



EUROPEAN BOARD
FOR DIGITAL SERVICES



Report on the European Elections

Digital Services Act

and

Code of Practice on Disinformation



A Report by
**THE EUROPEAN BOARD
FOR DIGITAL SERVICES**

DISCLAIMER

The positions presented in this document result from cooperation of the members of the Ad Hoc Working Group on Elections of the European Board on Digital Services and the European Commission's services with a view to assessing the actions taken under Regulation (EU) 2022/2065, the Digital Services Act (DSA), in the run-up to and during the European elections that took place between 6-9 June 2024.

The positions presented in this document do not account for an assessment of actions taken by regulated service providers or prejudge any future actions the European Commission or the Digital Services Coordinators may undertake in the enforcement of the DSA. In particular, the assessment of the conduct of these elections may change, should new evidence bring potential infringements of the DSA to light.

As referred to in the Recommendation on inclusive and resilient electoral processes in the Union and enhancing the European nature and efficient conduct of the elections to the European Parliament presented in the context of the Defence of Democracy Package, in December 2023, the Commission will issue a comprehensive report on the conduct of the 2024 elections to the European Parliament. This report will take into account different sources of information including information provided by Member States.

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Executive summary

The **Digital Services Act (DSA)** is a new, global first-of-its kind rulebook for platform responsibility.⁽¹⁾ With the DSA, the European Union possesses a powerful regulatory framework to assess and mitigate risks to the information environment in the EU, while safeguarding fundamental rights. The DSA is complemented by the **Code of Practice on Disinformation**, the first worldwide industry-led framework in the digital field and source of industry best practices to limit the spread of online disinformation.

This report gives an overview of the actions taken by the European Commission and **Digital Services Coordinators (DSCs)** to monitor compliance and to enforce the DSA, as well as the actions undertaken under the Code of Practice on Disinformation and the actions taken by the **European Digital Media Observatory (EDMO)** in the context of the European elections that took place between 6 and 9 June 2024. This report is not an assessment by the Commission of the actions undertaken by VLOPSEs for the European elections.

The Commission has been using all tools available under the DSA to ensure systemic risks to civic discourse and electoral processes are adequately addressed and mitigated on very large online platforms and search engines (VLOPSEs).

Since the DSA entered into force for designated VLOPSEs in August 2023, **the Commission has actively monitored VLOPSE's risk assessment and mitigation** during national elections taking place in Member States, cooperated with national authorities and organised readiness dialogues on election integrity with VLOPSEs.

In April 2024, in the run-up to the European elections, the Commission issued **Guidelines for the providers of VLOPSEs**, after public consultations, which recommend risk mitigation measures for electoral integrity.⁽²⁾ As a follow-up to these Guidelines, the Commission organised a **stress test in the form of a tabletop exercise** to prepare VLOPSEs, civil society organisations, DSCs and European institutions for information manipulation scenarios, and exercise coordinated responses under the framework of the DSA and the Election Guidelines.⁽³⁾

To monitor the compliance of providers of VLOPSEs with the DSA, the Commission has engaged in **regulatory dialogues on election preparedness** with designated VLOPSEs since the DSA entered into force. In the run-up to the European elections, the Commission organised several technical roundtables where the implementation of the guidelines was discussed.⁽⁴⁾ In addition, an **Ad Hoc Working Group** was set up in March under the European Board for Digital Services, consisting of the Commission and DSCs, with the goal of gathering the expertise of DSCs and competent national authorities on electoral issues falling within the scope of the DSA. The Ad Hoc Working Group proved to be an important venue for knowledge building, the exchange of best practices and provided the Commission with local insights and dedicated points of contact for incidents falling within the scope of the DSA.

Shortly before the European elections, the Commission also set up a **DSA Incident and Threat Response Framework**, a voluntary agreement between the Commission and DSCs

(1) [Regulation \(EU\) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC \(Digital Services Act\)](#)

(2) [Commission Guidelines for providers of Very Large Online Platforms and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes pursuant to Article 35\(3\) of Regulation \(EU\) 2022/2065](#)

(3) [Commission stress tests platforms' election readiness under the Digital Services Act – European Commission](#)

(4) [DSA Election Readiness - Roundtable with Platforms, Search Engines, and Digital Service Coordinators – European Commission](#)

with the aim to facilitate cooperation of the Board and bilateral cooperation between DSCs and the Commission during incidents falling within the scope of the DSA.

Furthermore, the Commission has taken concrete action in the context of elections and information integrity using the strong enforcement tools of the DSA. In total, over **fifty Requests for Information (RFIs)** have been sent to designated VLOPSEs including in relation to election risk mitigation measures and generative AI. Such RFIs send a strong signal to the provider of the VLOPSEs addressed, sometimes resulting in direct corrective action.

In its enforcement capacity, the Commission has **opened formal proceedings against X and Meta** on the suspicion that they do not adequately mitigate against information manipulation on their platforms. The Commission has a **range of investigative and sanctioning powers** under the DSA. Where there is an urgency to act due to the risk of serious damage for users, it can ask for interim measures. Providers may also offer binding commitments to the Commission to ensure compliance with the DSA. Where the Commission establishes a breach of the DSA, it may adopt a non-compliance decision imposing a heavy fine of up to 6% of the global turnover of the VLOPSE.

