

Public survey for European Democracy Action plan

Fields marked with * are mandatory.

Introduction

The Commission's Political Guidelines announced a European Democracy Action Plan under the headline ambition of a new push for European Democracy. The Commission intends to present the Action Plan towards the end of 2020.

The aim of the European Democracy Action Plan is to ensure that citizens are able to participate in the democratic system through informed decision-making free from interference and manipulation affecting elections and the democratic debate.

The Commission has started the preparation of the European Democracy Action Plan and would like to consult the public on three key themes:

- Election integrity and how to ensure electoral systems are free and fair;
- Strengthening media freedom and media pluralism;
- Tackling disinformation.

In addition, the consultation also covers the crosscutting issue of supporting civil society and active citizenship.

When providing your contribution, you may opt to fill in one or more of the four sections, according to their relevance to your areas of interest. Please note that a specific public consultation on the Digital Services Act package is open until 8 September 2020 and covers also elements relevant in the context of the European Democracy Action Plan.[1]

[1] <https://ec.europa.eu/digital-single-market/en/news/consultation-digital-services-act-package>

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish

- Dutch
- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

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

* First name

Xnet

* Surname

Xnet

* Email (this won't be published)

xnet@xnet-x.net

* Organisation name

255 character(s) maximum

Xnet – Instituto para la Cultura Democrática en la Era Digital

* Organisation size

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

Transparency register number

255 character(s) maximum

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

* Country of origin

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

- | | | | |
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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 |

- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland

- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

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| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
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| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena Ascension and Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

* 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 your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

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

Questions on election integrity and political advertising

Fair democratic debates and electoral campaigns as well as free and fair elections in all Member States are at the core of our democracies. The space for public debate and electoral campaigns has evolved rapidly and fundamentally, with many activities taking place online. This brings opportunities for the democratic process, public participation and citizen outreach but also challenges, inter alia concerning the transparency of political advertising online and possible threats to the integrity of elections. Ahead of the 2024 European Parliament elections, changes to the role of European political parties might also be considered.

(i) Transparency of political advertising

Q1 Have you ever been targeted^[2] with online content that related to political or social issues, political parties (European or national), political programmes, candidates, or ideas within or outside electoral periods ('targeted political content')?

[2] Paid for ads and any form of personalised content promoted to the user

- 1. No, never
- 2. Yes, once
- 3. Yes, several times
- 4. I don't know

Q2. If you receive such targeted political content, are you checking who is behind it, who paid for it and why you are seeing it?

- 1. No, I am not interested
- 2. I don't know how to do it
- 3. Yes, occasionally
- 4. Yes, all the time
- 5. I don't receive targeted political content

Q3. To what extent do you agree with the following statements related to targeted political content you have seen online?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
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1. Targeted content was labelled in a clear manner	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. It was easy to distinguish paid for targeted content from organic content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. It was easy to identify the party or the candidate behind the content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. The content included information on who paid for it	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. The information provided with the content included targeting criteria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
6. The ad was linked to a database of targeted political content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. The targeted political content offered the possibility to report it to the platform	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q4. Which of the following initiatives/actions would be important for you as a target of political content?

	Not at all	A little	Neither a lot nor a little	A lot	Absolutely	Don't know
1. Disclosure rules (transparency on the origin of political content)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
2. Limitation of micro-targeting of political content, including based on sensitive criteria, and in respect of data protection rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3. Creation of open and transparent political advertisements archives and registries that show all the targeted political content, as well as data on who paid for it and how much	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
4. Political parties to disclose their campaign finances broken down by media outlet	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
5. Prohibit foreign online targeted political content	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Prohibit online targeted political content altogether	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Rules limiting targeted political content on the election day and just before	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
8. Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q5. Online targeted political content may make use of micro-targeting techniques allowing advertisers to target with high precision people living in a specific location, of a certain age, ethnicity, sexual orientation or with very specific interests. Do you think that:

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Micro-targeting is acceptable for online political content and it should not be limited	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Criteria for micro-targeting of political content should be publicly disclosed in a clear and transparent way for every ad	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Micro-targeting criteria should be strictly limited	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Micro-targeting criteria should be banned	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

Como explicamos en nuestro ensayo de investigación sobre monopolios de la desinformación "#FakeYou" (<https://xnet-x.net/informe-fake-news-desinformacion/>) y en nuestras recomendaciones jurídicas (<https://xnet-x.net/ley-fakeyou/>) los criterios principales a aplicarse para evitar la manipulación de la información política son a)

la transparencia (como obligación - con aparejadas estrictas sanciones incluso hasta la ilegalización - para cualquier persona físico o jurídica que pague o cobre para la difusión y viralización de información); b) la obligación claridad informativa para las y los usuarios. Hablamos de un etiquetado neutral como con los alimentos; c) Prohibir con mayor contundencia el perfilado no autorizado por las y los receptores.

Sin el perfilado no es posible el micro-targeting.

Por otra parte, no debe ser posible que un partido se dirija a distintos votantes con discursos y posicionamientos distintos según las convicciones de estos.

Incluso para quienes consientan recibir información y ser perfilados, la información debe ir debida y claramente etiquetada de forma bien visible:

- 1) El contenido debe señalarse como "micro-targeted content";
- 2) Los criterios utilizados para llegar a los distintos votantes sean accesibles de forma inmediata por parte de estos y se describan en la misma granularidad de su elección por parte de quienes divulgan la información. Así mismo, debe incrementarse la información proporcionada a los votantes sobre la información política que reciben.

Por último, la regulación no debe ir dirigida solo a partidos políticos sino por todos los intervinientes en el negocio de la información y desinformación, haciendo obligatorio por vía legislativa el etiquetado que pormenorizamos en #FakeYou (muy diferente del etiquetado a posteriori que se hace por parte de los llamados "verificadores" o factcheckers).

Q6. EU countries regulate offline political advertising on traditional media (e.g. press, television) in the context of local, national or EU elections. These rules limit the amount of airtime or maximum expenditure permitted for political advertising on broadcast TV or print media. Do you think similar rules should also apply to online targeted political content?

- 1. Yes
- 2. No
- 3. I don't know

Please explain your answer

Sí, pero el enunciado no es completamente cierto.
 En países como España, la regulación es muy laxa.
 - Los medios privados no respetan las cuotas y la ley es ambigua respecto a su responsabilidad por lo que sistemáticamente crean asimetrías informativas solo en base a criterios comerciales de audiencia. Esto favorece la polarización del debate y el enrarecimiento del debate, con proliferación de desinformación.
 - No hay medios efectivos para sancionar quienes no respete la regulación por lo que todo esto ocurre en la más completa impunidad.
 Por todo ello, decir que se apliquen los mismos criterios online que offline es ABSOLUTAMENTE INSUFICIENTE. Los criterios offline ya no son adecuados. Como explicamos en nuestro ensayo de investigación anteriormente mencionado #FakeYou, partidos políticos, instituciones, medios, empresas de comunicación, corporaciones y informadores influyentes con inversión o ingresos en y por comunicación tanto ONLINE como OFFLINE deben responder a reglas.

