

# **STRENGTHING FACTCHECKING ACROSS THE EUROPEAN UNION (ERGA REPORT)**



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## EXECUTIVE SUMMARY

In May 2020 [the European Regulators Group for Audiovisual Media Services](#) (ERGA) published [its assessment](#)<sup>1</sup> of the implementation and effectiveness of The [Code of Practice on Disinformation](#) (The Code). This concluded that the Code should be regarded as an important step in the process of building a new relationship between its signatories, the European Union (EU) and National Audiovisual Regulators. However, ERGA also identified significant weaknesses in the Code that need to be addressed if it is to achieve its objectives. These related to expanding the Codes commitments, improved monitoring and exploring new (more effective) tools to counter disinformation. One of the tools identified for review was strengthening the relationship between factcheckers and platforms as factchecking was identified in the Code as one of the mechanisms to combat disinformation.

In 2020 ERGA established a workstream to address this issue and this report presents the outcomes of this activity. The first step in this process was to gather more detailed information on the factchecking infrastructure across the EU. A survey was circulated to active factcheckers by ERGA members and 31 responses covering 22 countries were submitted. These were analysed and a series of 8 recommendations were developed.

A draft version of the recommendations was presented to stakeholders at a workshop on October 19<sup>th</sup>, 2020 where they were generally endorsed as balanced and comprehensive. Stakeholder feedback also suggested that the recommendations present an accurate picture of the scale and scope of the challenges that need to be addressed in order to establish a factchecking infrastructure that can effectively contribute to the fight against disinformation in Europe. It was also noted that the recommendations are high level and require further elaboration and clarification. A final version of the recommendations emerging from this process is presented below.

1. *Factchecking should be extended to all major platforms, including video- sharing platforms and platforms offering messenger services.*
2. *The possibility of extending factchecking to all types and sources of potential disinformation, including advertising should be considered.*
3. *Platforms and factcheckers need to be more transparent in relation to all aspects of their factchecking operations.*
4. *The editorial freedom and independence of factcheckers should be protected.*
5. *Factchecking is under resourced across the EU and this means that it is not an effective response to disinformation. Most factcheckers are operating in a precarious position (insufficient funding, burnout, risk of online and offline abuse) and the current model may not be sustainable. Adequate resourcing of factchecking activities is a crucial element in the battle against disinformation.*

<sup>1</sup> <https://erga-online.eu/wp-content/uploads/2020/05/ERGA-2019-report-published-2020-LQ.pdf>

6. *Labelling is preferred over the removal of false content however removal may be necessary in exceptional cases e.g. illegal content or statements that present a serious risk to human life or health. Some common labelling standards are desirable.*
7. *The current accreditation system is effective and widely accepted by the factchecking community. However new accreditation models should be investigated and tested in order to increase the opportunities for the growth of fact-checking activities in Europe.*
8. *Some common standards are required regarding the notion of factchecking and a factchecked item.*

The value of ERGA's contribution to the evaluation of the Code of Practice on Disinformation was highlighted by the EU Commission in this process. ERGA's contribution is a useful reference point in considering feedback from the signatories to the Code about how they believe the Code can be improved. The ERGA recommendation that a Co-regulatory framework is required to address the weaknesses in the Code identified to date was again noted. It was suggested that these recommendations in relation to strengthening factchecking could also be applied more broadly to other aspects of the Code e.g. harmonisation of processes, harmonisation of definitions and data access. These all required further discussion and debate.

ERGA recognises the value of information exchange with other regulators, NGO's and the Council of Europe who are also active in this space. The global nature of the challenges means such an approach is essential to effective action. In this context ERGA particularly welcomes the inclusion of support for fact-checking in [European Digital Media Observatory's](#) (EDMO) immediate action plan. ERGA looks forward to co-operating with EDMO in relation to this and other initiatives to combat disinformation.



# 1. INTRODUCTION

In May 2020 ERGA published [its assessment](#)<sup>2</sup> of the implementation and effectiveness of the [Code of Practice in Disinformation](#) (The Code). This concluded that the Code should be regarded as an important step in the process of building a new relationship between its signatories, the EU, and National AV Regulators. Nevertheless, the work carried out by ERGA in 2019 indicated that the Code has significant weaknesses that need to be addressed if it is to achieve its objectives. ERGA committed to a number of actions in the Report and work on these is ongoing. These actions included exploring if guidelines would strengthen the relationship between factcheckers and platforms as factchecking is one of the mechanisms to combat disinformation identified in the Code. The first step in this process was to gather more detailed information on the factchecking infrastructure across the EU and based on this information develop recommendations to strengthen factchecking across the EU.