The **formal proceedings against X** opened in December 2023 concern the effectiveness to combat information manipulation on the platform, notably the effectiveness of X's 'Community Notes' system in the EU.⁽⁵⁾ On 12 July 2024, the Commission informed X of its **preliminary finding that it is in breach of the DSA** in areas linked to dark patterns, advertising transparency and data access for researchers. X now has the possibility to exercise its rights of defence by examining the documents in the Commission's investigation file. The Commission continues to investigate in particular the effectiveness of the measures taken by X to combat information manipulation.⁽⁶⁾

The **formal proceedings against Meta** opened in April 2024 concern the suspicion of insufficient mitigation measures against deceptive advertisement and coordinated inauthentic behaviour used for disinformation campaigns, such as the Doppelganger campaign, a well-known Russian operation.⁽⁷⁾ The opening decision against Meta also concerns the non availability of an effective third-party election-monitoring tool. To facilitate real-time election monitoring, public live dashboards were made available for each EU Member State through Meta's data access tool, CrowdTangle.⁽⁸⁾

Signatories of the Code of Practice on Disinformation have also undertaken a series of actions, building on the commitments and measures of the Code, to ensure preparedness and cooperation during the electoral period. In March 2024, **signatories reported about their actions to protect the European Parliament elections** based on the Code's commitments. In addition, the permanent Task Force of the Code served as an agile cooperation mechanism between signatories, including major online platforms, fact-checkers, civil society organisations and other industry players. The signatories also established a dedicated working group to exchange information and collaborate during elections. They implemented the **Rapid Response System (RRS)**, based on the Code's relevant Commitments, which enabled non-platform signatories to swiftly report to the platforms content, accounts or trends that pose a threat to the electoral process with the possibility of quick reaction and feedback by platforms.⁽⁹⁾

Another key actor complementing these actions is the **European Digital Media Observatory (EDMO)**, an independent network of fact-checkers, researchers, and media literacy practitioners covering all EU Member States. EDMO, its 14 national and regional hubs and its **dedicated Task Force on 2024 European Parliament Elections** played a crucial role in monitoring the EU's information space and exposing disinformation during the European Parliament elections, crucially enhancing situational awareness.⁽¹⁰⁾

(5) [Commission opens formal Proceedings against X under the DSA, 18 December 2023](#)

(6) [Commission sends preliminary findings to X for breach of the DSA, 12 July 2024](#)

(7) [Commission opens formal proceedings against Facebook and Instagram under the DSA, 30 April 2024](#)

(8) [2024 European Parliamentary Elections | Live Displays - CrowdTangle](#)

(9) [The Code of Practice on Disinformation](#). In particular, Commitment 37 and Measure 37.2.

(10) [Task Force On 2024 European Parliament Elections - EDMO](#)

The Commission's initial assessment is that there were **no major or systemic incidents that disrupted the conduct of the European elections**. The incident level was in line with expectations and the preparations and coordinated response paid off.⁽¹¹⁾ However, the Commission will continue to assess evidence as it becomes available.

After the European elections, the underlying threat of mis- and disinformation and foreign information manipulation and interference is likely to evolve. **Continued investment in countering such threats will remain a high priority**. The Commission, together with the DSCs, will continue to monitor the situation and assess VLOPSEs' compliance with the DSA. The Commission will not hesitate to take regulatory action under the DSA, should this be merited.

The Commission remains vigilant for upcoming elections in the EU. The DSA Election Guidelines remain applicable, and **the Commission will monitor platforms' compliance for upcoming national, regional, and local elections** in the context of risks to electoral integrity. The Ad Hoc Working Group of the Board will be integrated into a **permanent Working Group**, where the Commission and DSCs will continue to build on and exchange knowledge. Work under the Code of Practice on Disinformation on elections shall also continue, notably in its Election Working Group, including **finalising and stabilising the Rapid Respond System** of the Code for future elections. Additionally, the Code of Practice **shall become a co-regulatory part of the DSA** in the next months.

(11) [EU Elections 2024: the battle against disinformation was won, but the attrition war is far from over - EDMO](#). As anticipated, EDMO noted an increase in EU-related-disinformation ahead of the EP elections, which amounted to 15% of the total detected disinformation in the month before the vote, compared to 11% two months before the elections. This increase is in line with usual trends where disinformation follows information trends, in this case a heightened focus of the information space on the EU around the EP elections. At the same time, the EDMO Task Force on 2024 European Elections did not detect any major disinformation incidents during the elections.

1. Introduction

In the European Union, elections have and will take place at European, national, regional, and local level in 2024. Safeguarding the integrity of these elections online is a key priority for the European Commission and Digital Services Coordinators (DSCs). The online information environment plays a significant role during electoral periods, with citizens increasingly relying on very large online platforms and search engines (VLOPSEs) for election related information.⁽¹²⁾ The shift to online news consumption, such as online video-based content among younger citizens, and the advancement of new technologies, such as generative artificial intelligence (AI), showcase the evolving nature of the information environment.⁽¹³⁾

Additionally, misinformation and disinformation have been ranked as the number one short-term risk in the 2024 Global Risks report of the World Economic Forum⁽¹⁴⁾, while the most frequently cited threat to democracy by EU citizens is 'false and/or misleading information in general circulating online and offline', according to the 2023 Eurobarometer survey.⁽¹⁵⁾ In addition, events such as elections are important catalysts for foreign information manipulation and interference (FIMI) activity.⁽¹⁶⁾ These developments create challenges for trust in electoral information online and our democratic processes more broadly.

