

# European Democracy Shield - Open public consultation

Fields marked with \* are mandatory.

## Introduction

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Democracy, the rule of law and fundamental rights are founding values of the European Union. They underpin EU's achievements in fostering peace, prosperity, economic competitiveness, social cohesion and stability. The essence of democracy is that citizens can freely express their views and participate in democratic life, choose their political representatives, and have a say in their future. Citizens should be able to form their own opinions in a public space where they have access to reliable information from a plurality of sources, where different views can be expressed, where they have a right to disagree and to cast their votes in elections that are free from interference, either foreign or domestic.

In the [2024 Flash EB 550 survey](#), out of a list of ten threats to democracy, growing distrust and scepticism towards democratic institutions (36%) and false and/or misleading information in general circulating online and offline (34%) were the two greatest threats mentioned. The [Standard EB 102](#) also showed that 82% of Europeans agree that the existence of news or information that misrepresent reality or is even false is a problem for democracy in general.

The EU has taken significant steps to address pressing threats to European democracy under the European Democracy Action Plan (2020) and the Defence of Democracy Package (2023). But recent experience has shown an intensification and wider spread of these threats. The methods used are now harder to track, more damaging and easier to deploy using digital tools and social media. This reflects a deep change in the information space, shifting from editorial media sources to user-generated content mediated on platforms and pushed by algorithms. This enables new freedoms and opportunities but also makes it easier for hostile actors, both internal and foreign, to manipulate information and step up information warfare. This new information landscape also poses challenges to equal opportunities for political participation and to European security to democracy more broadly.

Recent developments, including during electoral processes in Europe, show that the threat landscape is increasingly complex, with interference and distortions in the information space, as well as hybrid threats, attempting to both impact on election results as well as lower public trust in democratic processes. This highlights the need to ensure an efficient toolbox to help withstand such challenges. They also underline the need for better cooperation to effectively address the new realities affecting democratic processes, including in the online sphere. This means improving the overall situational awareness and the capacity to respond to threats and manage crisis situations, as well as promoting democratic resilience across the EU.

That is why the Commission is preparing the European Democracy Shield, as announced in the

Commission's Political Guidelines for 2024-2029. It will provide a strategic framework to better protect and promote democracy in the EU, underpinned by concrete initiatives, ensuring respect for democratic values and fundamental rights, including the EU's enduring commitment to preserving and promoting freedom of expression.

The Commission would like to consult the general public and stakeholders on the key issues that the Shield should address, structured around four themes:

- Countering disinformation and foreign information manipulation and interference (FIMI);
- Ensuring the fairness and integrity of elections and the strengthening of democratic frameworks and checks and balances, including media and civil society organisations;
- Strengthening societal resilience and preparedness;
- Fostering citizens' participation and engagement.

Stakeholders likely to be interested in this initiative include:

- individual citizens
- Member States' national authorities
- EU institutions and bodies, including the European Parliament, the Council, the European Economic and Social Committee, the European Committee of the Regions
- international organisations, such as the Council of Europe, OSCE-ODIHR, the OECD, and NATO
- European and national political parties
- relevant EU-level networks
- civil society organisations (including youth organisations) and human rights defenders
- representatives of academia and researchers
- media representatives, journalists and their federations
- online platforms
- online communities
- influencers

## About you

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### \* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German

- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

\* I am giving my contribution as

- ☐ Academic/research institution
- ☒ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

\* First name

Francesca

\* Surname

Fabbri

\* Email (this won't be published)

\* Organisation name

255 character(s) maximum

AER - Association of European Radios

\* Organisation size

- ☒ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

6822083232-32

\* Country of origin

Please add your country of origin, or that of your organisation.