(ii) Threats to electoral integrity

Q1. Do you believe the following are real and existing threats to the electoral process in the EU and its Member States?

	Yes	No	Don't know
1. Intimidation of minorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Intimidation of political opposition	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Micro-targeting of political messages, that is messages targeted to you or a narrowly defined group	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Information suppression, that is the purposeful lack of information on a topic	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Disinformation or fake accounts run by governments, including foreign governments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Divisive content, that is content created to divide society on an issue	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. The amplification of content that makes it difficult for you to encounter differing voices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Intimidation of women candidates	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. I or someone I know has been targeted based on sensitive criteria such as gender, ethnicity or sexual orientation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
10. Content where I could not easily determine whether it was an advertisement or a news post	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
11. Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

[IF Q1=11: Please define]

La manipulación que influye en las elecciones no es solo la de los períodos electorales. Los criterios de control a partidos, instituciones, etc. deberían llevarse a cabo todo el año. Tanto en periodo electoral como no, los medios que deberían ser los "perros guardianes", comunican como si fuera información lo que instituciones y partidos dicen. Esto no es periodismo es ser altavoces de una o varias de las partes. La verificación y el contraste debería ser una obligación para los medios, para las instituciones y para los negocios que se basan en la información. Para más información, véase: <https://xnet-x.net/ley-fakeyou/> y <https://xnet-x.net/informe-fake-news-desinformacion/>

Q1.1 IF Q1=YES for any answer option

- 1. Have you felt personally intimidated/threatened by targeted political content?
- 2. Could you tell us more about your experience?

Please explain your answer

Sobre el número (5) Nuestra investigación demuestra que no son principalmente influencias extranjeras quienes manipulan la información que circula, sino que sobre todo de partidos y grandes actores locales. Enfocar en "extranjero" desvía de mejorar realmente nuestras democracias. El debate polarizado causado por las burbujas de eco que se crean con los medios y plataformas, crean debates polarizados y desinformación masiva que crean un ambiente propicio a la violencia.

(iii) European Political Parties:

Q1. Is there scope to further give a stronger European component to the future campaigns for EU elections? Please list initiatives important to you in this regard

	Not at all	A little	Neither a lot nor a little	A lot	Absolutely	Don't know
1. Better highlighting the links between the national and European Political Parties, for example by displaying both names on ballot papers and in targeted political content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. More transparency on financing (e.g. information about how much national parties contribute yearly to the European Political Parties budgets)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3. Bigger budgets for European Political Parties	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Strengthening the European campaigns by European Political Parties in Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5. Better explaining the role of European Political Parties in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain

La transparencia de los gastos y cobros en la difusión de contenido e información, tanto online como offline, es fundamental. En concreto, debe establecerse, la obligación de los grandes fabricantes y viralizadores de noticias (gobiernos, instituciones, partidos políticos, medios de comunicación de masas, corporaciones y grandes fortunas) de aflorar el detalle de los gastos o cobros de las partidas de comunicación, relacionando las cantidades con los contenidos exactos de los ítems/servicios (mensajes, publicaciones, bots, banners, carteles, campañas...).

Esto para cada uno de los servicios contratados o realizados por el equipo propio. Ello servirá para poner el foco en el lucro y penalizar los pagos y cobros por la emisión y viralización de información sin las debidas garantías de veracidad.

El daño que pueden causar la desinformación se produce si tiene un impacto masivo, lo que ocurre cuando existe un esfuerzo institucional o una inversión en ella y se espera que genere ciertos beneficios, sean políticos, económicos o de cualquier otra índole.

Para más información, véase: <https://xnet-x.net/ley-fakeyou/> y <https://xnet-x.net/informe-fake-newsdesinformacion/>

(iv) European Elections

Q1. In your opinion what initiatives at national level could strengthen monitoring and enforcement of electoral rules and support the integrity of European elections (multiple selections possible)?

- 1. Strengthened sharing of information and monitoring activity across borders and between authorities
- 2. Technical interfaces to display all political advertisements as defined by online service providers
- 3. Technical interfaces to display all advertisements (political or not)
- 4. Clear rules for delivery of political ads online in electoral periods, similarly to those that exist in traditional media (TV, radio and press)
- 5. Independent oversight bodies with powers to investigate reported irregularities
- 6. Enhanced reporting obligations (e.g. to national electoral management bodies) on advertisers in a campaign period
- 7. Enhanced transparency of measures taken by online platforms in the context of elections, as well as meaningful transparency of algorithmic systems involved in the recommendation of content

- 8. Privacy-compliant access to platform data for researchers to better understand the impact of the online advertisement ecosystem on the integrity of democratic processes
- 9. Greater convergence of certain national provisions during European elections
- 10. Stronger protection against cyber attacks
- 11. Higher sanctions for breaches of the electoral rules
- 12. Other – please specify

Please explain your answer

Las medidas aplicables a la publicidad política deben serlo para todo tipo de publicidad y/o inversión en la difusión de contenido y/o información, tanto online como offline. Cuando la información es mediada por pagos, es un negocio y todos los actores han de regularse. Y no se ha de segregar el online porque estos negocios son multi-plataformas online + offline. De hecho, la combinación de ambos ámbitos es el actual campo omnipresente de desinformación y manipulación de la opinión pública. Debemos recordar que Internet no debe ser tratado como un estado de emergencia donde se puede reducir la importancia de los derechos fundamentales. Internet es parte de la vida en la era actual, no es un lugar a parte. Los daños para el debate democrático provienen de una combinación de los distintos campos de comunicación, online y offline y todos ellos deben ser abordados para resolver el problema. Por tanto, las medidas que se propongan deberían aplicarse no sólo al entorno online sino también al offline para gozar de la eficacia deseada, haciendo posible aflorar la inversión y trazar el origen.

Como ha hemos comentado, los actores que más deben ser sujetos de regulación son gobiernos, instituciones, partidos políticos, medios de comunicación de masas, corporaciones y grandes fortunas. Las medidas deben absolutamente evitar atacar la libertad de expresión de las y los usuarios y la ciudadanía.