The Digital Services Act (DSA) provides strong legal obligations for providers of VLOPSEs and is equipped to deal with the challenges highlighted above. VLOPSEs are obliged to conduct risk assessments and put in place proportionate,

reasonable and effective mitigation measures in relation to actual or foreseeable negative effects on civic discourse and electoral processes, while taking into account fundamental rights such as freedom of expression.⁽¹⁷⁾ The European Commission oversees providers of VLOPSEs' compliance with such provisions of the DSA, closely cooperating with DSCs.

The Code of Practice on Disinformation is a first-of-its kind tool through which relevant players in the industry agreed - for the first time in 2018 - on self-regulatory standards to fight disinformation. The Code was substantially revised and strengthened in 2022 based on the expectations set out by the Commission in 2021, containing several commitments and measures that are relevant to counter online disinformation in the context of elections.⁽¹⁸⁾

In the run-up to the 2024 European elections, Member States, European institutions, civil society organisations as well as VLOPSEs put in place measures and set-up collaborative structures to protect the integrity of the elections. This joint election preparedness was key in keeping the elections safe, free, and fair. The Commission's initial assessment is that, while there was mis- and disinformation circulating around the elections, there were no major or systematic disinformation incidents that disrupted the elections. The incident level was in line with expectations and the preparations and coordinated response paid off. Initial reports by the EDMO Task Force on 2024 European Elections⁽¹⁹⁾ as well as civil society organisations who monitored the information space during these elections confirm this view.

(12) Eurobarometer: Media & News Survey 2023

(13) [Overview and key findings of the 2024 Digital News Report - Reuters Institute for the Study of Journalism](#)

(14) [The Global Risks Report 2024 - World Economic Forum](#)

(15) Eurobarometer Study: Democracy - December 2023

(16) [2nd EEAS Report on Foreign Information Manipulation and Interference Threats: A Framework of Networked Defence - EEAS](#)

(17) Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act) Article 34 & 35

(18) [Guidance on Strengthening the Code of Practice on Disinformation - European Commission](#)

(19) [EU Elections 2024: the battle against disinformation was won, but the attrition war is far from over - EDMO](#)

This report's purpose is to present the main actions undertaken by the European Commission and DSCs under the DSA on electoral processes in the context of the European elections, the actions taken under the Code of Practice on Disinformation as well as the European Digital Media Observatory (EDMO). This report aims to provide transparency on the actions taken, review these actions and look ahead at future elections in the EU. The report does not present an assessment or analytical information on VLOPSE' actions for the elections under the DSA or Code of Practice. The Commission is following information on VLOPSEs' actions during the European elections and will take enforcement action, where necessary. Furthermore, although other relevant activities such as the work done

by the Commission's Cyber Crisis Taskforce and Network Against Disinformation, the European External Action Service, and by Member States under the European Cooperation Network on Elections and the Rapid Alert System were also central in election preparedness, they are not in scope of this report.

After the European elections, the underlying threat of mis- and disinformation and foreign information manipulation and interference has not disappeared and is likely to evolve. ⁽²⁰⁾ Instruments such as the DSA, Code of Practice against Disinformation and the work done by EDMO will remain vital to protect our democracies.

⁽²⁰⁾ Disinformation is false or misleading content that is spread with an intention to deceive or secure economic or political gain, and which may cause public harm. Information influence operation refers to coordinated efforts by either domestic or foreign actors to influence a target audience using a range of deceptive means, including suppressing independent information sources in combination with disinformation. Foreign interference in the information space, often carried out as part of a broader hybrid operation, can be understood as coercive and deceptive efforts to disrupt the free formation and expression of individuals' political will by a foreign state actor or its agents. (European Democracy Action Plan COM(2020) 790).

2. The Digital Services Act and enforcement actions

Articles 34 and 35 of the DSA require providers of VLOPSEs to conduct risk assessments and put in place mitigation measures in relation to actual or foreseeable negative effects on civic discourse and electoral processes, including in relation to disinformation. In line with this, the Commission has carried out several enforcement actions related to systemic risks to civic discourse and electoral processes.

As one of these actions, the Commission has sent formal requests for information (RFIs) based on suspicions of infringements of the DSA to several providers of VLOPSEs on the topic of elections. These include RFIs requesting information on risk mitigation measures linked to generative AI, such as so-called ‘hallucinations’ where generative AI provides false information, the viral dissemination of deepfakes, as well as the automated manipulation of services that can mislead voters.⁽²¹⁾

Furthermore, the Commission has opened formal proceedings against providers of VLOPSEs to assess whether they have breached the DSA in several areas, including investigations related to risks to civic discourse and electoral processes. On 18 December 2023, the Commission opened formal proceedings against X to assess if X may have breached the DSA including in relation to the effectiveness of X’s measures taken to combat information manipulation on the platform, notably the effectiveness of X’s ‘Community Notes’ system in the EU and the effectiveness of related policies in relation to the mitigation of risks to civic discourse and electoral processes.⁽²²⁾ On 12 July 2024, the