*This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.*

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| <input type="radio"/> Afghanistan    | <input type="radio"/> Djibouti           | <input type="radio"/> Libya         | <input type="radio"/> Saint Martin                     |
| <input type="radio"/> Åland Islands  | <input type="radio"/> Dominica           | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon        |
| <input type="radio"/> Albania        | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania     | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria        | <input type="radio"/> Ecuador            | <input type="radio"/> Luxembourg    | <input type="radio"/> Samoa                            |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt              | <input type="radio"/> Macau         | <input type="radio"/> San Marino                       |
| <input type="radio"/> Andorra        | <input type="radio"/> El Salvador        | <input type="radio"/> Madagascar    | <input type="radio"/> São Tomé and Príncipe            |
| <input type="radio"/> Angola         | <input type="radio"/> Equatorial Guinea  | <input type="radio"/> Malawi        | <input type="radio"/> Saudi Arabia                     |
| <input type="radio"/> Anguilla       | <input type="radio"/> Eritrea            | <input type="radio"/> Malaysia      | <input type="radio"/> Senegal                          |
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| ○ Antigua and Barbuda              | ○ Eswatini                            | ○ Mali             | ○ Seychelles                                   |
| ○ Argentina                        | ○ Ethiopia                            | ○ Malta            | ○ Sierra Leone                                 |
| ○ Armenia                          | ○ Falkland Islands                    | ○ Marshall Islands | ○ Singapore                                    |
| ○ Aruba                            | ○ Faroe Islands                       | ○ Martinique       | ○ Sint Maarten                                 |
| ○ Australia                        | ○ Fiji                                | ○ Mauritania       | ○ Slovakia                                     |
| ○ Austria                          | ○ Finland                             | ○ Mauritius        | ○ Slovenia                                     |
| ○ Azerbaijan                       | ○ France                              | ○ Mayotte          | ○ Solomon Islands                              |
| ○ Bahamas                          | ○ French Guiana                       | ○ Mexico           | ○ Somalia                                      |
| ○ Bahrain                          | ○ French Polynesia                    | ○ Micronesia       | ○ South Africa                                 |
| ○ Bangladesh                       | ○ French Southern and Antarctic Lands | ○ Moldova          | ○ South Georgia and the South Sandwich Islands |
| ○ Barbados                         | ○ Gabon                               | ○ Monaco           | ○ South Korea                                  |
| ○ Belarus                          | ○ Georgia                             | ○ Mongolia         | ○ South Sudan                                  |
| ● Belgium                          | ○ Germany                             | ○ Montenegro       | ○ Spain  |
| ○ Belize                           | ○ Ghana                               | ○ Montserrat       | ○ Sri Lanka                                    |
| ○ Benin                            | ○ Gibraltar                           | ○ Morocco          | ○ Sudan  |
| ○ Bermuda                          | ○ Greece                              | ○ Mozambique       | ○ Suriname                                     |
| ○ Bhutan                           | ○ Greenland                           | ○ Myanmar/Burma    | ○ Svalbard and Jan Mayen                       |
| ○ Bolivia                          | ○ Grenada                             | ○ Namibia          | ○ Sweden                                       |
| ○ Bonaire Saint Eustatius and Saba | ○ Guadeloupe                          | ○ Nauru            | ○ Switzerland                                  |
| ○ Bosnia and Herzegovina           | ○ Guam                                | ○ Nepal            | ○ Syria  |
| ○ Botswana                         | ○ Guatemala                           | ○ Netherlands      | ○ Taiwan                                       |
| ○ Bouvet Island                    | ○ Guernsey                            | ○ New Caledonia    | ○ Tajikistan                                   |
| ○ Brazil                           | ○ Guinea                              | ○ New Zealand      | ○ Tanzania                                     |
| ○ British Indian Ocean Territory   | ○ Guinea-Bissau                       | ○ Nicaragua        | ○ Thailand                                     |
| ○ British Virgin Islands           | ○ Guyana                              | ○ Niger            | ○ The Gambia                                   |

