

Master Thesis
Double-Degree "European Governance"

News media and the democratic public sphere

A frame analysis of the
EU policy discourse on
"Tackling Online
Disinformation"



by Yvonne Freya Clarissa Gross
Student ID: 6968066
Rue Floris 14
1030 Schaarbeek
f.c.gross@students.uu.nl

Supervisors
Dr. Alexander Hoppe, Utrecht University
doc. PhDr. Petr Kaniok, Ph.D, Masaryk University

23.01.2021

Acknowledgements

This thesis was a piece of work. It has consumed a lot of time, energy, and brain power – while exhausting capacities, and interpersonal relations. Considering this, I am even more proud to present an extensive study that I, myself, can very well live with.

Thank you, Yuki, Mayo, Chris, Gert, and Judith, best of them all, for your *inexhaustible* support, infusing me with energy, love and care – and with hope as to the finality and quality of this research project!

Abstract

The issue of online disinformation, also commonly referred to as “fake news”, has continuously become more topical on the EU policy agenda. Any attempt to find adequate solutions to this perceived problem is reflective of the tension between ensuring an informed citizenry, based on truthful information, and potentially jeopardising freedom of expression. To address this delicacy, the European Commission launched a public consultation in 2017/18, inviting stakeholders to share their assessment of the problem as well as to indicate policy preference. The main goal of this thesis is to provide for a comprehensive overview of relevant stakeholders, mapped and grouped into coalitions according to the Advocacy Coalition Framework, which are shaped by ideas and belief systems implicit to their position. The role ascribed to news media within democratic societies is of particular importance when analysing these belief systems.

Table of Contents

List of abbreviations.....	VI
List of figures	VII
List of tables	VIII
1 Disinformation as a regulatory problem on EU level.....	1
2 The era of disinformation, misinformation, and fake news.....	5
3 The Advocacy Coalition Framework as analytical framework.....	8
3.1 The Advocacy Coalition Framework as a means to media policy analysis	8
3.1.1 The notion of 'idea' in policy research	9
3.1.2 Genesis, rationale, and evolution of the ACF.....	10
3.1.3 The ACF as a fertile framework for media policy analysis.....	12
3.2 The Advocacy Coalition Framework and policies against disinformation.....	14
3.2.1 Macro-level: Policy-subsystems as units of analysis	14
3.2.2 Meso-level and micro-level: Advocacy Coalitions and belief systems.....	16
3.3 Belief systems in digital and media policy.....	18
3.3.1 Established policy paradigms in communication policy.....	18
3.3.2 Deep core beliefs in media policy: role and value of news media in society	19
4 Methodological considerations and analytical framework.....	22
4.1 Case selection and theoretical framework	22
4.2 Stakeholder identification and data collection.....	23
4.3 Method of content analysis	24
4.4 Operationalisation.....	25
4.5 Reflections on the research design and its limitations	27
5 EU efforts against disinformation: a nascent policy subsystem	28
5.1 Subsystem identification and EU policy initiatives.....	28
5.1.1 EU policies against disinformation throughout the investigation period	29
5.2 Characteristics of the problem area	30
5.2.1 The EU working definition of disinformation in a broader context	30
5.2.2 Implications for contemporary regulation.....	31
5.3 Constitutional structure of EU communication policy.....	32
5.4 Basic socio-cultural values underpinning EU communication policy	33
6 Advocacy Coalitions in the disinformation discourse.....	34
6.1 Identifying coalitions according to the three-layered belief system.....	38
6.2 <i>Coalition A</i> : disinformation as a serious issue, warranting intervention.....	39
6.2.1 Deep core beliefs in <i>Advocacy Coalition A</i>	40

6.2.2	Frames indicating the policy core: perceptions of problem and causality	43
6.2.3	Frames indicating secondary aspects: suggested remedies	45
6.3	<i>Coalition B</i> : disinformation as an issue, cautious intervention possible	46
6.3.1	Deep core beliefs in <i>Advocacy Coalition B</i>	47
6.3.2	Frames indicating the policy core: perceptions of problem and causality	49
6.3.3	Frames indicating secondary aspects: suggested remedies	52
6.4	<i>Advocacy Coalition C</i> : disinformation as a non-issue, no intervention	53
6.4.1	Deep core beliefs in <i>Advocacy Coalition C</i>	53
6.4.2	Frames indicating policy core: perceptions of problem and causality	55
6.4.3	Frames indicating secondary aspects: suggested remedies	57
6.5	Cross-cutting master frames	58
6.5.1	The lack of media literacy as an uncontroversial assessment	58
6.5.2	The cure cannot be worse than the disease.....	60
7	News media in the disinformation discourse	62
7.1	Normative references to news media, their role and impact in democracy	62
7.1.1	Problem perception and causality in reference to news media.....	63
7.1.2	Suggested remedies in reference to news media	65
7.2	Master frames referring the role of news media in society	66
7.2.1	The notion of information disorder reflecting the complexity of the issue	66
7.2.2	Level playing field regulation: platforms as more than mere hosting providers.....	68
8	Discussion and Conclusion	70
8.1	Hypothesis 1: stakeholder analysis and advocacy coalition formation	71
8.2	Hypothesis 2: Intra-coalitionary congruence of belief systems	73
8.3	Hypothesis 3: views on the role of news media in society.....	75
8.4	Reflection and outlook.....	79
9	References	81
10	Annex.....	87
10.1	Public Consultation Questionnaire (blank).....	87
10.2	Documents analysed: contributions to the Public Consultation	89
10.3	Frame Analysis:	95
10.3.1	Methodology: Detailed operationalisation of hypotheses.....	95
10.3.2	Identified frame elements.....	97

List of abbreviations

AC	Advocacy Coalition
ACF	Advocacy Coalition Framework
ACHPR	African Commission on Human and Peoples' Rights
ADAP	Action Plan Against Disinformation
cf.	<i>confer</i>
CFR	Charter of Fundamental Rights of the European Union
Commission	European Commission
Council	Council of the European Union
CoE	Council of Europe
CoP	Code of Practice On Disinformation
CoR	Committee of the Regions
EEAS	External Action Service
ECHR	European Court of Human Rights
EESC	European Economic and Social Committee
e.g.	<i>exempli gratia</i>
EP	European Parliament
EU	European Union
HLEG	High Level Expert Group
i. a.	<i>inter alia</i>
ibid.	<i>ibidem</i>
ICT	information and communication technologies
i.e.	<i>id est</i>
MIL	Media and Information literacy
NRA	National Regulatory Agency
OAS	Organization of American States
OSCE	Organization for Security and Co-operation in Europe
PSM	Public Service Media
s.	see
sic	<i>sic erat scriptum</i>
UN	United Nations

List of figures

Figure 1: Flow Diagram of the ACF	14
Figure 2: Online disinformation as nested, nascent subsystem	28
Figure 3: Disinformation according to common working definitions	31
Figure 4: Advocacy Coalitions identified	34
Figure 5: Contributions according to societal sub spheres	34
Figure 6: Comparative composition of advocacy coalitions according to sectors and topics	35
Figure 7: Contributions from public actors according to area of society and organisation type	35
Figure 8: Stakeholders from civil society according to topic/sector	36
Figure 9: Contributions from companies according to sector	36
Figure 10: Public Service and commercial media organisations according to media format	37
Figure 11: Advocacy in the media sector according to media format	37
Figure 12: Coalition "A", according to societal sub spheres	39
Figure 13: Coalition "A", civil society organisations according to topic	39
Figure 14: Coalition "A", all stakeholders from the traditional media sector	40
Figure 15: Coalition "B", according to societal sub spheres	46
Figure 16: Coalition "B", civil society organisations according to topic	46
Figure 17: Coalition "B", all stakeholders from the traditional media sector	46
Figure 18: Coalition "B", according to societal sub spheres	53
Figure 19: Coalition "B", all stakeholders from the traditional media sector	53
Figure 20: Coalition "C", civil society organisations according to topic	53
Figure 21: Advocacy Coalitions formation according to conflict lines	73

List of tables

Table 1: Normative frame clusters in Advocacy Coalition "A"	40
Table 2: Prevalence of preferred remedies in Advocacy Coalition "A"	45
Table 3: Normative frame clusters in Advocacy Coalition "B"	47
Table 4: Prevalence of preferred remedies in Advocacy Coalition "B"	52
Table 5: Normative frame clusters in Advocacy Coalition "C"	54
Table 6: Prevalence of preferred remedies in Advocacy Coalition "C"	58
Table 7: Answers to question 13 of the public consultation per coalition	59
Table 8: Remedy frame "Empower the consumer", prevalence per coalition	60
Table 9: Frame "The phenomenon is not new", prevalence per coalition	60
Table 10: Problem frame "The risk of censorship", prevalence per coalition.....	61
Table 11: Prevalence of macrolevel media values per coalition.....	62
Table 12: Prevalence of comments of professional ethics in journalism, per coalition	63

1 Disinformation as a regulatory problem on EU level

Falsehood flies, and truth comes limping after it, so that when men come to be undeceived, it is too late; the jest is over, and the tale hath had its effect: like a man, who hath thought of a good repartee when the discourse is changed, or the company parted; or like a physician, who hath found out an infallible medicine, after the patient is dead.

Swift (1710)

Jonathan Swift's essay "The art of political lying" can easily be identified as a document of the 18th century with a rhetoric undeniably antiquated. Yet, the issue it touches upon feels oddly familiar and could, indeed, be put into topical perspective; i. a., due to the COVID-19 pandemic, the issue of disinformation is as present, if not more relevant, in today's political and cultural discourse than ever.

While it is true that "Propaganda, lies, and 'truthiness' have been around for hundreds of years" (Schiffrin 2017: 121), it is equally valid to postulate that recent technological change has intensified the dissemination of disinformation considerably: "the use of social media to move public opinion is a relatively new phenomenon, and the speed and volume of the incorrect messages transmitted by social media may be unprecedented" (Schiffrin 2017: 120). In light of the current COVID-19 pandemic, the dissemination of false information on a large scale, potentially causing significant public harm, has gained more issue salience than ever. The term *infodemic* was coined and governmental efforts to counter online fake news were explicitly intensified (World Health Organization & others 2020; European Commission 2020c). A BBC Newsnight piece even bluntly asks: "How do you handle an epidemic in the age of fake news?" (BBC 2020).

The issue of disinformation can be considered a complex regulatory problem¹, caught between established, fundamental principles of democracy, such as the freedom of expression or media pluralism, and concerns about resilience and integrity of democratic procedure.

Within the EU policy context, the term *disinformation* was officialised along the public consultation (13 November 2017 to 23 February 2018) "on fake news and online disinformation" which preluded the Commission's first Communication on the subject matter, titled "Tackling online disinformation" (European Commission 2018b, 2018c). Therein, *disinformation* is defined as

¹ Since this thesis analyses the policy discourse on (potential) regulatory intervention into online disinformation and not the content of such regulation itself, regulation is understood in a relatively broad sense according to Selznick (1985: 363) as "sustained and focused control exercised by a public agency over activities that are valued by the community".

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.

(European Commission 2018c: 3–4).

Research Objective

The main goal of this thesis is to provide for a comprehensive overview of stakeholders and their respective positions towards any potential regulatory intervention against online disinformation. These positions are reflective of the way relevant actors perceive disinformation as a problem – or not. They are also characterised by the respective solutions, as identified and communicated by stakeholders, to such problem (van den Bulck & Donders 2014a). Using Sabatier and Jenkins-Smith's Advocacy Coalition Framework (ACF), relevant stakeholders will be mapped and grouped into advocacy coalitions which are formed and shaped by ideas belief systems implicit to their position.

In ACF terminology, these ideas are reflected in the concept of *belief systems*, referring to a three-tiered, hierarchical structure of worldviews. The notion of public interest in media policy is of particular importance to this analysis, touching upon the role ascribed to (news)media within democratic societies.

In this regard, the Commission's efforts against online disinformation, and the respective policy debate that has unfolded around it, will serve as a case study to shed light onto relevant actors, logics, and paradigms within the policy subsystem of EU communication policy. Carboni argues the ACF was "often used to explain stakeholders behaviour and policy outcomes in conflicting political contexts" (Carboni 2009: 5). EU media governance may be considered as such, representing a system that is shaped by a complex maze of actors and varying competences (Loisen et al. 2014).

Background

While the notion of public interest has been feeding into considerations of media policy ever since technological process allowed for mass mediatic constitution or transmission of the public sphere, the interpretation of such principle has undergone significant change. Not only was it affected by technological evolution but also modified along broader, paradigmatic changes in regulatory practice and rationale, reflecting societal values beyond media governance alone.

Creation and evolution of internet-based services is considered the most recent "defining development" in this regard. The Internet as an "increasingly sophisticated, international communication platform through which an online world of media production and consumption has developed" (Puppis et al. 2016: 1) remains a regulatory challenge, especially in light of convergence.

Media convergence is understood as a process which has been "blurring" the boundaries between content formats and media markets with the latter being continuously opened up to actors

external to legacy mass media organizations², notably to services and services providers from the “information and communication technologies” sector (Puppis et al. 2016: 5).

This is particularly important, considering that the public controversy surrounding disinformation and its respective identification as a problem deserving regulatory intervention is deeply related to how we assess the quality of public discourse in democracies – both empirically and normatively (Tandoc et al. 2018). While the constitution and function of such public sphere in democracies has been subject to normative debate for a long time, digitization has fundamentally altered the state of play, interrupting established set-ups and paradigms in media policy (McQuail 2008; Gripsrud & Moe 2010b; Splichal 2010).

It is in those presumed gaps of regulation – where established media governance supposedly lags behind technological change or needs readjustment to the reality of convergence – that new policy options are being discussed. This also includes remedies for externalities associated with disinformation (Loisen et al. 2014; Puppis & van den Bulck 2019).

EU policies against disinformation, or more specifically the process leading up to those, represent an intriguing research problem. It is characterized by a relatively new phenomenon³ – the proliferation of false information online, disseminated mostly via social media platforms – as well as a complex environment of European communication policy. By combining stakeholder analysis with ideational policy analysis, this thesis provides an innovative research angle to the regulatory challenge of disinformation. It thereby aims at bridging reflections on contemporary media policy and insights into the stakeholder discourse that unfolds within a new, emerging policy subsystem.

Research Question

The research question consists of one main and three sub-questions:

- What are the underlying ideas shaping stakeholders’ positions on the role of news media in democracy when participating in the EU policy discourse on tackling online disinformation?
 - Which stakeholders participate in which constellation of advocacy coalitions?
 - How can their positions be interpreted according to the three-layered structure of belief systems as introduced by the ACF?
 - To what extent do belief systems reflect considerations over the role of news media in democratic societies and reference to any public interest principle in governance?

² Legacy mass media notably refers to print and broadcasting media; for more detail, see chapter 3.1.3.

³ Furthermore, both topicality and relevance have been reinforced by the outbreak of the COVID-19 pandemic and its political, social, and economic consequences.

Outline

The thesis is structured as follows. In the second chapter, a literature review, is conducted to give a comprehensive introduction to the relatively new phenomenon of online disinformation and its reception by scholars and regulators. In the third chapter, the conceptual framework (ACF) is outlined along its most relevant features which have informed the formulation of hypotheses. The fourth chapter explains which methodological considerations have guided the research design, including remarks to its potential and limits; it further contains the operationalization of the hypotheses.

Following this, the ACF is applied to the case study. In chapter five, the boundaries of the policy field or subsystem that is subject to this analysis are defined. In addition, the respective competence structure and content of media policy on the European level will be discussed along what is known as *stable parameters* in ACF terminology. In chapter six, the previously determined stakeholder contributions from the sample will be analysed with the aim to identify relevant advocacy coalitions as well as the belief systems that guide them. Furthermore, cross-cutting master frames that can be found across the entire sample will be discussed.

In chapter seven, a special focus is put onto any reference indicating how stakeholders interpret the role of news media in society, considering their relevance for the democratic process. Here, dominant normative references and frame clusters, as well as cross-cutting master frames regarding news media and journalistic practice will be illustrated.

The results of the qualitative content analysis will subsequently be presented, reviewed, and discussed with respect to the hypotheses and investigated according to prior operationalisation. Lastly, after a summary of these findings, comprehensive conclusions will be drawn.

2 The era of disinformation, misinformation, and fake news

As this thesis is going to analyse and map stakeholders' positions within the policy debate that is evolving around "Tackling online disinformation" in the EU, including the ideas and belief systems implicit to those, a thorough understanding of the regulatory problem labelled *online disinformation* is essential before proceeding to the actual analysis.

With the ambition to conceptualize the phenomenon beyond any commonly used buzzword, for example *fake news*, this chapter shall provide a useful definition of what is now referred to as *disinformation* by EU-institutions and scholars (Marshall 2017; Schiffrin 2017; Marsden et al. 2020) and which has gained in issue salience since 2016⁴. By exploring the respective literature, this chapter will trace the historical and political evolution of an issue that proves to be as old as political communication itself, while establishing a comprehensive link between the current issue of disinformation and the field of media policy research.

As indicated by the title of this chapter, finding common terminological ground on what is to be understood as online disinformation⁵ proves to be difficult for more or less obvious reasons. Firstly, a conventional literature review to establish an broad, yet detailed picture of how disinformation is being elaborated on academic level presupposes a terminological consensus that thus far does not exist (Martens et al. 2018; Fink & Gillich 2020). Secondly, researching a social phenomenon that is believed to represent a relatively new problem and to which a regulatory solution is yet to be found⁶ means researching it amid a nascent societal debate. An issue as mediatized or even "politicized" (Tenove 2020: 519) may very well evolve around a number of notions pointing in the same direction. Notably, those are *fake news* (High level Group on fake news and disinformation 2018; Tandoc et al. 2018; Saurwein & Spencer-Smith 2020; Zimdars & McLeod 2020), *post-truth* (Cervi & Carrillo-Andrade 2019), even *information pollution* or *disorder* (Wardle & Derakhshan 2017) and lately also *infodemic* (World Health Organization & others 2020; European Commission 2020c).

⁴ Political events which are frequently cited in this regard are the US presidential elections 2016 – see Schiffrin (2017); Saurwein and Spencer-Smith (2020); Tenove (2020) – and Brexit, both also in relation to the Cambridge Analytica Scandal according to Fink and Gillich (2020); Saurwein and Spencer-Smith (2020). Also, the conflict in Eastern Ukraine since 2014 is mentioned as a catalyst moment by Saurwein and Spencer-Smith (2020).

⁵ *Online* disinformation implies a difference to any analogous form of disinformation which, in fact, also exists. If not indicated otherwise, this thesis uses "disinformation" as equivalent to the phenomenon of online disinformation which has been shaped and exacerbated by the digitisation of the media ecosystem.

⁶ I would like to point out, that the novelty of this problem, as perceived by policymakers, is inherent to the term *online* disinformation. Furthermore, the fact that, by now, a second public consultation on the so-called *European Democracy Action Plan* European Commission (2020a) has been concluded, set out to inquire on issues of disinformation in light of the COVID-19 crisis, proves this point. For further elaboration, see chapter 5.1.1.

Among the many terms that have been introduced to describe the above-mentioned problem, either within public or academic discourse, *fake news* has proven to be the most resilient and commonly used. Saurwein & Spencer-Smith declare it the “most popular term used to problematize the subject” (2020: 2). This contention – if it was not for the striking, intuitive familiarity with the term that was coined by US-president Donald Trump⁷ – is being corroborated by a simple inquiry, at least concerning the academic debate. Using the Google Scholar search engine, 226 articles carry the notion of “fake news” whereas only 83 mention “disinformation” in their title⁸.

In general, one may assume that what is commonly referred to as fake news has found its academic equivalent⁹ in the concept of disinformation (Marsden et al. 2020; Tenove 2020). The fact of the latter being picked up and propagated by international organisations such as the EU but also the UN (Special Rapporteur on Freedom of Opinion and Expression 2017) and the CoE (Council of Europe Parliamentary Assembly 2018) might reinforce its legitimization and subsequent use in academia. In their report on “Information Disorder” for the CoE, Wardle & Derakhshan (2017: 20) argue that the term fake news was in itself misleading as it “conflate[d]” the notions of “mis-information, dis-information and mal-information”¹⁰ which vary in their respective intent to mislead (not the case for mal-information) or the actual falsity of information disseminated (which in cases of mal-information is not the case since it concerns the publication of leaked yet accurate information).

Tandoc et al. (2018) identify five types that are being referred to as fake news, namely *news satire*, *news parody*, *news fabrication*, *photo manipulation* and *propaganda*. Reflecting on these types, there are two striking commonalities to be identified: they are united in the appropriation of a certain news experience, and, furthermore, cannot necessarily be associated with an entirely new phenomenon. Therefore, the term disinformation should be regarded as a neologism brought up in relation to the digitization of (news) media¹¹. Fake news or disinformation is not an entirely new phenomenon and most scholars feel inclined to state this (Schiffrin 2017; Martens et al. 2018; Fink & Gillich 2020; Marsden et al. 2020). Therefore, it is a pitfall to assume fake news was created by the internet. Some authors go as far as claiming that disinformation and everything it implies were “endemic to

⁷ The issues associated with undue influence during the election campaign of 2016 is to be discerned from politicians’ claims of false media reporting on them; that is why fake news has been labelled “inadequate” and “misleading” by the High Level Group on fake news and disinformation (2018: 10).

⁸ Search conducted on 6 August 2020 via Google Scholar, limited to articles between 2016 and 2020.

⁹ Indeed, when looking at the definition of fake news, provided by Gelfert as early as 2018, defining them as “cases of deliberate presentation of (typically) false or misleading claims as news, where these are misleading *by design*. The phrase ‘by design’ here refers to systemic features of the design of the sources and channels by which fake news propagates and, thereby, manipulates the audience’s cognitive processes” (2018: 84), similarities to the EU definition can be identified.

¹⁰ While misinformation represents false information that is unintentionally produced and spread, malinformation refers to factually correct information, obtained and leaked with malicious intent; see Wardle and Derakhshan (2017: 20).

¹¹ On the specific character of news media see chapter 3.3.2.

‘information society’”, relating it to the broader picture of human communication patterns¹² (Marshall 2017: 2).

Following the working definition of the Commission, in particular the part that speaks of “misleading information (...) created (...) for economic gain or to intentionally deceive the public”, it is fair to assume that for as long as there has been mediatic transmission of information, there was room for the dissemination of false information, even prior to the invention of the printing press (Lockhart & Marcus 1994; Burkhardt 2017; Marsden et al. 2020).

Considering this, it seems almost naïve to not regard the creation of any political myth¹³, hence the propagation of a construed political reality, as implicit to the political game. The invention of the printing press may be considered a significant step towards precisely those disinformation dynamics that are being problematized today; technology enabled a more extensive spreading of information while those “who were literate could easily use that ability to manipulate information to those who were not literate” (Burkhardt 2017: 5).

Moreover, it should be noted that not only did the invention of the printing press expand the potential for political propaganda but also it also established the option to disseminate authentic or falsified information for personal economic gain – be it directly, e.g., when making money out of selling pamphlets, or indirectly, in exchange for advertising (Burkhardt 2017).

The dissemination of disinformation is, however, not reserved to written news formats (analogous or digital). Photographs have been edited for propagandistic reasons as early as at the beginning of the 20th century¹⁴; while broadcasting productions also have a legacy of unintentionally misinforming the broader public¹⁵.

What may seem like complementary historical digression at first sight, actually represents the necessary backdrop against which disinformation as a contemporary regulatory problem needs to be understood – and is also being discussed. This will be demonstrated by analysing stakeholder contributions to this debate.

¹² Marshall’s argument in sum: “This arises because communication has social functions other than the transmission of accurate information. In information society, communication becomes primarily strategic and identity based. People invest heavily in information groups around identities and meaning, and develop information embracing an ordering of doubt or suspicion.” Marshall (2017: 19)

¹³ Which is, in fact, to be regarded as the objectivation and thereby legitimisation of a construed political reality following the knowledge-sociological approach of Berger and Luckmann (1974); an approach that is also referred to by Künzler (2012) when discussing the notion of ‘idea’ in policy research, see chapter 3.1.1.

¹⁴ Reference is being made to the infamous removal of Leon Trotsky from a photograph that initially showed him standing next to Lenin on a grandstand in Moscow – see Fink and Gillich (2020)

¹⁵ Reference to Orson Welles’ radio drama *War of the worlds*, “famous for allegedly having caused mass panic”, s. Fink and Gillich (2020: 265). It is claimed that listeners who had missed the introductory remark about the fictional character of the piece assumed that earth was under attack by extra-terrestrial forces; see also Burkhardt (2017); Tandoc et al. (2018).

3 The Advocacy Coalition Framework as analytical framework

After defining disinformation and illustrating the scholarly debate that has emerged around it, the following chapter will establish the Advocacy Coalition Framework (ACF) as the theoretical basis for this research project. While the first subchapter elaborates on how the framework can prove especially fertile for analysing stakeholder positions within the policy discourse on tackling disinformation, the second subchapter will identify and specify those theoretical elements that contribute to the formulation of concrete hypotheses in regard to the research question of this thesis.

3.1 The Advocacy Coalition Framework as a means to media policy analysis

The ACF represents a well-established and frequently applied analytical framework for both stakeholder analysis and policy change (Radaelli 1999; Carboni 2009; van den Bulck & Donders 2014a; van den Bulck 2019). It is based on a non-linear conception of the policy process¹⁶ which is characterized by dynamic interaction of competing advocacy coalitions “in which stakeholders share beliefs about policy, problems and solutions” (van den Bulck & Donders 2014a: 24). The notion of *beliefs* is of particular importance to this approach. Following the ACF’s theoretical assumptions, those beliefs shape and structure stakeholder behaviour and will ultimately infuse, i.e., be translated, into policy formulations and governmental programs (Jenkins-Smith et al. 2014).

In this regard, the ACF can be considered part of ideational approaches to public policy which have gained recognition as well as significance throughout the past decades (Baumgartner 2014; Daigneault 2014). Therefore, one subchapter is devoted to an introduction into the notion of ideas and paradigm in public policy research. Subsequently, the ACF will be introduced as theoretical basis and analytical framework to this thesis. Lastly, a third subchapter will provide proper contextualization of media policy beyond the specific, acute subject matter of online disinformation, taking into consideration the particularity of state intervention into media behaviour. It will show how the ACF and its underlying rationale provide for a suitable analytical tool, especially in matters of European media policy.

¹⁶ As opposed to the well-established model of stages heuristic that pictures the policy process according to distinct, consecutive phases that are not interlinked by causal logic, see Weible et al. (2009). This study understands the policy process as “characterised by formulation of views and interests, expressed by actors or stakeholders that adhere to a certain logic and that engage in debate and work towards a policy decision on relevant forums”; s. van den Bulck and Donders (2014a: 20).

3.1.1 The notion of 'idea' in policy research

Introducing the notion of *idea* as a relevant variable to the policy process, after a more general “ideational turn” in social sciences had been proclaimed¹⁷, initially stirred some controversy regarding the epistemological value of such a concept (Gofas & Hay 2010). The vast range of contributions which have been published throughout the past 30 years¹⁸, however, suggests that social sciences are no longer in doubt as to whether ideas matter; instead, they engage in discussions as to what extent they do (Mehta 2010; Baumgartner 2014).

An idea is commonly understood as an item that guides actors’ ethical and moral judgments and thereby informs their decisions about causal relationships; as such, these items can be referred to as *beliefs*, *norms*, *worldviews* or *values* (Parker & Parenta 2008: 610). There is no commonly shared conceptualization of these items, however, which is why the abovementioned controversy surrounding what may be subsumed under the label of *ideational* approaches, cannot be considered settled. Contributions as recent as 2014 voice criticism over the theoretical viability and reliable operationalization of the concept, especially when applied to public policy (Daigneault 2014).

Despite the lack of conceptual orthodoxy, the success of ideational approaches, as reflected in their proliferation, points to an explanatory power which other established theories, e.g., institutionalist or interest-based, seem to lack (Künzler 2012; Baumgartner 2014). Parker & Parenta emphasize the genuine value of ideational approaches in analysing policy change which possess the capacity to overcome “weaknesses in interest-based” approaches (Parker & Parenta 2008: 611). Those weaknesses refer to what can be considered a one-dimensional model of actors’ preferences; instead of interpreting actors’ preferences solely as an expression of rational choice, ideational approaches focus on the backdrop against which preferences are being shaped. By investigating “worldviews, values and cognitive frames or intellectual paradigms” (Parker & Parenta 2008: 611) researchers hope to understand and explain policy processes and outcomes on the basis of what actors *believe*.

Such research becomes particularly relevant in moments of perceived crisis which could ultimately trigger policy change (Parker & Parenta 2008). Hereof, the interpretation of online disinformation as being symptomatic of a broader crisis of the media ecosystem (Wardle & Derakhshan 2017) has inspired this thesis when considering the potential impact of policy paradigms in media governance. Hay (as cited by Parker & Parenta 2008: 611) contends that in such moments

¹⁷ The term itself was initially coined by Blyth et al. (1997).

¹⁸ Hall’s *Policy Paradigms, Social Learning, and the State* (1993) is commonly cited as tangible initial point to ideational approaches in public policy research, exerting “path breaking influence” on the discipline, s. Daigneault (2014: 466).

of actual or perceived crisis "the narration of the crisis and of the conditions appropriate for its resolution are (...) especially significant if a new paradigm is to emerge and be consolidated".

In consequence, any fruitful application of said approaches boils down to what is understood by *idea*, *paradigm*, *belief*, or *worldview*. Within the ACF, Sabatier & Jenkins-Smith introduce the concept of *belief systems* in order to explain actors' perception of policy problems and the according range of policy options they would consider (1993). Künzler categorizes the concept of belief systems as representative of "the most complex types of ideas", alongside with *policy paradigms* and *worldviews* (2012: 59). This assessment is somewhat echoed by Jenkins-Smith et al. who further accentuate the complexity of belief systems, arguing that although belief systems function as a means to heuristic simplification for individuals, they themselves cannot be understood as mere "abstract representations of values and priorities" but "also encapsulate the perceived causal patterns and relationships that shape the empirical world" (Jenkins-Smith et al. 2014: 192). By providing a three-tiered structure to belief systems which can be identified and explored, the framework seems to pre-empt Daigneault's critique of approaches whose lack of conceptual clarity might hamper scientific rigour and explanatory force¹⁹.