**Section 2** sets out the outcomes of the primary research on the current position in relation to factchecking infrastructure across Europe. This is based on 31 responses that were received from 22 countries, including 2 outside the EU<sup>3</sup>. No active factcheckers were identified in 4 countries (Bulgaria, Cyprus, Hungary and Luxembourg).

**Section 3** sets out the draft conclusions and recommendations that emerged from the primary research presented at Section 2.

In order, to provide an opportunity for a broader range of stakeholders to input into this process, a workshop to discuss draft conclusions and recommendations was convened on October 19th, 2020. Participants at the workshop included Factcheckers, Video Sharing Platforms, the EU Commission, ERGA members, The European Digital Media Observatory and [The European Platform for Regulatory Authorities. Full Fact](#),<sup>4</sup> a UK based independent factchecking organisation and other interested third parties including academics and the [Australian Communications and Media Authority \(ACMA\)](#) were also present. Participants were asked to address two questions as outlined below.

1. What is your view of the findings and recommendations?
2. What action can be taken to address these – particularly in the context of the evolution of the Code of Practice on Disinformation?

There was also an opportunity to provide written comments before October 26<sup>th</sup>. The outcomes of the workshop are presented in **Section 4**.

<sup>2</sup> <https://erga-online.eu/wp-content/uploads/2020/05/ERGA-2019-report-published-2020-LQ.pdf>

<sup>3</sup> Belgium, Bulgaria, Croatia, Cyprus, Czechia, Estonia, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Luxembourg, Norway, Poland, Portugal, Slovakia, Slovenia, Sweden, Switzerland, The Netherlands

<sup>4</sup> <https://fullfact.org/>

## 2. DATA COLLECTION AND RESULTS

A questionnaire was sent to factchecking organisations by ERGA members in July 2020 and 31 responses were received covering 22 countries (including 2 outside the EU)<sup>5</sup>. No active factcheckers were identified in 4 countries<sup>6</sup> and no responses were received from the remaining Member which indicates that there are probably no active Factcheckers in these countries. If this is the case, then there are no factcheckers in 33% of the 27 Member States.

12 of the Factcheckers who responded are members of the International Fact Checking Network (IFCN) and one also a member of SEE Check (a network of fact checking organisations in the SEE region). 1 of the respondents is a member of the European Broadcasting Union (EBU) Fact Checking Network. 12 of the respondents are not members of any Fact Checking Network however 2 of these are planning to join the IFCN. It should also be noted that one factchecking organisation stated they had an affiliation with the ZINC Network (an info security organisation) while a second noted it is a member of the SOMA/Beacon Project Networks<sup>7</sup>.

While most of the factcheckers are newly established, there are some that have been operational for several years. Two of the respondents have two separate operational arms, one relating to political claims and another focusing on disinformation. The material generated through the questionnaire is set out below under fifteen headings that broadly correspond to the different elements covered by the questionnaire.

### 2.1. ACCREDITATION PROCEDURE AND THE ROLE OF THE EUROPEAN DIGITAL MEDIA OBSERVATORY

Little information was provided about why a factchecker opted for IFCN accreditation. It appears that membership is seen as an opportunity for better cooperation, access to additional factchecking tools and recognition of the quality of the factchecking activity. Some answers also suggest that an additional motivation to join the IFCN network is because IFCN accreditation is a requirement for membership of the Facebook Third Party Fact Checking Program.

There seems to be a consensus among the IFCN members that the current IFCN accreditation system works satisfactorily. It is noted that it applies high standards that are regularly reviewed and widely accepted by the factchecking community.

