofit land", he said (personal communication, November 8, 2024).

<sup>3</sup> The only case where national support was available to a larger extent was Croatia, where the Council for Electronic Media established a fact-checking fund from the European Union funds for resilience and recovery. Jelena Berković highlighted that it is a one-time grant, that can uphold its independence by funding "the method of journalism, not the output" (personal communication, November 20, 2024).

In this context, again, representatives of countries that joined the EU in the new millennium, and had started democratizing only in the 1990s, see the involvement of states in the development of independent media as less paradoxal. As Jelena Berković of Faktograf said: “I’m very much used to taking foreign democratic money for democratic development and using it for whatever makes sense in this particular development of democracy” (personal communication, November 20, 2024). In fact, there is ample literature showing how important media development assistance has been in the past decades (Mottaz, 2010; Bleyer-Simon, 2022).

As previously highlighted, independence is also important for European institutions. Thus, the selection and evaluation of grants is done by independent assessors, and Commission employees make sure not to request anything from the fact-checkers that would fall under independent editorial decision making. “We have a very clear mandate and limitations, and then we mustn’t interfere in their actions. So, if they would fact-check us, this can also happen, because there has to be accountability in all of this”, said an anonymous representative of the European Commission (personal communication, November 19, 2024).

At the time of the interviews, revenues from online platforms were the main source of income for most of the organizations in this sample (albeit there were some fact-checkers that had no platform revenue whatsoever). Many of them were part of third-party fact-checking programs, especially working for the platforms of Meta (Facebook, Instagram and WhatsApp), as well as TikTok. Some interviewees referred to the platforms as “frenemies”: they engaged with policymakers and civil society in discussions over content moderation and the mitigation of risks, committed to take certain measures and financed activities, despite having a strong monetary incentive to let controversial content flourish on their services. This situation makes the collaboration fragile.

To reduce the vulnerability of fact-checkers in this unequal relationship, the European Commission included a commitment in the CoP stating that fact-checking should be supported by platforms. At the same time, the interviewees believed that the Commission’s policies were not responsible for these platform cooperations – albeit helpful in scaling up and maintaining them. Instead, they considered the third-party cooperation a direct outcome of the developments of the United States, where Meta started cooperating with fact-checkers as a response to a number of scandals that broke about the spread of harmful content on their platforms. Meta, at the time, chose to cooperate with fact-checkers that were certified members of the International Fact Checking Network (IFCN). Alexios Mantzarlis, who was the director of the organization at the time, believes that the collaboration came to existence due to the IFCN’s ability to seize the moment, and propose a fact-checking collaboration to platforms at a time when they needed to invest in the improvement of their public image. “If you give a ready-made solution to a platform in crisis, at the right moment, they’ll take it”, said Mantzarlis (November 8, 2024). The choice of IFCN can be considered an outcome of its cultural and social capital, as it represented a network of organizations that were vetted for their standards and methodology. The spread of disinformation was not the only



scandal related to online platforms; Google and Facebook were also criticized for hurting the revenues of the press, which had already led to journalism support programs in the past (see González-Tosat & Sádaba-Chalezquer, 2021).

The interviewed fact-checkers said that, in the context of third-party collaborations, they could work freely, without interference from platforms. Platforms were not willing to pay for fact-checking content that originates from politicians; nevertheless, fact-checkers that had political disinformation in their portfolio continued to assess that kind of content as well. Some interviewees highlighted that the EFCSN could be one of the most effective tools in navigating the power relations – both with the Commission and the platforms. As Bastien Carniel of Science Feedback highlights, the EFCSN “acts as a layer that has the admin capacity, financial capacity, and brand recognition” to improve their bargaining positions. The strengthening of the EFCSN’s symbolic capital was made clear by Meta’s decision to accept EFCSN membership as an entry requirement into the third-party fact-checking program (EFCSN, 2024). Carniel added:

Fact-checking organizations are very small and lack the resources to push for things that are in our collective interest, but not sufficiently important for each of the organizations, individually to take up. For instance, we know that our content gets scraped a lot and used by commercial actors to train AI models or things like that, but we don’t have the resources to go to make sure to go negotiate deals with OpenAI and people like that. It’s in their mandate to actually take all these concerns and go reach out to OpenAI or Google. (personal communication, September 25, 2024)

Another way in which interference could be minimized was the creation of a “clearing house”. One example is the European Media and Information Fund, which provides grants to fact-checkers, researchers and media literacy professionals. Its funding comes from private donors, chiefly Google, but the tech company has no say when it comes to the selection of supported projects (Cesarini, December 9, 2024).