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| ○ Brunei                   | ○ Haiti                             | ○ Nigeria                  | ○ Timor-Leste                          |
| ○ Bulgaria                 | ○ Heard Island and McDonald Islands | ○ Niue                     | ○ Togo                                 |
| ○ Burkina Faso             | ○ Honduras                          | ○ Norfolk Island           | ○ Tokelau                              |
| ○ Burundi                  | ○ Hong Kong                         | ○ Northern Mariana Islands | ○ Tonga                                |
| ○ Cambodia                 | ○ Hungary                           | ○ North Korea              | ○ Trinidad and Tobago                  |
| ○ Cameroon                 | ○ Iceland                           | ○ North Macedonia          | ○ Tunisia                              |
| ○ Canada                   | ○ India                             | ○ Norway                   | ○ Türkiye                              |
| ○ Cape Verde               | ○ Indonesia                         | ○ Oman                     | ○ Turkmenistan                         |
| ○ Cayman Islands           | ○ Iran                              | ○ Pakistan                 | ○ Turks and Caicos Islands             |
| ○ Central African Republic | ○ Iraq                              | ○ Palau                    | ○ Tuvalu                               |
| ○ Chad                     | ○ Ireland                           | ○ Palestine                | ○ Uganda                               |
| ○ Chile                    | ○ Isle of Man                       | ○ Panama                   | ○ Ukraine                              |
| ○ China                    | ○ Israel                            | ○ Papua New Guinea         | ○ United Arab Emirates                 |
| ○ Christmas Island         | ○ Italy                             | ○ Paraguay                 | ○ United Kingdom                       |
| ○ Clipperton               | ○ Jamaica                           | ○ Peru                     | ○ United States                        |
| ○ Cocos (Keeling) Islands  | ○ Japan                             | ○ Philippines              | ○ United States Minor Outlying Islands |
| ○ Colombia                 | ○ Jersey                            | ○ Pitcairn Islands         | ○ Uruguay                              |
| ○ Comoros                  | ○ Jordan                            | ○ Poland                   | ○ US Virgin Islands                    |
| ○ Congo                    | ○ Kazakhstan                        | ○ Portugal                 | ○ Uzbekistan                           |
| ○ Cook Islands             | ○ Kenya                             | ○ Puerto Rico              | ○ Vanuatu                              |
| ○ Costa Rica               | ○ Kiribati                          | ○ Qatar                    | ○ Vatican City                         |
| ○ Côte d'Ivoire            | ○ Kosovo                            | ○ Réunion                  | ○ Venezuela                            |
| ○ Croatia                  | ○ Kuwait                            | ○ Romania                  | ○ Vietnam                              |
| ○ Cuba                     | ○ Kyrgyzstan                        | ○ Russia                   | ○ Wallis and Futuna                    |
| ○ Curaçao                  | ○ Laos                              | ○ Rwanda                   | ○ Western Sahara                       |
| ○ Cyprus                   | ○ Latvia                            | ○ Saint Barthélemy         | ○ Yemen                                |

- ☐ Czechia
- ☐ Lebanon
- ☐ Saint Helena  
Ascension and  
Tristan da Cunha
- ☐ Zambia
- ☐ Democratic  
Republic of the  
Congo
- ☐ Lesotho
- ☐ Saint Kitts and  
Nevis
- ☐ Zimbabwe
- ☐ Denmark
- ☐ Liberia
- ☐ Saint Lucia

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

### \* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

#### ☐ Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

#### ☒ Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

## 1. Foreign information manipulation and interference and disinformation

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Democracies within the EU are confronted with increasing threats, arising both from within and from outside the Union, driven by various hostile actors that aim to erode social cohesion and to undermine citizens' trust in democracy and democratic institutions. These threats can take various forms, including foreign information manipulation and interference (FIMI), disinformation and other forms of hybrid threats.

FIMI refers to a pattern of behaviour that threatens or has the potential to negatively impact values, procedures and political processes. Such activity is manipulative in character, conducted in an intentional and coordinated manner. Actors of such activity can be state or non-state actors, including their proxies inside and outside of their own territory[1].