As regards the possible involvement of EDMO in the accreditation process, some IFCN members believe that this is unnecessary and that it would create confusion. Several of the respondents also raise concerns about EDMO's links with the political institutions and underline that its involvement in the accreditation procedure could make the factchecking organisations look biased and politically manipulated. Respondents also stated that the recognition of any

<sup>5</sup> Belgium, Bulgaria, Croatia, Cyprus, Czechia, Estonia, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Luxembourg, Norway, Poland, Portugal, Slovakia, Slovenia, Sweden, Switzerland, The Netherlands

<sup>6</sup> Bulgaria, Cyprus, Hungary and Luxembourg

<sup>7</sup> <https://www.disinfobservatory.org/webinar-on-fact-checking-practices-during-the-information-pandemic/>

accreditation system by the factchecking community depends on its practical usefulness and the added value that it can offer to factcheckers. For example, it could be useful if the platforms were officially advised to sign contracts with such accredited factcheckers or if such accreditation offered some protection against threats of legal action that many factcheckers often face. There are some IFCN members that adopt a more nuanced position and conclude that it may be best to wait to review any proposed model of cooperation and any contribution that an additional accreditation system could have to the current relationship between factcheckers and the IFCN. It is nevertheless argued that factcheckers would prefer to be evaluated and accredited by their peers.

It should be highlighted that some factcheckers that are not accredited by the IFCN were more positive about the possibility of a role for EDMO noting that it could provide additional opportunities for international cooperation and allow factcheckers that operate as freelancers to acquire official accreditation.

## 2.2. RELATIONSHIPS WITH THE PLATFORMS

Ten of the respondents who are members of the IFCN have a formal relationship with Facebook due to their membership of its [Third Party Fact Checking Program](#). While limited information was provided about the financial details of these agreements, it appears that factcheckers are paid according to the number of the items that they factchecked with the possibility of bonus payments based on monthly targets. Regarding the conditions attached to these agreements, some respondents state that they maintain full editorial independence in relation to the items selected for factchecking. It was also noted that political statements are excluded from factchecking under these agreements. One of the respondents criticised this limitation on political speech and highlighted that this limits the revenue earned under the Fact Checking Program. Another respondent expressed the opposite view and supported the exclusion of political statements.

One of the IFCN members also has a formal relationship with WhatsApp and uses a dedicated number via the app to promote factchecked material and collect alerts from the users through a dedicated chat box. The factchecker maintains full editorial independence over its activities.

One of the respondents stressed the need to create a contractual relationship between factcheckers and YouTube, arguing that the latter is currently the most important source of disinformation and it is not covered by any agreements.

With regards to the respondents that do not have IFCN accreditation, none of these factcheckers reported the existence of a formal relationship with any platform. However, two of those factcheckers note that they share the Facebook tools and funding, though a sister company that has been accredited by the IFCN.

## 2.3. ANNUAL INCOME AND EXPENDITURE

No clear picture about the annual income and expenditure of Factcheckers emerged from the research. Some provided no information while others referred only to their income or their expenditure. In other instances, figures were provided without context making it difficult to generate a clear picture beyond the view that the sector is not adequately or evenly resourced given that the reported annual income varies from €0 to €1m with expenditure varying from €50k to €300k.

Some factcheckers are a small part of a larger company and receive funding from the parent company. Some reported no external funding while others receive some funding from project grants and European funds. Other stated that their only income source is the Facebook Third Party Fact Checking Program.

## 2.4. OPERATION UNDER GUIDELINES AND CODE OF PRACTICES

All IFCN members operate under the IFCN Code of Principles. Most of them also refer to their own Code of Practice and their national codes of ethics. Fact checkers that are not accredited by the IFCN mention the national press code of conduct and their internal factchecking guidelines. Not all respondents answered this question.

## 2.5. NUMBER OF ITEMS FACTCHECKED

Most respondents reported a significant increase in the number of factchecked items in the first half of 2020, compared to 2019, and this is primarily linked to disinformation about the COVID 19 pandemic. These factchecks amount for approximately 80% of all factchecks conducted in the relevant period. The number of items factchecked last year ranged from 7 to 1200, while the relevant number of factchecks in the first half of 2020 ranges from 2 to 750. The number of items factchecked in the same period in relation to COVID 19 ranges from 1 to 580. Surprisingly, factchecking organisations in some smaller countries reported a larger number of factchecked items than those established in the larger countries.

## 2.6. IDENTIFICATION OF ITEMS FOR FACTCHECKING

A mixed picture emerges regarding how items for factchecking are selected. It appears that most respondents rely on their own editorial teams and on referrals from the public. Two organisations report that their own teams select all items for review. Two other organisations report that items are selected primarily based on external complaints supplemented by their own monitoring of the web. One respondent reported that political statements are selected for factchecking exclusively by its own team, while general items are based entirely on public referrals. References by the platforms and consumer associations are also mentioned by some organisations while some respondents mention the use of other methods and specialized search tools. Only four organisations state that they examine claims referred by the government and other such official sources. Interestingly for one factchecker this is the only method used to identify items for factchecking.