La transparencia no solo debe ser de los pagos y cobros (véase la pregunta anterior) sino que debe incluir más información. En efecto, es importante proporcionar herramientas a la ciudadanía para poder permitir la verificación por parte de aquellos a quién se dirige la información, etiquetando, de forma similar al etiquetado alimentario, la información que se difunde. Para más información, véase: <https://xnet-x.net/ley-fakeyou/>

Deber de verificación: hasta ahora solo aplicado por parte de profesionales de los medios de comunicación, debería exigirse su aplicación a estos y otros actores de denotada influencia y para los que la información sea negocio (partidos, negocios relacionados con la información, administraciones e instituciones, etc.), incluso cuando se trate de publicidad. Toda comunicación que pretenda considerarse información profesional amparada por el legítimo ejercicio de la libertad de información o relacionadas con un pago /cobro (negocio) debe incorporar -para gozar de una presunción simple de veracidad- protocolos de verificación en su proceso de elaboración por los sujetos que se encuentren indicados abajo. Estos protocolos de verificación son considerados el estándar mínimo de diligencia profesional que un informador debe respetar para poder difundir información veraz. Más detalles en: <https://xnet-x.net/ley-fakeyou/>

Q2. In your opinion what initiatives at European level could strengthen monitoring and enforcement of rules relevant to the electoral context?

- 1. Strengthened sharing of information and monitoring activity across borders and between authorities
- 2. European-level obligations on political advertising service providers
- 3. European-level shared online monitoring and analysis capability being made appropriately available to national authorities
- 4. Cross border recognition of certain national provisions
- 5. Other

Please explain your answer

Véase pregunta anterior.

Questions on strengthening media freedom and media pluralism

Freedom of expression and freedom and pluralism of the media are enshrined in the Charter of Fundamental Rights of the European Union (Article 11), and their protection is underpinned by Article 10 of the European Convention on Human Rights. They are essential elements of a healthy democratic system. Whilst in general the EU and its Member States score well on a global scale, there are signs of deterioration (as shown by the Media Pluralism Monitor) and the sector is facing challenges from threats to the safety of journalists (including strategic lawsuits against public participation – ‘SLAPP lawsuits’) to the transformation of the sector, with digital technologies and new players transforming the established business model of advertising revenue. The COVID-19 pandemic has worsened the situation, both in the EU and outside of the EU, from restrictive national legislation to critical loss of revenues for the media sector.

Initiatives to strengthen media freedom and media pluralism will build in particular on the analysis and areas covered by the upcoming Rule of Law Report, with a focus on improving the protection of journalists, their rights and working conditions. Please note that the Commission also intends to propose, by the end of the year, an Action Plan for the Media and Audiovisual sector to further support the digital transformation and the competitiveness of the media and audiovisual sectors and to stimulate access to quality content and media pluralism.

(i) Safety of journalists / conditions for journalistic activities

Q1. Are you aware of issues regarding safety of journalists and other media actors or conditions for journalistic activities in your country?

- 1. Yes (please justify)
- 2. No (please justify)
- 3. I do not know

Please explain your answer

Algunos casos:

- <https://www.rsf-es.org/grandes-citas/clasificacion-por-paises/>
- <https://www.informeanualrsf.es/news/espana-19/>
- <https://elpais.com/espana/2020-08-26/la-justicia-cita-a-declarar-al-presidente-de-mediaset-tras-unadenuncia-de-la-familia-franco.html>
- <https://www.publico.es/sociedad/periodista-denuncia-guardia-civil-silencio.html>

Pero también se da la situación contraria: la prensa no cumple con su deber de informar y verificar. Así ocurrió con la reciente fuga del Rey emérito o en el caso de un caso flagrante de mala praxis periodística (noticia totalmente construida en medios mainstream) cuyas sanciones han sido mínimas y seguramente no suficiente

respecto al gran daño ocasionado: https://www.eldiario.es/sociedad/periodista-condenado-mundo-coaccionsentencia_1_1248321.html

Además, en España muy a menudo los medios no protegen sus fuentes que acaban perseguidas judicialmente por la información que a los medios reporta visibilidad y ganancias (véase el caso de los Correos de Blesa, Papeles de la Castellana, caso Cristina Cifuentes, etc.).

En suma, se debe defender a los periodistas para que puedan llevar a cabo su trabajo de averiguación de la verdad, pero también se debe defender la opinión pública del negocio periodístico sin escrúpulos.

Q1.1 If yes, what kind of issue?

- 1. Lack of proper sanction applied to perpetrators of attacks against journalists– Yes/No
- 2. Abuse of defamation laws or other laws aiming at silencing journalists and news media – Yes/No
- 3. Lack of legal safeguards for journalistic activities – Yes/No
- 4. Lack of institutions to protect journalists – Yes/No
- 5. Online hate speech – Yes/No
- 6. Cyberbullying – Yes/No
- 7. Physical threats – Yes/No
- 8. Other – please specify

Please explain your answer

Q2. Are you familiar with the concept of ‘strategic lawsuits against public participation’ (SLAPPs)?

- 1. Yes
- 2. No
- 3. Don't know

Q2.1 If yes, are you aware of such lawsuits in your own Member State?

- 1. Yes
- 2. No
- 3. Don't know

Please explain your answer

Q3. In your opinion, on which SLAPP related aspects should the European Union-level action be taken (multiple answers possible):

- 1. Regular monitoring of SLAPP cases in the European Union
- 2. Financial support for journalists facing SLAPP lawsuits
- 3. Rules on legal aid for journalists facing SLAPP lawsuits
- 4. Cross-border cooperation to raise awareness and share strategies and good practices in fighting SLAPP lawsuits
- 5. EU rules on cross-border jurisdiction and applicable law
- 6. None of the above
- 7. Other – please specify

Please explain your answer

Estas medidas no pueden ser solo para periodistas. Toda organización o persona activa en cualquier ámbito está sometida a presiones judiciales por entidades e intereses poderosos.

<https://ifex.org/rights-groups-demand-an-eu-wide-anti-slapp-directive/>

Además de la defensa de las y los alertadores “whistleblowers” (véase Directiva 2019/1937) y nuestra proposición de ley al respecto: <https://xnet-x.net/proposicion-ley-proteccion-integral-alertadores/>

Q4. Do you think that the EU should act to strengthen safety of journalists and other media actors / improve conditions for journalistic activities?

- 1. Yes (please justify)
- 2. No (please justify)
- 3. I do not know

Please explain your answer

Creemos firmemente que la libertad de expresión, la libertad de dar y recibir información verificada no es ya un derecho y prerrogativa de los grandes medios de comunicación sino DE TODA LA CIUDADANÍA. Proteger solo al periodismo no es suficiente.

Por otra parte, el periodismo merece una protección especial si cumple con la función especial de investigar y verificar para informar. Esto debe ir parejo a obligaciones de verificación y transparencia o sino es solo un actor más de la manipulación informativa. Una actividad que tiene como principal resultado la manipulación informativa no merece especial protección.