Commission informed X of its preliminary view that it is in breach of the DSA in areas linked to dark patterns, advertising transparency and data access for researchers. X now has the possibility to exercise its rights of defence by examining the documents in the Commission’s investigation file. The Commission will continue to investigate in particular the effectiveness of the measures taken by X to combat information manipulation.⁽²³⁾

On 30 April 2024, the European Commission opened formal proceedings against Meta, the provider of Facebook and Instagram, to assess if Meta may have breached the DSA, including in relation to systemic risks to civic discourse and electoral processes, such as obligations related to deceptive advertisements and coordinated inauthentic behaviour used for disinformation campaigns, such as the Doppelganger campaign, a well-known Russian operation.⁽²⁴⁾ The formal proceedings also concern Meta’s policies and approach to political content and suspicions of inadequate data access for election monitoring.⁽²⁵⁾ In the run up to the European elections, Meta made 27 public live election dashboards available, one for each Member State, through the data access tool CrowdTangle.⁽²⁶⁾

The opening of formal proceedings under the DSA is the first step in a formal investigation. The Commission is now conducting in-depth investigations in relation to all formal open proceedings. The Commission may in the future, where deemed necessary and based on a suspicion of infringement open additional formal proceedings against providers of VLOPSEs.

(21) [Commission sends requests for information on generative AI risks to 6 Very Large Online Platforms and 2 Very Large Online Search Engines under the DSA – European Commission](#)

(22) [Commission opens formal proceedings against X under the Digital Services Act, 18 December 2023](#)

(23) [Commission sends preliminary findings to X for breach of the DSA, 12 July 2024](#)

(24) [EU Disinfo Lab - Doppelganger Operation](#)

(25) [Commission opens formal proceedings against Facebook and Instagram under the Digital Services Act, 30 April 2024](#)

(26) [2024 European Parliamentary Elections | Live Displays - CrowdTangle](#)

2.1 Election Guidelines

On 26 April 2024, the Commission formally adopted the first ever guidelines under the DSA addressed to providers of VLOPSEs and outlining mitigation measures for systemic risks that may impact the integrity of electoral processes. The Guidelines provide recommendations and best practices in relation to mitigation measures to be undertaken before, during and after electoral periods, with due regard for fundamental rights.

The Guidelines are drawing from the results of a public consultation, roundtables and meetings with stakeholders, as well as the DSC representatives' input through the Ad Hoc Working Group on Elections and the Board. This created comprehensive Guidelines, based on best available evidence as required under the DSA.

Substantively, the adopted Guidelines include recommendations on reinforcing internal processes, specific measures linked to generative AI and political advertising in anticipation of the forthcoming Regulation laying down harmonised rules on AI ("AI Act") and on the regulation on the transparency and targeting of political advertising. providing reliable access to data for researchers conducting work on elections, to name a few from a broad range of recommended measures. The Guidelines also draw on the Code of Practice on Disinformation for specific risk mitigation measures, such as promoting access to official information on the electoral process, developing targeted media literacy initiatives or reducing the prevalence of disinformation content in recommender systems. Providers of VLOPSEs are recommended to assess the effectiveness of such measures through a public post-election review, providing the opportunity for feedback.

In response to the Guidelines, several VLOPSEs announced actions such as implementing new policies or terms and conditions on political advertising and in relation to manipulated

media to proactively label generative AI content. Cooperation channels, specifically escalation channels with Member State authorities, with the EDMO Task Force on the 2024 European elections, civil society organisations and fact-checking partnerships were set up, including cooperation through the elections Working Group of the Code of Practice on Disinformation.

2.2 Election readiness dialogue with VLOPSEs

Since the DSA entered into force for the first 19 designated VLOPSEs at the end of August 2023, the Commission engaged in a series of readiness dialogues on election integrity in the run-up to several national elections with several providers of VLOPSEs. During the first meetings, which took place with individual VLOPSEs, risk assessment and mitigation measures for national elections were discussed, with the goal of assessing the implementation of the DSA by VLOPSEs in the context of electoral processes.

In preparation for the European elections, the Commission held two election readiness roundtables with relevant providers of VLOPSEs on 17 May and 3 June. The second roundtable was attended by DSCs and other competent national authorities. The meetings focused on providers of VLOPSEs' incident response mechanisms, risks linked to generative AI, threat response frameworks and cooperation with relevant stakeholders. Providers of VLOPSEs were questioned on their actions to ensure readiness in relation to major incidents, such as the assassination attempt of Slovak Prime Minister, Robert Fico on 15 May 2024.

Furthermore, VLOPSEs presented the specific actions and changes they have implemented on their services in relation to election readiness and in compliance with the DSA Election

Guidelines. These included actions such as implementing new policies and updating terms and conditions in relation to manipulated media, efforts to curb election-related ‘hallucinations’ of generative AI systems and proactively labelling generative AI content, adjustments to their political advertisement policies and increased cooperation and escalation channels with relevant Member State authorities, civil society organisations and fact checking organisations. In addition, providers of VLOPSEs stated that they have provided access to official information on elections, such as initiatives linking to reliable information on how to vote in the European elections. VLOPSEs which are signatories of the Code of Practice on Disinformation also referred to their elections specific measures under the Code, such as the Code’s Rapid Response System.

In relation to incident response, the Commission questioned providers of VLOPSEs on their readiness for potential elevated risks following incidents during electoral periods. The providers of VLOPSEs all stated that they were actively monitoring the potential risks that could result in the activation of incident response measures.