Disinformation refers to false or misleading content that is spread with an intention to deceive or secure economic or political gain, and which may cause public harm[2].

[1] [https://www.eeas.europa.eu/eeas/tackling-disinformation-foreign-information-manipulation-interference\\_en](https://www.eeas.europa.eu/eeas/tackling-disinformation-foreign-information-manipulation-interference_en)

[2] <https://digital-strategy.ec.europa.eu/en/policies/online-disinformation>

## General

1.1. Please indicate your perception of the risks posed by the following techniques:

technique	very high	high	neutral	low	very low	don't know
Foreign information manipulation and interference and disinformation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inauthentic use of social media by foreign and domestic actors to impact the EU democratic sphere (e.g. through fake accounts, bots, opaque amplification techniques including through exploitation of algorithms, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Covert funding of political activity (parties, campaigns etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Interference in research and academia	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Threats and attacks against political actors	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Threats and attacks against the media and journalists	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Corruption, fraud, etc. in politics	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

*3500 character(s) maximum*

The prevalence of viral disinformation, predominantly spread through online platforms, necessitates a focused and robust response targeting these digital environments. State driven actors often intentionally orchestrate these disinformation campaigns, making online intervention a critical area. Simultaneously, a multi-faceted approach should prioritise the strengthening of the media landscape. This includes bolstering the resilience of media organisations against disinformation, fostering their long-term economic sustainability to ensure their independence and viability, improving public access to diverse and reliable media sources,



and enhancing the visibility of quality journalism in an increasingly crowded information space. These parallel efforts are essential to counteract the influence of disinformation and promote a well-informed citizenry.

Other (please explain):

1500 character(s) maximum

1.2. Please indicate which of the following measures would in your view be most important to detect and combat foreign information manipulation and interference and disinformation (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Information sharing and cooperation among Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information sharing and cooperation between Member States and EU institutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gathering of information, knowledge sharing and cooperation between governmental actors (at Member State and EU level) and non-government stakeholders (fact-checkers, researchers, civil society organisations...)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dedicated structure(s) at EU level to better detect these threats and react to them	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforcement of the capacity for national authorities to react to such threats	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for non-governmental stakeholders (fact-checkers, researchers, civil society organisations...)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stronger monitoring and enforcement of existing rules	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Raising awareness and building resilience	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to a more pluralistic landscape of online platforms	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing the economic tools and financial incentives behind the spreading of foreign information manipulation and interference and disinformation (e.g. hiring of influencers, manipulation of algorithms, use of bots or fake accounts etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the transparency of algorithms and recommender systems (i. e. provision of personalised suggestions to users based on their preferences, behaviors, or other data inputs) on online platforms and more broadly the accountability and transparency of online platforms and other online services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Supporting the development and use of technologies (such as Artificial Intelligence) to better detect and address these threats	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased transparency on the use of new technologies (such as Artificial Intelligence) when disseminating political content online	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Empowering media to respond to such threats (including trainings for journalists etc...)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforced involvement of independent and trustworthy experts and scientists (in Information Technology (IT), Artificial Intelligence (AI), socio-political and other relevant disciplines) to advise on issue impacting the EU democratic sphere	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sanctions for actors involved in foreign information manipulation and interference and disinformation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforced EU cooperation with partner countries outside the EU and international organisations (such as NATO, the G7 and others)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stronger diplomatic measures (such as politically exposing and calling out the perpetrators, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

### Please comment, if needed:

3500 character(s) maximum

To ensure user autonomy and a thriving truth-based media environment, AER advocates for robust enforcement and advancement of regulations concerning the transparency of algorithms and recommender systems. Platforms should clearly explain their content prioritisation and personalisation methods, while also granting users significant control over their displayed content. This is crucial for upholding editorial integrity. Platforms and any kind of user interface should clearly display the identity/logo of the radio station so the listeners are always aware of the source of the stream they are listening to.