Q4.1 If yes, how?

- 1. By issuing guidance – Yes/No
- 2. By setting up dedicated structured dialogue with Member States – Yes/No
- 3. By providing financial support – Yes/No
- 4. Other – please specify

Please explain your answer

By adopting legislation.

Q5. Are you aware of any issues regarding the protection of journalistic sources in your country?

- 1. Yes (please provide concrete examples)
- 2. No
- 3. I do not know

Please explain your answer

Nos ha pasado como activistas: en España muy a menudo los medios no protegen sus fuentes que acaban perseguidas judicialmente por la información que a los medios reporta visibilidad y ganancias (véase el caso de los Correos de Blesa, Papeles de la Castellana, caso Cristina Cifuentes, etc.).

Q6. Are you aware of any difficulties that journalists are facing when they need access information / documents held by public authorities and bodies in your country?

- 1. Yes (please provide concrete examples)
- 2. No
- 3. I do not know

Please explain your answer

Las excepciones previstas en la legislación de transparencia no son lo suficientemente claras y explícitas, causando una interpretación sesgada de la misma por parte de las instituciones. Ello conlleva que frecuentemente no se proporcione el acceso debido a información pública. Algunos casos y demandas relacionados con la situación actual

del acceso a la información pública en España pueden encontrarse a continuación:

- <https://www.access-info.org/es/blog/2020/07/14/coalicion-proacceso-insis=te-gobierno-compromisostransparencia-iv-plan-gobierno-abierto/> y <https://www.access-info.org/wp-content/uploads/2da-Carta-de-CPA-a-Foro-de-Gobierno-Abierto-1.pdf>

- <https://www.access-info.org/es/blog/2018/04/23/la-sociedad-civil-pide-recursos-suficientes-en-lospresupuestos-generales-para-velar-por-la-transparencia/>

(ii) Media independence and transparency

Q1. How would you characterise the situation with regards to independence of media and journalism in your country?

	Not at all	To a limited extent	To a great extent	Don't know
1. The government controls or exerts pressure on media outlets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Powerful commercial actors control or influence editorial policy of media outlets	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3. Journalists are afraid of losing their job or of other consequences and avoid voicing critical opinions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. News media, in particular public broadcasters, provide balanced and representative information, presenting different views, particularly in times of electoral campaigns	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q2. How important is the support for independent journalism (including free lance journalists and bloggers/web journalists) and the protection of the safety of independent journalists to supporting democracy in the EU and internationally?

- 1. Very important
- 2. Important
- 3. Not important
- 4. Don't know

Q3. Do you feel sufficiently informed about the ownership of the media outlets you are consulting?

- 1. Yes
- 2. No (please explain)
- 3. I do not know

Please explain

No solo es importante conocer la propiedad de los medios de comunicación sino también quién los financia, tanto regularmente como puntualmente. Por ejemplo, financiando un artículo o reportaje concreto. Además, muchas publicaciones son marcas blancas de redes clientelares relacionadas con partidos políticos o entidades corporativas. Todo esto tiene que aflorar y ser fácilmente identificable para la opinión pública. Por todo ello proponemos aflorar toda esta información de forma fácilmente accesible y de forma obligatoria en todo ámbito donde se invierta o se cobre por la emisión y difusión de información. Para más información, véase: <https://xnet-x.net/ley-fakeyou/> y <https://xnet-x.net/informe-fake-newsdesinformacion/>

Q4. Should it be mandatory for all media outlets and companies to publish detailed information about their ownership on their website?

- 1. Yes (please explain)
- 2. No (please explain)
- 3. I do not know

Please explain

Véase pregunta anterior.

Q5. Should content by state-controlled media, where governments have direct control over editorial lines and funding, carry specific labels for citizens?

- 1. Yes (please explain)
- 2. No (please explain)
- 3. I do not know

Please explain

Como explicamos en <https://xnet-x.net/ley-fakeyou/> y <https://xnet-x.net/informe-fake-news-desinformacion/> es importante proporcionar herramientas a la ciudadanía para poder permitir la verificación por parte de aquellos a quién se dirige la información, etiquetando, de forma similar al etiquetado alimentario, la información que se difunde. Para todos los medios, no solo los que dependen de estados, sino de otros inversores.

Q6. Do you think information from independent media and trustworthy sources should be promoted on online intermediary services (such as search engines, social media, and aggregators)?

- 1. Yes (please explain)
- 2. If yes, please give examples of how it could be achieved and how to distinguish sources to be promoted?

- 3. No (please explain)
- 4. I do not know

Please explain

Estos actores no deben promocionar contenido ni escoger qué medios son de confianza y cuales no lo son, pudiendo tener sesgos propios, lo cual causaría un riesgo de discriminación de la información y periodismo independiente y de monopolio informativo, vulnerando la libertad de expresión e información. El problema no consiste solo en escuchar diferentes voces, sino de verificar. Un dicho sobre periodismo es: No ubliques la fuente que dice que llueve y la que dice que no en igualdad de condiciones. Asómate a la ventana, y mira si llueve o hace sol, y solo después publica.

Se trata pues de imponer responsabilidades de verificación y transparencia de la misma a todo negocio vinculado con la información. En este caso los intermediarios deberían solo asegurarse de que la información lleve un etiquetado de transparencia de verificación suficientemente fiable.

Q7. Do you think further laws or institutions should be put in place in your country to strengthen media independence and transparency in any of the following areas?

- 1. Transparency of state advertising and state support to news media / journalism – Yes/No
- 2. Transparency of media ownership – Yes/No
- 3. Promotion of information from independent media and trustworthy sources– Yes/No
- 4. Ownership limitations of commercial actors – Yes/No
- 5. Ownership limitations of political actors – Yes/No
- 6. Rules to prevent foreign (extra-EU) based manipulative and hate-spreading websites from operating in the EU - Yes/No
- 7. Other – please specify
- 8. No, what is in place is sufficient
- 9. No
- 10. I do not know

Please explain your answer

Como explicamos arriba y en <https://xnet-x.net/ley-fakeyou/> y <https://xnet-x.net/informe-fake-newsdesinformacion/> es importante mejorar la transparencia de los contenidos, su financiación y los sesgos en su elaboración proporcionando herramientas a la ciudadanía para poder permitir la verificación por parte de aquellos a quién se dirige la información, etiquetando, de forma similar al etiquetado alimentario, la información que se difunde.