3.1.2 Genesis, rationale, and evolution of the ACF

Weible & Sabatier introduce the ACF as "one of the more useful public policy frameworks" (2007: 123), thereby making reference to the sheer number of ACF studies and publications which have analysed an ever growing variety of topics, on every continent (Weible & Sabatier 2007; Weible et al. 2009; Weible et al. 2011). It is worth acknowledging the emphasis of the ACF being a theoretical *framework* rather than a theory in itself (Weible et al. 2011; Jenkins-Smith et al. 2014). It therefore can be considered to be a "shared research platform" that enables common analytical ground, also in terms of vocabulary (Jenkins-Smith et al. 2014: 188–189). Therefore, the ACF was "best thought of as a framework supporting multiple, overlapping theoretical foci" (Jenkins-Smith et al. 2014: 188)²⁰.

According to the authors, these foci specifically concern advocacy coalitions, learning and policy change which is "where students and researchers should attempt to test and develop descriptions and explanations" (Jenkins-Smith et al. 2014: 189). Following this, essential features of

¹⁹ Jenkins-Smith et al. refer to the "several years of effort" that Sabatier and Jenkins-Smith would spend on continuously reworking the framework, collecting data and, also, "the creation of code forms for measuring belief systems and coalition stability over time" (2014: 185).

²⁰ In detail, the researchers adopt the definition of frameworks as being "not directly testable but provide guidance toward specific areas of descriptive and explanatory inquiry" while theories being "narrower in scope and emphasize a smaller set of questions, variables, and relationships" would allow for "precise conceptual and operational definitions of concepts and interrelate concepts in the form of testable and falsifiable hypotheses or propositions". Jenkins-Smith et al. (2014: 189).

the framework will be briefly outlined in this chapter while chapter 3.2 is entirely dedicated to those components that are specifically relevant for this research project²¹.

The ACF is inspired by shortcomings of established theories which failed to capture and accurately explain the dynamics of policy change. In this regard, the ACF is as much a product as it is an element of the upsurge of ideational approaches mentioned in the previous subchapter.

Sabatier's framework questions the linear simplicity of the policy cycle stages heuristic and rejects conventional emphases on the significance of political institutions in shaping the policy process (Weible et al. 2009). Instead, the ACF's "underlying logic" (Jenkins-Smith et al. 2014: 185), or core rationale, interprets the policy process as shaped by continuous rivalry between stakeholders whose interpretation of policy problems and solutions is predominantly guided by belief systems (Carboni 2009). Or, as van den Bulck & Donders (2014a: 25) put it:

The ACF assumes that there are sets of core ideas about causation and value in public policy with regard to key policy issues around which subsystems develop.

The initial framework is based on four premises: first, the primary unit of analysis is a so-called policy subsystem; second, relevant subsystem actors can be aggregated into coalitions; third, policies and governmental programs may be interpreted as implicit reflection of coalition beliefs; fourth, researchers are encouraged to adopt a long-term perspective of ten years or more in order to fully grasp processes and change²² (Weible et al. 2011).

These assumptions, extended over time, now also include two additions that are particularly relevant for this project. The first details a concise model of the individual, defined by actors who might be rationally motivated but also limited in their ability to process stimuli; perceptions of a complex reality are thus filtered through a belief system. Second, a guideline towards stakeholder identification is added, claiming that any person who attempts to influence sub systemic affairs on a regular basis may be considered relevant (Jenkins-Smith et al. 2014).

The analytical focus of this thesis lies on advocacy coalitions and the belief systems they are guided by; the chapters 3.2 and 3.3 will provide the theoretical foundations thereof. A secondary, more descriptive emphasis is put on relatively stable parameters which categorize and constrain the policy subsystem to a more profound extent. These parameters will be touched upon theoretically (cf. chapter 3.2.1) and then comprehensively described in chapter 5.

²¹ Specializing on subcomponents of the frameworks is apparently quite common among researchers according to Weible et al. (2011) and Jenkins-Smith et al. (2014).

²² While the ACF relies on the presumption that a long-term research focus is advisable in order to provide for a reliable account of policy change, the authors explicitly relativize this approach. They claim that their suggestion is not to be misunderstood as a literal advice to applying a perspective of ten years – or more – only Jenkins-Smith et al. (2014).

3.1.3 The ACF as a fertile framework for media policy analysis

Although the ACF has, so far, been most frequently applied to environmental and energy policy²³, there is considerable reason to believe that the ACF will prove equally suitable for analysing EU media policy – as this subchapter will illustrate.

“Media as a policy field” (Puppis & van den Bulck 2019: 4) draws upon the societal relevance of so-called *legacy* mass media, notably print and broadcasting, which has been thoroughly modified by technological change, ultimately leading to media convergence (ibid.). As media policy, traditionally, reflects “more abstract paradigmatic views on the relationship between the state, society and media” (Puppis & van den Bulck 2019: 5), Puppis and van den Bulck (2019: 6) conceptualize it as

‘the broader field in which competing ideas and assumptions about the desirable structure, conduct, and performance of media systems circulate’.

While media regulation is conceptually narrower, the opposite may be said about the term media governance. It refers to a shift in loci and rationale of power, encompassing “the sum total of mechanisms, both formal and informal, national and supranational, centralized and dispersed, that aim to organize media systems” (Freedman 2008: 14). The terminological differentiation is not necessarily restrained to the domain of media but indicates the rise of the governance concept itself (McQuail 2008). Yet, Puppis & van den Bulck (2019: 8) speak of a “number of peculiarities” which refer to the fact that mass and news media occupy a central position within society, playing an essential role in most citizens’ daily routines. This renders media policy more significant as its scope and, hence, its potential impact on entire political and cultural systems is defined by mass mediatic reach (Napoli 2019; Puppis & van den Bulck 2019). In this regard, it is also worth noting that media organisations (and journalists) are not neutral intermediaries, participating in public sphere, but might act biased when covering media policy themselves (Puppis & van den Bulck 2019).

Furthermore, and this is particularly relevant for the research project, such central position results in a dual conceptualization of media organizations and their respective role: not only do they sell an average commodity that is news and information (or even entertainment) and therefore act as economic entities; they also have to comply with a certain societal expectation implicit to the character of the product they sell (Gripsrud & Moe 2010a; Puppis & van den Bulck 2019). These expectations may vary, according to the roles ascribed to news media organisations, and, according to what extent these roles are expected to be secured by the state (Christians et al. 2009). This leaves

²³ Which may be interpreted as a “legacy” of the original research by Sabatier & Jenkins-Smith, s. Weible et al. (2009).

room for debate, if not for actual conflict, reflective of competing ideas over the direction and formulation of policy, thus, fertile ground for stakeholder and policy analysis according to the ACF.

Scholars widely agree that media policy in the 21st century is first and foremost challenged by technological convergence (McQuail 2008; Gripsrud & Moe 2010a; Loisen et al. 2014; Puppis et al. 2016; Puppis & van den Bulck 2019). While the development of the Internet can be considered a “defining” element in the process, contributing to convergence since the 1990s (Splichal 2010; Puppis et al. 2016), pace and volume of this technological change make it more and more difficult for regulators to keep pace, and to adjust policies accordingly.

These processes seem to trigger concerns which have accompanied emergence and establishment of previous ‘new’ media or technologies before. A lack of “obvious means of supervision or control at national (or regional) level” ²⁴ (McQuail 2008: 24) can be identified as recurring narrative in academic literature and policy discourse, notably when debating digital policy (Napoli 2019; Nielsen et al. 2019; European Commission 2020b; Marsden et al. 2020).

Regardless of the aptness of those concerns being valid or not, there is a perceived regulatory vacuum which necessitates debate over appropriate media policies; in the EU, those efforts are reflected by recent legislative projects dealing with digital platforms, artificial intelligence, cloud computing – or online disinformation. These files engage a considerable number of stakeholders, representing businesses and civil society on the one side, and a complex maze of public actors with complementary competences, split on numerous levels and layers of governance, on the other.

To understand a policy process that now involves “a more extended, complicated and multidimensional web of actors”²⁵ (van den Bulck & Donders 2014b: 85), a theoretical framework which puts these actors into the centre of attention, therefore, seems to be a suitable choice.

²⁴ In this case, to deal with the internet, establishing itself as sophisticated platform for media production & consumption.

²⁵ Characteristics of the EU media policy making process increase the number of participating actors considerably; these include the effect of multilevel governance, the institutionalized position of interest groups within the EU policy arena, the fact that media policy carries symbolic character which often encourages stakeholders external to the subsystem to participate, and, lastly, the ambiguous nature of media between culture and economic policy.

3.2 The Advocacy Coalition Framework and policies against disinformation

After a general introduction of the Advocacy Coalition Framework as an analytical framework, the following subchapter will present the specific components which are deemed useful for the research project. It will provide the “precise conceptual and operational definitions” of *policy subsystems*, *advocacy coalitions* and *belief systems* which can then be interrelated “in the form of testable and falsifiable hypotheses or propositions” (Jenkins-Smith et al. 2014: 189).

3.2.1 Macro-level: Policy-subsystems as units of analysis

Policy subsystems represent the major unit of analysis within the ACF. Yet, a concise definition of what can be considered a policy subsystem does not exist; policy subsystems cannot be defined as but are defined *by* three constitutive elements: their territorial scope, a substantive policy topic, and a set of relevant actors attempting to influence subsystem affairs on a regular basis. The respective, underlying assumption implies that modern policymaking has become so complex (both “substantively and legally”, s. Sabatier & Weible 2007: 192) that actors who seek to actually influence the policy process need to specialise if they want to succeed. Relevant stakeholders are thus understood as “any actor directly or indirectly influencing subsystem affairs”²⁶ – even if “extent and consistency” of such involvement varies among them (Jenkins-Smith et al. 2014: 190).

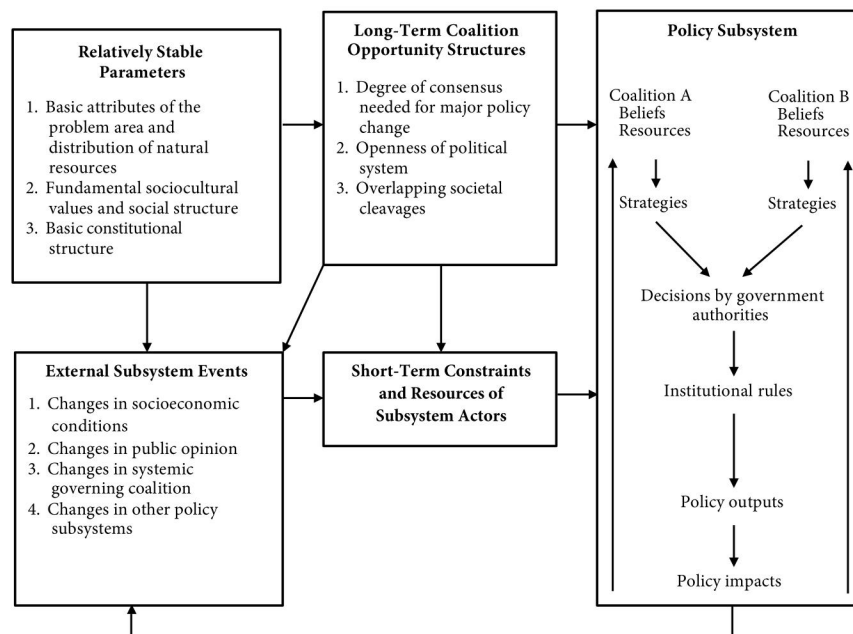


Figure 1: Flow Diagram of the ACF (Jenkins-Smith et al. 2014: 194)

²⁶ This explicitly includes officials from any level of government, representatives from the private sector, members from non-profit organizations, members of the news media, academic scientists and researchers, private consultants, and even members of the courts according to Jenkins-Smith et al. (2014: 190).

Mature versus nascent subsystems

Sabatier & Weible (2007) emphasise the importance of appropriately demarcating the scope of the policy subsystem that is being analysed. By equipping researchers with defining properties, the authors try to guide the process of identifying the scope of the subsystem (Jenkins-Smith et al. 2014).

It is important to understand that subsystem components (e.g., institutional characteristics or actors' attributes) are numerous and interact in non-trivial ways in order to produce outputs for a specific policy topic. There are integrated and non-integrated actors who are involved with a certain policy topic; however, only those actors who are not merely interested in, or affected by, the topic but those who actively engage with it can be considered relevant and thus demarcate the system. Furthermore, policy subsystems are semi-independent units, i.e. they overlap and interrelate with other subsystems to an extent where they might even be nested entirely within another subsystem.

Sewell (2005: 41) lists another three actor-based characteristics which could prove useful when delimiting the policy subsystem. He identifies relevant stakeholders as representing a semi-autonomous community sharing a domain of expertise; specialized subunits within agencies at all relevant levels of government to deal with policy within the domain; and finally, interest groups, or sub-units within those, which specialize in the substantive policy area for an extended period of time. In identifying these elements, Sewell basically refers to Sabatier and Weible's definition of a *mature* policy subsystem – as opposed to a *nascent* one (Sabatier & Weible 2007: 193).

The differentiation between mature and nascent subsystems is significant, insofar as the ACF assumes that their respective characteristics alter the path to policy change and coalition behaviour. Nascent policy subsystems are expected to inhibit greater volatility concerning the degree of actor integration and belief system formation while emerging (Nohrstedt & Weible 2010).

Overlapping and nested policy subsystems

Claiming the existence of policy subsystems obviously implies their integration into a bigger, encompassing political system. The ACF conceptualizes the broader political and socioeconomic context which policy subsystems find themselves embedded in as external variables, labelled *relatively stable parameters* and *external events*²⁷ (s. Figure 1). These shape the relationships among and between subsystems on a durable, profound basis (Sewell 2005).

²⁷ *Stable Parameters* entail basic attributes of the problem, fundamental sociocultural values and structure, and basic constitutional structure as variables. *External events* refer to the overall socioeconomic conditions, changes in the governing coalition, and policy decisions from other subsystems.

Appropriately delimiting the policy subsystem as a unit of analysis is thereby being complicated by the differentiation of overlapping subsystems that co-exist as interrelated units. This is especially true for international policy making, considering the more pronounced degree of vertical integration between several layers of government. *Overlapping* subsystems are defined as

subsystems with the same or sufficiently related functional domains such that policies arising in one have an impact in the other. The extent of the overlap is determined by the degree to which political actors participate in both, and overlapping subsystems may be nested, interrelated, or both.

Sewell (2005: 70).

The highest degree of overlap is found in *nested* subsystems which “have the same or very similar functional domains and the boundaries of one or several are completely enclosed by the other, larger and hierarchically superior subsystem” (ibid: 71).

3.2.2 Meso-level and micro-level: Advocacy Coalitions and belief systems

As regards the meso-level, the ACF simplifies subsystem analysis by grouping relevant stakeholders into advocacy coalitions; those are composed of “actors sharing policy core beliefs who coordinate their actions in a nontrivial manner to influence a policy subsystem” (Jenkins-Smith et al. 2014: 195). They thereby develop informal networks, engaging in non-trivial coordination, which implies that stakeholders effectively develop complementary strategies and share resources when working towards a shared goal (Sabatier & Weible 2007).

Although the authors consider the possibility to aggregate actors by organizational affiliation, they recommend organizing them based on shared beliefs or coordination strategies; this would represent a more effective way to lower the number of actors who deserve analytical attention (Jenkins-Smith et al. 2014). It further corresponds with the ACF’s assumption that stakeholders are strongly motivated to have their belief systems translated into policy programs – based on the model of “boundedly rational” individuals²⁸ (Jenkins-Smith et al. 2014: 191). This model also implies that actors are capable of acting rationally (or strategically); e.g., when seeking allies whom they can pursue their policy goals with (Carboni 2009: 27). Stakeholders can be identified on all levels of government, in diverse interest groups, research institutions and the media (Weible & Sabatier 2007).

Belief systems, however, remain the central element in motivating coalition behaviour, and thus, in shaping policy outcomes according to the ACF. As outlined earlier, belief systems should be

²⁸ Which translates into a limitation “in their cognitive abilities to process stimuli, such as information and experience”. Such disposition would then encourage the simplification of reality through the lens of belief systems – a three-tiered structure of normative and cognitive ideas. Jenkins-Smith et al. (2014: 191).

understood as a complex reflection of cognitive and normative ideas which structure the individual's perception of reality; as such, they significantly contribute to the constitution of causal patterns, ultimately informing stakeholders' policy preferences. In terms of advocacy coalitions, belief systems may be understood as the "glue that holds [them] together" (van den Bulck & Donders 2014a: 25).

Belief systems are conceptualized as a three-tiered, hierarchical structure consisting of *deep core* beliefs, *policy core* beliefs and *secondary aspects*. *Deep core* beliefs refer to the very basic, entirely normative ideas and ontological axioms a person holds (Jenkins-Smith et al. 2014). They therefore are not bound to specific policies but to be interpreted as the underlying values that guide one's view of broader philosophical concepts such as the relation between the individual and society or the role of the state (van den Bulck 2019). They are respectively difficult to alter as they are assumed to date back to childhood socialization (Sewell 2005; Sabatier & Weible 2007).

Policy core beliefs can be both normative and empirical but mostly reflect perceptions of causality within a given subsystem. Normatively, policy core beliefs refer to basic values and priorities for the specific policy field such as the magnitude of governmental intervention; empirically, they assess cause, severity and possible solutions to the policy problem at stake (Sabatier & Weible 2007). *Secondary aspects* reflect the most concise level of belief systems by referring to preferences for specifics of policy implementation or the choice among diverging regulatory instruments.

Based on policy core beliefs, researchers may expect to typically identify two to four advocacy coalitions on a given policy issue. Furthermore, the beliefs of more than one coalition should be implicitly or even explicitly reflected through policy formulation or in government programs (Jenkins-Smith et al. 2014). Hence, policy change can reflect an alteration of belief system structure (most notably on the second and third tier) of a relevant advocacy coalition, i.e., the one that is currently in political charge or dominantly influential. Therefore, the ACF considers technical and scientific information as a crucial factor shaping inter-coalition dynamics, and between actors inside the policy subsystem.

Bearing the micro-level assumptions for individuals in mind, formally neutral information might, however, be assessed with the same cognitive bias that fosters belief systems in the first place. Belief systems can function as perceptual filters that "screen out dissonant information and reaffirm conforming information, thus making belief change quite difficult." (Sabatier & Weible 2007: 194).

3.3 Belief systems in digital and media policy

Assuming that policies against disinformation are nested within digital policy and media policy, there is legitimate reason to investigate established belief systems in these subsystems. The present subchapter will focus on belief systems which have been identified in media policy²⁹. Those could prove useful for contextualizing advocacy coalitions' ideas with regard to disinformation.

Following one of the ACF's premises on belief systems³⁰, identifying them is crucial when trying to understand policies and their eventual change. Concerning those belief systems in media policy which prove relevant for investigations in the policy subsystem of online disinformation, only deep core beliefs can be inferred from academic literature as they do not regard issues that are subsystem specific. Deep core beliefs refer to broad, underlying normative assumptions about the individual and how it relates to society, i.e., social as well as political institutions and thereby constitute the most profound layer of belief systems according to the ACF.

The decision to focus on media policy paradigms in the first subchapter is based on three premises that have already been touched upon: first, the maturity of the media policy subsystem as opposed to the digital policy subsystem; second, the overlap of both subsystems as a direct result of digitization and dynamics of technological convergence; finally, the ambiguous role of social media or online platforms and their respective classification as either media or technology company.

3.3.1 Established policy paradigms in communication policy

In their landmark publication on communication policy paradigms, van Cuilenburg & McQuail relate efforts and characteristics of media regulation to material developments that would encourage the demand for respective regulation – based on either perceived threats to wellbeing (based on economic, environment or health concerns) or on perceived benefits that could be exploited for public interest (van Cuilenburg & McQuail 2003). Especially 20th century media policy was marked by considerable development with regards to communication technology, accompanied by a growing relevance of means of communication at the centre of post-industrial societies ; guiding paradigms were thus manifest and shaped by technological progress in media and telecommunications policy,

²⁹ While media policy represents a mature policy subsystem – the discussion in chapter 3.1.3 is indicative of it – digital policy has not reached this level of maturity yet. The variety of what is still being subsumed, and thus simplified, under the label “digital” would enormously complicate an overview of belief systems in digital policy only. There is also no reason to strictly differentiate between established belief systems in media as opposed to digital policy. Due to the fact that digitization has amplified the process of technological convergence in media policy, any resulting overlap between the two subsystems might have already affected established belief systems in the more mature one.

³⁰ Which have been referred to as “paradigms” by van Cuilenburg and McQuail (2003); Jakubowicz (2012); Baumgartner (2014); yet, due to their definition must be considered equivalent to the ACF's concept of “belief systems” in terms of ideational nature and complexity, see Künzler (2012).

as well as by growing concerns for public interest and liberalization (ibid.). The authors ultimately distinguish three policy phases to date of their article's publication³¹.

In summary, van Cuilenburg & McQuail contend that European communication policy in the early second phase was guided by values derived "from ideas of freedom, equality and solidarity, and policy was expected to create institutional expression of these and related values"; the 'new' phase, however, was characterized by emerging conditions where "policy ha[d] generally to follow the logic of the marketplace and the technology and the wishes of consumers (and citizens) rather than impose its goals" (van Cuilenburg & McQuail 2003: 200). As this assessment dates almost two decades back Jakubowicz' contribution offers valuable addition, considering how fundamentally media landscapes have been altered by the Internet. She identifies two developments, underpinning the persisting relevance of paradigms in communication policy. First, the notion of access to communication (e.g., in terms of connectivity) in internet-based technologies would grow in normative relevance (see also Padovani et al. 2010). Second, the more recent, 'liberal' paradigm seemed to persist, yet, complementary to a "renewed" public service paradigm (Jakubowicz 2012: 253).

Both developments are significant in view of the disinformation policy subsystem. They reflect an ongoing debate within the fora of Internet governance, debating not only technological or economic aspects but more and more acknowledging its social significance and the notion of public value as well. While the identification of a potential paradigm shift in EU media policy cannot be of interest to this thesis, any narrative reference to said paradigms and values is.

3.3.2 Deep core beliefs in media policy: role and value of news media in society

Legacy media regulation is very much shaped by the notion of *public* and *public sphere* when discussing the relationship between citizenry, the state, and media, especially news media, as elements within or constitutive of the intermediate sphere. Sánchez-Tabernero argues that "from the beginnings of modern democracy, information on public issues has been perceived as a basic right of citizens" (2006: 476). The linkage between an accurate functioning of the democratic process and the media as facilitator in providing the necessary amount of publicity to this process has also infused the set-up of European media systems. As McQuail (2008: 22) puts it

³¹ Methodologically, the authors defined the respective policy paradigms based on the historical reconstruction of ultimate goals and intermediate goals of communication policy in the United States and Europe. The second phase encompasses post-war policy, preoccupied with the consolidation of democracy and shaped by the ethos of public service when regulating mass media. From the 1980s on, this policy paradigm would be superseded by a more liberal one which, however, was difficult to identify and to label as it had not fully emerged yet; this "new" paradigm was characterized by efforts to doing justice to convergence resulting in regulating of legacy mass media and telecommunications.

Although less clearly articulated, there was broad acceptance of the notion that a democratic society requires the means to circulate reliable information among citizens, sufficient to support informed political choice and maintain essential links between government and government.

Therein, news media organisations carry the legacy of the very first news medium, newspapers, defining news media to this day as being “[written] accounts of current events, mainly of a political, diplomatic, military, regularly appearing or commercial character” (Christians et al. 2009: 114).

The notion of the public

Consequently, the commodity of news is, to a certain extent, constitutive of what is otherwise considered the *public* (Gripsrud & Moe 2010a; Splichal 2010) – a notion which has occupied a prominent spot in political philosophy ever since the ancient Greeks, and which has henceforth been integrated into considerations on “fundamental principles of democratic governance” at large (Splichal 2010: 26). However, there is a difference between what is and used to be philosophically debated as public and what is *commonly* understood as public sphere. Splichal (2010: 29) refers to this common understanding³², describing the public sphere as

a specific sphere, domain, or “imagined space” of social life existing between, and constituted by, the state and civil society, which represents an infrastructure for social integration through public discourse – a kind of “opinion market”.

By the beginning of the 20th century, two distinct paradigms had emerged with regard to the public; the first, conceptualizing it as a prerequisite to political participation in democracy, while the other perceived public opinion as potentially threatening the free expression of individual opinion (ibid.: 24). Christians et al. even claim a distinction in the basic understanding of democracy which applies when conceptualizing the media in relation to democracy and society (Christians et al. 2009)³³.

Splichal points out that those established paradigms of political theory, i. a. based on the works of A. Tocqueville, were seriously challenged by the advent and success of empirical opinion polling and public relations. Prominent representatives of this new discipline, e.g., Edward Bernays, rejected any normative-theoretical conceptualization of “the public”, defining public opinion as “the aggregate result of individual opinions – now uniform, now conflicting – of the men and women who make up society or any group of society” (Bernays [1923]1961: 61; in Splichal 2010). It was only with

³² Thereby implicating the first and the last “peculiarity” of media policy, namely the significant role that mass media are occupying in societal and people’s everyday lives as well as the duality of media organizations.

³³ The authors introduce the concepts of civic republicanism and procedural liberalism as ideal types – adversary or at least truly distinct in their conception of the public and its relevance to the democratic procedure, thus with different implications for the role of the media within this construct.

Jürgen Habermas' ground-breaking works that the concept of the public was reinvigorated while nature and relevance of the notion of public sphere would be increasingly debated again (ibid.).

News media's position and role in the democratic process

News media, offline or online and often associated with legacy mass media, play an important role in establishing a public sphere, while journalists, who act as intermediary agents, subsequently shape the discourse, and therefore occupy a pivotal role within. Napoli notes:

As has been well documented, the institution of journalism (regardless of the technology through which news is disseminated) is infused with an ethical obligation to serve the public interest.

(2019: 134).

Christians et al. (2009) show that there are certain roles ascribed that are reflective of the duties which journalism, and hence media organisations, are expected to perform along a certain democratic ideal. They identify three "basic tasks of journalism in a democracy":

1. The task of *observing and informing*, primarily as a service to the public
2. The task of *participating* in public life as an independent actor by way of critical comment, advice, advocacy and expression of opinion
3. The task of *providing* a channel, forum, or platform for extramedia voices or sources to reach a self-chosen public

(Christians et al. 2009: 116).

They further contend that, whereas there have been different phases of mass media journalism, i.e., following different logics and apt to coeval technology, those have merged into one dominant type in the Western world. This model has emerged along dynamics of globalization and marketization and is characterized by "pluralism of news and opinion; neutrality and objectivity in reporting; market orientation; and professionalization according to shared norms of practice". In addition, it is emphasized that such a model was "typically supportive of established forms of democracy and respectful of legitimate authority whether judicial or governmental" (Christians et al. 2009: 116).

4 Methodological considerations and analytical framework

This master thesis is conducted along a qualitative case study³⁴ design, informed by theory and conceptualized along coherent methodological considerations³⁵. It may be best described as exploratory and descriptive, given its reliance on qualitative, thematic content analysis. It is thereby in line with Merriam & Tisdell's pragmatic-constructivist approach to case studies (2016).

The case study is understood as methodology of “qualitative inquiry most suitable for a comprehensive, holistic, and in-depth investigation of a complex issue (...) where the boundary between the context and issue is unclear and contains many variables” (Harrison et al. 2017). It represents a sophisticated format of inquiry in social sciences, distinct in its flexibility which allows for the combination of different epistemologies and methods (ibid.). While such research design rarely leads to generalizable results and thus holds limited validity, its analytical focus on a specific entity of interest is particularly well suited to conduct policy-related research (Broughton Micova 2019).

4.1 Case selection and theoretical framework

EU policies against disinformation represent an intriguing research problem based on a relatively new phenomenon, embedded in a complex environment. Therefore, a case study design seemed to be the best option in order to shed light onto the problem. The research question was formulated as

What are the underlying ideas shaping stakeholders' positions on the role of news media in democracy when participating in the EU policy discourse on tackling online disinformation?

Research design, theoretical underpinning, and unit of analysis have been chosen along pragmatic considerations; notably, in order to reconcile a genuine interest in the above-mentioned problem with a sound, workable analytical framework.

In this case, stakeholder positions, limited to the policy discourse on disinformation and to the European layer of governance, represent the unit of analysis. These positions are based on public, written accounts, clarifying stakeholders' position towards EU policy efforts³⁶ against disinformation. In order to prevent any compliance with the “common pitfall (...) to attempt to answer a question that is too broad or a topic that has too many objectives for one study” (Baxter et al. 2008: 546), the

³⁴ Understanding a case study as “an intensive analysis of an individual unit (as a person or community) stressing developmental factors in relation to environment” according to Merriam-Webster.

³⁵ As opposed to an emergent, open-ended research design, see Simons (2009).

³⁶ The term *policy effort* thereby refers to the process leading up to actual policy formulation and therefore includes a chronological dimension. That is particularly relevant as it provides further delimitation to the unit of analysis.

case was further bound by a specific time frame. This frame reflects the process leading up to the formulation of the Code of Practice against Disinformation (European Commission 2018a), covering the period from November 2017 to March 2018.

Considering the theoretical premises of the ACF, notably in reference to the complexity of policy making, and the interplay between individual (i.e., belief systems) and the surrounding structural level (i.e., policy subsystems, stable parameters etc.), the decision in favour of a case study design is also a reflection of the ACF's theoretical versatility.

The ACF is considered to be one of the "most influential frameworks of policy dynamics" (Daigneault 2014: 453), frequently referred to when enumerating influential ideational approaches to analysing the policy process. It represents a well-established, reliable framework which has proven effective in explaining policy outcomes and policy change. With regard to the specific elements that have been picked out of the ACF's theoretical framework, namely advocacy coalitions and their respective belief systems, it is fair to assume that those can be comprehensively analysed and interpreted as captured within a specific time frame that is defined by the scope of this case study.

4.2 Stakeholder identification and data collection

Identifying relevant stakeholders is implicit to analysing advocacy coalitions along the ACF. Although stakeholder analysis could be considered a research object in itself (van den Bulck & Donders 2014a; Flew & Lim 2019), it represents only the first step to reconstructing relevant advocacy coalitions.³⁷

Stakeholders are commonly understood as "people, groups or organizations with a vested interest in (the outcome of) a particular policy" (van den Bulck 2019: 453); within the ACF they represent relevant subsystem actors which show a significant level of integration into said system. Such level of integration corresponds to specialization into a specific policy topic³⁸.

For this research project, key actors were identified based on personal observations in the given policy field when interning for the Association of European Press Publishers³⁹. By virtue of these

³⁷ The identification of stakeholders was conducted iteratively, following van den Bulck & Donders who describe this process as "dynamic", implying that "unexpected parties may surface while analysing and collecting data" (2014a: 21).