The Commission also held a post-election roundtable with VLOPSEs on 10 July 2024, to take stock of the actions undertaken by VLOPSEs for the European elections. VLOPSEs provided information on measures employed during the electoral period and updated the Commission on the work they are conducting under the DSA Election Guidelines on a post-election review. The Commission questioned VLOPSEs on the lessons learned and possible future measures for upcoming elections.

2.3 Stress Test in the form of a Tabletop Exercise

On 24 April 2024, the European Commission conducted a stress test in the form of a tabletop exercise with designated providers of VLOPSEs, DSCs and civil society organisations to test the participants’ readiness against election manipulation and interference in relation to the

European Parliament elections.⁽²⁷⁾ The stress test included realistic potential scenarios in relation to civic discourse and electoral processes in the lead up to, during and following electoral periods. Focus was placed on potential disinformation as well as manipulative tactics, techniques and procedures that may be used in the context of elections.

The incidents and examples included addressing the intentional spread of false information in relation to electoral processes, information manipulation using generative AI and through coordinated inauthentic behaviour, attempts at suppression through harassment and threats online, and incitement to violence.

The aim of the exercise was to test if existing instruments, processes, and cooperative mechanisms are being used to their fullest potential and meet the expectations set out by the DSA and the Election Guidelines. This exercise allowed an assessment where further improvements are required by the respective actors in relation to mitigating risks to electoral processes.

2.4 Ad Hoc Working Group on Elections with Digital Services Coordinators

On 19 February 2024, the first meeting of the European Board for Digital Services, composed of DSCs and chaired by the Commission, took place.⁽²⁸⁾ The Board is an independent advisory group with the objectives of contributing to the consistent application of the DSA, coordinating, and contributing on emerging issues covered by the DSA and aiding the Commission in the supervision of VLOPSEs. During the first meeting of the Board the ‘Ad Hoc Working Group on Elections’ was established, with the aim of gathering expertise of DSCs and competent authorities on electoral issues at the national level falling within the scope of the DSA.

The Working Group on Elections met in total four times in the run-up to the European Parliament elections. During these meetings,

⁽²⁷⁾ [Commission stress tests platforms’ election readiness under the Digital Services Act – European Commission](#)

⁽²⁸⁾ [European Board for Digital Services – European Commission](#)

the Commission gathered input and feedback from the Working Group on the DSA Election Guidelines and the DSA stress test on elections (see above). DSCs also provided information on their national electoral rules and election related developments. The last meeting was a technical roundtable with relevant VLOPSEs, where participants shared their views on perceived threats to electoral processes, their assessments of potential systemic risks, and readiness measures at their disposal should such risks arise.⁽²⁹⁾

The Working Group on Elections has proven to be a successful collaborative effort by the Commission and DSCs to engage in dialogue, learn of country- and context-specific challenges and support efforts to curb systemic risks to civic discourse and electoral processes in the run up to the elections for the European Parliament.

2.5 DSA Incident and Threat Response Framework

In the run-up to the European elections, the European Commission had a dedicated team following election related risks on providers of VLOPSEs in the context of the DSA. This team was part of the European inter-institutional effort to counter disinformation in the EU.⁽³⁰⁾ This exchange included information sharing through the Council's Integrated Political Crisis Response (IPCR) which was activated in information sharing modus on foreign interference in the European elections.⁽³¹⁾ Through the Cyber Crisis Task Force, Commission services and EU institutions, bodies and agencies, coordinated their responses to cybersecurity threats, and with Member States through relevant cybersecurity networks, as information operations have become increasingly intertwined with cyber-related attacks as part of a wider strategy to influence elections and destabilise democratic processes. These threats call for a united response from various stakeholders using all available tools, including the DSA and cybersecurity measures. Information from the institutions and Member

States involved is key in the enforcement of the DSA. Next to EU Institutions such as the European External Action Service, this inter-institutional effort included a wide range of other stakeholders, such as EU Member States (through dedicated networks such as the Rapid Alert System and the European Cooperation Network on Elections), independent media, fact-checking and civil society organisations, to share insights, exchange experiences and best practices and coordinate responses.

Furthermore, the Commission set up a DSA Incident and Threat Response Framework outlining the cooperation between the Commission and DSCs in response to the spread and amplification of illegal or unlawful content. The framework is a voluntary agreement between the Commission and DSCs with the aim to facilitate cooperation of the Board during incidents. The framework establishes two levels of response that can be activated when conditions are met: an Incident Protocol and a Threat Protocol. The Incident Protocol is designed for fast evolving situations with an online dimension and relevant to the scope of the DSA, or situations which negatively affect users and require an immediate and coordinated response at EU level, but do not meet the threshold of "crisis". The Threat Protocol addresses events falling under the definition of a crisis provided by Recital 91 of the DSA of 'extraordinary circumstances that can lead to a serious threat to public security or health'. Neither the Incident nor Threat Protocol were activated during the European elections. However, these Protocols allowed for the European Commission to be prepared should such an incident occur.