During the interviews, many fact-checkers noted that organizations need to be prepared that Meta or TikTok may at some point end their cooperation with fact-checking organizations. Both policy and fact-checking community representatives highlighted that diversification of revenues could further strengthen the independence of fact-checkers. Jelena Berković of the Croatian organization Faktograf, for example, argued that, in an optimal scenario, no source of revenue would contribute to more than 20 percent of the budget (personal communication, November 20, 2024). Fact-checkers also mentioned the need to collect revenues from readers and to start crowd-funding campaigns, but at the time of writing reader revenues did not manage to become an important component of the revenue mix. The only exception in the sample was Volksverpetzer. However, this outlet admittedly differed from the rest of the organizations, by taking an activist stance, using a satirical tone, prioritizing fact-checks that looked at prominent topics and had the potential to go viral, as well as putting the emphasis on mainstream conversations, including sensationalist content in tabloid media (Laschyk, personal communication, November 20, 2024).



## DISCUSSION AND CONCLUSION

Fact-checking is a journalistic format that is widely practiced in the European Union and its neighbors. As the fact-checking method is used to address disinformation, both policymakers and online platforms have developed an interest in working with the fact-checking community. The European Commission has included the support of fact-checking organizations, as well as a request for the integration of their services into online platform content moderation, in a number of its policy documents, while tech companies have relied on the services of fact-checkers to signal to users and the policy community that they are working on mitigating the risks posed by disinformation.

In this constellation, fact-checking could emerge as an autonomous field with sufficient symbolic capital to influence the neighboring fields of policymaking and platform operation. Fact-checkers have participated in the formation of policies and successfully occupied a role in platform governance. However, fact-checkers were aware at the time of the interviews that their position was vulnerable, as a significant percentage of their economic capital still depended on the revenues coming from the technology companies and the policy community. The interviews showed that fact-checkers had successfully strengthened their symbolic capital, by building a robust system of rules and transparency and making it clear to observers that their actions are independent of interest groups. This can be crucial, as platforms would have a harder time justifying ceasing to work with fact-checkers if both the policy community and the users see value in their work. While fact-checkers did not manage to achieve financial independence from platforms and the policy community, the interviews show that the European Commission acted as an ally to the fact-checkers vis-a-vis the platforms, by providing them with means to establish some diversity of funding and to strengthen both their cultural and social capital, by building networks and collaborations.

The latest developments show that the protection of democracy and the integrity of the information environment appear to remain a priority for the European institutions, even in the years 2024-2029. The President of the Commission, Ursula von der Leyen announced the establishment of a so-called Democracy Shield (European Parliament, 2024b) to further this goal in the coming years. At the same time, there were several worrying trends in national politics, with election successes of leaders who are hostile towards the press and fact-checking, both inside and outside the European Union. After most of the interviews were conducted, Meta announced in the United States that it is going to end its cooperation with the country's fact-checking organizations – an action that was made possible due to a change in the country's political environment, as the re-elected Donald J. Trump framed platform-moderation as a threat to freedom of expression (Zahn, 2025). The representatives of most major technology platforms attended Trump's inauguration, in January 2025, and soon after he assumed power, Elon Musk – at the time the richest man of the world – was appointed to head the Department of Government Efficiency (DOGE) – an advisory body that initiated job cuts and the cancellation of numerous overseas grants (Clarke, 2025). American tech billionaires have been increasing

pressure on European governments (Bleyer-Simon & Marx, 2025). Musk, who fell out of Trump's favor in June 2025, has also openly supported European far-right actors and used his X social media platform to amplify disinformation (Zitelli, 2025).

There was no information about the possible ending of cooperation with fact-checkers in Europe, but European fact-checking organizations held an emergency meeting on the day of the announcement, to come up with a common position to counter the claims about censorship and ineffectiveness, and to prepare for a possible loss of funds. At the time of writing, no official assessment had been made, but fact-checking organizations estimated that the withdrawal of Meta would deprive EU fact-checking organizations of EUR 30 million per year. It is a significant amount. Most fact-checking organizations would need to downsize, some of them may not be able to continue operating. The EFCSN (2025b) published a statement in which they highlighted the possible risks of the tech company's decision to end its engagement with fact-checkers.