### Other (please explain):

1500 character(s) maximum

### 1.3. Are you aware of the following regulations and policies?

regulation/policy	well aware	somewhat aware	unaware
The EU Regulation on the transparency and targeting of political advertising	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU Digital Services Act (DSA)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU Artificial Intelligence Act (AI Act)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU Code of Conduct on Disinformation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Self-commitments and ethical standards by political parties	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Self-commitments and ethical standards by other political actors (campaign organisers etc.)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
EU policies supporting digital and media literacy and critical thinking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
National policies and/or measures to prevent, counter and raise awareness of FIMI and disinformation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Platforms' own policies (terms of service/guidelines, etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

#### 1.4. What further measures could be considered to reinforce the current EU framework and tools to fight disinformation and information manipulation in the EU, while safeguarding freedom of expression?

1500 character(s) maximum

The enduring role of radio in the local context: in an increasingly digitalised information landscape, the role of traditional media, particularly radio, remains significant, especially within local communities. Radio often serves as a vital source of information for citizens, particularly in areas with limited internet access or among demographics who may not be digitally native. Its immediacy and accessibility make it a powerful tool for disseminating local news, emergency alerts, and community-specific information. Moreover, local radio stations often play a crucial role in fostering community identity and providing a platform for local voices and perspectives, contributing to a more informed and engaged citizenry at the grassroots level.

According to all Eurobarometer studies, radio holds the distinction of being the most trusted media outlet among European citizens. This high level of trust positions radio as a particularly valuable channel for disseminating information and engaging with the public on important issues. Its accessibility and widespread reach across diverse demographics further amplify its significance in the media landscape. The consistent trust afforded to radio suggests its continued relevance and influence in shaping public opinion and fostering informed dialogue.

#### 1.5. In addition, please indicate which of the following measures would in your view be most important to support a healthy and democratic information space across the EU to (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
More initiatives to support media and digital literacy and critical thinking among the whole population	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More support for free, plural and independent media	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More support for trusted, impartial and open-source information (reliable information)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
More support for scientific research on disinformation and information manipulation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Involvement of independent and trustworthy scientific advice in the fight against these phenomena	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
More support for fact-checkers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

More support for civil society organisations active in fighting disinformation and information manipulation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stronger measures to address inauthentic and manipulative dissemination of information on online platforms	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote innovative structures for fair, safe and transparent democratic debates, including online	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

*3500 character(s) maximum*

From the perspective of radio broadcasters, we need an environment where our members can generate sustainable, diverse, and predictable revenues through access to advertising markets, licensing arrangements with various intermediaries that utilise and benefit from audio content.

It is crucial to ensure that radio broadcasters are not structurally disadvantaged by unfair competition from dominant digital platforms, non-transparent algorithmic systems that may limit discoverability, or the unauthorised use of our copyrighted content in AI applications or third-party services without proper compensation or attribution. Without these fundamental conditions in place, short-term funding initiatives alone will not secure the future of a free and pluralistic radio landscape. Support for radio broadcasting should be recognised as a long-term investment in local democracy, community resilience, and cultural vitality.

Enhancing access to radio: radio is one of the most relevant means of communication, especially in local contexts. Its importance as a gateway to reliable information and especially to that information needed in crises is why it should be held accessible for everyone, everywhere. As cars are one of the most used places for receiving radio signals, having a hybrid radio installed should be mandatory in every new car in Europe.

For many individuals, especially those who commute or travel frequently, the car radio remains a primary source of real-time news, traffic updates, and local information. Mandating or incentivising the inclusion of accessible and user-friendly radio tuners in all vehicles can significantly contribute to maintaining radio's reach and ensuring that citizens have readily available access to this important medium, regardless of their digital literacy or internet connectivity. This simple yet effective measure can reinforce radio's role in providing timely and relevant information to a wide segment of the population.