³⁸ Departing from the ACF's model of the individual which claims they had "limited capacity (...) to process stimuli" and considering that "policies usually involve complicated topics" there is only so many subsystems that actors can specialize in to "influence output" – therefore, subsystem integration is a matter of actor specialization and "with specialization comes involvement and a perception among integrated actors of some autonomy from other subsystems.", s. Nohrstedt and Weible (2010: 7–8).

³⁹ For more information, see EMMA (2020) and ENPA (2020) This experience has also fostered a good understanding of the boundaries to the policy subsystems concerned; in this regard, Weible and Sabatier's advice to ACF applicators about "conducting preliminary interviews of policy participants and asking them to identify the territorial and substantive boundary of the issue and the major interest groups and government agencies involved" has been noted but is considered compensated by personal experience in the sector and with the issue concerned (2007: 127).

insights, the Public Consultation *on fake news and disinformation*, running from 13 November 2017 to 23 February 2018, was identified as the most significant and encompassing forum, serving for debate in an emerging policy subsystem and specifically targeting “citizens, social media platforms, news organisations, academia and civil society organisations” (European Commission 2017).

In order to establish an informative pool of data – which the analytical framework, including a method of qualitative content analysis, could be applied to in a timely, conclusive manner – a sample of the most relevant contributions to the consultation was created⁴⁰. In the end, a total of 77 documents was analysed for this research project (cf. Annex 10.2).

4.3 Method of content analysis

In order to investigate the research question, frame analysis was chosen as a method of qualitative content analysis and as means to operationalising the hypotheses. As will be elaborated here, such procedure allows for “(re)constructing” latent meaning from the collected documents and, therefore, is well suited to analyse the assembled data in a conclusive manner.

A frame is considered to be a “scheme of interpretation that structures the meaning of reality” (Goffman 1975; Löblich 2019: 419). Hence, it serves as a tool, notably in policy discourses, for conveying a particular idea of the policy problem while simultaneously arguing a pool of possible solutions. Media policy is no exception to this. In fact, Löblich explicitly refers to the utility of frame analysis when mapping media policy debates: not only is it useful for identifying actor specific spins, but also helpful when trying “to understand why certain media problem definitions emerge and get legitimacy and others disappear or do not become visible at all” (Löblich 2019: 423).

Entman’s definition⁴¹ is a common reference for operationalising frames (de Vreese 2005; Brüggemann et al. 2016). Following his definition, a frame contains four functional elements: one defining a problem, another diagnosing causes to such problem, a third element implying a normative judgment; and, finally, an element offering a remedy to the problem outlined (ibid.).

Brüggemann et al. consider distinct frame layers, working with the notion of ‘master frames’ to identify “broadly shared patterns of interpretation” (2016: 535). These are understood as often

⁴⁰ This step followed Puppis(2019) who argued that in qualitative research, sampling was “not based on the idea of representativeness. Rather, (...) sampling aims at choosing the material necessary to answer the research questions” (Puppis 2019: 373). The hereby created sample is arguably biased towards highly regularized and professionalized stakeholders – which will probably produce results that do not cover the range of potentially relevant stakeholders.

⁴¹ According to it, to *frame* means “to select some aspects of a perceived reality and making them more salient in a communicating context, in such way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation”, see Entman (1993: 52).

consensual, “widely distributed worldviews or ideas” (Löblich 2019). Below this level of master frames, various other (sub) frames then “compete for attention” (Brüggemann et al. 2016).

Both Entman’s definition as well as the reference to the concept of master frames (Snow & Benford 1992) reminds of the three-layered, hierarchical set up of belief systems according to the ACF. Therefore, conducting a frame analysis is not only reasonable in view of the research object – analysing media policy debate – but also considering the theoretical framework chosen.

Although there have been approaches where such refinement or merger between the ACF and similar, analytical methods was systematically pursued, e.g., with regard to policy narratives (Radaelli 1999; Shanahan et al. 2011), this thesis does not aim to provide for another refinement of the ACF by conceptualising frame analysis into it. It is, however, worth pointing out that there is an obvious congruence between the three tiers of belief systems (deep core beliefs, policy core beliefs, secondary aspects) and the frame definition (see Entman 1993), including an implicit typology or hierarchy of frames (Snow & Benford 1992; see Brüggemann et al. 2016).

4.4 Operationalisation

Before conducting the frame analysis, the sampled documents were consulted and subjected to discursive close reading. This way, an exhaustive list of stakeholders could be compiled while, simultaneously, relevant frame elements were identified.

Hypothesis 1

- **The policy discourse on tackling disinformation is reflective of a premature policy subsystem in which one to four advocacy coalitions can be identified.**

Sabatier & Weible (2007) emphasise the importance of appropriately demarcating the scope of the policy subsystem that is being analysed. By equipping researchers with defining properties, the authors try to guide the process of identifying the scope of the subsystem (Jenkins-Smith et al. 2014). Furthermore, Sewell lists three actor-based characteristics which could prove useful when delimiting a mature policy subsystem: he identifies relevant stakeholders as representing a semi-autonomous community sharing a domain of expertise; specialized subunits within agencies at all relevant levels of government to deal with policy within the domain; and finally, interest groups, or sub-units within those, which specialize in the substantive policy area for an extended period of time (2005: 41).

By juxtaposing the data, notably based on the results of the stakeholder analysis, against the abovementioned criteria, respective conclusion as to the delimitations as well as the maturity of the disinformation policy subsystem will be drawn.

Hypothesis 2

- **Actors within an advocacy coalition will show substantial consensus on issues pertaining to the policy core, although less so on secondary aspects.**

This hypothesis is part of the formal hypotheses suggested by the original ACF literature (Weible et al. 2009). To identify respective advocacy coalitions, the authors recommend:

We find that operationalizing two or three of these policy core beliefs is sufficient to identify at least two advocacy coalitions. However, we recommend operationalizing as many components of policy core beliefs as possible, because the subdivisions within coalitions or the possibility of a third coalition are often explained by disagreement across other components of policy core beliefs.

Sabatier & Weible (2007: 195).

Since the policy core is, among others, characterized by actors' assumptions about severity and cause of the policy problem, as well as by preferred solutions for addressing it (Jenkins-Smith et al. 2014), these can be operationalised by operationalising the respective frame elements as suggested by Entman (1993). Stakeholders were therefore mapped according to their attitude towards measures against online disinformation, – based on how they rated severity of the problem (online disinformation), which causes they would identify (e.g., lacking regulation of online platforms), and which remedies they preferred to solving it (e.g., solutions based on artificial intelligence).

Hypothesis 3

- **Belief systems will be reflective of established paradigms in media governance and therefore contain frames which refer to broader, normative concepts.**

An operationalisation of this hypothesis touches upon the matter of deep core beliefs, representing the most profound layer of belief systems. As regards the frame analysis, such deep core beliefs can be equated with what has been introduced as master frames by Snow & Benford (1992). Those carry similarities to deep core beliefs and therefore should reference paradigmatic views onto concepts such as the state, the basic functioning of society, the individual as well as their respective interrelation. In light of the research question – and the policy discourse on disinformation – master frames are expected to bear reference to notions of public interest with regards to the role of news media in society (e.g., constituting or facilitating the public sphere), state intervention in media policy (e.g., complying with a right to information and thus ensuring news media provision) or the digitized media ecosystem (e.g., in relation to news media conduct and accountability or legitimacy).

Despite a previous contextualization based on relevant literature (see chapters 3.3 and 3.4), master frames as well as their respective sub-frames have also been identified inductively. A list of all the frame elements identified is annexed to this thesis.

4.5 Reflections on the research design and its limitations

There are several remarks to be made regarding the research design and its application. First, there is the case study design which provides for only limited potential to generalisation. This is especially true for small-N case studies that primarily 'dwell' on case specific details. As this case study was not conducted inductively but guided by theory – which ultimately informed the choice of data and method of analysis – conceptual rigidity was inherent to the research design.

Secondly, there are also shortcomings in terms of theoretical framework. With regard to conducting a stakeholder analysis, there are several inherent blind spots which need acknowledgement. Especially when focussing on official fora and track records, there is a risk to overlook relevant actors while neglecting informal paths to decision making. Concerning the theoretical framework chosen, namely the ACF, there was the option to include chronology into the analysis, e.g., in order to trace stakeholder influence within the policy subsystem. Explaining policy change and learning are among the theoretical foci of the framework but were excluded in view of the research objective and the typically limited scope of a master's thesis.

Thirdly, the sources of data also deserve critical assessment. Although documents represent an "efficient and cost-effective data source" (Karppinen & Moe 2019: 251), there are obvious disadvantages of working with official, publicly available sources. These mostly concern document authenticity (Karppinen & Moe 2012); documents, especially when created for publication, must be seen as "social phenomenon in the sense that it was created under a set of circumstances, for a specific purpose, by specific people, at a certain time and place" (Karppinen & Moe 2019: 252).

Lastly, there might be reason to question the objectivity of frame analyses in view of their qualitative character. Therefore, they are particularly suitable for uncovering even latent meanings, often characterised by not only what is included but also excluded from the text (Puppis 2019). Löblich emphasises the risk of "finding frames the researcher is 'consciously or unconsciously looking for'" (Löblich 2019: 424). Ensuring validity and reliability in frame identification is further complicated by the fact that one single coder lacks exposure to critical feedback loops that would allow for discussing results, and, ultimately, also perceived frames (Brüggemann et al. 2016).

5 EU efforts against disinformation: a nascent policy subsystem

To illustrate the disinformation subsystem constellation, chapter 5 will elaborate the stable parameters that contemporary communication policy operates in, providing the descriptive element of the case study. By investigating online disinformation as a problem embedded in the context of EU policy, the chapter will illustrate how tackling online disinformation has continuously become more topical on the EU policy agenda, emerging as a manifest subsystem that is in the process of formation and emancipation. It further defines the normative and legal framework that is necessary to adequately contextualize the policy discourse on online disinformation.

5.1 Subsystem identification and EU policy initiatives

There is reason to believe that the European policy discourse on tackling online disinformation is symptomatic of either a nascent, proper policy subsystem of its own – or that it is part of an emerging subsystem that is either nested or interrelated with the bigger policy subsystems of media and of digital policy – as it fully mirrors the complexity of policy making in times of media convergence.

Following the detailed criteria set forth by Jenkins-Smith et al. (2014) and Sewell (2005), this thesis assumes that policies against disinformation are part of a nascent subsystem. This subsystem is fully integrated into the subsystems of both European media and digital policy; more specifically: there is a nascent disinformation policy subsystem which is nested where European media and digital policy overlap (see Figure 2). Pamment partly seconds this assessment in his analysis of EU policy against disinformation, when arguing that disinformation itself “define[d] a policy area”; it was, however, lacking “a firm legal basis” (Pamment 2020: 5).

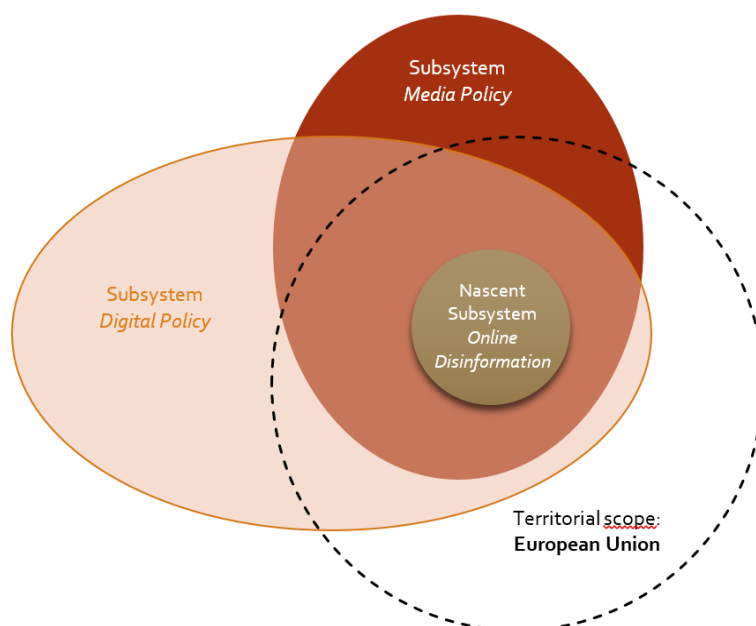


Figure 2: Online disinformation as nested, nascent subsystem; graphic inspired by Sewell (2014)

5.1.1 EU policies against disinformation throughout the investigation period

EU efforts against disinformation originated within the EEAS as a matter of security and defence. The *East StratCom Task Force* was established in 2015 to counter Russian disinformation campaigns in view of the Eastern Ukrainian conflict (EEAS 2018). Its flagship project, *EUvsDisinfo*, “identifies, compiles, and exposes disinformation cases originating in pro-Kremlin media that are spread across the EU and Eastern Partnership countries” (EUvsDisinfo 2020). Next to monitoring activities and media analysis, the task force aims at strengthening a healthy media ecosystem by supporting media freedom and independence, notably in Eastern Europe and the Western Balkans. Although the EEAS’ role has not been formalized, the respective division that is in charge of the abovementioned projects represents a central actor in advocating the EU’s cultural and political objectives (Pamment 2020).

In addition to tackling online disinformation under the impression of foreign policy, Parliament and Commission decided to investigate the issue from an economic point of view, scrutinizing the behaviour of online platforms (Juncker 2017; European Parliament 2017). Specifically for this purpose, a public consultation on fake news and disinformation was launched in October 2017, encouraging citizens and stakeholders to contribute their views on the issue.⁴²

Parallel to the consultation process, a high-level expert group (HLEG) was set-up and tasked with the development of policy recommendations in consideration of the EU regulatory landscape. The HLEG report from March 2018 was the first EU publication to suggest a common working definition⁴³ that then later was adopted in the first Commission communication, *Tackling online disinformation: a European Approach* in April 2018 (High level Group on fake news and disinformation 2018; European Commission 2018c). This communication indicated the Commission’s intent to propose a self-regulatory instrument to the tech industry; the *Code of Practice On Disinformation* (CoP) was then presented in July, and launched three months later, in September 2018 (European Commission 2018a). Marsden et al. consider the CoP to be the “most important European policy document dealing with disinformation” (2020: 3). Alongside the CoP, whose signatories include the most relevant social media platforms, a Sounding Board was established, encompassing stakeholders from legacy news media organisations and consumer interest groups as well as from academia (EBU 2018).

⁴² Ideally speaking, public consultations are supposed to “help bring greater democratic legitimacy to the EU but to also provide decision-makers with much-needed policy related expertise”; functionally speaking, they “provide an opportunity to aggregate citizen and stakeholder preferences, demonstrate where support lies on a given issue and, subsequently, work to resolve potential conflicts amongst decision-makers as well as to clearly coalesce decision-maker preference” acc. Chalmers (2014: 599). For an overview of the questions asked in the consultation questionnaire, see Annex 10.1.

⁴³ The relevance of this definition is further underlined when looking at the academic discussion where numerous publications base their research, i. a., on them: Martens et al. (2018); Fink and Gillich (2020); Marsden et al. (2020).

Finally, in December 2018, the Commission presented an *Action Plan Against Disinformation* (ADAP), reviewing the actions and instruments under the direction of the EEAS in addition to introducing new operational tools in several areas. These covered measures to better coordinate inter-institutional efforts, engage the private sector, enhance awareness for the overall problem, e.g., through media literacy initiatives, and to support quality journalism (Pamment 2020).

5.2 Characteristics of the problem area

As indicated in the literature review (cf. chapter 2), comparing the ancient issue of falsehood being part of publicly conveyed information, to contemporary disinformation can prove fertile in making evident what is genuinely new about the current phenomenon. This subchapter illustrates the considerations that characterize both the contemporary and the policy discourse on disinformation, as reflected in official problem definitions, stakeholder accounts as well as within the formulation of counter policies (Special Rapporteur on Freedom of Opinion and Expression 2017; Council of Europe Parliamentary Assembly 2018; European Commission 2018c).

5.2.1 The EU working definition of disinformation in a broader context

The EU definition resonates earlier publications, pointing to emerging threats and underlying logics to be associated with disinformation: the Joint Declaration by UN, OSCE, OAS and ACHPR (Special Rapporteur on Freedom of Opinion and Expression 2017)⁴⁴ and CoE report on “Information disorder” (Wardle & Derakhshan 2017). Consequently, common features can be identified. Those prove relevant when trying to distinguish online disinformation – both legally and contextually – from similar forms of content circulated on the internet. As rightfully indicated by the HLEG report definition, any illegal content is to be excluded from defining the problem of disinformation⁴⁵. Furthermore, analysing separate entities of meaning in these definitions can prove beneficial to the process of stakeholder mapping. Such entities have been identified as the sender’s or creator’s intention to deliberately spread (1) non-factual information (2) for either economic or political gain (3) with the potential to cause public harm (4). For a detailed overview, see Figure 3 which serves as an orientation to better understand the policy debate on online disinformation as a phenomenon that is entangled with the technological evolution of the media ecosystem.

⁴⁴ The Joint Declaration further places this “growing prevalence of disinformation” within both “legacy and social media” which confirms this thesis’ conceptualization of disinformation as a matter of media policy.

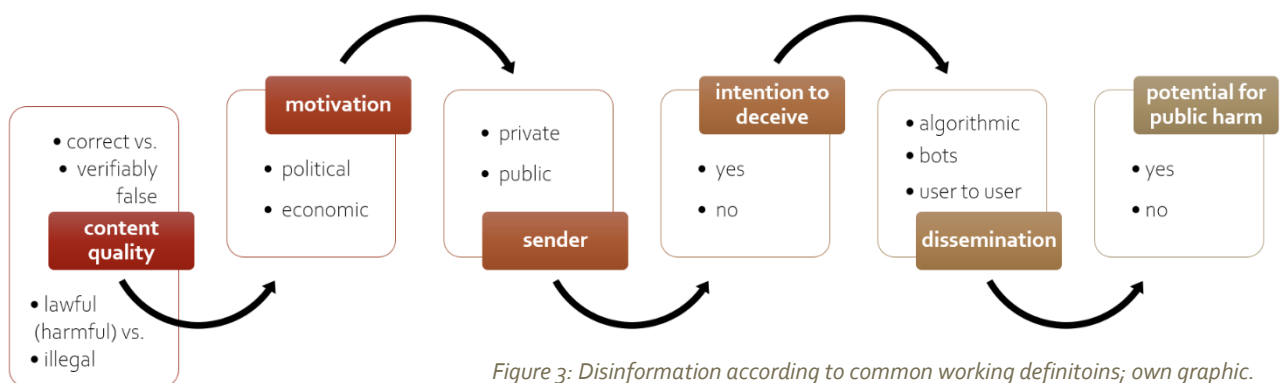
⁴⁵ Such content, i.e. hate speech, racism and harmful content for minors, is already prohibited by EU law. Similarly, journalist formats that distort facts for satire or parody must be excluded, s. Martens et al. (2018: 10); Tandoc et al. (2018).

5.2.2 Implications for contemporary regulation

It was emphasised how digitization has significantly altered media consumption and media landscapes. Thus, it is fair to speak of a “digitization of disinformation via social media platforms” (Marsden et al. 2020: 2) which is characterised by a facilitation of dissemination mechanisms. The information technology that enables platform business models equally produces a staggering amount of data which can be considered problematic in itself – irrespective of the actual accuracy of the information conveyed⁴⁶. Disseminating disinformation for either ideologic (i.e. political) or purely economic gain thereby remains as relevant today as it was before the Internet (Tandoc et al. 2018).

Furthermore, the crucial role of advertisement in indirectly financing (news) media products has been reinforced by digitization. First, it is often an essential if not the exclusive source of revenue to social network sites (SNS) which are arguably very attractive for advertising due to their potential to algorithmically curate content and target customers. Second, online advertisement is simply not as regulated as its analogous counterpart, notably with regard to political advertising (Schiffrin 2017). It is no surprise that, as a result, advertisers are shifting budgets towards social media at the expense of conventional media products (Wardle & Derakhshan 2017) without great concern for quality of the content their advertisement is associated with (Burkhardt 2017: 8).

Finally, there is another aspect to disinformation which impacts even matters of hard politics such as foreign policy (Crilley 2018). The phenomenon of *hybrid war*⁴⁷ has been acknowledged by the Council of Europe, bearing reference to “troll factories, click farms and automated social media accounts⁴⁸” which are currently being employed by state actors (Wardle & Derakhshan 2017).



⁴⁶ Marshall therefore refers to “data smog”, elaborating on how the abundance of information is so overwhelming that any creation of filter bubble seems like a natural development: “‘Information’ becomes so plentiful, it is difficult to find (or sort out), what is accurate or relevant” – or more simply put: “Accuracy of information can be undermined by strategies to cope with quantity” Marshall (2017: 10–11).

⁴⁷ Which is referred to as “a new type of threat consisting of (...) cyberattacks; mass disinformation campaigns, including fake news, in particular via social media; interference in election processes; disruption of communications and other networks; and many others” according to the Council of Europe Parliamentary Assembly (2018).

⁴⁸ Also known as *bots*, “software applications that run automated tasks over the internet”, see Fink and Gillich (2020: 264).

5.3 Constitutional structure of EU communication policy

According to Martens et al., the debate on disinformation may be “re-formulated as a debate on quality concerns in news markets” – and thus as a debate from an economic point of view (2018: 9). Therefore, EU media policy – policy affecting news markets, and which genuinely emanates from the European policy arena – is to be understood as oscillating between economic and cultural policy⁴⁹.

Economically, competition law plays a major role in shaping European media policy. Its cross-cutting nature allows for horizontal application and state intervention into media markets; ideally, such policy upholds external media pluralism while ensuring fair competition between private and public providers of audio-visual services (Ungerer 2014). This is especially relevant as the Union’s supporting competence in media policy derives from Art. 167 TFEU⁵⁰ on artistic and literary creation and audio-visual services (Pauwels 2014; European Parliament 2020). Although formalized along the Maastricht Treaty in 1992, policy makers had already adopted measures to harmonize the audio-visual sector by means of market policies and therefore prior to the so-called “Culture Article” (Michalis 2014; Pauwels 2014). It is, however, not until the introduction of Art. 167 that media policy enters a controversial and ambiguous *grey zone* (as opposed to the “white” zone of exclusive member state competence), further evolving along economic, cultural and legal arguments (Pauwels 2014).

In terms of secondary law, media governance is conducted along regulatory instruments, i.e., the directives on audio-visual media services (AVMSD, amended in 2018) and on copyright (adapted to the digital single market in 2019 as CDSM). Concerning the respective infrastructure, EU regulation on telecommunications – now, electronic communications – applies (Cave et al. 2019). EU media governance is further pursued as subsidiary cultural policy, e.g., financing MEDIA, a subprogram to the Creative Europe fund. In addition, EU digital policy envisages both supply (e.g., by regulating e-Commerce or subsidising innovation and research) and demand side of online services; the latter encompassing education policy to foster media and information literacy (Mansell 2014).

Media literacy is also reflected in EU soft law. Having “far reaching prescriptive effects” (Loisen et al. 2014: 9), these soft law instruments, e.g., communications or green papers, play a crucial role within the decision making process on media policy. This is especially true in view of the EU’s recent engagement in favour of media pluralism and independence – thus, issues that touch

⁴⁹ Michalis argues that media policy is to be understood as “the balance between the two integral facets of the media: cultural, social and democratic goals; and economic and industrial competitiveness aims” and that this was especially true for EU media policy (2014: 128). This conception also reflects the schism between the EC and EP approach to media policy, with the former generally supporting its economic aspect and the latter advocating for a more cultural interpretation; see Loisen et al. (2014).

⁵⁰ Initially introduced as Art. 128 of the Maastricht Treaty, it became Art. 167 TFEU along the Lisbon Treaty reform.

upon the sociocultural aspect of media governance, rather than on the economic one. Although, traditionally, it is the CoE whose declarations and expertise provide moral guidance – a fact that serves as member state argument to contain EU media policy ambitions – the EU’s growing ambition in this regard shows equally in the discourse on disinformation and its normative underpinnings.

5.4 Basic socio-cultural values underpinning EU communication policy

European media policy has developed distinct features alongside technological progress, thereby inspiring normative principles which were declared policy goals and led to an according formulation of regulatory frameworks. McQuail (2008: 21) enumerates “traditionally distinctive features of European media systems”⁵¹ which illustrate the European approach to media governance. On the other hand, they reflect fundamental values, partly enshrined in primary law (Macmillan 2014).

McQuail identifies “acceptance of a transparent role for government as a positive (as well as inevitable) feature of the system” and the “willingness to acknowledge an idea of the ‘public interest’ (sometimes ‘national interest’) that is unlikely to be (...) achieved by market forces on their own” (2008: 21). The European news media market is characterised by a regulatory dichotomy; while there is almost no regulation of print media markets, following the ideal of a “free market place of ideas”, the broadcasting sector is traditionally subject to more public scrutiny (Valcke & Ausloos 2014: 312). Based on the presumption that pluralism and information quality could only be ensured through regulation, government intervention into broadcasting markets is further justified on the basis of a certain scepticism towards mass media, associated with “mass deception and electoral gain” (ibid.).

Furthermore, McQuail indicates the persisting significance of public service media in Europe. This becomes apparent when looking at the provisions of the AVMSD which are, i. a., based on Article 11 CFR, referring not only to the freedom of expression but equally to the fundamental freedom to receive information. Recital 62 of the AVMSD explains: “The right to access political news programmes is crucial to safeguard the fundamental freedom to receive information.”⁵² Article 11 further entails reference to the fundamental principles of media freedom and pluralism, both prerequisite to democracy itself.⁵³ Unsurprisingly, the notion of cultural diversity plays also a major role in European media governance considering the “value attached to linguistic and cultural distinctiveness, according to national and regional identities” (McQuail 2008: 21).

⁵¹ Although national media landscapes in Europe developed distinctively from another, respective commonalities exist.

⁵² The AVMSD explicitly includes audiovisual services on social media platforms in its scope.

⁵³ While media freedom implies the independence of media ownership and editorial conduct, media pluralism refers to a more complex concept. Council of Europe Committee of Ministers (1999) defines it as “the existence of a plurality of independent and autonomous media (generally called structural pluralism) as well as a diversity of media types and contents (...) made available to the public”.

6 Advocacy Coalitions in the disinformation discourse

In order to identify advocacy coalitions active in the policy discourse on online disinformation, a total of 77 stakeholder contributions was analysed. The sample consists of responses to the public consultation questionnaire given on behalf of a collective entity, i.e., an organisation, and therefore excludes contributions of individuals associated with a certain organisation. These organisations had to be either a public body or registered with the European Transparency register; specific survey questions provided for respective distinction and thereby allowed to reduce the dataset to the most relevant stakeholders. Furthermore, only stakeholder contributions in English, German or French language could be taken into account⁵⁴; frame analysis is context sensitive and sufficient language proficiency is thus a necessary requirement to the method.

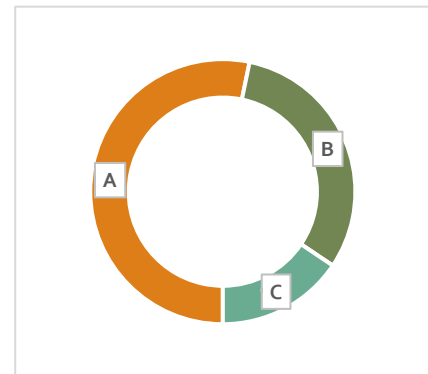


Figure 4: Advocacy Coalitions identified

To investigate the second hypothesis, stakeholder contributions were categorized according to the frame elements employed. Thereby, three advocacy coalitions could be identified, particularly distinct in their problem perception and the respective conclusions drawn.

Stakeholder contributions were submitted by actors from both public (21%) and private sector (79%), covering organisations that belong to the political-administrative domain, private businesses, civil society, and the media. There is an overlap between business and media when it comes to commercial media organisations which results from their dual conceptualisation as both economic and intermediary entities within the public sphere. Next to the binary criterion of public versus private entities and their distribution over functionally distinct categories of society, actors can be further distinguished on the basis of whether their organisation engages in advocacy work, i.e., as interest, pressure, or lobby group. In this sample of 77 stakeholder contributions, 58% were attributed to advocacy groups, whereas the rest (42%) was contributed by public bodies, businesses, or civil society actors without lobbying purpose, e.g., factchecking organisations.

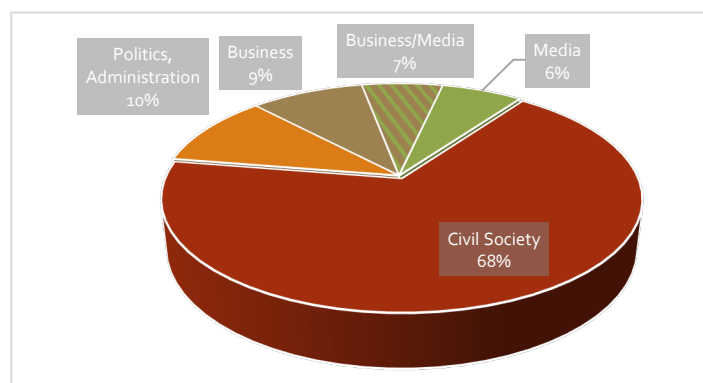


Figure 5: Contributions according to societal sub spheres

⁵⁴ In this regard, it is worth mentioning that roughly half of the contributing organisations can be considered multinational or European in view of their membership or scope of their work, while the other half represents national associations.

Concerning the sectors and topics that these organisations (advocacy and non-advocacy) represent, the composition of *Advocacy Coalitions A* and *B* are relatively close to the overall sample. *Coalition A* shows no remarkable difference except for a slightly lower proportion of NGOs representing civil, digital and consumer rights. *Advocacy Coalition B* equally closely mirrors the sample's composition, however, shows the highest share of traditional media interest. *Advocacy Coalition C* deviates the most, showing an overrepresentation of NGOs (in the fields of civil liberties, human, digital and consumer rights), as well as in business interest from civil society only.