Whether the European Commission can provide protection to the fact-checking community and incentivize fact-checkers with its regulatory regime remains to be seen. Vincent Couronne, CEO of Les Surligneurs, who we interviewed after the announcement of Meta, said that the coming months would become a "stress test or crash test for DSA in the EU", and the success of the exercise will depend on whether the European Commission, the body in charge of the enforcement of the regulation, can act as a law enforcement authority rather than a political institution. He added that a self- and co-regulatory tool, such as the Code of Practice on Disinformation, can only become successful if political institutions are stronger than the private companies (Couronne, personal communication, January 13, 2025).

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## Appendix

### List of interviewees

>Anonymous European Commission official, November 19, 2024

>Anonymous interviewee from unnamed fact-checking organization, November 29, 2024



- >Anonymous European Commission Official, January 8, 2025
- >Jelena Berković, Policy Advisor at Faktograf, November 20, 2024
- >Marie Bohner, Head of Development and Partnerships, Digital Investigation, Agence France-Presse, Member of the Governance Body of the EFCSN, November 27, 2024
- >Tommaso Canetta, Deputy Director of Pagella Politica, September 10, 2024
- >Bastien Carniel, Data & Policy Lead at Science Feedback, September 25, 2024
- >Paolo Cesarini, Chair of the Executive Board of the European Digital Media Observatory, December 9, 2024
- >Vincent Couronne, General Director of Les Surligneurs, Member of the Governance Body and Treasurer of the European Fact-Checking Standards Network, January 13, 2025
- >Paula Gori, Secretary General of the European Digital Media Observatory, October 30, 2024
- >Carlos Hernández- Echevarría, Associate Director of Maldita, August 26, 2024
- >Bernd Kerschner, Editor-in-Chief at Medizin Transparent, November 19, 2024
- >Irene Larraz, Coordinator of Verification at Newtral, December 13, 2024
- >Thomas Laschyk, Founder and Editor-in-Chief at Volksverpetzer, November 20, 2024
- >Alexios Mantzarlis, Online Information Quality Professional, November 8, 2024
- >Stephan Mündges, Coordinator of European Fact-Checking Standards Network, September 23, 2024
- >Nelly Pailleux, Chief Operations Officer at Les Surligneurs, December 17, 2024
- >Jochen Spangenberg, media practitioner, Member of the Advisory Board of the European Digital Media Observatory, November 18, 2024
- >Treasurer of the European Fact-Checking Standards Network, January 13, 2025
- >Giovanni Zagni, Director of Pagella Politica, October 18, 2024 & October 23, 2024

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## UTVRĐIVANJE ČINJENICA KAO FOKUS JAVNIH POLITIKA EU-A

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Konrad Bleyer-Simon

**SAŽETAK** Utvrdjivanje činjenica (engl. fact-checking) popularan je novinarski oblik koji se naširoko koristi diljem Europske unije kao odgovor na dezinformacije i druge lažne narative koji se šire i putem društvenih mreža i putem tradicionalnih medija. Kako bi potaknula njegovu širu primjenu, Europska komisija uključila je u brojne svoje strateške dokumente podršku organizacijama za utvrđivanje činjenica, kao i zahtjev za integraciju njihovih usluga u moderiranje sadržaja na internetskim platformama. Aktivnosti nadzora koje provode oni koji utvrđuju činjenice tako postaju dijelom javnih politika EU-a, što pak omogućuje tim organizacijama da oblikuju politike – iako ne bez određenih prepreka, s obzirom na to da mnoge osobe koje utvrđuju činjenice ovise o financiranju tehnoloških kompanija i europskih institucija. Cilj ovog rada jest bolje razumjeti europski krajolik utvrđivanja činjenica te identificirati na koje načine organizacije koje se time bave komuniciraju s donositeljima politika u EU-u, kako europske institucije i zajednica za utvrđivanje činjenica mogu međusobno utjecati jedni na druge, kao i kakvi su odnosi moći između organizacija za utvrđivanje činjenica i internetskih platformi.

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### KLJUČNE RIJEČI

UTVRĐIVANJE ČINJENICA, EUROPSKA UNIJA, UPRAVLJANJE PLATFORMAMA,  
DRUŠTVENE MREŽE, DEZINFORMACIJE

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Bilješka o autoru \_\_\_\_\_

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