Other (please explain):

*1500 character(s) maximum*

## 2. Fairness and integrity of elections and strengthening democratic frameworks

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### Elections

2.1. Please indicate which of the following measures would in your view be most important to strengthen the fairness and integrity of elections at EU, national, regional and local level (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Sharing of good practices among Member States' authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased cooperation among Member States and between them and the EU institutions on the integrity of elections taking place in the EU, including in crisis situations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A European repository of good electoral practices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU standards or rules on the funding of political activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforced national rules and frameworks on equality of opportunities for political parties and candidates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures at EU or national level to better protect political candidates and elected representatives against threats and attacks (online and offline)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the responsible use of Artificial Intelligence in democratic processes (campaigns, voting, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to enhance cyber-security and the protection of critical infrastructure in the context of elections	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ethical frameworks and voluntary commitments by political actors on integrity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to protect voters from online manipulation and disinformation campaigns threatening the integrity of the electoral process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Involvement of independent and trustworthy experts and scientists in IT, AI, socio-political and other relevant disciplines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

*3500 character(s) maximum*

Other (please explain):

*1500 character(s) maximum*

According to all Eurobarometer studies, radio holds the distinction of being the most trusted media outlet among European citizens. This high level of trust positions radio as a particularly valuable channel for disseminating information and engaging with the public on important issues. Its accessibility and widespread reach across diverse demographics further amplify its significance in the media landscape. The consistent

trust afforded to radio suggests its continued relevance and influence in shaping public opinion and fostering informed dialogue.

### The media and information sphere

#### 2.2. Are you aware of the European Media Freedom Act (EMFA)?

- ☒ Yes  
☐ No

#### 2.3. Please indicate which of the following measures would in your view be most important to strengthen media freedom and pluralism and independent journalism in the EU (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Promote media freedom, pluralism and independence of the media	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhance citizens' access to diverse media content and reliable information	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support media sectors of relevance to democracy (such as local media and investigative journalism)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the resilience and viability of professional journalism and media companies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhance innovation in the media sector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Foster the responsible use of new technologies by the media (e.g. Artificial Intelligence)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring a safe and enabling environment for journalists, building on the work done to protect them from abusive lawsuits (SLAPPs) and other acts of pressure and unethical behaviour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

#### Please comment, if needed:

*3500 character(s) maximum*

The EMFA is fundamental in guaranteeing access and findability and prominence of licensed radios, a crucial opportunity to secure the future of radio and ensure a level playing field between tech platforms and licensed radio broadcasters. Particularly important is the implementation of article 20 "Right to customise the media offering" which should address both the configuration of the user interfaces and the conditions under which media content is made available on such interfaces.

As part of this, measures should be taken to prevent providers of user interfaces, including Virtual Assistant platforms and connected car user interfaces, from, for instance, charging access fees and self-preference their own services.

Member States should be encouraged to implement measures comparable to Article 7a AVMSD in order to increase media pluralism and findability of journalistic-editorial media content.

Furthermore, another measure that could help strengthen radio (and all media in general) is to conduct a media impact assessment in legislative processes to ensure that media are not subject to policy fragmentation or over burdening obligations. It is important to refrain from imposing disproportionate regulatory burdens or transparency obligations that have no real face value. Instead, the focus of the EDS should lie in enforcing existing legislation such as the DSA, DMA or EMFA.

Other (please explain):

1500 character(s) maximum

## 2.4. What measures could be considered to reinforce the current EU framework and tools to protect free, plural and independent media?

1500 character(s) maximum

Very important for the radio sector in this context is the DMA as a tool to properly address harmful and anti-competitive practices of leading Virtual Assistants by designating them as Core Platform Services (CPSs) provided by gatekeepers. Listening habits have shifted, Virtual Assistants have become increasingly popular 'gateway devices' to access radio at home and in the car, and, as a consequence, radios rely on tech platforms to reach their listeners.