Q8. Do you think that the EU should act to strengthen media independence and transparency in any of the following areas? (Multiple answers possible)

- 1. Transparency of state advertising and state support to news media / journalism – Yes/No
- 2. Transparency of media ownership – Yes/No
- 3. Promotion of information from independent media and trustworthy sources – Yes/No
- 4. Ownership limitations of commercial actors – Yes/No
- 5. Ownership limitations of political actors – Yes/No
- 6. Other – please specify
- 7. No
- 8. I don't know

Please explain your answer

Ver respuesta a la pregunta anterior.

Q9. If you answered yes to some of the options of the previous question, how should the EU act in these areas?

- 1. By issuing guidance – Yes/No
- 2. By setting up dedicated structured dialogue with Member States – Yes/No
- 3. By providing financial support – Yes/No
- 4. By adopting legislation – Yes/No
- 5. Other – please specify

Please explain your answer

Todo cuanto explicamos en las respuestas anteriores, lo hemos desglosado en directrices para legislación:
<https://xnet-x.net/ley-fakeyou/>

Q10. EU countries have rules applying to media content such as news or current affairs, in general (e.g. rules on editorial independence, objectivity/impartiality), and in particular during elections (rules on scheduling and the balance of the programmes, moratoria on political campaign activity, opinion polls). Do you think similar rules should apply online?

- 1. Yes
- 2. No
- 3. I don't know

Please explain your reply.

Las mismas normas que se aplican online deben aplicarse offline. Diferenciarlos es peligroso porque criminaliza Internet y al mismo tiempo no es eficiente para resolver el problema de la desinformación, como defendemos y demostramos en el libro «#FakeYou – Fake News y Desinformación» Gobiernos, partidos políticos, mass media,

corporaciones, grandes fortunas: monopolios de la manipulación informativa y recortes de la libertad de expresión”, la manipulación informativa y desinformación se producen en un entorno multi-capa que concierne tanto los medios tradicionales como Internet. La responsabilidad debe exigirse en ambos ámbitos por parte de aquellos que cobran y pagan la difusión de información, incluyendo los siguientes sujetos:

A.1.- Información que circula mediante pago y cobro = patrocinio:

Cualquier persona física o jurídica que invierta cualquier cantidad de dinero para la viralización (alcanzar un mayor número de personas a las que no llegaría sin inversión económica) de una información.

Cualquier persona física o jurídica que perciba cualquier cantidad de dinero para la viralización (alcanzar un mayor número de personas a las que no llegaría sin inversión económica) de una información, por ejemplo, redes sociales, buscadores, espacios publicitarios, medios de comunicación...

La simple comunicación pública sin ulterior inversión no se considera viralización. No se incluyen los prestadores de servicio de la sociedad de la información que ofrezcan espacios para la simple comunicación pública (blog, página web) sin prestaciones posteriores de segmentación de público viralización.

Queda excluida de esta definición cualquier tipo de expresión artística.

A.2.- Medios de Comunicación:

Los que se presentan como tales o tienen intención y apariencia de actuar como un medio, tengan sus prerrogativas, derechos o privilegios. Las estructuras que tienen como objetivo prioritario el ejercicio del periodismo entendido como la redacción y difusión de informaciones verídicas.

A.3.- Empresas y profesionales de la comunicación:

Personas físicas o jurídicas cuya actividad sea la producción, preparación, planificación, desarrollo, gestión y colocación de informaciones por cuenta de terceros, o asesoramiento para la realización de dichas actividades, con el objetivo de difundirlas a un público específico, con o sin el uso de herramientas de gestión de contenidos, la

analítica web o la comunicación técnica. Incluye las plataformas de contenido online como Facebook.

B.- Instituciones y partidos políticos

Q11. Should the role of and cooperation between EU media regulators in overseeing respect for such standards, offline and online, be reinforced?

- 1. Yes
- 2. No
- 3. I don't know

Please explain your reply.

(iii) Cross-border cooperation, media and press councils, self-regulation

Q1. Are you aware of the existence of a press or media council or another media self/co-regulation body supervising journalistic ethical standards and conduct in your country?

- 1. Yes
- 2. No

Q1.1 If yes, what are the main activities of a press or media council or another media self/co-regulation body in your country?

- 1. Please specify
- 2. I do not know

Please explain your answer

En España existen nueve Colegios Profesionales de Periodistas (Andalucía, Asturias, Castilla y León, Cataluña, Galicia, La Rioja, Murcia, Navarra y País Vasco), agrupados en la Red de Colegios Profesionales de Periodistas donde colaboran para la mejora de servicios comunes y la realización de actuaciones conjuntas en defensa del periodismo y de la comunicación audiovisual. Sus principales líneas de trabajo son: el impulso de la aprobación de la Ley de creación del Consejo General de Colegios Profesionales; la profesionalización de la comunicación en el sector público [Compromiso Público por el Empleo y la Profesión Periodística] y en el sector privado [Sello de Comunicación Responsable]; proporcionar herramientas para la ciudadanía contra la desinformación [Registro de Medios Digitales, ROMDA]; establecer un Estatuto de la profesión periodística; dignificar el ejercicio profesional, etc. (fuente: <https://www.colegiosperiodistas.es/>).

En general son organismos que si bien defiende el gremio, no son suficientemente independientes como para asumir con la suficiente fuerza la corrección de malas praxis internas, en defensa del interés general.

Q1.2 Do you think press or media councils should be established in all EU countries?

- 1. Yes (please explain)
- 2. No (please explain)

Please explain

Q1.3 In order to address the challenges in the media sector, which activities should be prioritised by press and media councils or other media self/co-regulation bodies?

- 1. Incentivising exchanges of best practices and promoting journalistic standards, in particular online – Yes/No
- 2. Providing support for journalists in the process of digitalisation of media sector – Yes/No
-

- 3. Ensuring effective complaints handling mechanisms – Yes/No
- 4. Establishing links between journalists and citizens to increase trust – Yes/No
- 5. Contributing to the fight against disinformation online – Yes/No
- 6. Other - please specify

Please explain your answer

Consideramos gravísimo que se insista con aplicar medidas "en particular" online (opciones 1 y 5). Las medidas que se emprendan (1) y la lucha contra la desinformación (5), como ya hemos señalado, no deben producirse solo en el ámbito online sino también en el ámbito offline (véase pregunta Q10 del apartado (ii) Media independence and transparency). Toda legislación que solo aborde el problema online está pensada para consentir y estimular la DESINFORMACIÓN de medios e instituciones tradicionales y monopolistas, socavando la pluralidad y el derecho a la información además de deberes profesionales de verificación y el principio de veracidad.

Q2. What role, if any, should the EU play to facilitate cross-border cooperation?