2.6 Examples of actions taken by Digital Services Coordinators

The Digital Services Coordinators played a key role in safeguarding election integrity through the implementation of the DSA and application of the DSA Election Guidelines in Member States.⁽³²⁾ DSCs focused on coordination and

⁽²⁹⁾ [DSA Election Readiness - Roundtable with Platforms, Search Engines, and Digital Service Coordinators – European Commission](#)

⁽³⁰⁾ [European elections: EU institutions prepared to counter disinformation – European Parliament](#)

⁽³¹⁾ [Foreign interference: Presidency reinforces exchange of information ahead of the June 2024 European elections – Council of the EU](#)

⁽³²⁾ [Digital Services Coordinators – European Commission](#)

stakeholder engagement in their national contexts. Utilising both existing coordination mechanisms and proactively establishing new communication channels among authorities as well as with providers of VLOPSEs, these actions considerably boosted election integrity planning and improved overall election readiness.

The German Federal Network Agency (BNetzA), the French Regulatory Authority for Audiovisual and Digital Communication (Arcom), the Italian Authority for Communications Guarantees (AGCOM), the Austrian Communications Authority (KommAustria), the Irish Coimisiún na Meán (CnaM), the Slovak Council for Media Services (CMS), the Romanian National Authority for Management and Regulation in Communications (ANCOM), the Estonian Consumer Protection and Technical Regulatory Authority (CPTRA) and the Dutch Authority for Consumers and Markets (ACM) initiated regular exchanges with representatives of providers of online platforms and search engines, including the providers of VLOPSEs. These meetings focused on their obligations under the DSA, the recommendations of the Election Guidelines and the specific risk mitigation measures service providers are implementing in their national contexts, for both European and national elections. Additionally, Arcom adopted recommendations to address the risk of information manipulation on online services, building on the Commission's Election Guidelines.⁽³³⁾ AGCOM devoted a specific section of its regulation on the European elections to incorporate the principles of the DSA Election Guidelines.⁽³⁴⁾

Furthermore, the above DSCs, as well as current and future DSCs in Belgium, Croatia, Czechia, Estonia, Hungary, Luxembourg, the Netherlands, Portugal, and Spain organised and participated in meetings with national authorities dealing with elections, cybersecurity, and countering disinformation and foreign interference online. DSCs joined intra-governmental discussions, through election coordinating bodies or networks.

DSCs also engaged with stakeholders to raise awareness and provide information on

information manipulation and disinformation during electoral periods. BNetzA organised exchanges with political parties in the German Parliament focused on the obligations of providers of VLOPSEs under the DSA. CnaM engaged with An Coimisiún Toghcháin, civil society organisations, academia, and industry. ANCOM held meetings with the Romanian Permanent Electoral Authority (AEP) and the Central Electoral Bureau (BEC).

Several DSCs published relevant information for various stakeholders. KommAustria launched a website on disinformation and the European elections, which will be adapted with a view to the national elections in September, while the National Media and Infocommunications Authority (NMHH) in Hungary published several articles on disinformation. The Portuguese National Communications Authority (ANACOM) published information regarding the application of the DSA in the context of the European elections. The Competition Authority of Luxembourg issued guidance to support users against misinformation and illegal content. CnaM published an Information Pack for candidates ahead of the local and European elections. The Pack provided information on the role of CnaM and offered guidance on what to do when candidates are faced with harmful and/or illegal content online, including information on the rights of users under the DSA.

Many DSCs actively shared the EU-wide campaign by the European Regulators Group for Audiovisual Media Services (ERGA) aiming at enhancing users' awareness of potential information disruptions during the elections to the European Parliament. The Commission and ERGA produced a short video recommending a few simple steps to help EU citizens recognise information manipulation and disinformation. This video was published online by the Commission and ERGA through their institutional channels and websites, by public service broadcasters of EU Member States and by various online platforms as an advertisement. The video, translated in the 24 official languages of the EU, gathered 217 million social media impressions, and was seen by one-third of the social media users

[\(33\) Recommendations relating to the fight against the information manipulation on online platforms in view of the elections to the European Parliament from June 6 to 9, 2024 - ARCOM](#)

[\(34\) Resolution 90/24/CONS - Provisions for implementing the regulations on political communication and equal access to media in relation to the campaign for the election of the Members of the European Parliament taking place in Italy on 8 and 9 June 2024 - AGCOM](#)

and viewers of the public service broadcasting channels. Due to this success, the Commission and ERGA amended the video to have a focus on disinformation generally and kept it available online.

Furthermore, DSCs developed their organisational capacity to monitor and effectively respond to complaints and incidents in the context of the European elections. The Authority for Consumers and Markets (ACM) in the Netherlands and the National Commission for Markets and Competition (CNMC) in Spain engaged in various networks and reporting channels to share information and coordinate response strategies. The Croatian Regulatory Authority for Network Industries (HAKOM) actively participated in the National Cooperation Network on Elections in the Field of Elections for the European Parliament, which worked on the timely detection, notification and reporting of incidents. KommAustria coordinated the exchange of contact persons between competent authorities for elections and VLOPSEs. The Czech Telecommunication Office (CTU) created a list of contact points among relevant authorities and VLOPSEs to be used for direct communication in case of incidents and developed internal processes for handling incidents. CnaM in Ireland established a cross-divisional working group, setting out criteria for incidents, processes, and training of relevant staff as well as raising awareness across the organisation.