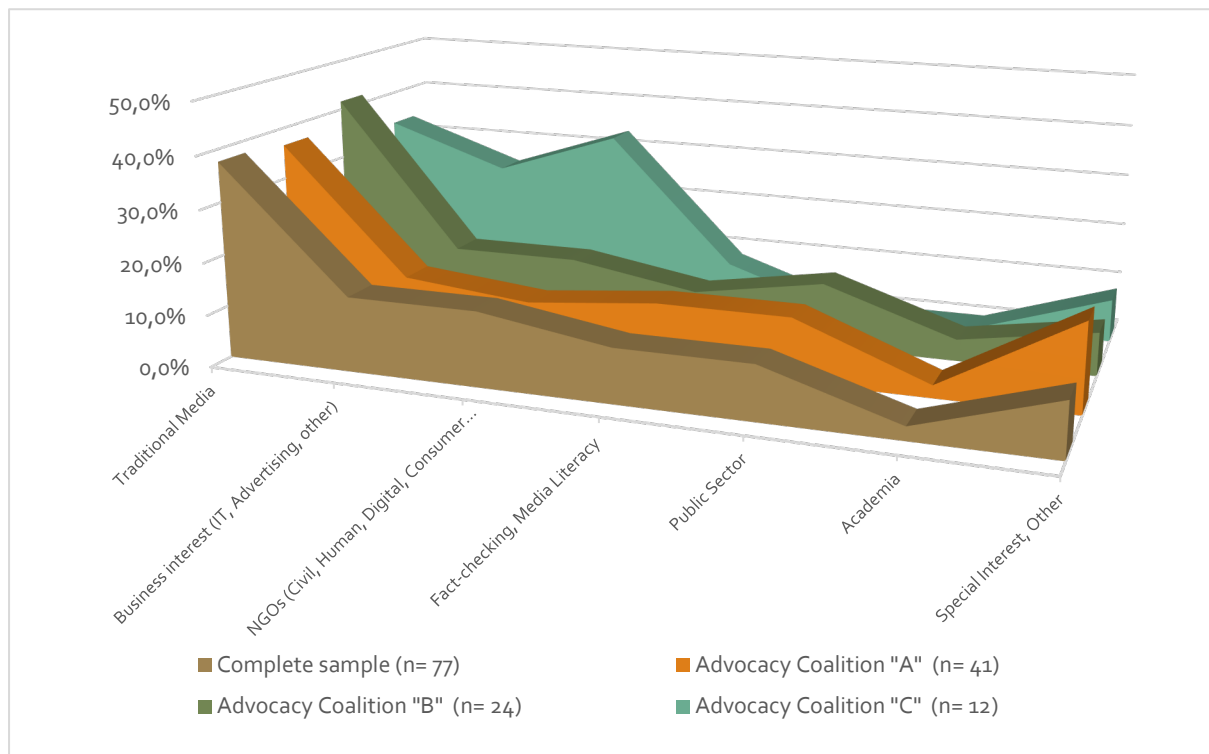


Figure 6: Comparative composition of advocacy coalitions according to sectors and topics

Stakeholders from the public, political-administrative sector

Public actors account for a fifth of the contributions, spread across the political-administrative sphere and civil society. Those from the political-administrative sector who contributed to the public consultation include two member state governments, four national regulatory agencies and two political parties. Other public bodies which are part of either the media or civil society include PSM, universities and one statutory education programme.

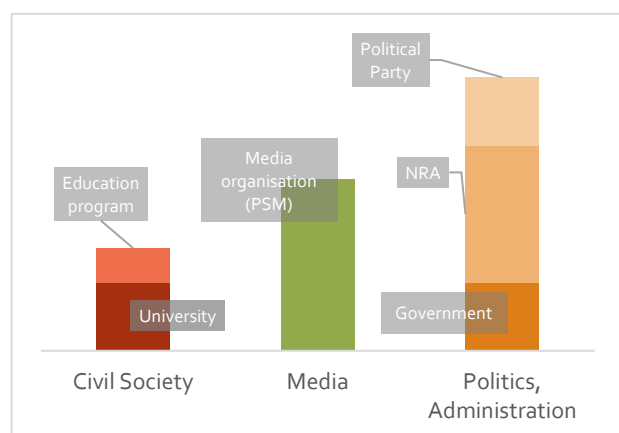


Figure 7: Contributions from public actors according to area of society and organisation type

Civil society organisations in the sample

Civil society contributions to the public consultation account for two thirds, thus, the majority of feedback. Actors listed in this category refer to socioeconomic pressure groups (52%), e.g., professional associations or unions, community- or member-serving NGOs (together 31%), think tanks (12%). They also include those actors who are public in nature, however external to political-administrative domain, namely representatives from academia and specific education programmes (6%). Stakeholders that can be considered part of the civil society cover a wide array of sectors and topics (cf. Figure 8). The vast majority of these organisations are advocacy groups, defending mostly business interests, but also interests related to public welfare or consumer rights. Among these, those representing the interests of news and entertainment organisations dominate the sample. Lastly, and with regard to the central issue of the public consultation and of this thesis, the two contributions of fact-checking organisations are worth mentioning; next to two contributions from academia, these represent the majority of non-advocacy groups in the civil society part of the sample.

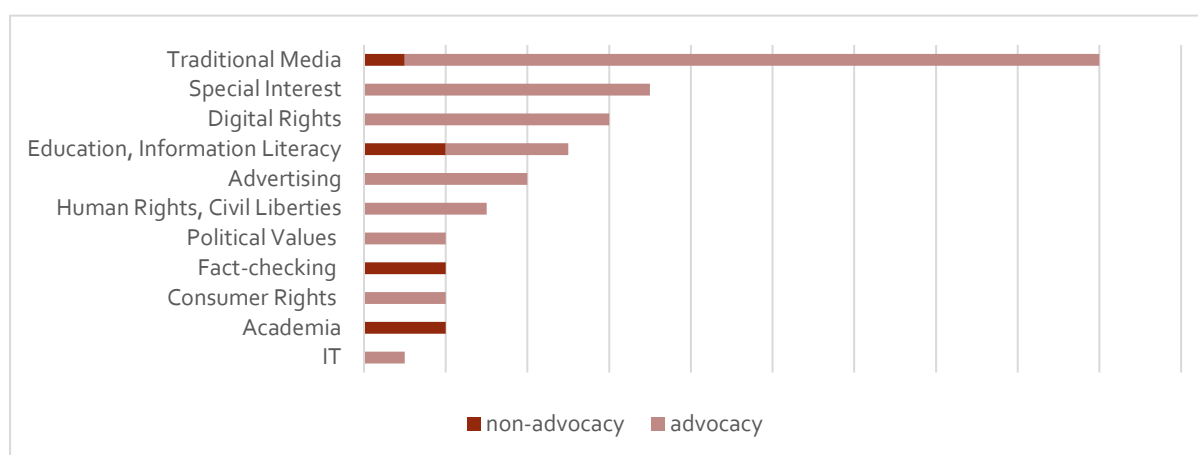


Figure 8: Stakeholders from civil society according to topic/sector

Businesses and companies

Private organisations, operating for profit and not as an advocacy group, represent only 15% of the

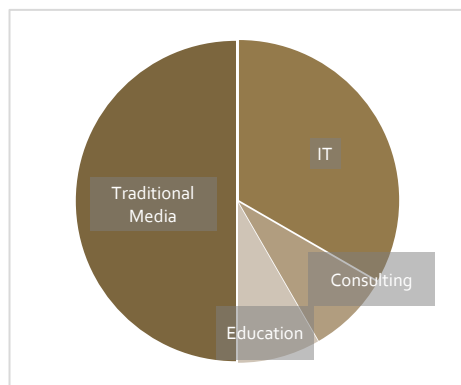


Figure 9: Contributions from companies according to sector

sample. This might be a result of the sampling process as small and medium-sized firms do not necessarily possess a European Transparency Register number. Another interpretation suggests that relevant sectors are already represented through advocacy groups and companies abstain from engagement with the consultation. Half of these businesses are representatives of legacy mass media, i.e., established broadcasting and press companies. The rest is mostly technology or IT companies of different sizes.

Stakeholders affiliated with traditional news media

In light of the research focus and since stakeholders from traditional media predominate the sample, they deserve closer analysis. Stakeholders from the media sector encompass news and entertainment companies from public and private sector, news agencies, journalists, and their respective pressure groups. In this sample, even a copyright collective and a research institute on European media law contributed. In total, ten organisations can be categorized as being part of the *media system in society*⁵⁵. Among these non-advocacy, content-creating organisations, the majority of contributions comes from public service broadcasters, followed by commercial broadcasters.

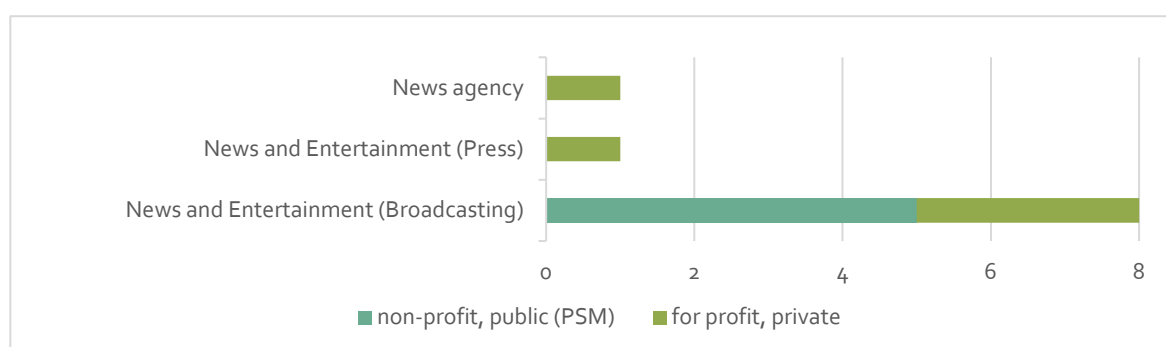


Figure 10: Public Service and commercial media organisations according to media format

Advocacy groups associated with traditional media mostly defend interests that are grouped according to media formats. In this public consultation, lobby organisations working for the press sector represent the majority, closely followed by professional associations of journalists.

In total, that is both media companies – private and public –, and their associated or affiliated advocacy groups, constitute a good third, namely 38 %, of the sample.

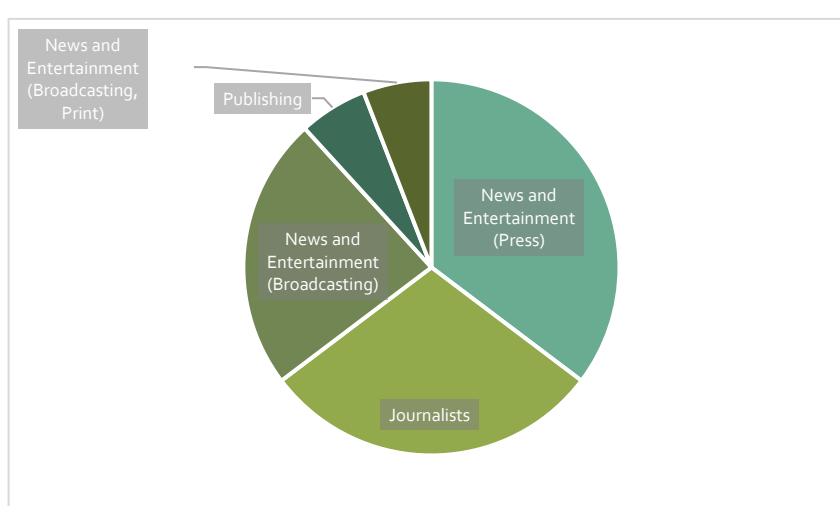


Figure 11: Advocacy in the media sector according to media format

⁵⁵ Five of these can also be defined as business entities and are therefore also represented in the statistic on businesses.

6.1 Identifying coalitions according to the three-layered belief system

As pointed out in the previous section, three patterns emerged subsequent to the frame analysis⁵⁶ and thereby indicated the existence of three advocacy coalitions. These are distinct in the relationship between perception of problem severity and the preference for more or less intense countermeasures that actors thought warranted by such problem.

Deep core beliefs & master frames: statements indicating paradigmatic ideas

Deep core beliefs and master frames embody stakeholders' world views and value systems, thus, they refer to the most profound level of belief systems within advocacy coalitions. In order to comply with the overarching research objective of this thesis, which is to investigate those ideas that shape or illustrate stakeholders' positions on the role of news media in democracy, respective frame elements were inductively identified and listed. They then were interpreted, mostly by comparing their prevalence and context, especially with regard to inter-coalitionary differences, i.e., inter-coalitionary specificities. Varying complexes of topics or thematic value clusters can be described whereas both cross-cutting frames as well as coalition specific patterns will be detailed.

While references to democracy, notably in relation to news media, or references to the public sphere were proactively looked for when analysing the data, others emerged due to the nature of the policy topic. It is fair to say that most of the dominant frames referring to deep core beliefs are not exclusively found in a singular coalition, however, distinct normative patterns, in line with coalition specific perceptions of the policy problem and its severity, emerge.

In the overall sample, references to democracy, public sphere or fundamental rights as frame elements were made by less than half of the stakeholders. Nevertheless, the analysis of these elements remains relevant in respect to the research question, specifically, and to analyse deep core beliefs within coalitions more generally.

Policy core beliefs: perceptions of problem severity and causality

The classification into distinct advocacy coalitions primarily followed stakeholders' response to the first question of the consultation questionnaire: "In your opinion, which criteria should be used to define fake news for the purposes of scoping the problem?" (European Commission 2017). In addition, the responses to question four of the questionnaire ("In your opinion, what are the main economic,

⁵⁶ After a first close reading, then a second consultation of the data in order to identify and list frame elements, an inter-coalitionary comparison was conducted in order to identify and interpret potential frame patterns within the data.

social, and technology-related factors which, in the current news media landscape, contribute to the increasing spread of fake news?”, *ibid.*) were analysed in order to confirm or complement the respective categorisation. Frame elements indicating causality in the overall sample range from economic, technological factors to those that imply social or political aspects as contributing to disinformation. Furthermore, stakeholders’ attitude towards more action against this alleged policy problem– as expressed through question 15 of the consultation questionnaire (“Do you think that more should be done to reduce the spread of disinformation online?”, *ibid.*) – was equally crucial when differentiating advocacy coalitions, i.e., when assigning stakeholders to coalitions.

Secondary aspects: remedies and policy instrument preference

The preference for certain policy measures further reflects the policy core in advocacy coalitions’ belief systems. These preferences were operationalised through the frame element of remedy. Secondary aspects in belief systems, e. g policy instrument preference, were operationalised through the same frame element. After analysing the respective responses to the consultation questionnaire, here also, tangible patterns, distinguishing the coalitions from each other, emerged.

6.2 *Coalition A*: disinformation as a serious issue, warranting intervention

Advocacy Coalition A is the biggest one among the coalitions identified; more than half, that is 41 out of 77, of the stakeholder contributions from the sample can be assigned to it. Most strikingly, this coalition mirrors the overall sample very closely, e.g., regarding formal criteria such as the composition of societal sub spheres (cf. Figure 11).

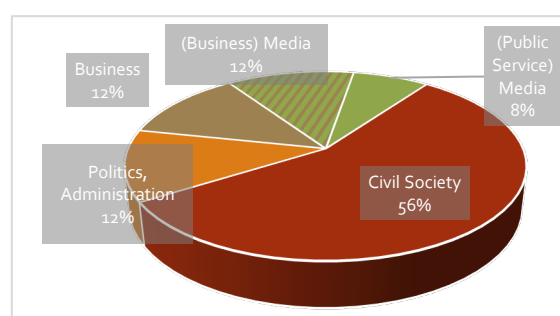


Figure 12: *Coalition "A", according to societ. sub spheres*

The ratio between public and private contributions in *Coalition A* is almost identical to that in the overall sample. Public bodies assigned to this coalition represent the entirety of organisation types that have been listed in the previous subchapter and include the two contributing governments, two NRAs, one political party and one university. The share of civil society organisations, however, is slightly lower (56%) than in the total sample (68%; cf. Figure 4).

Concerning civil society groups and their respective topics, the smaller share of community-

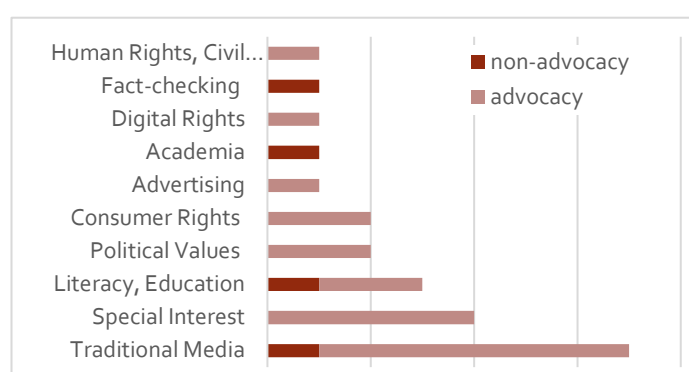


Figure 13: *Coalition "A", civil society organisations according to topic*

serving NGOs on the topics of Human, Digital and Consumer rights as well as on civil liberties stands out.

As regards traditional media organisations and their respective advocacy groups, there is some congruence to the overall sample composition, yet not striking. While journalist and press groups are underrepresented, broadcasters are slightly overrepresented in this coalition (cf. Figure 13). Overall, organisations affiliated with traditional media represent 37% of *Advocacy Coalition A*.

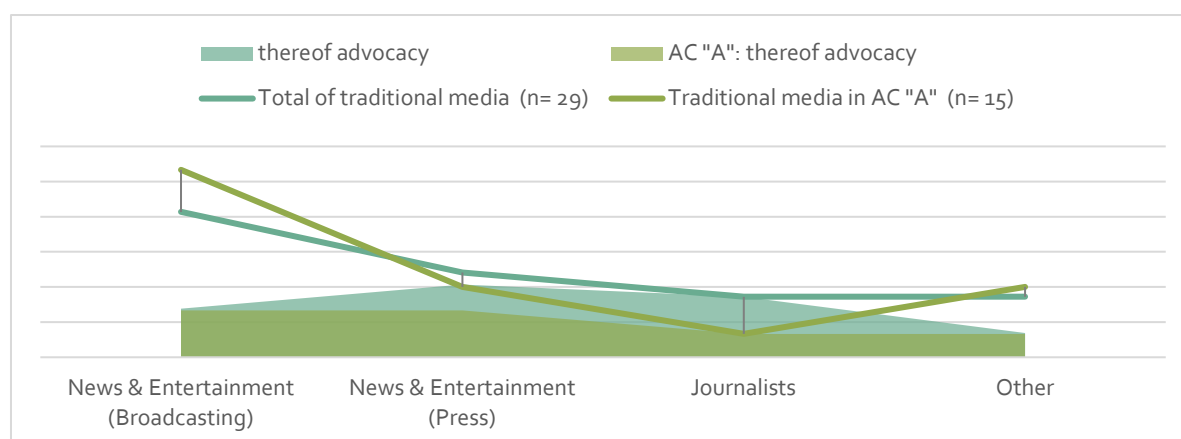


Figure 14: Coalition "A", all stakeholders from the traditional media sector (private/ public, advocacy/non, for-profit /non)

6.2.1 Deep core beliefs in *Advocacy Coalition A*

Advocacy Coalition A identifies disinformation as a serious issue, and, therefore, is unanimously in favour of more policy effort against it. Normative references which could be summed up in patterns are, however, rather heterogeneously distributed. Except for frame elements linked to journalistic practice and "quality" journalism (cf. chapter 7.2.1. for more detail on the notion of quality journalism), found in 63% of the stakeholder contributions, no other normative frame cluster – e.g., references to democratic values, fundamental rights, or research as a necessary basis for policy making – could be found in more than 50% of *Coalition A*. Compared to the other two coalitions, however, the notion of informed citizenry, is the most prevalent here.

1.	Journalist values, professional ethics (news media micro- and meso-level)	66%
2.	Media values (macro-level)	49%
3.	Public, public sphere and public debate	44%
4.	Democracy; Fundamental Rights	41%
5.	Informed citizenry	39%
6.	News media, their role and impact in society	34%
7.	Public interest, public value	21%
8.	Research as a necessary basis for policy	20%
9.	Internet values*	12%

Table 1: Normative frame clusters in *Advocacy Coalition A*

* Similar to the normative assessment of how mass media ought to be like to comply with standards of democracy and liberty, the assessment of the Internet as a public arena links has some stakeholders link it to similar values (e.g., diversity, neutrality).

“Media have an impact” – Frames in reference to democracy and democratic practice

There is one dominant frame in reference to democracy and respective values in *Advocacy Coalition A* which establishes the assessment that media – be it traditional or new – do have an impact on democracy and thus play a role in it. The frame “Media have an impact on democracy” does not comment on the nature of a such role in itself or provides for a normative evaluation of it; yet the mere fact that media is assigned a role provides an idea of how stakeholders assess the issue of disinformation. The *Association of Commercial Television in Europe* (ACT) (2018) links this frame with the demand for a so called “Level playing field regulation”, a frame further described in chapter 7.2.2:

(...) we believe that providing a comparable set of rules for platforms is essential to ensure symmetry of rules applying to broadcasters and online platforms/social media. They both have an impact on democracy and are far from being neutral, especially in opinion making.

“Disinformation can be harmful”: Frames in reference to the public and informed citizenry

There are two dominant frames in reference to the existence and function of the *public*, or public sphere, which are also associated with public opinion and the idea of an informed citizenry.

The first one, “Fake news can be harmful to society and/or democracy” aligns with this coalition’s assessment of disinformation as a serious problem (see chapter 6.2.2), indicating that stakeholders are more inclined to associate disinformation with grave and extensive harm to society as specified by the *Cultural Department* of the Flemish Government (2018):

While fake news may not be illegal per se, it can cause harm to society by for instance manipulating the democratic debate, causing reputational or economic harm, undermine public security, or merely by wasting people’s attention in an information society where human attention has become a scarce commodity.

The second one, “Democracy needs an informed citizenry based on truthful information” touches upon the very understanding of democratic process, or, rather, on the informal procedural rules in democracy. Unsurprisingly, the frame is predominantly employed by broadcasters, especially those that can be described as public service media; *Nordic Public Service Broadcasting* (NPSB) (2018), for example, the association representing PSM from Norway, Finland, Sweden, Denmark and Island, illustrates in detail how they perceive themselves as a part of democratic society:

PSM online offers should be easy to find and access. Informing all audiences with independent news and helping them to better understand the society represents an essential contribution to informed citizenship. This underpins the values of democratic societies, offering a wide choice of quality content, impartial information and pluralistic views, promoting both social cohesion and cultural diversity.

“The risk of censorship”: Fames in reference to fundamental rights

As regards references to fundamental rights, notably freedom of expression and freedom of information, it is striking that these seem to play a smaller role in *Advocacy Coalition A* than in the other two coalitions identified. The frames employed in this context, however, are similar to those that can be found in *Coalition B* and *C* (cf. chapters 6.3.1 and 6.4.1). Actors, on the one hand, demand “Proportionate policy responses” – as paraphrased by the *Association of European Journalists* (AEJ) (2018):

The AEJ considers the issues related to fake news and online disinformation as problems that require a good level of public understanding and public media literacy, and a high level of professional and editorial skills, technical expertise and respect for journalistic ethics and fundamental rights.

On the other hand, “The risk of censorship” is pointed out. While some, like the Benelux branch of the political party *La République en Marche* (LRM Benelux), scrutinise the inappropriate role potentially played by platforms in this regard⁵⁷ there is also the perspective of questioning government practice and government intervention:

We also do agree with the Commission’s concerns that public authorities should not operate a “Ministry of Truth”. Information, particularly in a political context, is often disputed without necessarily being false or deliberately misleading. In these contexts, there are substantial risks to public authorities attempting to play this role and such efforts could have negative consequences on the plurality of information in democratic societies.

Google (2018)

⁵⁷ In verbatim, LRM Benelux (2018) argues that “platforms should not be put in charge of deciding what content is appropriate to be shared on their platforms. This would create the risk of private actors infringing on the right of free expression, particularly where a fake news cannot be considered illegal content”. This further points to another frame of its own that is especially prevalent in *Advocacy Coalition C* (for more detail, see chapter 6.4.1).

6.2.2 Frames indicating the policy core: perceptions of problem and causality

Advocacy Coalition A unanimously agrees on online disinformation being a serious problem which can be defined and discerned. They further believe that considerable effort is necessary, and, thus, that new policy solutions are required to counter online disinformation.

Problem and moral evaluation frame: Disinformation as an issue that can be scoped and defined

Stakeholders assigned to this coalition do not scrutinise the possibility of defining and therefore scoping the 'problem'; much on the contrary, they predominantly (75% of *Coalition A*) list criteria and defining elements when responding to said question in the consultation's questionnaire.

The predominant criterion mentioned here is "intent" – indicated by 61% of *Coalition A*, followed by the criterion of motivation (27% of *Coalition A*), describing online disinformation as pursued for either "political or economic gain". The *European Association for Viewers Interests* (EAVI) (2018), a consumer interest NGO, for example, suggests a relatively simplistic definition:

We would be in favour of using 'disinformation' (instead of fake news) as a general term to be used in the general discourse to define a media message (in any format) designed to look genuine but published with the intention to deceive.

The *European Consumer Organisation* (BEUC) (2018), on the other hand, does not reject the term fake news, however, feels compelled to point out the "twofold" motivation behind disinformation:

In a more broader context, fake news can have a twofold objective: on one side, to influence the behaviour of those receiving the content (e.g., in political campaigns), and on the other side, to maximise advertising revenues by creating content that is appealing to share and disseminate irrespective of its veracity and accuracy.

The *International Republican Institute* (IRI) (2018) emphasises the complexity of the problem by elaborating on the wide range of "manipulative techniques" that seem to underlie the issue:

All traditional approaches to disinformation combine the accuracy – or the lack thereof – with the intent (to mislead and undermine). Disinformation does not always require a fabrication of untrue facts. (...) Often, the facts in the disinformative news are (largely) true, but they are twisted, used selectively and their context is distorted. In short, they are treated by the whole range of manipulative techniques often refereed [sic!] to as sentimental manipulation.

The notable difference between this first coalition and the other two is expressed in the absence of relativization when assessing the seriousness of the problem discussed. While within the other coalitions, a significant share of stakeholders mentioned the problem of definition or the complexity of online disinformation as a policy problem, notably with regard to the potential risk of censorship,

these frame elements only feature 22% (“problem of definition”), respective 44% (“risk of censorship”) of *Advocacy Coalition A*⁵⁸. Stakeholders of *Coalition A* are further comparatively vocal when it comes to linking the problem discussed to “harm” (ifa Akademie gGmbH 2018) or to a broader societal scope, “affecting public opinion” (Bonnier 2018); almost three quarters of the stakeholder contributions in this coalition make such reference (cf. chapter 6.2.1).

Causal frame: Economic, technological as well as social factors contributing to disinformation

In *Advocacy Coalition A* these different factors indicating causes of disinformation are present, however, more heterogeneously distributed than in *Coalition B* and more pronounced as in *Coalition C*. The platform business model, based on the so-called “attention economy” and dynamics of digital advertising, dominates the responses to question four of the public consultation, encompassing 78% of stakeholders. *Medialiitto* (2018), the Finnish Media Federation, describes it as follows:

Social media companies need content on their platforms to attract users and to get valuable user-data, an asset they monetize effectively. Basically they have no economic incentive to differentiate the content between true or false.

The issue of digital advertising, brought up by 51% of *Coalition A*, is mostly problematised under the impression of user targeting with content being delivered based on algorithmic curation:

Algorithms control more of the public’s media consumption. (...) A particular problem in the context of fake news is the possibility of purchasing visibility, eg. a group with a political agenda can, based on a detailed specification, target its communication at specific groups on social media, and thus further strengthen possible misconceptions among the members of this group.

(Nordic Public Service Broadcasting 2018).

In this regard, economic and technological factors should be considered intertwined. Interestingly, the problematisation of algorithmic curation is most prevalent in this coalition. Almost half of the stakeholders in *Coalition A* scrutinise the ability of platforms, especially social media, to accurately target users with content. This ability is often credited to the amount of user generated data, amassed by these platforms over the years, as pointed out by News Media Europe (2018):

The way in which platforms rank content, we suppose, must be aligned with their business model: to maximise data collection and revenues. One of the main concerns of our industry

⁵⁸ Both the frame element of “problem of definition” as well as “risk of censorship” are more frequent in *Advocacy Coalitions B* and in *Coalition C*. The problem of definition is mentioned by 58% of *Coalition B*, respective 50% of *Coalition C*; the risk of censorship is prevalent among 54% of *Coalition B* stakeholders, respective 58% in *Coalition C*.

is the lack of transparency over algorithm methodology and the concern of creating a filter bubble. This has led many in society to live in echo chambers (...).

The abovementioned developments are furthermore associated with a social component that supposedly contributes to disinformation. Reference to a “climate of distrust” (further detailed in chapter 7.2.1 and condensed in a quote by *La République en Marche* Benelux (2018) is made by 44% of *Coalition A* – the share bigger than in any other coalition:

The general distrust of large parts of the population towards 'experts' or mainstream politicians leads to a similar distrust towards mainstream news sources and an appetite for news that appear to go against the establishment's views of the world.

6.2.3 Frames indicating secondary aspects: suggested remedies

The most prominent policy measure suggested in *Advocacy Coalition A* – except for more media literacy initiatives – is the intervention into the platform business model, especially by forcing transparency upon the technology companies behind it. In this regard, *Coalition A* and *B* are somewhat united in their opposition to *Coalition C* in which regulation or intervention into platform business practice is rather unpopular if not rejected at all. *Coalition A* is, however, distinct from the two other coalitions when it comes to the order of other policy preferences. Its rather pronounced pledge (61% of *Coalition A*) for more coordination, e.g., between different levels of government or by pooling information and research, ranks comparatively high. Finally, *Advocacy Coalition A* is the only coalition that quite openly favours the regulation of content; 59% express preference for measures that would oblige platforms to rank or label content according to provenance or ‘trustworthiness’ of the source. Even the employment of artificial intelligence and algorithms when moderating content are deemed acceptable by a quarter of *Coalition A* – whereas both *Coalitions B* and *C* strictly reject the regulation of content, especially when based on technological, automated solutions.

1.	Empower the consumer, educate	83%
2.	Regulate platform business model	73%
3.	Support the (news)media ecosystem; Coordinate efforts (policy and research)	61%
4.	Regulate content**	59%
5.	Modify online journalism	41%

Table 2: Prevalence of preferred remedies in *Advocacy Coalition "A"*

**Moderation or removal of user generated content and labelling or ranking of news-like content on social media.

6.3 Coalition B: disinformation as an issue, cautious intervention possible

Advocacy Coalition B is the intermediate coalition, both in terms of policy preferences as well as in consideration of its size. A total of 24 stakeholders can be assigned to this coalition which amounts to roughly a third of the contributions analysed. When compared to *Advocacy Coalition A*, the share of contributions from civil society (71%) is higher and

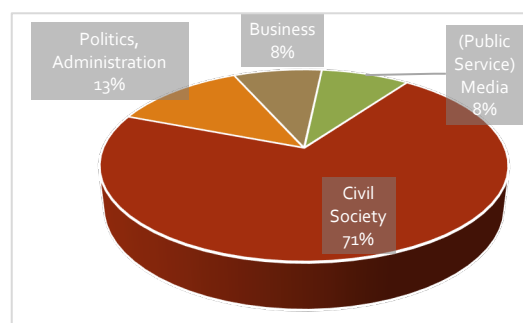


Figure 15: Coalition "B", according to societ. sub spheres

thereby comes close to the value in the overall sample. Except for the share of civil society, however, there are some remarkable differences to the overall sample; notably, the fact that the media sphere is emulated solely by public service media while all commercial media organisations (three broadcasters, one newspaper and a news agency) have been assigned to *Coalition A*.