- 1. Provide financial support to media councils or other media self/co-regulation bodies – Yes/No
- 2. Set up an EU-level coordination network – Yes/No
- 3. Promote citizens' awareness about their activities – Yes/No
- 4. Other (please specify)
- 5. No role

Please explain your answer

Questions on tackling disinformation

Designed to intentionally deceive citizens and manipulate our information space, disinformation undermines the ability of citizens to form informed opinions. Disinformation can also be a tool for manipulative interference by external actors.

(i) Scope

Q1. The April 2018 Commission Communication on Tackling online disinformation: a European Approach defines disinformation as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm.[4]

Do you think this definition should be broadened and complemented to distinguish between different aspects of the problem?

[4] Public harm includes threats to democratic processes as well as to public goods such as Union citizens' health, environment or security. Disinformation does not include inadvertent errors, satire and parody, or clearly identified partisan news and commentary.

- 1. Yes (please specify)
- 2. No (please specify)
- 3. Don't know

Please explain your answer

En el primer capítulo de nuestro libro ««#FakeYou – Fake News y Desinformación» Gobiernos, partidos políticos, mass media, corporaciones, grandes fortunas: monopolios de la manipulación informativa y recortes de la libertad de expresión” se examina de qué formas se están definiendo en este momento las nociones de fake news y desinformación.

La noción distorsionada de desinformación que se pretende presentar al público determina que, para luchar contra ella, no se modifique en absoluto el negocio monopolístico de toda la vida, sino que les baste con limitarse a atar en corto a sus nuevos competidores, las corporaciones de contenidos en línea. Así, para perpetuar la asimetría de poder propia de la época predigital entre los ciudadanos y los grandes medios y emisores de información (gobiernos, instituciones, partidos y medios de comunicación), se criminaliza la tecnología en sí, y con ello persigue el acceso democrático a la misma por parte de la ciudadanía en el ejercicio de derechos y libertades. Sin duda, aprovechar la oportunidad para acallar las voces críticas o bien aumentar su control sobre la población es una gran tentación, como demuestran distintos ejemplos presentes en Europa y el resto del mundo.

La definición que proponemos es la siguiente: “La desinformación incluye fake news (información falsa) e información inexacta o engañosa. Podemos considerarla una parte inherente y mejorable de nuestra naturaleza humana y cuando hacemos uso de la libertad de expresión, y por sí misma no produce daños públicos masivos ni significativos. No obstante, estos sí se producen cuando los grandes monopolios informativos, políticos y económicos invierten recursos en la creación y la viralización de la desinformación, tanto en línea como en formatos tradicionales. En estos casos debe combatirse proactivamente para salvaguardar los derechos y libertades democráticos. Atacar el problema solo en línea sería un enfoque con el único objetivo de preservar monopolios de la desinformación y no de atacar el problema realmente”

Q2. So far, the European Commission has addressed the spread of disinformation through a self-regulatory approach, which has resulted in a Code of Practice on Disinformation being subscribed by major online platforms and trade associations representing the advertising industry. Do you think that this approach should be:[5]

[5] This question complements the questionnaire for the public consultation on the Digital Services Act, which focuses on illegal content

- 1. Continued as it is currently pursued (status quo)
- 2. Pursued but enlarged to a wider range of signatories
- 3. Pursued but combined with a permanent monitoring and reporting programme
- 4. Pursued but on the basis of a substantially reviewed Code of Practice
- 5. Pursued but accompanied by a regulatory framework fixing basic requirements for content moderation, data access and transparency, as well as respective oversight mechanisms
- 6. Pursued but accompanied by a regulatory package fixing overarching principles applicable to all information society services and establishing more detailed rules for dealing with disinformation under such general principles
- 7. Replaced by special regulation on disinformation
- 8. abandoned altogether, as all forms of restriction or control on content posted online by internet users and which is not illegal in nature (e.g. illegal hate speech, incitement to terrorism) could endanger freedom of speech
- 9. Other (please explain)

Please explain your answer

Hasta ahora la CE ha trabajado muy influenciada por los lobbies de los medios audiovisuales y corporaciones de medios informativos: el 47% de los expertos del comité defienden esos intereses. Es hora de que ataque el problema de verdad, ordenando las responsabilidades - las mismas tanto online como offline - para gobiernos, instituciones, partidos políticos, corporaciones, medios de comunicación, plataformas y empresas de comunicación todos ellos actores del negocio de la desinformación. Hablamos de NEGOCIO porque no se trata de atacar la libertad de expresión de la población ya no solo por tratarse de derecho fundamental si no porque el problema reside en la inversión para la viralización de contenido, o sea en el negocio que como todo negocio puede ser regulado. Para ser efectivas, las medidas deben ser de carácter legislativo y conllevar sanciones en caso de incumplimiento, siguiendo el ejemplo establecido por el Reglamento General de Protección de Datos.

Q3. Have you ever encountered the following measures to reduce the spread of disinformation on social media platforms?

	Yes	No	Don't know
1. Alerts when attempting to share or publish content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. Notifications to users who have previously engaged with content or sites that have failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Clear labels above content or sites that have failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Mechanisms allowing you to report disinformation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q3.1 If yes, on which platforms have you encountered this?

- 1. Google
- 2. Facebook
- 3. Twitter
- 4. YouTube
- 5. WhatsApp
- 6. Other (Please specify)

Please explain your answer

(ii) Disrupting the economic drivers for disinformation

Q1. What type of measures should online platforms and advertising networks operators take in order to demonetise websites that create, present or disseminate disinformation?[6]

[6] Please note that this question refers to monetisation of websites that systematically publish false or misleading information, which is not illegal in nature. Monetisation via advertisement placements of web sites publishing illegal content is addressed within the context of a separate questionnaire for the public consultation on the Digital Services Act.

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and publish them	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and remove the ad accounts concerned	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Establish and regularly update lists of websites identified by fact-checkers as systematic sources of disinformation (black list approach) and temporarily suspend the ad accounts concerned	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Establish and regularly update lists of websites identified by fact-checkers as occasional sources of disinformation (grey list approach) and give the advertisers the possibility to selectively exclude such websites	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Block ad accounts only for those websites that engage in deceptive behaviour (e. g. spamming, misrepresentation of identity, scraping content from other sources, containing insufficient original content, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Ensure a systematic scrutiny of websites providing advertisement space and limit ad placements only on those websites that are considered trustworthy by reputable indexes (white list approach)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Ensure transparency of platforms vis-à-vis advertisers and provide for third-party verification (e.g. position of the ads, the content the ads are run next to, metrics)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q2. Paid-for content on issues of public interest is promoted on social media platforms both during and outside electoral periods. Due to the special prominence given to such paid-for content in news-feeds and other systems for displaying content online, users may be misled as to its credibility or trustworthiness, irrespective of the veracity of the content. Do you think that issue-based advertising / sponsored content of political context:

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Should be systematically labelled	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Should be systematically labelled and collected in public, searchable repositories	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Should be subject to the same rules as on political advertising (see above section)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Should not be regulated	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

(iii) Integrity of platforms' services

Q1. Do you think there should be targeted regulation at EU or national level to prohibit deceptive techniques such as the use of spam accounts and fake engagement to boost posts or products?