DSCs also responded to complaints in the context of the European elections. In Germany, accounts of the European Parliamentary candidates and political parties were blocked, which was reported to and actioned by BNetzA. Furthermore, the German DSC and other relevant German authorities were informed that around 450,000 inauthentic accounts were detected and deleted on a platform, preventing the amplification of narratives aimed at polarising society and destabilising democracy. The Consumer Rights Protection Centre (CRPC) in Latvia reported two cases of illegal content related to the European election. CMS in Slovakia used their bilateral communication channels with several VLOPSEs as 'escalation channels' to flag cases of potential violations of the DSA, the Code of Practice on Disinformation or the national media legislation. The CMS also serves as the primary contact point for other public and government authorities for reporting dangerous or potentially problematic content. Furthermore, CMS is carrying out its own monitoring activities, and sent a structured questionnaire to the monitored VLOPSEs.

Overall, the work of the DSCs on the national level complemented the work of the European Commission. As is evident throughout this report, the DSCs were also closely working with the European Commission to provide localised knowledge and expertise relevant to enforcement of the DSA.

3. The Code of Practice on Disinformation

The Code of Practice on Disinformation contains several commitments and measures that are relevant to counter online disinformation in the context of elections.⁽³⁵⁾ This includes demonetising disinformation content, ensuring the transparency of political advertising, providing context to users on the content they see, including through fact-checking labels, promoting authoritative information, reducing the virality of disinformation, strengthening media literacy as well as empowering fact-checkers and researchers.

In March 2024, signatories of the Code reported on the actions they are taking or planning to take to protect the European elections.⁽³⁶⁾ These specific measures include requiring advertisers or creators to clearly label whenever an image, video or audio has been digitally created or altered, further cooperating with fact-checking organisations across the EU to expose election-related disinformation, promoting high-quality and authoritative information to voters, and developing targeted media literacy and pre-bunking campaigns.

In addition, the permanent Task Force of the Code has set up a dedicated workstream on elections. This workstream benefited from the participation and combined perspectives of a wide range of stakeholders, including major online platforms (Google, Meta, Microsoft, TikTok), fact-checkers, civil society organisations and other industry players. This served as an important forum of cooperation, for coordinating relevant actions from the signatories and improve situational awareness on threats to the European elections.

As foreseen in the Code, signatories implemented a Rapid Response System (RRS)⁽³⁷⁾ to enhance cooperation and communication among relevant signatories during the 2024 European election. The RRS allowed fact-checkers and civil society organisations that are signatories of the Code to swiftly report to platform signatories time-sensitive content, accounts, or trends that they deem to present threats to the integrity of the electoral process and discuss them with the platforms in light of their respective policies. This system proved to be an agile mechanism complementing the DSA framework, enabling timely exchange of information and action by the platforms.

(35) <https://disinfo.eu/>

(36) <https://disinfo.eu/reports-archive/reports-march-2024/?chapter=elections&commitment=european-elections-2024>

(37) <https://disinfo.eu/eu-elections-2024/>

4. The European Digital Media Observatory (EDMO)

EDMO, an independent network of fact-checkers, researchers, and media literacy practitioners covering the entire EU, is another key pillar of the Commission's strategy to address the risks of disinformation, including in times of elections. EDMO established a dedicated Task Force to monitor the information space during the European elections, bringing together a multi-disciplinary team of researchers, fact-checkers, and media literacy practitioners.⁽³⁸⁾ The Task Force also comprised representatives from all EDMO national and regional hubs, providing full coverage of the EU.

The EDMO Task Force conducted in-depth investigations contributing to election preparedness, notably a report analysing risks to the elections based on 1000 fact-checking articles published in the context of past national elections.⁽³⁹⁾ EDMO also contributed to uncovering foreign information manipulation operations, such as the Russian network of copycat websites called "Pravda".⁽⁴⁰⁾

The EDMO Task Force was monitoring and exposing disinformation narratives around the

European elections on a daily basis. Between 8 April and 11 June 2024, the Task Force produced notably daily briefs on urgent disinformation narratives as well as weekly insights with deeper analysis of disinformation trends and early warnings.⁽⁴¹⁾⁽⁴²⁾ Through its EU-wide fact-checking network, EDMO also tracked the volume of fact-checked disinformation circulating in EU Member States during the electoral period, including the proportion of EU-related disinformation. It showed notably that EU-related disinformation amounted to 15% of the total detected disinformation in the month before the elections, from 11% two months before.⁽⁴³⁾

Finally, EDMO developed a dedicated media literacy campaign, #BeElectionSmart, to raise awareness about the risks of disinformation around the European elections.⁽⁴⁴⁾ The campaign was circulated on social media platforms in all EU languages and benefited from the combined reach of EDMO's 14 national and regional hubs. EDMO also provided a training series for journalists and other key stakeholders dedicated to election integrity.⁽⁴⁵⁾

(38) [EDMO Taskforce on 2024 European Elections – Latest Publications & News - EDMO](#)

(39) [Second edition \(March 2024\): Disinformation narratives during the 2023 elections in Europe – EDMO](#)

(40) [Russian disinformation network "Pravda" grew bigger in the EU, even after its uncovering](#)

(41) [EU Elections Disinfo Bulletin – EDMO](#)

(42) [Weekly Insights and Early Warnings – EDMO](#)

(43) [EU-related Disinformation Keeps Growing Before the EU Parliament Elections – Monthly brief no. 36 - EDMO](#)