Contributions from public bodies (29%) are the highest when compared to the other two coalitions and the entirety of contributions. Their composition is quite mixed, including two NRAs, one political party and two educational bodies. The share of advocacy groups, however, is higher than in *Coalition A* and in the totality of contributions, yet, smaller when compared to *Coalition C*.

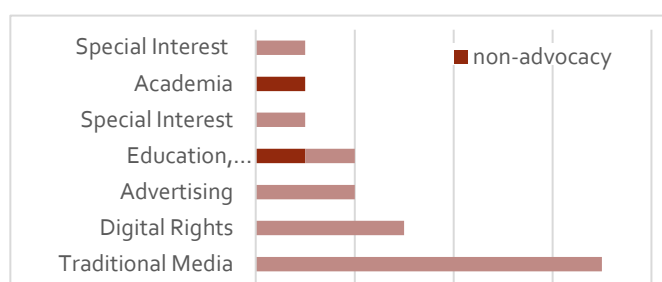


Figure 16: Coalition "B", civil society organisations according to topic

The share of traditional media (42%) is the highest in *Coalition B* when compared to the other coalitions and the sample. As mentioned earlier, there are no for-profit media organisations but public service broadcasters only. With regard to media advocacy groups in *Coalition B*, the share of journalist groups and the lack of broadcasters are remarkable.

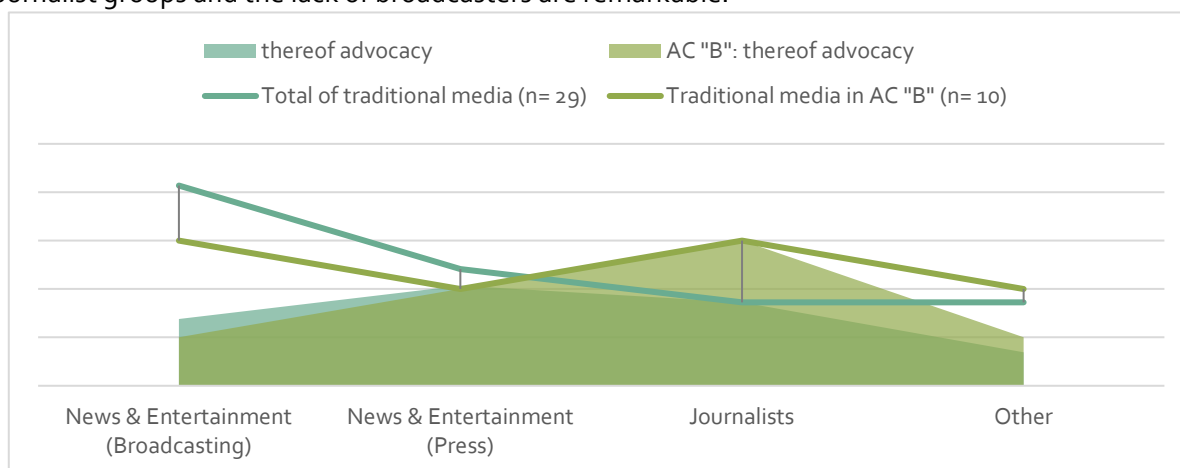


Figure 17: Coalition "B", all stakeholders from the traditional media sector (private/ public, advocacy/non, for-profit /non)

6.3.1 Deep core beliefs in *Advocacy Coalition B*

While in *Coalition A* most frame clusters in reference to deep core beliefs do not concern a majority of stakeholders, the opposite is true for *Advocacy Coalition B* and *C*. In *Coalition B*, most of those frame clusters that cover more than half of the stakeholders can be linked to the news media topic. As was the case in the previous coalition, most of the normative references in *Coalition B* concern journalism and the values associated with the profession; two-thirds of *Advocacy Coalition B* make reference to it. The notion of democracy as well as macro level values associated with media, such as plurality, diversity, or independence of media, rank second in this coalition and concern, respectively, 58% of stakeholder contributions. Thirdly, the role of news media in society, e.g., with regard to their function within the democratic process, can be found in 54% of *Coalition B*. Lastly, half of this coalition make reference to Fundamental Rights in their argumentation.

1. Journalist values, professional ethics (news media micro- and meso-level)	67%
2. Media values (macro-level)	58%
3. News media, their role and impact in society; Democracy; Public, public sphere and public debate	54%
4. Fundamental Rights	50%
5. Internet values	25%
6. Research as a necessary basis for policy	21%
7. Informed citizenry	18%
8. Public interest, public value	17%

Table 3: Normative frame clusters in *Advocacy Coalition "B"*

"Media have an impact": Frames in reference to democracy and democratic practice

In *Advocacy Coalition B*, the dominant frames referring to democracy associate it with news media, which is consistent with the findings described in the previous paragraph. The most prevalent frame is indeed the same one that predominates in *Coalition A*, indicating that stakeholders share the idea of (news) media having a role within the democratic process. While British PSM *Channel 4* (2018) and BBC (2018), for example, use it to describe their 'mission' as public broadcasters – thereby justifying the very, and often contested, institution of PSM itself – the *Media Governance Lab* (2018) within the University of Vienna employs the frame rather neutrally:

As mentioned earlier, there must be a continued focus on what professional journalism is and means for a democratic society and fundamental freedoms. Continued focus should be on how to finance such journalism in the future, because the less professional factual balanced reporting there is the bigger the vacuum for disinformation.

Another dominant frame in this regard implies that a healthy news ecosystem was a precondition for a functioning democracy; used by the *European Publishers Council* (EPC) (2018), for example, in combination with the frame of news media being “watchdogs of democracy”:

Press publishers and broadcasters are the watchdogs of democracy. A free and independently funded press ensures that the democratic system remains healthy, diverse, uncorrupted and functional (...).

“Disinformation can be harmful: Frames in reference to the public and informed citizenry

The notion of informed citizenry is negligible within this coalition; references to the public, including the public sphere and public opinion, however, mostly result – as was the case with *Coalition A* – in the frame “Fake news can be harmful to society and/or democracy”. The *Digital Advertising Industry Association* (IAB Europe) (2018) links the ascertained harm to the motivation behind disinformation:

the most pernicious fake news is that which is politically-motivated, or economically-motivated in the sense of being aimed at steering public opinion toward a point of view that will confer economic benefits on a particular group of actors or a single actor (...). This is the fake news that meets the standard for being harmful at a “societal” level.

“The risk of censorship”: Frames in reference to fundamental rights

As opposed to *Coalition A*, the frame “The risk of censorship” is – despite the smaller size of the coalition – more prevalent in *Advocacy Coalition B* in absolute numbers (cf. chapter 6.2.2). As will be shown in the following subchapter, this reflects *Coalition B*’s perception of the problem of disinformation as being serious, however, delicate. The *European Association of Communication Agencies* (EACA) (2018), also representative of the advertising industry, refers to adopted, national hard law:

This is not simple and has to be approached with care. The recently adopted German law on online hate speech “NetzDG” illustrates how an attempt to legislate on this issue can pose a significant threat to the freedom of expression.

The Austrian Association of press publisher links the frame to their members business practice:

(...) in a democratic constitutional state, a general ban on “false reports” should be avoided, because this would violate the essentially important freedom of opinion and could also lead to the suppression / censorship of disagreeable media / journalists.

Verband Österreichischer Zeitungen & Österreichischer Zeitschriften- und Fachmedienverband (2018).

6.3.2 Frames indicating the policy core: perceptions of problem and causality

Advocacy Coalition B agrees along with *Coalition A* on online disinformation being a serious problem which deserves policy makers' attention. In this regard, both coalitions are distinct from *Coalition C* which rejects this assessment. The majority (92%) of stakeholders is explicit in their response to question 15 of the consultation, choosing the option *Yes* when asked if they thought "that more should be done to reduce the spread of disinformation online" (European Commission 2017).

Problem and moral evaluation: Online disinformation as an issue that is to be treated with caution

In contrast to *Coalition A*, however, stakeholders from *Advocacy Coalition B* acknowledge the difficulty of defining disinformation or fake news in a workable manner; 58% – almost as many as straightforwardly identify it as an issue – mention the problem of definition. On this subject, it is important to underline that the public consultation took place before the term *disinformation* was officialised. Consequently, some of the dissatisfaction with defining disinformation simply reflects the discomfort with the term *fake news*. In 25% of this coalition's questionnaires, the lack of empirical evidence which would allow to reliably assess the harm caused by disinformation is brought up; in *Coalition A*, this happens only in one out of 41 cases. While in *Coalition A* there are no reservations towards identifying disinformation as a serious issue, roughly a third of *Advocacy Coalition B* indicates that they do not know or cannot say whether it is – although they are in favour of more policy action against it. Furthermore, a third of *Coalition B* make negative reference to the policy maker's efforts, e.g., criticising the formulation of certain questions in the consultation questionnaire.

On the other hand, almost half of the stakeholders in *Coalition B* are willing to provide criteria which they deem useful in scoping the problem. Among these, the notion of intent is predominant:

Fake news is a multi-faceted problem. (...) However, at the core of it lies "intentional disinformation" often purporting to be news reporting; or what has always been known as propaganda for various and different purposes.

(European Publishers Council 2018).

Advocacy Coalition B's approach to new and specific policy measures is more moderate as stakeholders caution the risk of unintended censorship more often than in the *Coalition A*. More than half of the stakeholders specifically voice concerns over the undue restriction of public debate or the delicate if not impossible task to determine *the* truth. The *Commission of the Episcopates of the European Union* (COMECE) (2018), one of the few special interest advocacy groups in this sample, argues:

Being wrong should in no case be a criminal offence. Truth has no legal definition. (...) The main criterion to define "fake news" should be respect for fundamental rights, the principle of the rule of law and the hierarchy [sic!] of norms, as defined in binding international standards. Relevant policy or legislative initiatives must not jeopardise [sic!] the rights to freedom of opinion and expression.

COMECE indicates concerns over the undermining of fundamental rights which stem from an angle that emphasises the freedom of religion. When looking at those organisations that specifically warn against repercussions for public debate, the dominance of traditional and notably print media representatives is striking: the *European Federation of Journalists* (EFJ) (2018), the *Austrian Newspaper Association* (VÖZ) (2018) as well as the *Austrian Magazine and Specialist Media Association* (ÖZV) (2018), the *International Federation of Library Associations and Institutions* (2018) and *Channel 4* (2018), a UK public broadcaster, voice concern. The *Media Governance and Industries Research Lab* (2018) of the University of Vienna argues that any removal of content "that is not illegal and hate speech etc laws is censorship" and, further, that it was "usually not illegal to share or even deliberately spread disinformation [sic!]" (2018). In this regard, *IT-Political Association of Denmark* (2018), a digital rights NGO, brings up the connection between the problem of definition and "arbitrary censorship" and, further, a critical assessment of the consultation text:

We find the scoping question very confusing. The Commission initially provides a definition of fake news which covers several types of online content (that are regarded as undesirable in society for different reasons. ...) In our opinion, the Commission is really asking us to do something literally impossible. First, no problem has been defined, except the claim that fake news is a problem. (...) We are skeptical that fake news can be defined and scoped in an objective way. The definition offered by the Commission is very deficient, lacking in both precision and predictability.

Although it is only a third of *Advocacy Coalition B* that explicitly criticizes the Commission and their approach to stakeholder consultation, this proportion is, however, significant when compared to *Coalition A* where the share of such critique is negligible. Nevertheless, it is worth emphasizing that *Coalition B* – as opposed to *Coalition C* (cf. chapter 6.4.2) – does not question the severity of disinformation in itself and predominantly welcomes future action against it. The *Mozilla Corporation* (2018), one out of two significant internet platforms contributing to this consultation diagnoses:

Misinformation depletes openness and sows discord, erodes inclusivity and trust, and saps the web's public benefit. In short: it makes the Internet less healthy.

Causal frame: The problem of digital advertisement and technological change

In *Advocacy Coalition B*, the expression of doubt, or reference to the lack of scientific knowledge, that characterised the problem frame element remains significant when looking at the construction of causality. The *Council for Broadcasting and Retransmission* (2018), a Slovakian NRA, for example, cautions:

to decide what the main [factors] are and correlate them to the actual use and spread of 'fake news' is not possible without building a more robust evidence base.

The platform business model, especially its reliance on online advertising, is described as contributing to disinformation by 83% of *Coalition B*. The underlying argumentation is similar to *Coalition A*: next to the problematisation of methods of online advertising such as click baiting, the notion of "attention economy" – referring to the monetisation of emotions and user generated content – is a prevalent frame element. As BEE Secure (2018), a Luxembourgian MIL education program puts it:

For companies, their content on social media should call consumers to an action, in general to generate traffic or more specifically to get consumers to click on a link. This click baiting plays e.g., an important role for advertising on social media.

Advertisement advocacy groups represented in *Coalition B* obviously reject the general problematisation of digital advertisement, arguing "that advertisers and the ad tech industry are to be considered as victims of intentional harmful behaviour and not as contributors" (IAB 2018). This view is surprisingly echoed by a digital rights NGO, *IT Denmark*, yet, from a different angle. They argue that the "problem" was "not advertising as such (...), but the way advertising is delivered" as most of it was "targeted advertising based on surveillance of online behaviour" (IT Denmark 2018).

The point raised is important since technology represents an essential prerequisite to the platform business model and the internet economy. Frame elements that refer to technology can be found in two thirds of *Advocacy Coalition B*'s responses to the public consultation. These elements mainly refer to the facilitation of content creation and dissemination, e.g., with regard to the speed and volume of transmission, partly fuelled by the reach of platforms, notably the bigger ones:

What is new today is that new technologies enable everyone to produce content and to very quickly make it accessible to a large number of recipients. Besides, any type of content is very easily shared on social media platforms and thus, fake news spread very quickly.

(VPRT 2018).

In addition, the ubiquity of information is also mentioned as a contributing factor to disinformation. As a frame element, it is sometimes employed to postulate a modification in user behaviour, indicating the growing relevance of online media (for detail cf. chapter 7.1.1):

People are also exposed to information and news potentially at all moments of the day, rather than when they sit down with a newspaper. People read information (at least that on websites) differently.

(International Federation of Library Associations and Institutions 2018).

6.3.3 Frames indicating secondary aspects: suggested remedies

Advocacy Coalition B shows no clear-cut policy preference apart from encouraging more MIL initiatives. There are only two other policy preferences that roughly half of this coalition can agree on. The first can be described as support for the news media ecosystem. Unsurprisingly, most of the actors in favour of this remedy are part of the traditional media sector; however, not exclusively:

The best way to fight so called fake news and disinformation and propaganda campaigns is to enable professional journalists to counter it with factual professional democracy upholding [sic!] watchdog journalism. If that journalism is absent the fake news wins.

(Media Governance and Industries Research Lab 2018).

The second preference may be labelled intervention into the platform business model; similar to *Coalition A*, stakeholders from *Coalition B* are mostly interested in forcing platform operators into more transparency towards competing businesses, private and corporate users, academia, and policy makers. Furthermore, a quarter of this coalition, and thereby again similar to *Coalition A*, can agree on revising platform liability⁵⁹. German NRA *die medienanstalten* (2018) refers to the regulation of the European audio-visual sector, i.e. viewer protection and functionality of media markets, arguing that “in terms of a far-reaching level of protection, it should therefore be possible to measure all journalistic-editorial offerings against the journalistic duty of care”.

1.	Empower the consumer, educate	75%
2.	Support the (news)media ecosystem; Regulate platform business model	54%
3.	Coordinate efforts (policy and research)	41%
4.	Modify online journalism	
5.	Regulate content	

Table 4: Prevalence of preferred remedies in Advocacy Coalition “B”

⁵⁹ The current legal framework defines most of the SNS, which are considered the main fora of disinformation, as mere hosting providers (cf. chapter 7.2.2)

6.4 Advocacy Coalition C: disinformation as a non-issue, no intervention

Advocacy Coalition C is the smallest of the advocacy coalitions identified. It consists of 12 stakeholders, exclusively representing civil society organisations. Thereof, 11 can be considered an advocacy group while no public actors or for-profit organisations are involved. According to those formal criteria, *Coalition C* appears to be the most homogeneous.

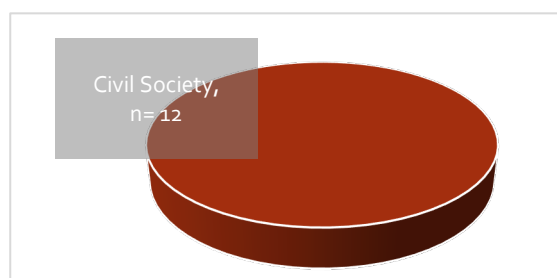


Figure 18: Coalition "B", according to societ. sub spheres

Concerning the sectors and topics these organisations represent, the composition of *Coalition C* also deviates the most from the overall sample. NGOs in the fields of civil liberties, human, digital and consumer rights, as well as

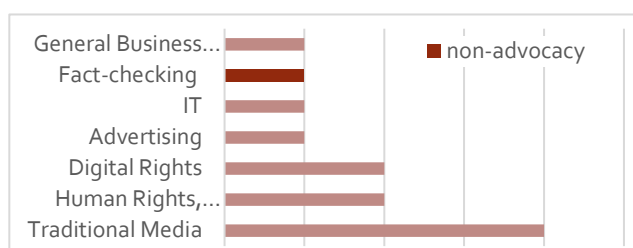


Figure 20: Coalition "C", civil society organisations according to topic

business interests are overrepresented. Traditional media interests are comparatively underrepresented (with a share of 33%); especially the biggest subgroup among traditional media organisations (advocacy and non-advocacy), namely, audio-visual broadcasters, is not represented at all. Instead, the only radio broadcasting advocacy organisation participates in this coalition.

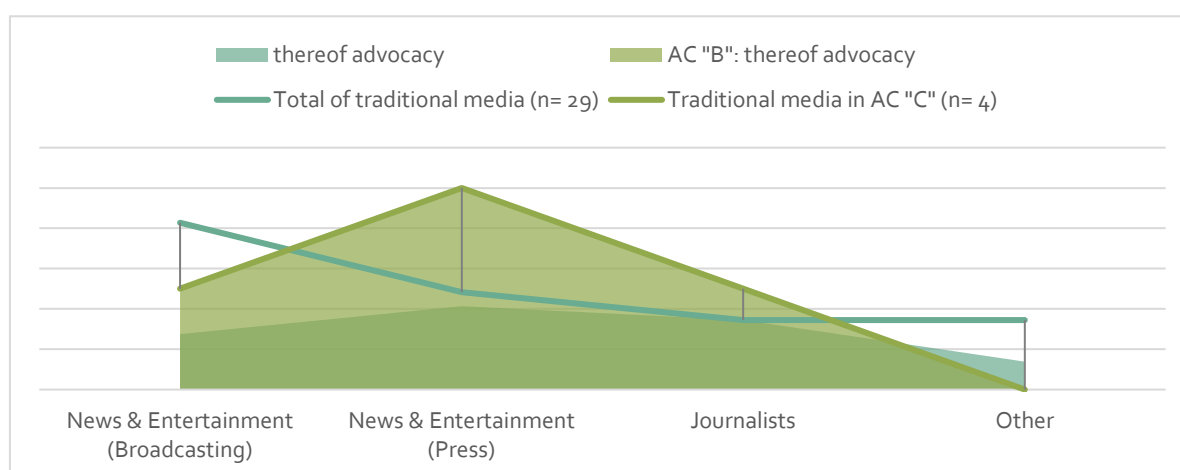


Figure 19: Coalition "B", all stakeholders from the traditional media sector (private/public, advocacy/non, for-profit/non)

6.4.1 Deep core beliefs in Advocacy Coalition C

A clear majority of *Advocacy Coalition C* engages in frames that refer to Fundamental Rights, notably the freedom of expression and the freedom of information as detailed in Article 11 CFR (European Union 2012). In this coalition, such reference is used to underline stakeholders' reservations towards

any further policy action against disinformation as it is considered too risky – potentially jeopardising free speech and directly or indirectly contributing to a practice of censorship.

What is also worth mentioning is the comparatively high rank of the frame “Research as a necessary basis for policy”; although this frame bears no nominal reference to democracy, public sphere or news media, there is an implicit normative evaluation of legitimate democratic process as stakeholders indicate their understanding of good governance. This frame further aligns with the coalition’s perception of disinformation as an issue whose harmfulness lacks scientific underpinning.

1. Fundamental Rights	75%
2. Media values (macro-level); Journalist values, professional ethics (news media micro- and meso-level)	58%
3. Democracy	50%
4. Research as a necessary basis for policy	42%
5. Public, public sphere and public debate; News media, their role and impact in society	33%
6. Informed citizenry; Internet values	25%

Table 5: Normative frame clusters in Advocacy Coalition “C”

“Platforms must not regulate content”: Frames in reference to democracy and democratic practice

Dominating frames in *Advocacy Coalition C* differ from those in the previous two coalitions; they thereby are consistent with this coalition’s policy core belief on problem severity (see chapter 6.4.2), distinct in rejecting the idea that disinformation is an issue warranting policy intervention. The frames employed by *Coalition C* in reference to democracy are diverse; thereof, the frame indicating concern about technology companies being put in the position to decide which content was truthful and which not is the most dominant, as illustrated by a Fundamental Rights NGO *Civil Liberties Union* (2018):

Having businesses make decisions about content is not only a heavy burden on the commercial sector, but it is also highly non-transparent, which is an entirely inappropriate way for democracies to regulate such an important issue as freedom of expression. The lack of transparency is a problem because it means no accountability (...).

“Public debate as a remedy”: Frames in reference to the public and informed citizenry

There are several frames that include references to the notion of public sphere, however only one is recurring. It describes public debate as a constructive means to overcoming the issue of disinformation, e.g., as employed by the Human Rights NGO *ADF International* (2018):

Instead of a paternalistic approach that regulates and micromanages citizens' interactions, Europe needs to foster responsibility, and campaigns for a strong and resilient, yet civilized public debate. The EU should empower citizens to discuss and make their voices heard.

There are other frames employed, however, not frequently – potentially due to the comparatively small size of the coalition. One of them is the same as the most prevalent in reference to democracy: content regulation must not be handed over private actors with commercial interests. Another frame argues that debate is allowed to be uncomfortable, as expressed by Digital Rights NGO *EDRi* (2018):

Uncomfortable or different views facilitate healthy debate, as eloquently elaborated by the European Court of Human Rights (...). We're in a democracy and people need to have the right to go online and be treated as if they were offline.

“The risk of censorship”: Frames in reference to fundamental rights

The most prevalent frame on fundamental rights, especially, freedom of expression, in *Advocacy Coalition C* is “The risk of censorship” – just like in *Coalitions A* and *B*. In *Coalition C*, there is distinct emphasis on freedom of expression which is being combined with warnings against restriction of free speech. This is consistent with stakeholders' assessment of problem severity and remedy as no further intervention is wanted or appreciated. The Association of European Press Publishers *EMMA/ENPA* (2018) denotes:

In contrast, any state regulation, quasi-state regulation or other kinds of regulation and/or interference with legal news puts freedom of opinion and press at stake. (...) *EMMA/ENPA* strongly stands by the position that neither regulation or soft regulation should be put in place as it could gravely jeopardize freedom of expression.

Considering that references to fundamental rights rank highest among normative frame clusters while the number of stakeholders assigned to this coalition is rather small, there are other relevant, however, less frequent frames. A particularly interesting one combines EU democratic values with the notion of responsibility – as underlined by fact-checking organisation *Full Fact* (2018):

We are conscious that decisions taken in the EU will be watched by other states' governments which do not necessarily share EU democratic values including freedom of expression.

6.4.2 Frames indicating policy core: perceptions of problem and causality

Advocacy Coalition C is the most critical towards perceiving online disinformation as a new and serious problem. Quite on the contrary, stakeholders from this coalition are adamantly questioning the legitimacy of any attempt to regulate online content

Problem and moral evaluation : “Online disinformation is not a problem – if anything, we simply cannot say if it is”

Just like members of *Coalition B*, *Coalition C* is emphasising the difficulties of defining disinformation in a workable manner which could as a basis for effective and proportionate policy responses:

‘Fake news’ has been used to refer to widely different kinds of content. (...) Defining ‘fake news’ is therefore fraught with difficulties.

(Computer and Communications Industry Association 2018).

This assessment is echoed by EMMA-ENPA (2018), representative of European press publishers, which points out that *fake news* was “too subjective a concept to define on the basis of criteria and is often opportunistically used in different contexts in various circumstances to discredit content”. The *Civil Liberties Union for Europe Liberties* equally refers to fake news being an “ill-defined concept encompassing different types of disinformation” and therefore suggests “that instead of trying to frame a proper definition for ‘fake news’, a better approach is to set it on a spectrum (...) Lawmakers (...) should only focus on content that is illegal” (Civil Liberties Union 2018).

Next to the difficulties perceived in any attempt to define online disinformation or fake news, stakeholders further point out the lack of scientific evidence that would support the claim of disinformation being increasingly ubiquitous. International Digital Rights NGO *Center for Democracy & Technology* (CDT) (2018) states that they had refrained from answering questions “due to insufficient European data available at this point on the volume and impact of ‘fake news’”, and in addition:

This question presumes that the spread of ‘fake news’ is increasing. We do not think there is sufficient evidence to support this statement. It is not known whether ‘fake news’ is increasing and if so at what rate, and what its impact may be.

Wirtschaftskammer Österreich, an industry association representing Austrian business, even boldly argues that fake news “per se” were not causing any damage (WKÖ 2018).

These positions of stakeholders in *Advocacy Coalition C* partly culminate in straightforward and resolute criticism towards the policy maker, in this case, the European Commission. EDRi (2018) is especially vocal, calling out formulations in the public consultation several times as they find the formulation of the consultation questionnaire partly misleading or biased. In response to the first question, they criticise the introductory statement for a perceived framing which was “not conducive to meaningful responses” and therefore conclude that “the consultation results will be no more than a reflection of the subjective feelings of the respondents rather than factual, diligent evidence”. With

regard to question four⁶⁰, they argue that it was inappropriate for the Commission to propose answers in this way” (ibid.). In addition, *ADF International* (2018) as well as the German association of newspaper publishers, BDZV (2018), and EMMA/ENPA (2018) question the consultation’s legitimacy by pointing to a lack of regulatory or legislative competence on EU level with regard to these issues.

Causal frame: the viability of news media and politically motivated disinformation

Although stakeholders in *Coalition C* question problem severity and the legitimacy of regulatory intervention, remarks indicating perceptions of causality were made. In this regard, BDZV, ENPA, the *Federation of European Direct and Interactive Marketing* (FEDMA), EDRi and Liberties emphasise that the declining viability of news organisations due to digitisation affects news quality. ENPA (2018), for example, contends that “online platforms that currently rake in 80 % of the European advertising revenue are not held responsible as much as other sectors for the consequences of their activities especially not in proportion to the vast role they play in society”. Furthermore, the connection between disinformation and political campaigning was almost half of the coalition. *Liberties*, for example, argues that there were member states which allowed the spread of political propaganda via PSM which represents an issue that the EU should investigate. FEDMA (2018) argues similarly:

On the one hand, misinformation online is sponsored by certain governments to increase political polarisation and to undermine democratic institutions. On the other hand, digital business models are abused (...)

6.4.3 Frames indicating secondary aspects: suggested remedies

The indicated consensus within *Advocacy Coalition C* in rejecting new policy measures against disinformation seems result from ambivalent assessments. For NGOs, such rejection might stem from concerns over the curtailing of freedom of expression and over the disregard of digital rights. It might, however, also be vice versa: because stakeholders fear additional regulatory burden or intervention into their business model, e.g., in the case of newspaper publishers. These do not share the assessment of disinformation with their colleagues from the audio-visual broadcasters and use freedom of expression as a strong argument against further regulation.

EDRi, Liberties, but also WKÖ are explicit in their refusal⁶¹. CDT and the Swedish Union of Journalists claim to have no opinion on the matter; CDT, however, indicates that they welcome soft

⁶⁰ Cf. question four of the public consultation questionnaire: “In your opinion, what are the main economic, social and technology-related factors which, in the current news media landscape, contribute to the increasing spread of fake news? (...)” European Commission (2017).

⁶¹ Choosing the option “No” for question 15 of the consultation questionnaire (“Do you think that more should be done to reduce the spread of disinformation online?”)

law initiatives. Also, 50% of this coalition would welcome support for the news media ecosystem; while this is unsurprising for representatives of press publishers and radio broadcasters, it is also the NGOs that make reference to safeguarding quality journalism.

The NGOs (EDRi, Liberties and CDT) further speak out against any alteration in platform liability as counterproductive to tackling disinformation. Full Fact and CDT explicitly refuse AI driven, technology-based evaluation and moderation of harmful, yet legal content which indicates the similarity to *Coalition B* while underlining the opposition to *Coalition A*.

Moreover, contributions from *Coalition C* are uniquely distinct in the share of stakeholders being vocal in rejecting specific policy measures, i.e. in saying what they do not want to happen as opposed to positively formulating which policy measures they would prefer:

The limits to freedom of the press and of expression are determined by national laws of the member states, as interpreted by independent courts. Any state or supranational regulation or even official classification and warning against either lawful media publications or other lawful statements should be rejected.

(EMMA/ENPA 2018).

1. Empower the consumer, educate	67%
2. Support the (news)media ecosystem	50%
3. Coordinate efforts (policy and research)	33%
4. Modify online journalism	26%
5. Regulate platform business model	17%

Table 6: Prevalence of preferred remedies in Advocacy Coalition "C"

6.5 Cross-cutting master frames

Cross-cutting master frames can be found in all coalitions. While they might be more or less dominantly distributed within these coalitions, their prevalence in the data remains striking. With closer examination this prevalence may be explained as both of these cross-cutting master frames can be considered inherent to the policy issue of disinformation. The first cross-cutting master frame illustrates stakeholders' assessment of user, i.e. consumer, competence in dealing with information, especially when provided through internet-based media while offering an uncontroversial remedy. The second cross-cutting master frame is reflective of the tension between considerations of ensuring an informed citizenry and the fundamental rights of freedom of opinion and of expression.