- 1. Yes
- 2. No
- 3. Don't know
- 4. Other

Q1.1 If you replied yes to the previous question, what do you think should be the most appropriate measures to tackle the above-mentioned manipulative techniques and tactics?

			Neither agree			I don't
			agree			

	Fully agree	Somewhat agree	not disagree	Somewhat disagree	Fully disagree	know /No reply
1. Label the content as artificially promoted	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Demote the content to decrease its visibility	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Suspend or remove the content because the use of manipulative techniques is contrary to platforms' terms of service	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Suspend or remove the accounts engaging in manipulative techniques	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Invest in internal intelligence systems to detect manipulative techniques	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Invest in artificial intelligence to detect manipulative techniques	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

(4) No debe sustituirse el rol de las autoridades públicas para que lo asuman actores privados tales como las plataformas.

(3) Tampoco confiar dicha autoridad a los términos y condiciones impuestos por parte de actores privados.

(5&6) El filtrado automatizado sin intervención humana, sobre todo referido a opiniones de usuarios, produce a menudo censura de la libertad de expresión, retirando contenido legítimo a causa de la falta de comprensión del contexto de los sistemas utilizados por las plataformas. Véase: <https://citizensandtech.org/2020/09/chilling-effect-automated-law-enforcemen/>

Es por ello por lo que no debería establecerse ni incentivarse dicho filtrado y retirada de contenido automatizado por ley ni por parte de las instituciones.

(7) Utilizar el etiquetado que hemos propuesto para todo tipo de contenido en todo tipo de medios, tanto online como offline. Como explicamos en <https://xnet-x.net/ley-fakeyou/> y <https://xnet-x.net/informe-fakenews-desinformacion/> es importante mejorar la transparencia de los contenidos, su financiación y los sesgos en su elaboración proporcionando herramientas a la ciudadanía para poder permitir la verificación por parte de aquellos a quién se dirige la información, etiquetando, de forma similar al etiquetado alimentario, la información que se difunde. O sea: tipo de contenido, fuentes, fuentes de contrato, sistema de verificación, número de fuentes, patrocinios desglosado etc.

El uso de bots no debe prohibirse si es claramente visible y aflorado.

(iv) Enhancing users' awareness

Q1. Do you agree that the following kinds of measures would help enhance user's awareness about how platforms operate and prioritise what users see first?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree
1. Promoting content from trustworthy sources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
2. Promoting factual content from public authorities (e.g. on election date)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Providing tools to users to flag false or misleading content	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Demoting content fact-checked as false or misleading	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Labelling content fact-checked as false or misleading without demoting	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Platforms should inform users that have been exposed to fact-checked content	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Removing content which is found false or misleading and contrary to terms of service (e.g. threatening health or public safety)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Which sources do you consider as trustworthy?

Ninguna fuente es de fiar per sé. Este no debería ser el criterio. No se trata de fiarse o no. La era digital permite transparencia. Cada uno debe poder fiarse de lo que ve. Por esto se trata de etiquetar la información y de sancionar el etiquetado falso. Cuando se compra un alimento se debe poder leer los ingredientes no fiarse del vendedor. Aquí lo mismo. Más información en: <https://xnet-x.net/ley-fakeyou/> y <https://xnet-x.net/informe-fake-news-desinformacion/>

Q2. In your opinion, to what extent, if at all, can the following measures reduce the spread of disinformation?

	No contribution	Minor contribution	Little contribution	Major contribution	Don't know
1. Demotion of posts or messages that have failed a fact-check by journalists or a fact-	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

checking organisation in the newsfeed					
2. Alerts if attempting to share content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Notifications to users who have previously engaged with content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Clear labels above content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Mechanisms enabling readers to flag content that is misleading	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Mechanisms to block sponsored content from accounts that regularly post disinformation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Closing of fake accounts and removal of automated social media accounts like bots	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Closing of accounts that continuously spread content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. Allowing more diversity in suggestion algorithms designed to find videos, posts or sites that you might be interested in	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10. Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q2.1. IF your answer=10, Please specify:

Esta probado, véase <https://xnet-x.net/informe-fake-news-desinformacion/>, que la desinformación proviene de la inversión económica o institucional en viralización masiva de contenido. Estos actores, los principales de los cuales son los partidos políticos y sus redes clientelares, deben estar sometidos a reglas estrictas cuando invierten dinero en información. Este es el único modo para reducir la difusión de desinformación. El resto son parches que permiten a estos grandes monopolios campar a sus anchas intoxicando el debate democrático.

La cuestión no es señalar si algo es cierto o es falso ya que no todo el contenido es verificable de forma estricta y no deben existir árbitros de la verdad.

Como explicamos en <https://xnet-x.net/ley-fakeyou/> y <https://xnet-x.net/informe-fake-news-desinformacion/> es importante mejorar la transparencia de los contenidos, su financiación y los sesgos en su elaboración proporcionando herramientas a la ciudadanía para poder permitir la verificación por parte de aquellos a quién se dirige la información, etiquetando, de forma similar al etiquetado alimentario, la información que se difunde.

Q3. To what extent, if at all, do you support the following measures to reduce the spread of disinformation?

	Do not support at all	Do not support	Neither support nor discourage	Support	Support fully	Don't know
1. Demotion of posts or messages that have failed a fact-check by journalists or a fact-checking organisation in the newsfeed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Alerts if attempting to share content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Notifications to users who have previously engaged with content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Clear labels above content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Mechanisms enabling readers to flag content that is misleading	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Mechanisms to block sponsored content from accounts that regularly post disinformation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Closing of fake accounts and removal of automated social media accounts like bots	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. Closing of accounts that continuously spread content that has failed a fact-check by journalists or a fact-checking organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9. Allowing more diversity in suggestion algorithms designed to find videos, posts or sites that you might be interested in	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10. Other	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q3.1 IF your answer=10, Please specify:

Véase la explicación de las preguntas anteriores.

What safeguards and redress mechanisms do you consider appropriate and necessary to avoid errors and protect users' rights?

Véase la explicación de las preguntas anteriores.