Measures should be taken to prevent providers of user interfaces, including virtual assistant platforms and connected car user interfaces, from, for instance, potentially charging access fees, unfairly appropriating a share of radios' advertising revenues and self-preference their own services.

The designation of Virtual Assistants under the DMA will provide a degree of regulatory protection which will help mitigate the growing challenge that Virtual Assistants in a gatekeeping position pose to radio, and create opportunities for increased digital audio listening and innovation.

Making sure that radio is accessible, discoverable and prominent for its listeners whatever device they are using, being it a connected device like a smart speaker or the connected car infotainment system, is very important.

## 3. Societal resilience and preparedness

3.1. Please indicate which of the following measures would in your view be most important to support societal resilience and preparedness (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Enhancing digital and media literacy and critical thinking for all age categories, starting from an early age	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fostering exchange of best practices within the media literacy community in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Support to EU-wide media literacy initiatives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for civic education	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for transparent and accountable public administration	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Raising people's awareness about narratives and techniques used in spreading disinformation to enable them to better recognise them and resist to them	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Relying on responsible and independent science advice	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

3500 character(s) maximum

A crucial element in safeguarding democratic processes against manipulation and disinformation is the active promotion of media literacy among citizens of all ages. This includes developing critical thinking skills necessary to evaluate information from various sources, understand who runs the media (i.e. state actors) and potential biases, and recognise manipulative techniques.

Educational initiatives should focus on equipping individuals with the tools to discern credible journalism from propaganda, identify deepfakes and manipulated content, and understand the functioning of online platforms and their algorithms.

Furthermore, proactive measures should be taken to ensure widespread and equitable access to primary sources of information, enabling citizens to form their own informed opinions based on verifiable facts rather than relying solely on secondary interpretations or potentially biased narratives. This could involve promoting digital literacy to navigate official databases and archives, and fostering collaborations between educational institutions and information providers.

Other (please explain):

1500 character(s) maximum

## 4. Citizens' participation and engagement

4.1. Please indicate which of the following measures would in your view be most important to support citizens' participation and engagement (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Reinforce frameworks for citizens' participation in public policymaking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Capacity-building for public authorities to engage with citizens on public policymaking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Increase communication and access to information about possibilities for citizens' participation in public policymaking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Foster people's interest and knowledge of politics and policymaking, starting at an early age	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the life-long participation in the democratic life and policy-making processes, starting at an early age	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support training and education on citizenship and democratic participation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforce citizens' trust in democratic institutions and the political sphere	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting EU citizenship and the rights deriving from it	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

*3500 character(s) maximum*

Other (please explain):

*1500 character(s) maximum*

## Concluding remarks

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If you wish to add further information, within the scope of this consultation, please feel free to do so here.

*1500 character(s) maximum*

Commercial radio listenership in cars is significant across Europe and it is an important space for radio broadcasters to reach their listeners.

During emergencies and natural disasters, the population can rely on broadcast radio to freely access trusted, high-quality information, anytime and anywhere, especially in cars, when the population is away from screens and mobile networks are down.

In addition to that, radio broadcasters face growing competition for listeners' attention from online platforms and streaming services as the number of connected car and in-car infotainment systems are continuously increasing. As most car manufacturers operate globally, they may prioritise partnerships with global digital platforms instead of European radio broadcasters, a situation worsened by the growing trend of vehicles, especially electric ones, being sold without radio receivers.

For these reasons, it is very important to secure the future distribution of trusted radio in the car through safeguarding and reinforcing the provisions in the European Electronic Communications Code (EECC) in its upcoming review.

For radio businesses to remain viable in this new environment, their trustworthy output needs to be accessible on all platforms and findable by listeners.

Please feel free to upload a supporting document (only 1 document up to 15 pages will be taken into consideration):

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

## **Contact**

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