6.5.1 The lack of media literacy as an uncontroversial assessment

This master frame is composed of two subframes which represent a combination of deep core belief and suggested remedy. The deep core belief assesses the demand side to both media consumption and disinformation, i.e. it provides an idea of the image stakeholders have of media consumers in the

disinformation context. The remedy suggested is linked to this assessment and represents a rather uncontroversial solution as it is based on education, thus, soft policy:

We stress the need for media literacy skills to be developed in the wider public. Without this, a pluralistic and independent news media remains unable to fulfil its purpose.

(News Media Europe 2018, *Advocacy Coalition A*).

The user lacks awareness, knowledge, or competence

Question 13 of the public consultation asks: "In your view, are readers sufficiently aware of the steps to take to verify the veracity of news, when reading and sharing news online (...)" (European Commission 2017). The Commission asks the respondent to evaluate consumers' media and information literacy in view of the disinformation problem. More than two thirds of the stakeholders represented in the data sample agree that readers are not sufficiently aware, thus, lack information literacy.

Are readers sufficiently aware?	AC "A" (n = 41)	AC "B" (n = 24)	AC "C" (n = 12)
Yes	83%	63%	25%
No answer provided	10%	13%	67%
No opinion on the matter	5%	21%	8%
No	2%	4%	-

Table 7: Answers to question 13 of the public consultation per coalition

Only two stakeholders – technology company *Google* from *Coalition A* and German NRA *die medienanstalten* in *Coalition B* – disagree and refer to relevant study results:

Competence in source criticism varies in particular by age. According to their own statements, almost every second person checks the facts presented in the news (45 percent). (...) The feeling of being overwhelmed when identifying fake news increases with age. (Source: LfM-Forsa study (...))

(*die medienanstalten* 2018, *Advocacy Coalition B*).

Educate and sensitise as an uncontroversial policy measure

Although the straightforward assessment of a lack in media literacy is not as pronounced or even convincing in *Coalition C*, especially when compared to the other two coalitions, two thirds express support for policy measures which empower the consumer, e.g., by enhancing their media literacy. As was the case with the first subframe, the demand for policy measures to empower users, notably through media literacy programs and education, decreases from *Advocacy Coalition A* to *Coalition C* – in case of the second (remedy) subframe, gradually.

	AC "A" (n = 41)	AC "B" (n = 24)	AC "C" (n = 12)
Suggested remedy: Empower the consumer	83%	75%	67%
Reinforce critical assessment	39%	29%	8%
Educate	66%	67%	25%
Enhance user autonomy and enable user choice	24%	13%	17%

Table 8: Remedy frame "Empower the consumer", prevalence per coalition

6.5.2 The cure cannot be worse than the disease

The master frame "The cure cannot be worse than the disease" consists of three subframes; first and second subframe refer to stakeholders' assessment of the problem and its severity. The third subframe is linked to the frame element of remedy. Together, these three frames can be combined to the master frame "The cure cannot be worse than the disease" which, as pointed out before, plays on the tension between enabling an informed citizenry, able and apt to participate in democratic discourse, and the delicate subject of free speech online:

We agree that the problem of misinformation is a serious one, but we should not solve it by discarding some fundamental freedoms which distinguish the EU from other, less open, tolerant and permissive states.

(Mozilla 2018, *Advocacy Coalition B*).

The phenomenon is not new

Depending on the coalition, the first subframe is gradually more or less prevalent, in *Advocacy Coalition A* to a lesser, in *Advocacy Coalition C* to a greater extent. Its message is easily summed up, especially considering the literature review in chapter 2:

Fake news and disinformation is not a new concept, and has throughout history been used to influence public opinion, generate emotions and shape the public sphere.

(Nordic Public Service Broadcasting 2018, *Advocacy Coalition A*).

	AC "A" (n = 41)	AC "B" (n = 24)	AC "C" (n = 12)
Subframe: The phenomenon is not new	29%	42%	58%

Table 9: Frame "The phenomenon is not new", prevalence per coalition

The risk of censorship and emphasis on freedom of expression and freedom of information

Warnings against censorship represent a recurring theme in all three coalitions (cf. chapters 6.2.1, 6.3.1 and o). Concerning the respective master frame, the warning against potential censorship is combined with the acknowledgement that the existence of online disinformation negatively impacts societal or political institutions, i.e. that the absence of disinformation was desirable:

While the possibility of receiving trustworthy information is certainly desirable in a free and democratic society, it is not a human right. On the other hand, freedom of expression is. Precisely because of this intricate relationship and of the risk of undermining one of the very foundations of our democratic societies (freedom of expression), any regulatory mechanism should be mindful of the balance to be struck.

(ADF International 2018, *Advocacy Coalition C*).

	AC "A" (n = 41)	AC "B" (n = 24)	AC "C" (n = 12)
Subframe: The risk of censorship	44%	54%	58%

Table 10: Problem frame "The risk of censorship", prevalence per coalition

Proportionate policy responses

The emphasis on freedom of expression, paired with a warning against censorship, is also sometimes – yet not as frequently – linked to the explicit or implicit demand for proportionate policy responses, as indicated by the quote in the previous paragraph:

Fact checking can be an important tool to identify Fake News and Disinformation, as US mainstream media does with the President's statements; but great care is needed to identify (and in certain conditions to remove) lies, deceptions or other falsehoods without restrictions on the legitimate right to freedom of expression, which can include statements and opinions that offend, shock or disturb.

(AEJ 2018, *Advocacy Coalition A*).

7 News media in the disinformation discourse

Stakeholders' perception of news media in the disinformation policy discourse have partly been touched upon, detailing prevalent belief systems, from deep core to secondary aspects, per coalition. Frame elements which can be associated with news media, or journalism, are found in more than half of the stakeholder contributions to the public consultation. As elaborated in chapters 3.1.3 and 3.3, online disinformation as a policy issue, growing in salience for the past three years, naturally involves stakeholders from established media and media governance. References to business or regulation practice as well as normative evaluations in reference to public interest, which is considered to be at stake, thus, warranting an inquiry by the Commission through public consultation, can be explained against this thematic backdrop.

7.1 Normative references to news media, their role and impact in democracy

Normative references to news media and their respective role within democracy and society can also be grouped into frame clusters. When it comes to deep core beliefs, values associated with the macro-level of media, i.e. touching upon an environment for media to live up to the standards of liberal democracy, as well as assignments of specific roles or functions were found in all three advocacy coalitions. Furthermore, there was a significant number of normative references to journalism, i.e. the professional standards and ethics to be associated with proper conduct.

With regard to policy core and secondary aspects, news media were integrated into frames establishing a causality between news media and the problem of disinformation; or, then again, into frames that prescribe specific remedies in association with news media.

Prevalent values associated with media or news media on a macro level

Frame elements indicating a normative reference to media on a macro level were identified as the following values: plurality or pluralism, diversity, freedom, independence as well as values associated with PSM, e.g., provision of content:

	AC "A" (n = 41)	AC "B" (n = 24)	AC "C" (n = 12)
Media values (macro-level) – total	49%	58%	58%
Constituting frame elements:			
Plurality, pluralism	27%	25%	18%
Diversity	10%	17%	17%
Freedom	20%	21%	25%
Independence	17%	33%	42%
PSM values	10%	13%	8%

Table 11: Prevalence of macrolevel media values per coalition

Prevalent values associated with journalism as a profession

In chapter 3.3.2 of this thesis, the role of journalism in democracy as well as the “infusion” of journalistic practice “with an ethical obligation” (Napoli 2019: 134) was discussed. Such normative connotation of the journalist profession can also be observed in all three advocacy coalition:

	AC "A" (n = 41)	AC "B" (n = 24)	AC "C" (n = 12)
Journalism – professional ethics:	59%	54%	58%
Constituting frame elements:			
Integrity and authenticity of content	20%	13%	-%
Content verification; source checking	37%	25%	8%
Accountability and responsibility	38%	29%	17%
Editorial liability	24%	33%	25%

Table 12: Prevalence of comments of professional ethics in journalism, per coalition

7.1.1 Problem perception and causality in reference to news media

News media as frame elements can also be part of frames that function as indicators for policy core beliefs. When consulting the data, two frames stand out in this regard; news media thereby are either regarded as part of the problem or they play a role in the narration of causality in order to explain the policy problem of disinformation.

Fake news in an offline environment: inaccurate journalism and opaque media ownership

As pointed out when analysing the master frame “The cure cannot be worse than the disease”, over a third of the contributing stakeholders feel inclined to state that disinformation was not a new phenomenon to them. Some of them thereby make reference to disinformation in the offline world by problematising misleading journalist and advertising practice, or to politicians who, in their view, would function as spreaders:

News media (offline, online, and broadcast) have always to varying degrees prioritised content that is controversial, sensational and emotionally engaging because due to the level of attention it attracts from audiences.

(Center for Democracy & Technology 2018, *Advocacy Coalition C*).

In relation to news media, the frame elements of unprofessional journalism, e.g., based on sensationalism, infotainment or framing, as well as opaque structures of media ownership contribute to this argument. Therefore, the Association of European Journalists describes “the anonymity of many media owners in parts of Eastern Europe, effective monopolies in the media field, concentration of ownership and cross ownership of media and distribution companies and media advertising companies” (AEJ 2018) as constitutive to the overall problem of disinformation.

Viability of news media and modified user behaviour

Significantly more prevalent than the previous one is the causal frame that problematises the viability of news media in a changing media ecosystem, notably due to the practice of big online platforms:

Digitisation has broken the traditional financial model for the media market with revenue moving from media outlets to aggregators like Facebook and Google. As companies have lost value, private media has suffered from a lack of financial resources and often falls into the hands of owners who have political agendas. This further endangers the impartiality of news.

(Civil Liberties Union 2018, *Advocacy Coalition C*).

This frame mostly consists of the reference to the interruption of the digital “value chain” by online intermediaries at the detriment of established providers of news content. The EPC argues

Every day, internet platforms make decisions about who gets to see what information online, and these editorial decisions are masked by opaque algorithms continually changed without any transparency or redress. European media companies no longer have the final say about significant parts of their own commercial value chain.

(European Publishers Council 2018, *Advocacy Coalition B*).

When highlighting the endangered viability of news media, there is clearly fertile ground for an organisation specific spin, allowing the news media (advocacy) organisations to argue their cause. The *European Federation of Journalists* (EFJ), for example, straightforwardly makes only reference to their own profession when indicating causes, naming the “lack of support to quality journalism” or the “increasingly precarious state of journalism” (EFJ 2018).

The viability of news media is brought up by 35% of the stakeholders, sometimes in combination with the assessment that a change in media consumption has taken place, e.g., since social media is growing as a source of news or because readers display less loyalty towards media brands:

The primary objective of many search and social platforms, including Facebook, is to retain users within their environments in order to serve advertising. (...) Successive changes to platform algorithms have favoured viral content (...) over high quality journalism. Online environments disintermediate journalism from the sites that host it (...) , undermining the connection between users and trusted news brands.

(Guardian Media Group 2018, *Advocacy Coalition A*).

7.1.2 Suggested remedies in reference to news media

News media also play a role within frames indicating secondary aspects of advocacy coalitions, i.e., referring to preferred solutions to the policy problem, sometimes even to specific instruments. In the first frame, news media themselves are put in charge, whereas, in the second frame they are only passively integrated into the remedy frame.

Modification of online journalism

Some stakeholders, mostly – but not exclusively – those that cannot be considered part of the traditional media sector, demand that news media themselves comply with stricter standards in order to tackle the problem of disinformation. BEUC, the *European Consumer Organisation*, for example, engages in considerable moral evaluation when using the frame:

News media organisations must be more responsible on the way they handle their own content and the impact it has on society. Often media organisation engage on campaigns to intentionally misinform citizens to attain political goals. It is therefore necessary that (...) media organisations comply with the ontological and ethical rules applying to the news publishing sector.

(BEUC 2018, *Advocacy Coalition A*).

In this regard, enhanced levels of transparency as well as procedural standards also seem to matter:

When re-using material/information, news media organisations should clearly establish and identify the original source of news (a news agency, a business actor, a political or government source).

(Commission of the Episcopates of the European Union 2018, *Advocacy Coalition B*).

Improve the labeling [sic!] of content and graphics to enable clear visual differentiation of the various types of news items that fall anywhere in the spectrum of 'analysis', 'opinion', 'sponsored content', and 'paid advertisements'. Improve quality of headlines to ensure that they are not misleading or overly sensational, which otherwise risk undermining trust in news media organisations itself.

(Center for Democracy & Technology 2018, *Advocacy Coalition C*).

Support for the news media ecosystem, also by public authorities

Since news media are considered relevant to the functioning of democracy – as elaborated in the chapters on deep core beliefs – stakeholders demand support for the respective ecosystem. Some target public authorities explicitly, thereby, ascribing them a responsibility for general intervention:

Public authorities are bound by international human rights law to securing an environment which promotes free and pluralist communications, including media diversity. Public authorities should ensure strong, and independent media which should maintain a high standard of journalism.

(ADF International 2018, *Advocacy Coalition C*).

Evidently, the demands of commercial media differ from those made by PSM; furthermore, publishers do not necessarily agree with broadcasters – as indicated by their partial separation into different advocacy coalitions (cf. stakeholder analysis in chapter 6).

7.2 Master frames referring the role of news media in society

There are two master frames that can be discerned which themselves are linked to respective subframes. The first master frame illustrates how stakeholders attempt to contextualize and interpret the issue of disinformation. The second master frame touches upon the regulatory status quo, i.e. a perceived discrepancy between platform and news media regulation.

7.2.1 The notion of information disorder reflecting the complexity of the issue

The notion of *information disorder*, as discussed in the literature review of this thesis (cf. chapter 2) was introduced by Wardle & Derakhshan (2017); it was subsequently picked up by some of the stakeholders represented in the data sample who proactively employ it while also referring to the respective CoE Report. The notion reflects, i. a., the idea that disinformation might be merely the symptom of a bigger problem while the entire online media ecosystem is flawed:

The EBU considers that the notion of 'information disorder', as coined in a recent report commissioned by the Council of Europe, better reflects the full extent of the current problem, where 'fake news' is only the tip of the iceberg. (...) 'Fake news' is the most visible element in a broader context of an online information disorder, where a small number of social media and other relevant platforms have huge influence on people's access to information.

(European Broadcasting Union 2018, *Advocacy Coalition A*).

As such, this frame can serve as a means to establish causality and to pinpoint responsibility; it can, however, also function as admonition to cautious policy making:

AER would like to outline the fact that fake news is not a new phenomenon but has recently taken a great amplitude because of today's digital and social platforms environment. In that sense, it is important to distinguish the phenomenon of fake news from the larger issue of information disorder.

(Association of European Radios 2018, *Advocacy Coalition C*).

The premisses leading up to this frame have been discussed as deep core beliefs, notably, that democracy needs an informed citizenry as well as a healthy ecosystem in order to properly function (cf. chapter 6.2.1). Furthermore, the perception of inaccurate journalist practice as being part of the problem (cf. chapter 7.1.2) can equally be linked to this frame.

Climate of distrust

Some stakeholders go as far as postulating a climate of distrust, contributing to the described information disorder. This subframe can either be directed towards established news media actors – or towards actors in politics assumed to either contribute or exploit the situation described:

public disillusionment with traditional news outlets, notably linked to a frequent unwillingness to print corrections or give due prominence, or a tendency to present sources' (including governments') opinions or claims as fact.

(International Federation of Library Associations and Institutions 2018, *Advocacy Coalition B*).

Quality journalism as a distinct form of journalism

Another significant subframe in this regard, and, furthermore, related to the normative assessment of news media as described in chapter 7.1, can be labelled "Quality journalism – as opposed to non-quality journalism". It implies that there is a differentiation to be made between 'quality' journalism and journalism which is conducted unprofessionally. This connotation seems reasonable at first glance, as it serves as a reference to established, regulated journalist practice:

News media (...) provide an important alternative to ensure the necessary plurality of opinion. At the same time they have a mark of quality, and in the case of the professional media services, the oversight from the regulatory level contributes to their trustfulness.

(Council for Broadcasting and Retransmission 2018, *Advocacy Coalition B*).

Evidently, this subframe also serves stakeholders from the media sector as a tool for normative evaluation of their own product or business practice, such as commercial broadcasters:

Commercial broadcasters are professional media companies that focus on quality of news and reliability. This underpins viewer trust and with it loyalty. (...) Broadcasters invests [sic!] enormously in quality journalism, assign internal teams of experts who verify the authenticity of news content (...) they have an important role in promoting reliable and truthful information.

(Association of commercial Broadcasters 2018, *Advocacy Coalition A*).

On the other hand, it is worth pointing out that in most stakeholder accounts, no contextualisation is undertaken. Consequently, the term “quality journalism” becomes an empty phrase rather than a proper reference. BEUC (2018), *Advocacy Coalition A*, therefore, feels inclined to denote:

the advertising revenue problem does not concern only social media but also mainstream media. The media sector portrayed as a source of quality is often a source of misleading information that reinforces what people find online as fake news.

7.2.2 Level playing field regulation: platforms as more than mere hosting providers

The second master frame touches upon the issue of convergence. It is composed of two subframes; the first indicating problem perception, by assessing online platforms as new gatekeepers. The second frame offers causality, evaluating the current regulatory framework as unfit for purpose while connecting it with the frame element of solution, suggesting to subject platforms to the same regulatory burden as traditional media:

media companies are subject to very strict laws (libel, defamation, data protection, etc.) and have developed high self-regulation standards. This stands in stark contrast to online platforms that are subject to very weak enforcement of existing laws that apply to them (copyright, weak enforcement procedures for defamation etc.) and are very small contributors in terms of developing adequate self-regulation mechanisms. In general, the fake news debate is indicative of the lack of level playing field in the European Union between content creators like press publishers and the online platforms.

(EMMA-ENPA 2018, *Advocacy Coalition C*).

Platforms as new gatekeepers

Following the current legislative framework, providers of online platforms, incl. social media, are deemed hosting providers which exempts them from liability related to the content they host (European Parliament & Council of the European Union 2000). In contrast to this definition, platforms may, however, be regarded as gatekeepers, implying more responsibility from their part:

There are several chokepoints in the making and spreading of disinformation. (...) However, its danger lies in its dissemination, and here online platforms can do much more.

(eyeo GmbH 2018, *Advocacy Coalition A*).

The missing, outdated, or unfit regulatory framework

As far as the assessment of an unfit regulatory framework is concerned, the conclusions as to what “level playing field” should mean obviously differ according to the stakeholder group. This assessment is ultimately linked to the claim that support for the media ecosystem helps the cause against disinformation. While press publishers would like to see their content licensed by online intermediaries (s. above), broadcasters prefer changes in the liability regime applying to platforms. VPRT (2018), *Advocacy Coalition B*, therefore, attributes the “vast spreading of fake news” to the fact that “Internet platforms (...), at their heart, [are] agnostic to the nature of the content posted on their services” and demands that:

Accountability and responsibility rules already applying to media organisations should be adapted and imposed to online platforms.

8 Discussion and Conclusion

The following chapter will summarize the case study and interpret the results from chapters 5 to 7 in consideration of the research question and the respective sub questions which were translated into hypotheses. It further aims to contextualize the research project regarding topical policy developments and potential implications for future research.

The initial research interest stemmed from observations in European media policy where the policy discourse on disinformation is growing in relevance. As indicated in chapter 5.1.1, disinformation has been occupying regulators and stakeholders for the past five years. Therefore, the project followed a twofold research objective. First, it aimed at identifying relevant stakeholders who would participate in such discourse, i.e., who felt the need to engage and make their voices heard concerning this emerging policy issue. Second, the underlying ideas and beliefs which inform respective stakeholder positions should be analysed.

To properly contextualise both the research project and the policy discourse as unit of analysis, an extensive amount of literature was consulted. At its core, the appropriation of news content seems to inhibit the biggest potential for harm, pinpointing to the regulatory challenge of media convergence. The HLEG refers to “changes in the business and profession of journalism, the move to digital media and rise of platforms, as well as the widespread crisis of confidence between much of the public and many public institutions” (High level Group on fake news and disinformation 2018: 11) when describing the thematic backdrop against which disinformation as a policy problem unfolds.

Disinformation represents a complex, contemporary regulatory challenge; however, instead of investigating and evaluating policy measures that have been undertaken so far, this thesis chose the angle of ideational policy research while focusing on news media and their assigned role in democracies. Consequently, the Advocacy Coalition Framework was cast as theoretical basis, providing for an analytical toolkit that would allow to investigate both the complex policy context as well as actor preferences. The choice was further aligned with the case study design.

The notion of belief systems represents one of the theoretical foci of the ACF and was equally central to operationalising the research question. Therefore, its relevant features, e.g., the three-tiered belief system set-up, were elaborated on in detail (cf. chapter 3.2). Interestingly, frame analysis as the chosen method of content analysis aligned closely with the structure of belief systems, enabling to connect frame elements with the respective layers of *deep core*, *policy core* and *secondary beliefs*. These theoretical considerations further informed the choice of data, thereby allowing to investigate the hypotheses and ultimately to answer the research question. The material derived from a public consultation, conducted by the Commission on the issue of disinformation three years

prior to this research project, and consisted of 77 sampled stakeholder accounts on the subject matter. Carboni argues that most “public policy outcomes have to reflect the interests of a wide variety of stakeholders in such a broadly constituted political system in order to retain continued legitimacy” (2009: 10). In contrast to this rationale of stakeholder engagement as conducted by the Commission, digital rights NGO *EDRi* (2018) evaluates the critically, however, captures well what makes it so suitable to both research objective and design:

This consultation seems to aim at assessing whether there is such a need, but the consultation results will be no more than a reflection of the subjective feelings of the respondents rather than factual, diligent evidence.

8.1 Hypothesis 1: stakeholder analysis and advocacy coalition formation

The formulation of the first hypothesis (“The policy discourse on tackling disinformation is reflective of a premature policy subsystem in which one to four advocacy coalitions can be identified.”, cf. 4.4) implies a twofold answer. Firstly, the maturity of the policy subsystem had to be determined; secondly, advocacy coalitions to be identified. Strictly speaking, this hypothesis should be considered an informed expectation rather than a proper research hypothesis whose evaluation is based on dependent and independent variables. Overall, the assessment of the first hypothesis necessitated a stakeholder mapping exercise. Relevant stakeholders were determined according to formal criteria based on the material from the public consultation. As detailed in chapter 6, stakeholders could be grouped according to societal subsystems (politics, civil society, business, and the media), according to their legal status (public vs. private), the nature and purpose of their activity (advocacy or pressure groups vs. non-advocacy groups) as well as their geographical scope (multinational/European vs. national organisations). Furthermore, they could be categorized along the sector or subject area they are active in – as well as according to the specific type of organisation they represent (e.g., thinktank, NGOs or trade unions).

Delineation and subsystem maturity

In regard to the maturity of the policy subsystem, features of the case had to be collated according to relevant criteria provided by Jenkins-Smith et al. (2014) and Sewell (2005). In chapter 5, the policy discourse on tackling disinformation was qualified as a *nascent* policy subsystem which is located within both digital and media policy. Therefore, it can be described as a *nested* subsystem. The fact that disinformation policies represent a proper policy subsystem in their own right can be justified when looking at the public consultation. This implies stakeholder interaction in non-trivial ways that are meant to produce tangible outputs (cf. (Jenkins-Smith et al. 2014). In the present case, relevant outputs can be considered the CoP and the APAD (cf. chapter 5.1.1).

The maturity of the subsystem was evaluated according to Sewell (2005). This thesis found the subsystem to be nascent, thus, emerging. Although stakeholders represent a “semi-autonomous community sharing a domain of expertise” (ibid.) – which shows along the employment of common terminology and similar empirical as well as normative references – their heterogeneous background and the fact that only fact-checking organisations can be considered properly specialized in the substantive policy area indicate that the policy subsystem has not fully emancipated itself from those established subsystems which it overlaps with. Furthermore, there are indeed subunits specialised on disinformation within agencies, e.g., when looking at the EAAS⁶², and potentially also within participating organisations; it remains however questionable whether disinformation warranted a specialised Council Working Group or Commission Directorate General.

Concerning the identified “nestedness”, chapters 3.3 and 5.2 have illustrated the overlap between the disinformation subsystem and issues of media and internet governance. This overlap is corroborated by the most popular frame among all stakeholders, the preference for media and information literacy, which underlines how much the issue is associated with considerations of media and information literacy. Therefore, a subsystem autonomy outside media and information technology is not evident.

Stakeholder mapping and coalition formation

The second part of the hypothesis required stakeholder mapping into advocacy coalitions as recommended by Weible & Sabatier (2007). There are some trends and similarities regarding formal criteria when assessing the composition of advocacy coalitions, notably the repartition of news media and respective advocacy groups throughout the coalitions.

There are, however, no striking patterns emerging that would indicate that representatives of traditional news media were on the same page; quite the contrary is true. The three advocacy coalitions identified are rather heterogeneously set up, which is intriguing and might be due to the fact that the subsystem is, or at the time was, in the process of formation. Furthermore, and, surprisingly, the identified advocacy coalitions do not match the dichotomy between CoP signatories (i.e., online platforms and social media companies) and members of the Sounding Board (cf. chapter 5.1.1). On one hand, this can be explained by the fact that only two of the CoP signatories engaged in the public consultation (Google and Mozilla). However, this explanation does not capture the discrepancy between the contributions of Sounding Board members who can be found in all three

⁶² In summer 2020, the European Parliament even instituted a special committee “on foreign interference in all democratic processes in the EU, including disinformation”; s. European Parliament (2021).

coalitions. This finding suggests that, although united in their opposition to online platforms, stakeholders affiliated with the Sounding Board do occupy diverging positions on disinformation which reflect the policy cores of *Advocacy Coalitions A, B* and *C*.

Conflicting views can be distinguished along two axes; the first axis represents the assessment on whether the discussed policy problem is severe or not, the second axis reflects stakeholders' wish for or commitment to more policy intervention. While *Advocacy Coalition A* assesses disinformation as a severe problem and demands more, and

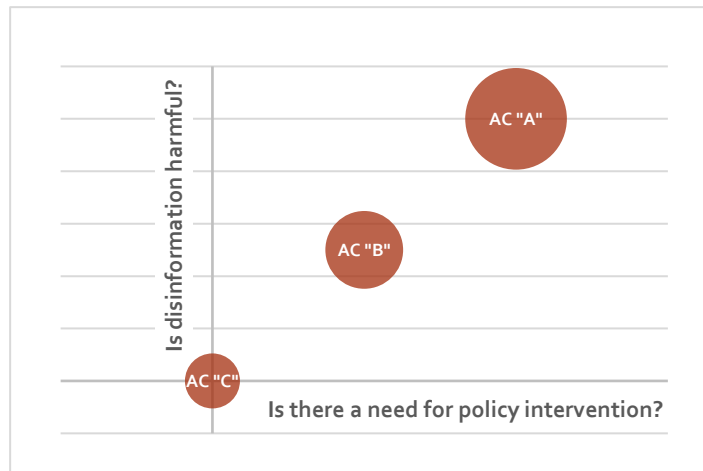


Figure 21: *Advocacy Coalitions formation according to conflict lines*

stricter policy measures against it, *Advocacy Coalition C* is fundamentally opposed in both regards. *Advocacy Coalition B*, on the other hand, identifies disinformation as harmful – however, acknowledges that it is difficult to define – and is more moderate, if not cautious, in its preferences for policy intervention.

Sticking with the example of the Sounding Board which mostly consists of advocacy organisations from legacy media, in addition to consumer interest groups and academia, two broadcaster associations (ACT and EBU) and one press publisher organisation (NME) as well as a consumer rights NGO (BEUC) can be found in *Coalition A*. *Coalition C*, by contrast, includes another press publisher organisation (EMMA/ENPA) as well as the organisation representing radio broadcasters (AER). In between, the European Publishers Council as well as the European Federation of Journalists can be assigned to *Coalition B*.

8.2 Hypothesis 2: Intra-coalitionary congruence of belief systems

Verifying hypothesis 2 ("Actors within an advocacy coalition will show substantial consensus on issues pertaining to the policy core, although less so on secondary aspects.", cf. 4.4) required a comprehensive idea of what beliefs constitute the policy core per coalition. Substantial consensus, as referred to in the hypothesis, was understood as a striking prevalence of specific frame elements and frames, i.e., was deemed conclusive if more than half of the stakeholders in an advocacy coalition should agree on it.

The policy core integrates normative and empirical claims regarding the substantive policy area and further establishes a narration of causality regarding the latter. At first, stakeholders were

roughly mapped according to problem perception (Is it severe? Does disinformation cause significant harm?) and their preference for policy intervention (Yes vs. no; preference for hard vs. soft intervention). In a second step, the grouping was verified according to what frame elements of causality were employed, and, if necessary, readjustments undertaken whereby stakeholders would be assigned to a different coalition. Effectively, such exchanges were only made in 9 out of 77 cases and solely happened between *Advocacy Coalition A* and *B*.

This indicates the similarity between the coalitions and further points to the difficulty of establishing coalition boundaries when relying on latent meanings according to frames. Those findings also suggest the volatility of the emerging subsystem when it comes to the degree of actor integration and belief system formation (cf. chapter 3.2.1, Nohrstedt & Weible 2010). Nevertheless, distinct policy core beliefs per coalition could be identified; these allowed for clear delineation between the *Coalitions A, C* and the intermediate *Coalition B*.

Advocacy Coalition A shows substantial consensus on the perception of disinformation as a severe problem, associating the issue with harm, even extensive harm, i.e., affecting society as a whole and with grave implications, e.g., for the functioning of the democratic process. Therefore, the coalition unanimously agrees that there is a need for more policy action, with almost three quarters of this coalition preferring the regulation of the platform business as a solution to the problem. This demand is consistent with the narration of causality in the coalition since 78% can agree on the platform business model being the root cause of the problem associated with disinformation online.

Advocacy Coalition B is indeed similar to *Coalition A*, notably when it comes to taking disinformation seriously and identifying the platform business model as causal to the problem. On the other hand, *Coalition B* doubts the possibility of conclusively defining disinformation, relativizing any conclusion that could be drawn as to potential effective remedies. Policy preferences are often voiced in combination with expressions of caution. Furthermore, the lack of scientific evidence, e.g., to prove an increase in volume of disinformation, is pointed out by 25% of stakeholders in *Coalition B* while in *Coalition A* only one out of 41 stakeholders does so.