Q4. Which information would you like to receive when reading the information on social platforms:

	Yes	No	Don't know
1. Better information about the source of the content	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Whether the content is sponsored or not	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Information about the micro-targeting (why the information is addressed to you)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Whether there are advertisements linked to the content	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Liability of the provider for supplying false or misleading information	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other: please list

Exactamente de esto se trata y en esto se han de dirigir los esfuerzos. Véase el etiquetado propuesto en: <https://xnet-x.net/ley-fakeyou/> y <https://xnet-x.net/informe-fake-news-desinformacion/>. Además, este contenido no solo debería proporcionarse en las redes sociales sino también en cualquier tipo de medio (online & offline) en que se difunda información sino serían políticas que simplemente favorezcan una desinformación frente a otra.

Q5. As a user, when you come across information that you perceive as false or misleading, which options should be available to deal with such content (more than one reply is possible)?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
--	-------------	----------------	----------------------------	-------------------	----------------	------------------------

1. Removing that content from your feed	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Removing that content from your feed and excluding similar content from being algorithmically promoted in your feed	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Flagging the content to the platform for fact-checking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Receiving feed-back about the action taken by the platforms after flagging, including possible demotion	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Flagging the content to competent authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q6. End-to-end encrypted messaging services (such as WhatsApp, Telegram or Signal) can be used to spread false and harmful content. In your view, should such platforms introduce measures to limit the spread of disinformation, with full respect of encryption and data protection law (more than one reply is possible)?

	Fully agree	Somewhat agree	Neither agree not disagree	Somewhat disagree	Fully disagree	I don't know /No reply
1. Introduce easy-to-find reporting or flagging system for users	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Limit the possibility to forward the same content to many users	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Limit the amount of people in a discussion group	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. In exceptional cases, proactively contact users about potential disinformation wave or promote authoritative content (e.g. in cases like Covid-19 pandemic)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Other (please elaborate)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

En nuestra propuesta, la información viralizada previo pago tiene que ir etiquetada. Si el o la usuario se percatara de que no se ha etiquetado o no correctamente, deberían poder abrirse un sistema de rectificación por parte de whatsapp y de sanciones.

Q7. Do you easily find information about how content is fact-checked on online platforms, and by whom?

- 1. Yes
- 2. No
- 3. Don't know

Q8. If your post is being fact-checked or labelled, do you know how to contest this if you do not agree?

- 1. Yes
- 2. No
- 3. Don't know

Q9. Which information should online platform publish about their factchecking /content moderation policy?

	Yes	No	Don't know
1. If they pay directly the factcheckers or if they work with an external factchecking organisation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. How they decide which posts are factchecked	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. How many posts are factchecked	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. How to flag posts to be factchecked	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Other, (please specify)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

Qué parte se hace de forma automatizada y según qué criterios.

Q10. Do you think it should be mandatory for online platforms to offer oversight bodies that enable users to seek recourse in case their account has been locked or content they have posted has been deleted?

- 1. Yes
- 2. No
-

3. Don't know

Q11. Do you think it should be mandatory for online platforms to provide points of contact for each Member State in their language?

- 1. Yes
- 2. No
- 3. Don't know

Q12. What kind of data and/or transparency tools do users/researchers/fact-checkers need to be better able to detect and analyse disinformation campaigns, including by foreign state and non-state actors? Please specify.

¿Por qué solo investigadores y verificadores y no el público en general?

Q13. How should the EU respond to foreign state and non-state actors who interfere in our democratic systems by means of disinformation (multiple answers possible)?

	Yes	No	Don't know
1. Analyse and expose state-backed disinformation campaigns	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Conduct public awareness-raising campaigns	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Support independent media and civil society in third countries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Impose costs on state who conduct organised disinformation campaigns	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Develop more effective public outreach and digital communication strategies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Other, (please specify)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

Estas actuaciones no deberían limitarse a actores externos sino también deberían incluir a actores internos de la Unión. En efecto, nuestra investigación demuestra que no son principalmente influencias extranjeras quienes manipulan la información que circula, sino que sobre todo de partidos y grandes actores locales. Enfocar en "extranjero" desvía de mejorar realmente nuestras democracias.

Q14. In your opinion, should content by state-controlled media outlets be labelled on social media?

- 1. Yes
- 2. No
- 3. Don't know

Questions on supporting civil society and active citizenship

As a crosscutting issue, civil society faces increasing pressure, but plays a key role in the democratic system, holding those in power to account and stimulating public debate and citizen engagement, as well as in combatting some of the identified threats. In addition to this, participatory and deliberative democracy gives citizens a chance to actively and directly participate in the shaping of planned or future public policies. A major element in the context will be the upcoming Conference on the Future of Europe.

Q1. Do you think civil society is sufficiently involved in shaping EU policies, notably through consultation?

- 1. Yes
- 2. No
- 3. Don't know

If Q1=2 What more could be done?

Más participación de organizaciones de la sociedad civil en los comités. Como dicho anteriormente y en el libro #FakeYou, por ejemplo, el comité sobre desinformación tiene un peso muy importante de lobistas y demasiado poca sociedad civil. Lo mismo pasa en los ámbitos de toma de decisiones.

Q2. Do you think civil society should be more involved in concrete EU-level actions to promote democratic debate?

- 1. Yes
- 2. No
- 3. Don't know

Please explain your answer

Ídem como arriba.

Q3. Do you think actions should be taken at EU level to strengthen cooperation among civil society actors across borders?

- 1. Yes
- 2. No
- 3. Don't know

Please explain your answer

Ídem como arriba.

Q4. Do you think the EU should provide more financial support for civil society (for example under the 'Rights, equalities and citizenship' programme)?

- 1. Yes
- 2. No
- 3. Don't know

Q5. Are you aware of measures to increase media and information literacy/develop media literacy skills? What type of action do you deem to be most efficient/most appropriate in this area:

- 1. Formal education in school/university
- 2. Education online via social media platforms
- 3. Life-long learning
- 4. Exchange of best practices in expert fora
- 5. Don't know

Q6. Do you think that more participatory or deliberative democracy at the European level, with more possibilities for public deliberation and citizen engagement, beyond public consultations, would be:

- 1. A good thing
- 2. Neither good nor bad
- 3. A bad thing
- 4. Don't know

Please explain your reply

Los debates son buenos para entender problemas pero no para tomar decisiones. El círculo virtuoso de la gobernanza en la era digital debería conformarse por un simetría y trabajo en cooperación de las instituciones, los privados, la ciencia y las organización expertas de la sociedad civil.

Q6.1 If given the opportunity, would you take part in a European participatory or deliberative democracy event?

- 1. Yes, absolutely
- 2. Yes, probably
- 3. Maybe
- 4. Probably not
- 5. No, not at all
- 6. Don't know

Q7. Are you familiar with the European Citizens' Initiative?

- 1. Yes, I have taken part in one before
- 2. Yes, but I have not taken part in one before
- 3. Not sure
- 4. No, I do not know what a European Citizens' Initiative is

Contact

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