(44) [#BeElectionSmart: an EU-wide EDMO campaign ahead of the 2024 European Parliament Elections - EDMO](#)

(45) [Read Some Of The Main Takeaways From The Training Session - EDMO](#)

5. Conclusion and ways forward

The online environment plays a significant role in electoral processes, with more and more people relying on very large online platforms and search engines as their main source of information. Protecting the integrity of elections in this fast-evolving environment is therefore a priority area for the European Commission under the DSA. The range of actions highlighted in this report showcases the commitment of the Commission to ensure electoral processes remain safe, free, and fair. These actions had tangible effects, such as strengthening situational awareness, sharing best practices, and creating streamlined communication channels between stakeholders to ensure election related issues can be swiftly and effectively brought to VLOPSEs' attention and acted upon sufficiently in the time sensitive period of the European elections. Several initiatives mentioned in this report, in particular the work of the EDMO, have provided an unprecedented capacity to monitor the information space and quickly expose disinformation threats.

As anticipated and indicated above, EDMO noted an increase in EU-related disinformation ahead of the European elections. However, EDMO did not detect any major disinformation incident during the elections.⁽⁴⁶⁾ This suggests that most incidents have been detected, exposed, and acted upon in their early stages. As pointed out by EDMO, it is also possible that growing awareness about the risks of disinformation together with the strong readiness of all relevant stakeholders could have deterred malicious actors. In this way, probably through this high level of preparedness during the European elections, no known major or systemic incidents or issues were reported.

Since the previous European elections in 2019, the European Union has become a frontrunner in developing new tools to counter disinformation and foreign interference campaigns, that are

both effective and respect the fundamental rights that lie at the basis of our Union. In the context of the European elections, the tools put in place were effective in countering threats to the information environment. However, the tactics, techniques and procedures used by malicious actors to influence elections may evolve. The Commission, DSCs, Member States, VLOPSEs and civil society organisations therefore must remain vigilant and continue to use the tools at their disposal. The Commission and the Board also invite EDMO to further build on its work during the European elections and carry it forward to make a continued contribution to situational awareness of the EU information space.

The DSA is still a new regulatory tool, and effective enforcement is key. The Commission and the DSCs are committed to continue addressing risks to civic discourse and electoral processes as a priority focus area in their enforcement work. The Commission is continuing to monitor the situation and assess reports and data in relation to potential electoral issues. The Commission will not hesitate to take regulatory action, should this be needed.

In addition, the Commission and the DSCs will continue the work under the Working Group on a permanent basis, in anticipation of upcoming elections in 2024 and beyond. The Working Group on the Integrity of the Information Space will continue building expertise and knowledge on risk assessment and mitigation, monitoring the implementation of the DSA Election Guidelines for future elections and contributing to the yearly comprehensive report on systemic risks for civic discourse and electoral processes. While the Commission has the sole competency under the DSA on the enforcement of risk assessment and mitigation for designated VLOPSEs, it cannot do so alone. This is clear from the range of stakeholders who took part in the actions highlighted in this report.

⁽⁴⁶⁾ [EU Elections 2024: the battle against disinformation was won, but the attrition war is far from over – EDMO](#)

Regarding lessons learnt during the European elections, DSCs highlighted the importance of collaboration and information sharing among all relevant entities, including national authorities, to ensure a rapid response to potential threats and incidents. Furthermore, DSCs recommended raising public awareness of the tools available to the recipients of the services covered by the DSA and intensifying monitoring mechanisms of information manipulation. Content created using generative AI and the use of automated and inauthentic accounts were observed during the European elections in a number of Member States and DSCs emphasized the importance of VLOPSEs implementing adequate mitigation measures against these techniques used for information manipulation.

Going forward, particular importance will also be given to elections taking place at national level in the Member States. As stated in the DSA election guidelines, VLOPSEs should also apply risk mitigation measures for national, regional and local elections or referenda, should risk assessments conclude there are actual or foreseeable negative effects for these electoral processes. In this context, cooperation between competent national authorities and VLOPSEs is important to gain knowledge of the specific national, legal, societal, and political context as well as for timely reactions to real-time developments affecting such risks.

The work of the signatories of the Code of Practice on Disinformation, in particular, but not limited to their work carried out in the Elections Working Group of the Code and the Rapid Response System of the Code, made a very important contribution to elections preparedness and swift reaction during the European Parliamentary elections. Drawing on this, it is crucial that signatories continue this work and further strengthen their cooperation in times of elections. As foreseen in the Code, this includes finalising a longer-term elections cooperation framework in particular by finalising and stabilising the Rapid Response System for future elections and using it in a consistent way. Signatories of the Code of Practice shall also report on their work related to the European Parliament elections in September, including their experience on the RRS, in their upcoming reports, which will be publicly available in the Transparency Centre of the Code.⁽⁴⁷⁾

Furthermore, the Commission and the Board urge signatories to proceed swiftly with requesting the conversion of the Code of Practice on Disinformation into a Code of Conduct under the DSA. As a result, the Code will become a part of the DSA co-regulatory framework, linked to the DSA's enforcement mechanism. In view of the important added value of the Code regarding mitigating systemic risks, the Commission considers a swift conversion of the Code as crucial, with the aim to finish this process in the coming months.

(47) [The Transparency Centre of the Code of Practice on Disinformation](#)



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