The described attitude of moderation and caution draws the coalition closer to *Advocacy Coalition C* as these two coalitions share the doubt of conclusive definitions of disinformation. *Coalition C*, however, refuses to problematise disinformation, either because stakeholders find it impossible to define, or, because the lack of scientific underpinning prohibits them from doing so. Insofar, no prevalent narration of causality unfolds within this coalition; the viability of news media is the only cause indicated by 50% of *Coalition C*. Furthermore, *Coalition C* is distinct in the rejection of further policy intervention; the motivations behind this rejection might differ.

Lastly, evaluating these findings in compliance with hypothesis 2 does not necessarily require an assessment of secondary aspects as the formulation implies that both consensus and dissent on secondary aspects, confirms the hypothesis – so long as consensus on the policy core exists. While identification and consensus on policy core frame elements was prerequisite to grouping stakeholders into coalitions, the only frame element that would function for operationalising secondary aspects is policy instrument preference. Evidently, there is inter-coalitionary discord on instrument preference among 77 stakeholders, suggesting a variety of tools.

8.3 Hypothesis 3: views on the role of news media in society

The third hypothesis ("Belief systems will be reflective of established paradigms in media governance and therefore contain frames which refer to broader, normative concepts.", cf. 4.4) referred to the overarching research question:

What are the underlying ideas shaping stakeholders' positions on the role of news media in democracy when participating in the EU policy discourse on tackling online disinformation?

As well as to its third sub question:

To what extent do belief systems reflect considerations over the role of news media in democratic societies and reference to any public interest principle in governance?

The formulation of both thereby reflected the initial hunch that EU efforts to "tackle" online disinformation – sticking to the Commission vocabulary – would echo considerations of contemporary media policy as to whether statutory intervention (drawing from instruments available within media regulation) is necessary to re-adjust the media ecosystem. Central to this hunch was the conception of regulation as a means to ensure or enhance public welfare, as well as the question on how this idea reflected in the policy discourse on disinformation.

The notion of public interest

Considerations of public interest have generally been structuring regulatory behaviour, but media governance in particular, given the distinct character of the commodity of news (cf. chapter 3.1.3) and the definition of professional journalism which – theoretically – relies on ethical standards in production and dissemination (Napoli 2019). This idea of public interest in media governance may be more or less pronounced among stakeholders, according to the democratic ideal they are associated with – or speaking in the logic of the ACF: those frames, relating journalistic activity to a broader societal context, may be more or less pronounced within actors' belief systems, depending on who is being asked and how these individuals have been socialized.

Public interest or *public value* as a frame element is rather underrepresented among stakeholders; only 21% of *Coalition A* and another 17% of *Coalition B* explicitly refer to it. The concept of public interest, however, exists between the lines as it seems to be translated into discussions on the balancing act between ensuring quality news provision and the fundamental right of free speech. The *Council for Broadcasting and Retransmission* (2018), from *Advocacy Coalition B* appositely states:

But to decide what the main [causes] are and correlate them to the actual use and spread of "fake news" is not possible without building a more robust evidence base. (...) But this is not an exemption since in the media policy many issues have to be in the end based on the policy decisions when trying to find a balance between the different fundamental rights and public interests at stake.

Public interest is thus discussed as a normative rivalry between regulation of public discourse in favour of preventing societal harm and freedom of expression. Indeed, the latter seems to outweigh the first in the disinformation policy discourse when considering the numerous warnings against censorship (cf. chapter 6.5.2), compared to which the notion of informed citizenry as a point of reference⁶³ plays a minor role.

Belief systems and the extent of news media frame elements

Regarding the sub question as to what extent stakeholder belief systems in the policy discourse broach the issue of news media in society, there is a quantitative and a qualitative answer to this. Quantitatively, the stakeholder analysis showed that 38% of the sample was composed of actors from the traditional media sector, thereby representing the biggest subgroup which could be categorized according to sector or topic (cf. chapter 6). These organisations would obviously refer to news media practice when arguing their cause. The share of organisations mentioning new media, however, goes beyond these actors. Normative references to news media are made by over 50% of all stakeholders; news media in reference to causality is brought up by a third of the sample whereas 57% of all 77 stakeholders incorporate news media when framing a solution to the problem.

When approaching the sub question qualitatively, it is worth recapitulating the theoretical subchapters on established policy paradigms and deep core beliefs in media policy (cf. 3.3.1 and 3.3.2). On one hand, there is the underlying concept of the public, being perceived as relevant or

⁶³ This dichotomy is probably best visualised on spectrum; while on the one end, freedom of expression is fiercely defended against any form of censorship, the "informed citizenry"-end can be best described along a quote by Shiffrin: "The implications of these developments for democracy are enormous. Is the Internet killing our democracy and paving the way for uninformed mob rule? Democracy rests upon the assumption of an educated populace; this is part of why public education is so important." (2017: 123)

irrelevant to the democratic process. Explicit reference to the public sphere is found with 45% of all stakeholder contributions while especially the notion of public debate matters in the disinformation context. While public debate is seldomly linked to legacy news media⁶⁴ it is more often put into perspective of newly emerging online fora of public debate. Regarding this, a delocalisation of public sphere is either problematised, e.g., by referring to filter bubbles and echo chambers, or by pinpointing a perceived lack of regulatory oversight:

The rise of the platforms, the privatisation of public agoras without regulation about what is being published, the lack of regulation. We have strong regulation on Media, but the platforms are not regulated as the media are.

(WAN-INFRA 2018, *Advocacy Coalition A*).

or scrutinized in context to democratic procedure:

We're in a democracy and people need to have the right to go online and be treated as if they were offline. We should not live in a world where conversations about important topics cannot happen online (...).

(EDRi 2018, *Advocacy Coalition C*).

On the other hand, there is the idea of what specific tasks news media and journalism are to perform in line with professional standards. Here, it is again worth pointing to the so-called dominant model of journalism (cf. chapter 3.3.2) which implies a conception of journalism that is associated with social responsibility. Otherwise, there would be no claim to professionalism, as neutrality and accuracy in reporting can be considered a normative choice as well. This directly impacts the idea of the role of media within political dynamics, ascribing journalism either a monitoring or a facilitating role.

News media and professional journalism in democracy

Stakeholders do imply that they find news media to have an impact on democracy – either contributing to democratic practice or, when, impeded or flawed, by causing harm. This is illustrated by references to premises of informed citizenry, or when referring to a healthy ecosystem as a basis of functional democracy (cf. chapter 6.2.1, notably).

Concerning the role ascribed to journalism as profession, it is striking that “quality media as opposed to non-quality media” is the most prevalent frame in relation to news media. News media in a monitoring role are explicitly and implicitly referred to, although the frequency is not striking.

⁶⁴ A nice, however, rare example for a respective frame is provided by GONG, a Croatian NGO: “Intentional disinformation related to public policies on media systems can manipulate the debate on public interest in the media system and enable non-journalistic interests to take over the channels of public communication.”, GONG (2018)

Implications that news media carry social responsibility, e.g., as “watchdogs of democracy”, thereby remain the most prevalent whereas news media as agenda setters or gatekeepers are rarely brought up. More prevalent in this regard is the argument of online platforms functioning as new gatekeepers which is explicitly mentioned by 25% of all stakeholders, and implicitly, e.g., when problematizing algorithmic curation, or social media as a growing source of information, in 65% of the sample.

Policy solutions on supply and on demand side

These results further reflect an initial controversy on the EU digital policy agenda: facilitating and harvesting the supply side, i.e., investing in and enabling new technology, versus adjusting and bracing the demand side (Mansell 2014). Conceptualizing media governance within a market set-up⁶⁵ opposes policy solutions on the supply side, e.g., by regulating or taming online intermediaries, to those on the demand side, e.g., by ensuring informed citizenship and providing media literacy whereas the latter represents an uncontroversial policy measure (cf. 6.5.1).

In addition, the question arises how the discussed normative concepts, whatever shape they take, are best ensured; more precisely: who is responsible for news media conduct as valued according to certain deep core beliefs – a market economy or the state?

When it comes to the latter, the role of government and public authorities in context to disinformation is approached from two different angles. Especially *Coalition C* and, also, *Coalition B*, scrutinise the role of governments because they fear “Ministries of truth”⁶⁶. Furthermore, politicians are described as being part of the problem by 17% of stakeholders. On the other hand, authorities are expected to improve the current situation and therefore put in charge; unsurprisingly, the diversity of the traditional media market is reflected in diverging ideas of support for the news media ecosystem. Broadcasters expect authorities to subject platforms to similar scrutiny that applies to the European audio-visual sector (cf. ACT 2018), PSM demands continued investment in their institution (cf. EBU 2018) – as opposed to the “free press” that expects favourable business conditions (cf. EMMA/ENPA 2018) while the journalist lobby wants to see the protection of their members reinforced (cf. EFJ 2018).

⁶⁵ In reference to “news as a market-driven product” as discussed in McManus (1992).

⁶⁶ A common reference, e.g., as found with Human Rights NGO *ADF International* (2008): “The recent debate regarding ‘fake news’ has attracted weighty considerations related to free speech, regulatory mechanisms online, and the risk of creating unaccountable ‘truth ministries’ to oversee the content of online speech.”

8.4 Reflection and outlook

This thesis has conducted an extensive and thorough analysis of stakeholders and their respective positions, resulting in tangible conclusions for the emerging policy subsystem of "disinformation" that have not been presented or addressed elsewhere in research. The evaluation of 77 stakeholder accounts following theory-driven frame analysis has provided a rich and diverse pool of results which were vividly presented with constant reference back to the research question. Thereby, an accurate contextualization of the complex issue of disinformation was undertaken, offering a research angle complementary to topical literature: not policies themselves, but their formation, background and the ideas inspiring them were of central interest to this research project.

Against this backdrop, several consecutive research questions unfold, notably inasmuch as the identified policy subsystem will probably evolve and mature. The rather big sample, encompassing 77 organisations, might undergo further refinement in a future project, considering that 77 singular actors are too numerous to influence EU policy on equal terms. Therefore, a follow-up stakeholder analysis would fare well in including the theoretical component of power or influence when describing relevant advocacy coalitions in greater detail. In this regard, an evaluation of subsystem volatility suggests itself, testing to what extent the identified advocacy coalitions remain stable in terms of formation and policy core beliefs. A suitable point of application could be the recent public consultation that was launched in the run-up to the *Democracy Action Plan* against which stakeholder participation and positions could be compared.

Lastly, future research could engage in analysing to what extent the presented belief systems effectively infused EU policy making, e.g., when comparing the results to formulations in soft policy documents. The Communication on "the EU's fight against COVID-19 Disinformation" represents a good example for this purpose, potentially offering insights as to what extent the COVID-19 pandemic has impacted or altered the perception of trustworthy news sources.

Recapitulating these results against the backdrop of online disinformation, future media and digital policy will have to address the issue from different points of view. Economically, the viability of traditional news media that see their business model disturbed by online content will remain a long-term regulatory challenge. Legally, the potency of technology, contributing to different perceptions of problem severity, needs addressing – not only in the disinformation context.

Finally, the fragmentation of the public sphere into several different online fora will continue to encourage a debate on how to imagine a public sphere and how it is supposed to function – ventilated by challenges of convergence. In this regard, the issue of media accountability remains relevant.

As most people presume that media, or the news media in particular, do not operate in a vacuum, they identify links “to the surrounding society by various ties of attachment, obligation, and even subordination that affect how purposes are determined” (Christians et al. 2009: 120). Thereof, the question arises as to how media accountability has been altered in an online environment, both normatively and legally. Reference to the principle of public interest is clearly inherent to the self-imposed codes by legacy news and media organisations, recognising their ethical responsibility and relevance to the democratic process through the formulation of professional standards (Napoli 2019). Yet, policy makers will have to evaluate whether self-regulatory and soft law measures as fixed in the *Code of Practice* or the recent *Democracy Action Plan* (European Commission 2020d) are effective when addressing online intermediaries.

On the other hand, media and information literacy is a crucial skill whose mastery remains essential in view of future technological development. Schiffrin (2017: 123) rightfully argues:

Is the Internet killing our democracy and paving the way for uninformed mob rule? Democracy rests upon the assumption of an educated populace; this is part of why public education is so important.

9 References

- Baumgartner, F. R. (2014) Ideas, paradigms and confusions. *Journal of European Public Policy* **21** (3), 475–480.
- Baxter, P., Jack, S. & others (2008) Qualitative case study methodology: Study design and implementation for novice researchers. *The qualitative report* **13** (4), 544–559.
- BBC (2020) <https://www.bbc.co.uk/programmes/p085qv2x/player>.
<https://www.bbc.co.uk/programmes/p085qv2x/player>. Accessed 9/17/2020.
- Berger, P. L. & Luckmann, T. (1974) *Die gesellschaftliche Konstruktion der Wirklichkeit: Eine Theorie der Wissenssoziologie*, 4. Aufl. Fischer, Frankfurt/M.
- Bernays, E. L. ([1923]1961) *Crystallizing public opinion*. Liveright, New York.
- Blyth, M. M., Goldstein, J., Keohane, R. & Sikkink, K. (1997) "Any More Bright Ideas?" The Ideational Turn of Comparative Political Economy. *Comparative Politics*, 29(2), 229. *Comparative Politics* **29** (2), 229.
- Broughton Micova, S. (2019) Case Study Research. In: van den Bulck, H., Puppis, M. & Donders, K. (eds.) *The Palgrave handbook of methods for media policy research*. Springer International Publishing, Cham, pp. 71–84.
- Brüggemann, M., Humprecht, E., Kleis Nielsen, R., Karppinen, K., Cornia, A. & Esser, F. (2016) Framing the Newspaper Crisis. *Journalism Studies* **17** (5), 533–551.
- Burkhardt, J. M. (2017) Chapter 1: History of Fake News. *Library Technology Reports* **53** (8), 5–9.
- Carboni, N. (2009) Advocacy Groups in the Multilevel System of the European Union: a Case Study in Health Policy-Making. *Observatoire Social Européen Research Paper* **1**, 1–35.
- Cave, M., Genakos, C. & Valletti, T. (2019) The European Framework for Regulating Telecommunications: A 25-year Appraisal. *Review of Industrial Organization* **55** (1), 47–62.
- Cervi, L. & Carrillo-Andrade, A. (2019) Post-truth and Disinformation: Using discourse analysis to understand the creation of emotional and rival narratives in Brexit. *ComHumanitas: revista científica de comunicación* **10** (2), 125–149.
- Chalmers, A. W. (2014) In over their heads: Public consultation, administrative capacity and legislative duration in the European Union. *European Union Politics* **15** (4), 595–613.
- Christians, C. G., McQuail, D., Nordenstreng, K., White, R. A. & Glasser, T. L. (2009) *Normative theories of the media: Journalism in democratic societies*. University of Illinois Press, Urbana.
- Council of Europe Committee of Ministers (1999) RECOMMENDATION No. R (99) 1.
https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016804fa377.
- Council of Europe Parliamentary Assembly (2018) *Legal challenges related to hybrid war and human rights obligations: Resolution 2217 (2018)*.
- Crilley, R. (2018) Post-truth: the new war on truth and how to fight back/Post-truth: how bullshit conquered the world/Post-truth: why we have reached peak bullshit and what we can do about it. *International Affairs* **94** (2), 417–425.
- Daigneault, P.-M. (2014) Reassessing the concept of policy paradigm: aligning ontology and methodology in policy studies. *Journal of European Public Policy* **21** (3), 453–469.
- de Vreese, C. H. (2005) News framing: Theory and typology. *Information design journal & document design* **13** (1).
- EBU (2018) *SOUNDING BOARD ON DISINFORMATION LOOKS TO ACTION PLAN TO ADDRESS SHORT-COMINGS OF SO-CALLED CODE OF PRACTICE*.

- EEAS (2018) Questions and Answers about the East StratCom Task Force.
https://eeas.europa.eu/headquarters/headquarters-homepage/2116/-questions-and-answers-about-the-east-stratcom-task-force_en. Accessed 10/1/2020.
- EMMA (2020) European Magazine Media Association.
<http://www.magazinemedi.eu/emma/index.html>.
- ENPA (2020) European Newspaper Publisher's Association. <https://www.enpa.eu/>.
- Entman, R. M. (1993) Framing: Toward clarification of a fractured paradigm.
- European Commission (2017) Public consultation on fake news and online disinformation: CONSULTATION. https://ec.europa.eu/info/consultations/public-consultation-fake-news-and-online-disinformation_en#questionnaire. Accessed 9/30/2020.
- European Commission (2018a) Code of Practice on Disinformation: Shaping Europe's digital future. <https://ec.europa.eu/digital-single-market/en/news/code-practice-disinformation>.
- European Commission (2018b) Public consultation on fake news and online disinformation: CONSULTATION. https://ec.europa.eu/info/consultations/public-consultation-fake-news-and-online-disinformation_en#questionnaire. Accessed 8/12/2020.
- European Commission (2018c) *Tackling online disinformation: a European Approach*.
- European Commission (2020a) Protecting European democracy from interference and manipulation: European Democracy Action Plan. <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12506-European-Democracy-Action-Plan/public-consultation>.
- European Commission (2020b) *Shaping Europe's digital future*. Publications Office of the European Union, Luxembourg.
- European Commission (2020c) *Tackling COVID-19 disinformation - Getting the facts right*.
- European Commission (2020d) *COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS On the European democracy action plan: COM(2020) 790 final*.
- European Parliament (2017) *Online platforms and the Digital Single Market. European Parliament resolution of 15 June 2017 on online platforms and the digital single market (2016/2276(INI): P8_TA(2017)0272*.
- European Parliament (2020) Audiovisual and media policy.
<https://www.europarl.europa.eu/factsheets/en/sheet/138/audiovisual-and-media-policy>.
- European Parliament (2021) *Parliament sets up special committees and a permanent subcommittee | News | European Parliament*.
- European Parliament & Council of the European Union (2000) *Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market ('Directive on electronic commerce'): DIRECTIVE 2000/31/EC*.
- European Union (2012) *CHARTER OF FUNDAMENTAL RIGHTS OF THE EUROPEAN UNION: (2012/C 326/02)*.
- EUvsDisinfo (2020) About. <https://euvsdisinfo.eu/about/>. Accessed 10/1/2020.
- Fink, U. & Gillich, I. (2020) Fake News as a challenge for journalistic standards in Modern Democracy. *University of Louisville Law Review* **58** (2), 263–282.
- Flew, T. & Lim, T. (2019) Assessing Policy I: Stakeholder Analysis. In: van den Bulck, H., Puppis, M. & Donders, K. (eds.) *The Palgrave handbook of methods for media policy research*. Springer International Publishing, Cham, pp. 541–555.
- Freedman, D. (2008) *The Politics of Media Policy*, 1. Aufl. Polity, s.l.

- Gelfert, A. (2018) Fake News: A Definition. *Informal Logic* **38** (1), 84–117.
- Gofas, A. & Hay, C. (2010) The ideational turn and the persistence of perennial dualisms. *The role of ideas in political analysis: A portrait of contemporary debates* **19**, 1.
- Goffman, E. (1975) *Frame analysis: An essay on the organization of experience*. Penguin books, Harmondsworth.
- Gripsrud, J. & Moe, H. (2010a) Introduction: The Digital Public Sphere. Challenges for Media Policy. In: Gripsrud, J. & Moe, H. (eds.) *The digital public sphere: Challenges for media policy*. Nordicom, Göteborg, pp. 9–19.
- Gripsrud, J. & Moe, H. (eds.) (2010b) *The digital public sphere: Challenges for media policy*. Nordicom, Göteborg.
- Hall, P. A. (1993) Policy Paradigms, Social Learning, and the State: The Case of Economic Policymaking in Britain. *Comparative Politics* **25** (3), 275.
- Harrison, H., Birks, M., Franklin, R. & Mills, J. (2017) Case Study Research: Foundations and Methodological Orientations. *Forum Qualitative Sozialforschung / Forum: Qualitative Social Research* **18** (1).
- High level Group on fake news and disinformation (2018) *A multi-dimensional approach to disinformation: Report of the independent high level group on fake news and online disinformation*. Publications Office of the European Union, Luxembourg.
- Jakubowicz, K. (2012) Battle of the paradigms: Defining the object and objectives of media/communication policy. *Trends in Communication Policy Research: New Theories, Methods and Subjects*, 237–259.
- Jenkins-Smith, H. C., Nohrstedt, D., Weible, C. M. & Sabatier, P. A. (2014) The advocacy coalition framework: Foundations, evolution, and ongoing research. *Theories of the policy process* **3**, 183–224.
- Juncker, J.-C. (2017) Commissioner for the Digital Economy and Society: Mission Letter. Mariya Gabriel.
https://ec.europa.eu/commission/commissioners/sites/cwt/files/commissioner_mission_letters/mission-letter-mariya-gabriel.pdf.
- Karppinen, K. & Moe, H. (2012) What we talk about when we talk about document analysis. *Trends in Communication Policy Research: New Theories, Methods and Subjects*, 177–193.
- Karppinen, K. & Moe, H. (2019) Texts as data I: Document analysis. In: van den Bulck, H., Puppis, M. & Donders, K. (eds.) *The Palgrave handbook of methods for media policy research*. Springer International Publishing, Cham, pp. 249–262.
- Künzler, M. (2012) It's the idea stupid! How ideas challenge broadcasting liberalisation. In: Just, N. & Puppis, M. (eds.) *Trends in communication policy research: New theories, methods and subjects*. Intellect, Bristol, UK, pp. 55–74.
- Löblich, M. (2019) Analyzing Talk and Text IV: Frame Analysis. In: van den Bulck, H., Puppis, M. & Donders, K. (eds.) *The Palgrave handbook of methods for media policy research*. Springer International Publishing, Cham, pp. 419–433.
- Lockhart, J. & Marcus, J. (1994) Mesoamerican Writing Systems: Propaganda, Myth, and History in Four Ancient Civilizations. *0018-2168* **74** (4), 713–715.
- Loisen, J., Donders, K. & Pauwels, C. (2014) Introduction: European Media Policy as a Complex Maze of Actors, Regulatory Instruments and Interests. In: Donders, K., Pauwels, C. & Loisen, J. (eds.) *The Palgrave Handbook of European Media Policy*. Palgrave Macmillan UK, London, pp. 1–16.

- Macmillan, F. (2014) 'Are You Sure/That We Are Awake?': European Media Policy and Copyright. In: Donders, K., Pauwels, C. & Loisen, J. (eds.) *The Palgrave Handbook of European Media Policy*. Palgrave Macmillan UK, London, pp. 382–401.
- Mansell, R. (2014) Here Comes the Revolution — the European Digital Agenda. In: Donders, K., Pauwels, C. & Loisen, J. (eds.) *The Palgrave Handbook of European Media Policy*. Palgrave Macmillan UK, London, pp. 202–217.
- Marsden, C., Meyer, T. & Brown, I. (2020) Platform values and democratic elections: How can the law regulate digital disinformation? *Computer Law & Security Review* **36**, 1–18.
- Marshall, J. P. (2017) Disinformation Society, communication and cosmopolitan democracy. *Cosmopolitan Civil Societies: An Interdisciplinary Journal* **9** (2), 1–24.
- Martens, B., Aguiar, L., GGmez, E. & Mueller-Langer, F. (2018) *The Digital Transformation of News Media and the Rise of Disinformation and Fake News*.
- McManus, J. H. (1992) What Kind of Commodity Is News. *Communication Research* **19** (6), 787–805.
- McQuail, D. (2008) The Current State of Media Governance in Europe. In: Terzis, G. (ed.) *European Media Governance: National and Regional Dimensions*, 1st ed. Intellect Books Ltd, Bristol, pp. 17–26.
- Mehta, J. (2010) The varied roles of ideas in politics. *Ideas and politics in social science research*, 23–46.
- Merriam, S. B. & Tisdell, E. J. (2016) *Qualitative research: A guide to design and implementation*, Fourth edition. Jossey-Bass, San Francisco, CA.
- Merriam-Webster Case study. <https://www.merriam-webster.com/dictionary/case%20study>. Accessed 10/1/2020.
- Michalis, M. (2014) Focal Points of European Media Policy from Inception till Present: Plus Ça change? In: Donders, K., Pauwels, C. & Loisen, J. (eds.) *The Palgrave Handbook of European Media Policy*. Palgrave Macmillan UK, London, pp. 128–142.
- Napoli, P. M. (2019) *Social media and the public interest: Media regulation in the disinformation age*. Columbia University Press, New York.
- Nielsen, R. K., Gorwa, R. & Cock Buning, M. de (2019) What Can Be Done? Digital Media Policy Options for Europe (and beyond). Reuters Institute for the Study of Journalism Oxford. <https://reutersinstitute.politics.ox.ac.uk/risj-review/what-can-be-done-digital-media-policy-options-europe-and-beyond>.
- Nohrstedt, D. & Weible, C. M. (2010) The Logic of Policy Change after Crisis: Proximity and Subsystem Interaction. *Risk, Hazards & Crisis in Public Policy* **1** (2), 1–32.
- Padovani, C., Musiani, F. & Pavan, E. (2010) Investigating Evolving Discourses On Human Rights in the Digital Age. *International Communication Gazette* **72** (4-5), 359–378.
- Pamment, J. (2020) The EU's Role in Fighting Disinformation: Taking Back the Initiative. https://carnegieendowment.org/files/Pamment_-_Future_Threats.pdf. Accessed 8/7/2020.
- Parker, R. & Parenta, O. (2008) Explaining contradictions in film and television industry policy: ideas and incremental policy change through layering and drift. *Media, Culture & Society* **30** (5), 609–622.
- Pauwels, C. (2014) Genesis and Rationales for European Intervention in Media. In: Donders, K., Pauwels, C. & Loisen, J. (eds.) *The Palgrave Handbook of European Media Policy*. Palgrave Macmillan UK, London, pp. 113–127.
- Puppis, M. (2019) Analyzing Talk and Text I: Qualitative Content Analysis. In: van den Bulck, H., Puppis, M. & Donders, K. (eds.) *The Palgrave handbook of methods for media policy research*. Springer International Publishing, Cham, pp. 367–384.

- Puppis, M., Simpson, S. & van den Bulck, H. (2016) Contextualising European Media Policy in the Twenty-First Century. In: *European Media Policy for the Twenty-First Century*. Routledge, pp. 1–20.
- Puppis, M. & van den Bulck, H. (2019) Introduction: Media Policy and Media Policy Research. In: van den Bulck, H., Puppis, M. & Donders, K. (eds.) *The Palgrave handbook of methods for media policy research*. Springer International Publishing, Cham, pp. 3–21.
- Radaelli, C. M. (1999) Harmful tax competition in the EU: policy narratives and advocacy coalitions. *JCMS: Journal of Common Market Studies* **37** (4), 661–682.
- Sabatier, P. A. & Jenkins-Smith, H. C. (1993) *Policy change and learning: An advocacy coalition approach*. Westview Pr.
- Sabatier, P. A. & Weible, C. M. (2007) The advocacy coalition framework. *Theories of the policy process* **2**, 189–220.
- Sánchez-Tabernero, A. (2006) Issues in media globalization. *Handbook of media management and economics*, 463–491.
- Saurwein, F. & Spencer-Smith, C. (2020) Combating Disinformation on Social Media: Multilevel Governance and Distributed Accountability in Europe. *Digital Journalism*, 1–22.
- Schiffrin, A. (2017) THE INTERNET TRANSFORMED PROTEST BUT DID NOT IMPROVE DEMOCRACY: DISINFORMATION AND DEMOCRACY. *Journal of International Affairs* **71** (1), 117–126.
- Selznick, P. (1985) Focusing organizational research on regulation. *Regulatory policy and the social sciences* **1**, 363–367.
- Sewell, G. C. (2005) *Actors, coalitions and the framework convention on climate change: Actors, coalitions and the framework convention on climate change*. Massachusetts Institute of Technology.
- Shanahan, E. A., Jones, M. D. & McBeth, M. K. (2011) Policy Narratives and Policy Processes. *Policy Studies Journal*, 39(3), 535–561. *Policy Studies Journal* **39** (3), 535–561.
- Simons, H. (2009) *Case study research in practice*. SAGE Publications.
- Snow, D. A. & Benford, R. D. (1992) Master frames and cycles of protest. *Frontiers in social movement theory* **133**, 155.
- Special Rapporteur on Freedom of Opinion and Expression (2017) *Joint declaration on freedom of expression and "fake news", disinformation and propaganda*.
- Splichal, S. (2010) Eclipse of „the Public“. In: Gripsrud, J. & Moe, H. (eds.) *The digital public sphere: Challenges for media policy*. Nordicom, Göteborg, pp. 23–40.
- Swift, J. (1710) The art of political lying. *The Examiner* **14**, 1710.
- Tandoc, E. C., Lim, Z. W. & Ling, R. (2018) Defining “Fake News”. *Digital Journalism* **6** (2), 137–153.
- Tenove, C. (2020) Protecting Democracy from Disinformation: Normative Threats and Policy Responses. *The International Journal of Press/Politics* **25** (3), 517–537.
- Ungerer, H. (2014) The Reasons for Intervention through Competition Policy. In: Donders, K., Pauwels, C. & Loisen, J. (eds.) *The Palgrave Handbook of European Media Policy*. Palgrave Macmillan UK, London, pp. 405–425.
- Valcke, P. & Ausloos, J. (2014) Audiovisual Media Services 3.0: (Re)defining the Scope of European Broadcasting Law in a Converging and Connected Media Environment. In: Donders, K., Pauwels, C. & Loisen, J. (eds.) *The Palgrave handbook of European media policy*. Palgrave Macmillan, Basingstoke, pp. 312–328.
- van Cuilenburg, J. & McQuail, D. (2003) Media Policy Paradigm Shifts. *European Journal of Communication* **18** (2), 181–207.

- van den Bulck, H. (2019) Analyzing Policy-Making I: Stakeholder and Advocacy Coalition Framework Analysis. In: van den Bulck, H., Puppis, M. & Donders, K. (eds.) *The Palgrave handbook of methods for media policy research*. Springer International Publishing, Cham, pp. 451–469.
- van den Bulck, H. & Donders, K. (2014a) Analyzing European media policy: Stakeholders and advocacy coalitions. In: Donders, K., Pauwels, C. & Loisen, J. (eds.) *The Palgrave Handbook of European Media Policy*. Palgrave Macmillan UK, London, pp. 19–35.
- van den Bulck, H. & Donders, K. (2014b) Of discourses, stakeholders and advocacy coalitions in media policy: Tracing negotiations towards the new management contract of Flemish public broadcaster VRT. *European Journal of Communication* **29** (1), 83–99.
- Wardle, C. & Derakhshan, H. (2017) Information disorder: Toward an interdisciplinary framework for research and policy making. *Council of Europe report* **27**.
- Weible, C. M. & Sabatier, P. A. (2007) A guide to the advocacy coalition framework. *Handbook of public policy analysis: theory, politics, and methods*, 123–136.
- Weible, C. M., Sabatier, P. A., Jenkins-Smith, H. C., Nohrstedt, D., Henry, A. D. & DeLeon, P. (2011) A quarter century of the advocacy coalition framework: An introduction to the special issue. *Policy Studies Journal* **39** (3), 349–360.
- Weible, C. M., Sabatier, P. A. & McQueen, K. (2009) Themes and Variations: Taking Stock of the Advocacy Coalition Framework. *Policy Studies Journal* **37** (1), 121–140.
- World Health Organization & others (2020) Novel Coronavirus (2019-nCoV): situation report, 13.
- Zimdars, M. & McLeod, K. (eds.) (2020) *Fake news: Understanding media and misinformation in the digital age*. The MIT Press, Cambridge.

10 Annex

10.1 Public Consultation Questionnaire (blank)

A. Scoping the problem

1. In your opinion, which criteria should be used to define fake news for the purposes of scoping the problem?
2. Are the following categories of fake news likely to cause harm to society? Please answer on a scale from 1 to 4: 1 (no harm), 2 (not likely), 3 (likely) to 4 (highly likely).
3. If you have remarks on these categories, please explain why and/or suggest additional categories of fake news.
4. In your opinion, what are the main economic, social and technology-related factors which, in the current news media landscape, contribute to the increasing spread of fake news? For instance, you can address reading behaviour, advertising revenues, the changing role of journalists and/or the impact of sponsored articles.
5. In which media do you most commonly come across fake news? Select the most relevant options
6. Indicate which of the following dissemination mechanisms, in your opinion, have the highest impact on the spread of fake news in the EU? Select the most relevant options.
7. Which of the following areas have, in your view, been targeted by fake news during the last two years? Please, for each area, use a scale from 1 to 4: 1 (not targeted), 2 (marginally targeted), 3 (moderately targeted), 4 (heavily targeted).
8. In your view, has public opinion been impacted by fake news in the following areas during the last two years? Please for each area use a scale from 1 to 4: 1 (no impact), 2 (some impact), 3 (substantial impact) to 4 (strong impact).
9. If you are an online platform or a news organisation, please explain the criteria you use to rank news content on your platform/online website and a description of their impact on the ranking of other sources of news.

B. Assessment of the measures already taken by online platforms, news media organisations and civil society organisations to counter the spread of disinformation online

10. To what extent, if at all, have the following measures reduced the spread of fake news? Please evaluate each of the following statements on a scale from 1 to 4; 1 (no contribution), 2 (minor contribution), 3 (appreciable contribution), 4 (great contribution).
11. If you are an online platform or a news organisation and you have adopted measures aimed at countering the spread of disinformation on your online platform, news media or website, or on those operated by third parties, please explain the measures you took. Please provide a short description of their characteristics as well as their results.
12. If you are an online platform or a news organisation, which tools do you use to assess the content uploaded on your platform/the quality of online information used to produce news content? Please evaluate each of the following measures on a scale from 1 to 4; 1 (rarely), 2 (occasionally), 3 (often), 4 (always).

13. In your view, are readers sufficiently aware of the steps to take to verify veracity of news, when reading and sharing news online (e.g., check sources, compare sources, check whether claims are backed by facts)?
14. If you are an online platform or a news organisation, what does your organisation do in order to inform readers about the precautions they should take when reading and sharing news online (e.g., periodic notifications, media literacy programmes) ? How do you help them assess a specific article/post (tools to investigate the source, links to facts & figures, links to other sources etc.) ?

C. Scope for possible future actions to improve access to reliable information and reduce the spread of disinformation online

15. Do you think that more should be done to reduce the spread of disinformation online?
16. In your view, which measures could online platforms take in order to improve users' access to reliable information and prevent the spread of disinformation online?
17. How effective would the following measures by online platforms be in preventing the spread of disinformation? Please evaluate each action on a scale from 1 to 4; 1 (no impact), 2 (low impact), 3 (moderate impact), 4 (strong impact).
18. In your view, which measures could news media organisations take in order to improve the reach of reliable information and prevent the spread of disinformation online?
19. How effective would the following measures by news media organisations be in strengthening reliable information and tackling fake news? Please evaluate each actions on a scale from 1 to 4; 1 (no impact), 2 (low impact), 3 (moderate impact), 4 (strong impact).
20. In you view, which measures could civil society organisations take in order to support reliable information and prevent the spread of disinformation online?
21. How do you rate the added value of an independent observatory/website (linking platforms, news media organisations and fact-checking organisations) to track disinformation and emerging fake narratives, improve debunking and facilitate the exposure of different sources of information online? Please evaluate each of the following statements on a scale from 1 to 4; 1 (strongly disagree), 2 (disagree), 3 (agree), 4 (strongly agree). If you find it useful, you can voice suggestions for independence hereunder - e.g., academic supervision, community-based structures or a hybrid such as Wikipedia.
22. What actions, if any, should be taken by public authorities to counter the spread of fake news, and at what level (global, EU, national/regional) should such actions be taken?
23. Please provide any comment and/or link to research that you consider useful to bring to the Commission attention.

10.2 Documents analysed: contributions to the Public Consultation

Advocacy Coalition "A"

National Media and Infocommunications Authority Hungary (2018) Public consultation for legal entities on fake news and online disinformation.

http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51202. Accessed 9/5/2020.

Mediakasvatuskeskus Metka - Centre for Media Education (2018) Public consultation for legal entities on fake news and online disinformation.

http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51196. Accessed 9/5/2020.

EBLIDA - European Bureau of Library, information and Documentation Associations (2018) Public consultation for legal entities on fake news and online disinformation.

http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51144. Accessed 9/5/2020.

ifa Akademie gGmbH (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51177. Accessed 9/5/2020.

Association of European Journalists (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51108.

Accessed 9/5/2020.

Identinetics IT-Services GmbH (2017) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51176. Accessed 9/5/2020.

Norwegian Media Authority / Medietilsynet (2018) Public consultation for legal entities on fake news and online disinformation.

http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51286. Accessed 9/5/2020.

International Republican Institute (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51184.

Accessed 9/5/2020.

Vaccines Europe (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51238. Accessed 9/5/2020.

Avoin Yhteiskunta ry (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51116. Accessed 9/5/2020.

ARD Liaison Office Brussels (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51105. Accessed 9/5/2020.

Finnish Media Federation Finnmedia (Medialiitto) (2018) Public consultation for legal entities on fake news and online disinformation.

http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51198. Accessed 9/5/2020.

European Broadcasting Union (EBU) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51158.

Accessed 9/5/2020.

RTL Group (2018) Public consultation for legal entities on fake news and online disinformation.

http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51220. Accessed 9/5/2020.

The European Values Think Tank (Evropské hodnoty z.s.) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51165. Accessed 9/5/2020.

La République en Marche, B. (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51194. Accessed 9/5/2020.

Bonnier Broadcasting (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51123. Accessed 9/5/2020.

GONG (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51171. Accessed 9/5/2020.

Public & Science (VA) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51239. Accessed 9/5/2020.

EAVI - the European Association for viewers Interests (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51146. Accessed 9/5/2020.

Institut für Europäisches Medienrecht (EMR) (2017) Öffentliche Konsultation für juristische Personen zu Falschmeldungen (Fake News) und online verbreiteten Desinformationen. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51183. Accessed 9/5/2020.

News Media Europe (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51099. Accessed 9/5/2020.

Grande Loge Féminine de France (Institut Maçonique Européen) (2018) Consultation publique destinée aux entités juridiques sur les fausses nouvelles et la désinformation en ligne. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51173. Accessed 9/5/2020.

Zweites Deutsches Fernsehen – ZDF (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51289. Accessed 9/5/2020.

Agence France-Presse (2018) Consultation publique destinée aux entités juridiques sur les fausses nouvelles et la désinformation en ligne. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51103. Accessed 9/5/2020.

Guardian Media Group (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51174. Accessed 9/5/2020.

WAN-IFRA (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51088. Accessed 9/5/2020.

Internet Society - Bulgaria (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51288. Accessed 9/5/2020.

ACT, Association of commercial television in Europe (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51100. Accessed 9/5/2020.

BEUC, the European Consumer Organisation (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51119. Accessed 9/5/2020.

European CanCer Organisation (ECCO) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51159. Accessed 9/5/2020.

eyeo GmbH (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51161. Accessed 9/5/2020.

Sky Plc (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51224. Accessed 9/5/2020.

European Advertising Standards Alliance (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51156. Accessed 9/5/2020.

Flemish Government (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51166. Accessed 9/5/2020.

Google (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51169. Accessed 9/5/2020.

Gouvernement français (2018) Consultation publique destinée aux entités juridiques sur les fausses nouvelles et la désinformation en ligne. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51168. Accessed 9/5/2020.

Nordic Public Service broadcasting (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51205. Accessed 9/5/2020.

pantarhei advisors europe (2018) Öffentliche Konsultation für juristische Personen zu Falschmeldungen (Fake News) und online verbreiteten Desinformationen. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51214. Accessed 9/5/2020.

University of Southampton IT Innovation Centre (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51237. Accessed 9/5/2020.

Swedish Library Association (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51226. Accessed 9/5/2020.

Advocacy Coalition "B"

- IAB Europe AISBL (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51175. Accessed 9/5/2020.
- British Broadcasting Corporation (BBC) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51120. Accessed 9/5/2020.
- CDU-Fraktion im Landtag Brandenburg (2018) Öffentliche Konsultation für juristische Personen zu Falschmeldungen (Fake News) und online verbreiteten Desinformationen. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51125. Accessed 9/5/2020.
- European Federation of Journalists (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51160. Accessed 9/5/2020.
- Verband Österreichischer Zeitungen (VÖZ) (2018) Öffentliche Konsultation für juristische Personen zu Falschmeldungen (Fake News) und online verbreiteten Desinformationen. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51241. Accessed 9/5/2020.
- European Publishers Council (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51162. Accessed 9/5/2020.
- Österreichischer Zeitschriften- und Fachmedienverband (ÖZV) (2018) Öffentliche Konsultation für juristische Personen zu Falschmeldungen (Fake News) und online verbreiteten Desinformationen. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51212. Accessed 9/5/2020.
- Deutscher Journalisten- Verband (2018) Öffentliche Konsultation für juristische Personen zu Falschmeldungen (Fake News) und online verbreiteten Desinformationen. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51142. Accessed 9/5/2020.
- International Federation of Library Associations and Institutions (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51185. Accessed 9/5/2020.
- BEE SECURE (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51118. Accessed 9/5/2020.
- Commission of the Episcopates of the European Union (Secretariat of COMECE) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51221. Accessed 9/5/2020.
- Media Governance and Industries Research Lab, University of Vienna (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51197. Accessed 9/5/2020.
- Association of European Journalists - Belgium (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51109. Accessed 9/5/2020.
- Channel 4 (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51129. Accessed 9/5/2020.
- COFACE-Families Europe (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51134. Accessed 9/5/2020.

- Council for Broadcasting and Retransmission (CBR) (2018) Public consultation for legal entities on fake news and online disinformation.
http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51140. Accessed 9/5/2020.
- die medienanstalten (2018) Öffentliche Konsultation für juristische Personen zu Falschmeldungen (Fake News) und online verbreiteten Desinformationen.
http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51147. Accessed 9/5/2020.
- European Association of Communications Agencies (2018) Public consultation for legal entities on fake news and online disinformation.
http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51155. Accessed 9/5/2020.
- IT-Political Association of Denmark (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51190. Accessed 9/5/2020.
- VG Media GmbH (2018) Öffentliche Konsultation für juristische Personen zu Falschmeldungen (Fake News) und online verbreiteten Desinformationen.
http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51242. Accessed 9/5/2020.
- Public Data Lab (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51277. Accessed 9/5/2020.
- Mozilla Corporation (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51200. Accessed 9/5/2020.
- VPRT (Verband Privater Rundfunk und Telemedien e.v.) becoming VAUNET (2018) Public consultation for legal entities on fake news and online disinformation.
http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51244. Accessed 9/5/2020.
- La Quadrature du Net (2018) Consultation publique destinée aux entités juridiques sur les fausses nouvelles et la désinformation en ligne.
http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51195. Accessed 9/5/2020.

Advocacy Coalition "C"

Full Fact (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51167. Accessed 9/5/2020.

Federation of European Direct and Interactive Marketing (FEDMA) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51163. Accessed 9/5/2020.

European Digital Rights (EDRi) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51157. Accessed 9/5/2020.

ENPA - European Newspaper Publishers' Association & EMMA- European Magazine Media Association (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51152. Accessed 9/5/2020.

Computer and Communications Industry Association (CCIA Europe) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51131. Accessed 9/5/2020.

Civil Liberties Union for Europe (Liberties) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51130. Accessed 9/5/2020.

Center for Democracy & Technology (CDT) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51126. Accessed 9/5/2020.

Association of European Radios / Association des Radios (AER) (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51114. Accessed 9/5/2020.

BDZV Bundesverband Deutscher Zeitungsverleger e.V. & VDZ Verband Deutscher Zeitschriftenverleger e.V (2018) Öffentliche Konsultation für juristische Personen zu Falschmeldungen (Fake News) und online verbreiteten Desinformationen. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51117. Accessed 9/5/2020.

ADF International (2018) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51102. Accessed 9/5/2020.

Wirtschaftskammer Österreich (WKÖ) (2018) Öffentliche Konsultation für juristische Personen zu Falschmeldungen (Fake News) und online verbreiteten Desinformationen. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51092. Accessed 9/5/2020.

Swedish Union of Journalists (2017) Public consultation for legal entities on fake news and online disinformation. http://ec.europa.eu/newsroom/dae/document.cfm?doc_id=51228. Accessed 9/5/2020.

10.3 Frame Analysis:

10.3.1 Methodology: Detailed operationalisation of hypotheses

To determine the *severity* of the problem – as perceived by stakeholders – the answers to questions 2 and 8 are analysed, referring to “harm to society” and to “impact on public opinion”:

- q2** *Are the following categories of fake news likely to cause harm to society? Please answer on a scale from 1 to 4: 1 (no harm), 2 (not likely), 3 (likely) to 4 (highly likely).*
- q8** *In your view, has public opinion been impacted by fake news in the following areas during the last two years? Please for each area use a scale from 1 to 4: 1 (no impact), 2 (some impact), 3 (substantial impact) to 4 (strong impact).*

Since these are not open questions but present the participant with multiple choice in order to differentiate degrees of severity for different categories concerned, it was decided to calculate a ratio⁶⁷ that would help categorizing stakeholders accordingly. A ratio of 0-2,0 indicated low severity while anything above that value (2,1-4,0) indicated high severity.

Furthermore, the frame element of *moral evaluation* served to indicate severity; in order to identify if the issue of online disinformation was judged particularly harmful, the following open questions⁶⁸ were additionally considered:

- q2** *In your opinion, which criteria should be used to define fake news for the purposes of scoping the problem?*
- q15** *Do you think that more should be done to reduce the spread of disinformation online? (...) You are welcome to comment on what should be done to reduce the spread of disinformation online.*
- q23** *Please provide any comment and/or link to research that you consider useful to bring to the Commission attention.*

This was especially relevant in case the answers to Q2 and Q8 were non-conclusive because participants had “no opinion” on the matter.

To identify *causes* to the policy problem and causal frames, the questions 4 to 6 were analysed, evaluating significant factors, sources and processes involved with the process of online disinformation:

- q4** *In your opinion, what are the main economic, social and technology-related factors which, in the current news media landscape, contribute to the increasing spread of fake news? For instance, you can address reading behaviour, advertising revenues, the changing role of journalists and/or the impact of sponsored articles.*
- q5** *In which media do you most commonly come across fake news? Select the most relevant options.*⁶⁹

⁶⁷ In order to calculate the ration, the singular degrees (per category, e.g., “aimed at influencing health policies” or “aimed at influencing voting decisions and elections”) were added up and then divided by the number of categories; if participants had no opinion on a certain category (“no opinion”), this would be left out of both steps of the calculation.

⁶⁸ These questions were also considered when looking for frame elements of cause and remedy.

⁶⁹ Not an open question; for the range of options see Annex 10.1

q6 *Indicate which of the following dissemination mechanisms, in your opinion, have the highest impact on the spread of fake news in the EU? Select the most relevant options.⁷⁰*

Lastly, *remedies* to the problem as suggested by public consultation participants were operationalised via question 15:

q15 *Do you think that more should be done to reduce the spread of disinformation online? (...) You are welcome to comment on what should be done to reduce the spread of disinformation online.*

In addition to that, the questions 16, 18, 20, 21 and 22 were subsequently considered in case the answers to question 15 were not substantial enough and in order to establish the respondent's preference with regard to who should be in charge of solving the problem (platforms, media, civil society organisations or the government):

q16 *In your view, which measures could online platforms take in order to improve users' access to reliable information and prevent the spread of disinformation online?*

q18 *In your view, which measures could news media organisations take in order to improve the reach of reliable information and prevent the spread of disinformation online?*

q20 *In your view, which measures could civil society organisations take in order to support reliable information and prevent the spread of disinformation online?*

q22 *What actions, if any, should be taken by public authorities to counter the spread of fake news, and at what level (global, EU, national/regional) should such actions be taken?*

In view of the second half of the hypothesis, referring to secondary aspects of belief systems, the questions 10, 17, 19 and 21 provide for a basis to identify preferences regarding specific tools that should be used to solve or mitigate said problem:

q10 *To what extent, if at all, have the following measures reduced the spread of fake news? Please evaluate each of the following statements on a scale from 1 to 4; 1 (no contribution), 2 (minor contribution), 3 (appreciable contribution), 4 (great contribution).*

q17 *How effective would the following measures by online platforms be in preventing the spread of disinformation? Please evaluate each action on a scale from 1 to 4; 1 (no impact), 2 (low impact), 3 (moderate impact), 4 (strong impact).*

q19 *How effective would the following measures by news media organisations be in strengthening reliable information and tackling fake news? Please evaluate each actions on a scale from 1 to 4; 1 (no impact), 2 (low impact), 3 (moderate impact), 4 (strong impact).*

q21 *How do you rate the added value of an independent observatory/website (linking platforms, news media organisations and fact-checking organisations) to track disinformation and emerging fake narratives, improve debunking and facilitate the exposure of different sources of information online? Please evaluate each of the following statements on a scale from 1 to 4; 1 (strongly disagree), 2 (disagree), 3 (agree), 4 (strongly agree). If you find it useful, you can voice suggestions for independence hereunder - e.g., academic supervision, community-based structures or a hybrid such as Wikipedia.⁷¹*

⁷⁰ Cf. Footnote 41.

⁷¹ Not an open question.

10.3.2 Identified frame elements

1	Deep core				Organisations (Reference-ID)		
1	Dem	Democracy					
1	Pub	Public					
1	Pub	1	Public debate				
1	Pub	1	1	Political advertisement online under scrutiny			
1	Pub	1	2	Undue influence on public discourse or public opinion			
1	Pub	2	Public interest				
1	Pub	2	1	Consumer protection, consumer interest			
1	Pub	3	Fundamental rights				
1	Pub	3	1	Freedom of expression			
1	Pub	3	1	1	Legitimate limits to		
1	Pub	3	1	2	No ministries of truth		
1	Med	Media					
1	Med	3	Social responsibility				
1	Med	3	1	Gatekeeping Function			
1	Med	3	2	Agenda setting			
1	Med	3	3	News Media as watchdogs			
1	Med	3	4	Platform as news media organisations with significant impact			
1	ICit	Informed citizenry					
1	ICit	1	Freedom of information				
1	PCul	Political culture					
1	PCul	1	National specificities				
1	PCul	2	Context sensitivity, need for nuance				
1	IVal	Internet values					
1	IVal	1	Data protection				
1	IVal	2	Open access				
1	IVal	3	Inclusivity				
1	IVal	4	Diversity				
1	IVal	5	Net neutrality				
1	MVal	Media values					
1	MVal	1	Plurality				
1	MVal	2	Diversity				
1	MVal	3	Freedom				
1	MVal	4	Independence				
1	MVal	4	1	Editorial independence			
1	MVal	5	PSM values				
1	MVal	5	1	Universal provision			
1	MVal	5	1	General interest content			
1	JVal	Journalism values					
1	JVal	1	Professional standards, Code of conduct, ethics				
1	JVal	1	1	Integrity of content, authenticity of content			
1	JVal	1	2	(internal) Verification of information prior to publication			
1	JVal	1	3	Accountability and responsibility			
1	JVal	1	3	1	Duty of accuracy		
1	JVal	1	3	2	Public correction		
1	JVal	1	3	3	Editorial liability		
1	JVal	2	The role of quality journalism (as opposed to non-quality)				
1	JVal	2	1	Training			
1	JVal	2	2	Trust in journalistic brands, consumer loyalty			
1	JVal	2	3	Trust into specific formats or types of news media			
1	RPol	Research					
1	RPol	1	Necessary basis for policy				
1	RPol	2	Autonomy of research				

2	Policy Core					Organisations (Reference-ID)
2	Pro	Problem				
2	Pro	1	Issue vs. non-issue			
2	Pro	1	1	Yes		
2	Pro	1	1	1	Criteria	
2	Pro	1	1	1	1	Intent
2	Pro	1	1	1	2	For economic or political gain
2	Pro	1	1	1	3	Imitation of news content
2	Pro	1	1	2	Symptoms	
2	Pro	1	1	2	1	Filter bubble
2	Pro	1	1	2	2	Hate speech online
2	Pro	1	2	No		
2	Pro	1	3	We cannot say		
2	Pro	1	3	1	Lack of scientific evidence to support	
2	Pro	1	3	2	Problem of definition	
2	Pro	1	3	2	1	Complexity
2	Pro	1	3	2	2	Spectrum
2	Pro	1	3	2	3	Too broad
2	Pro	1	3	2	4	As a matter of actual exposure
2	Pro	1	3	3	Factual harm needs to be proven	
2	Pro	1	3	4	Fake news as merely the symptom of a broader problem	
2	Pro	1	3	4	1	Factchecking not as a sustainable solution to the cause
2	Pro	2	The phenomenon is not new			
2	Pro	2	1	Therefore, no point regulating it		
2	Pro	2	2	Difference: pace and volume of disinformation		
2	Pro	2	2	1	Information disorder: the online media ecosystem is flawed	
2	Pro	2	2	2	Volume of information, information pollution, ubiquity of info	
2	Pro	2	2	2	1	Ubiquity of technology
2	Pro	2	3	Fake news in an offline environment		
2	Pro	2	3	1	Inaccurate or unprofessional journalism	
2	Pro	2	3	1	1	Sensationalism, Infotainment, Framing
2	Pro	2	3	2	Media ownership concentration, opaque ownership structures	
2	Pro	2	3	3	In politics: politicians as spreaders	
2	Pro	2	3	4	In advertising: advertorial, sponsored content	
2	Pro	2	4	Natural reading and consumption behaviour, i.e. preference for content		
2	Pro	2	4	1	Reference to neuroscience, behavioural psychology etc.	
2	Pro	3	The cure cannot be worse than the disease			
2	Pro	3	1	Risk of censorship		
2	Pro	3	1	1	Over-blocking or over-removal of content	
2	Pro	3	1	2	Who's in charge of defining truth?	
2	Pro	1	1	3	Unduly restricted public debate	
2	Pro	3	2	Rule of law issues in EU member states		
2	Pro	3	2	1	PSM as a tool for state propaganda	
2	Pro	3	2	2	State interference, tackling disinformation as a tool for propaganda	
2	Pro	3	3	Partiality/independence of factchecking and research		
2	Pro	3	4	Proportionate policy responses		
2	Pro	3	5	Upholding anonymity online		
2	Pro	4	Reference to the policy maker			
2	Pro	4	1	Positive		
2	Pro	4	1	1	Coordinated efforts	
2	Pro	4	1	2	Taking initiative	
2	Pro	4	2	Negative		
2	Pro	4	2	1	Criticizing the formulation in pub con	
2	Pro	4	2	2	Competence questions arise	

2	Cau	Cause						
2	Cau	1	Economic cause					
2	Cau	1	1	Platform business model				
2	Cau	1	1	1	Attention economy, economic incentives to disinfo			
2	Cau	1	1	1	1	Interaction with content, maximizing traffic		
2	Cau	1	1	1	2	Simplification, sensationalism, conflict		
2	Cau	1	1	1	3	Monetization of user generated content		
2	Cau	1	1	2	Advertising			
2	Cau	1	1	2	1	e.g., clickbait		
2	Cau	1	1	2	2	Targeted advertising based on data reinforcing bubbles		
2	Cau	1	1	3	Platforms indifferent towards content they host			
2	Cau	1	2	Platform power, monopoly, market share				
2	Cau	1	2	1	Competitive advantage by volume of assembled data			
2	Cau	1	2	2	Network effects, platform ecosystem			
2	Cau	1	2	3	Self-preferencing			
2	Cau	1	3	Viability of traditional news media				
2	Cau	1	3	1	Digital advertisement value chain interrupted			
2	Cau	1	3	2	Over-reliance on advertisement			
2	Cau	1	3	3	Subscription based models			
2	Cau	2	Technological cause					
2	Cau	2	1	Data				
2	Cau	2	1	1	Surveillance, tracking			
2	Cau	2	1	2	Algorithmic curation			
2	Cau	2	1	2	1	New potency of advertisement online		
2	Cau	2	2	Modified user behaviour				
2	Cau	2	2	1	Altered quality/practice of consuming, communicating, thinking			
2	Cau	2	2	2	Social media as growing source for information			
2	Cau	2	2	3	Relationship consumer to media product: less loyalty, less trust			
2	Cau	2	2	4	Linear vs. interactive media consumption			
2	Cau	2	3	Facilitation of content creation and dissemination				
2	Cau	2	3	1	Speed and volume			
2	Cau	2	3	2	Platform Reach			
2	Cau	2	3	3	Ubiquity of information			
2	Cau	2	3	4	Bots, fake accounts			
2	Cau	2	3	6	Anonymity of culprits			
2	Cau	3	Social cause					
2	Cau	3	1	Climate of mistrust				
2	Cau	3	1	1	Disillusionment with traditional news outlets			
2	Cau	3	1	2	Politicians failing to address, or even exploiting			
2	Cau	3	1	3	Elite attitude of contempt reinforcing populism			
2	Cau	3	1	4	Truth decay, post truth			
2	Cau	3	1	5	Poverty and social inequality			
2	Cau	3	2	Lack of media and information literacy				
2	Cau	3	2	1	Critical assessment of information and sources			
2	Cau	3	2	2	The audience generally wants simplistic information			
2	Cau	3	3	Significance of A-V content when accessing info				
2	Cau	4	Political cause					
2	Cau	4	1	Disinformation as a tool for political campaigning				
2	Cau	4	1	1	Foreign interference			
2	Cau	4	1	2	Internally			
2	Cau	4	2	Lack of regulatory framework for online platforms				
2	Cau	4	2	1	Convergence			
2	Cau	4	2	1	1	Challenges of the multiplatform age		

2	Rem	Remedy					
2	Rem	1	Who's in charge?				
2	Rem	1	1	Platform			
2	Rem	1	1	1	Monitor content		
2	Rem	1	1	2	Change user interface		
2	Rem	1	1	3	Complaint mechanisms		
2	Rem	1	1	4	Publication of corrections		
2	Rem	1	1	5	Transparency towards businesses, academia, users		
2	Rem	1	2	News media			
2	Rem	1	2	1	Comply with stricter standards		
2	Rem	1	2	2	Do not adhere to the same logic and practice of online advertising		
2	Rem	1	2	3	Admit errors		
2	Rem	1	2	4	Diversify income structure		
2	Rem	1	3	Civil Society			
2	Rem	1	3	1	Provide fact checking organisations		
2	Rem	1	3	2	Media and information literacy initiatives		
2	Rem	1	4	State			
2	Rem	1	4	1	Educate and sensitise		
2	Rem	1	4	2	Fund relevant civil society projects		
2	Rem	1	4	3	Coordinate and cooperate on several levels of governance		
2	Rem	1	5	User			
2	Rem	1	5	1	Critically assess		
2	Rem	2	Options				
2	Rem	2	1	Regulate platform business model			
2	Rem	2	1	1	Enforce transparency		
2	Rem	2	1	2	Change liability of online platforms		
2	Rem	2	1	3	Enhance data protection and e-Privacy		
2	Rem	2	1	4	Alter platform to business practice		
2	Rem	2	1	5	Support fact checking & third party oversight		
2	Rem	2	2	Modify online journalism			
2	Rem	2	2	1	Referencing and source indication linked		
2	Rem	2	2	2	Differentiate reporting from opinion pieces		
2	Rem	2	2	3	Support fact checking & third party oversight		
2	Rem	2	3	Support the online media ecosystem (and/or online journ.)			
2	Rem	2	3	1	Enhance financial viability of legacy media		
2	Rem	2	3	2	Regulate platform to media relationship (transparency, priority)		
2	Rem	2	3	3	Improve the situation of journalists		
2	Rem	2	3	4	Secure public service media		
2	Rem	2	4	Regulate Content			
2	Rem	2	4	1	Content ranking		
2	Rem	2	4	2	Content labelling		
2	Rem	2	4	3	Debunking		
2	Rem	2	4	4	Content removal		
2	Rem	2	4	5	Content moderation		
2	Rem	2	4	6	Removal or ban of certain accounts		
2	Rem	2	4	7	via algorithmic tweaks, e.g., diversify		
2	Rem	2	5	Empower the user or consumer			
2	Rem	2	5	1	Reinforce critical assessment of information		
2	Rem	2	5	2	Educate		
2	Rem	2	5	3	Enhance user autonomy (room for user choice)		
2	Rem	2	6	Coordinate efforts			
2	Rem	2	6	1	Internationally, EU-wide, globally		
2	Rem	2	6	2	External supervisory or regulatory body		
2	Rem	2	6	3	Pooling of information and research		
2	Rem	2	7	Other			
2	Rem	3	New vs. existing legislative tools, hard vs. soft law				
2	Rem	3	1	New			
2	Rem	3	1	1	Hard law		

2	Cau	3	1	1	1	Competition	
2	Cau	3	1	1	1	Libel and defamation law	
2	Rem	3	1	2		Soft law	
2	Cau	3	1	2	1	Self-regulation, best practice	
2	Cau	3	1	2	2	Co-regulation, e.g., hybrid systems	
2	Rem	3	2			Existing	
2	Rem	3	2	1		Enforce	
2	Rem	3	2	2		Harmonise and/or coordinate	
2	Rem	3	2	3		Illegal vs. legal content	
2	Rem	4				Holistic vs. simplistic remedies	
2	Rem	4	1			Holistic	
2	Rem	4	2			Simplistic	