## 2.7. PRIORITISATION CRITERIA

Most respondents reported that items are prioritized based on the virality and reach, its relevance for public debate and its potential to cause harm. The number of public complaints, its rating based on internal metrics and platform ranking are also important factors. Certain respondents also note that feasibility and resources also impact on decisions about whether to factcheck an item. For one organisation, the recurrence of an item that has already been factchecked is also a factor. In some instances, political claims are also a criterion for prioritization and in such instances there is a particular focus on the protection of electoral integrity and the need to ensure that statements from all political parties are examined. One of the respondents refers specifically to prioritization of health claims and statements that target specific groups in society.

## 2.8. PROCEDURE AFTER THE FACTCHECKING OF AN ITEM

Most respondents report that they publish factchecks on their website and one notes that it also posts them on its social media accounts. Some respondents report that they label the factchecked item as fake/disinformation. Organisations that are members of the Facebook Third Party Fact Checking Program state that items identified as requiring amendment or labelling are uploaded via a specific Facebook tool and these items are subsequently overlaid with the relevant label. The item is not removed but users are asked to click through if they wish to continue reading it. It is reported that this leads to a substantial reduction in the reach of the factchecked items. One of the members of the Facebook programme specifically notes that it supports labelling rather than the removal of factchecked items. It believes that removal of a factchecked item would reduce the opportunity to inform the public about misleading content and believes labelling is crucial in raising awareness around misinformation and helps support the fight against disinformation. This is important, because if content is not illegal and does not go against platforms' rules the removal could put freedom of speech at risk. One of the respondents notes though that Facebook has removed some of the misleading content relating to COVID 19. This is not surprising as Facebook has made clear in [March 2020](#) that it is removing COVID related content that could contribute to imminent physical harm.

Very little information is provided on how platforms other than Facebook respond to factchecked items. Some of the organisations that are not part of the Facebook programme underline that no specific action is ever taken by the platforms. One of the respondents refers specifically to Google and notes that all its published factchecks are registered through the Claim Review Scheme. Sometimes, the item is labelled as factchecked in the search results connected to it. The same respondent also refers to its formal cooperation with WhatsApp and notes that because of the particular features of that application users need to proactively engage with it to find out about factchecked items.'

## 2.9. PUBLICATION OF ACTIVITY REPORTS

Most respondents state that they do not publish reports on their factchecking activities. It also appears that some of the organisations that mention the publication of activity reports refer to their online published factchecks.

## 2.10. INFORMATION TO COMPLAINANTS AFTER THE COMPLETION OF THE FACTCHECK

Most respondents do not normally inform complainants about the outcome of their complaint. Some report that such information is only provided in exceptional cases while others occasionally use informal channels (social media) to respond. Only seven organisations regularly provide outcome information to those who highlighted an item for factchecking.

## 2.11. INTERACTION WITH THE PUBLIC AND OTHER STAKEHOLDERS AFTER FLAGGING

Members of the Facebook Third Party Fact Checking Program note the existence of a formal complaint and review procedure on Facebook for those whose posts have been flagged as containing misleading information. The publisher receives a notification from the platform that their post has been factchecked. Sometimes, the publisher in question, amends the content and the revised version is reviewed by the factchecker. If the factchecker changes its rating, the platform is informed, and the item is unflagged. Facebook collects monthly reports from organisations on the scale of such requests. One of the respondents notes that it has frequent interaction with the publishers after flagging and that it may change the content rating if solid arguments are presented. In such instances the rationale is presented to the platforms and the public. Another respondent underlines the problem of repeat offenders. These revise their misleading information as soon as it is flagged to have it unlocked by the platform but do not necessarily make similar adjustments to other posts. Another organisation states that it always seeks response from the publisher during and following the factchecking process.

Organisations that are not members of the Facebook Third Party Fact Checking Program mention very little interaction after factchecking with the publisher and the platforms. One of them argues that people spreading misinformation are not usually interested in factchecking. Another one notes that people can comment on its factchecks and these comments are visible online at the end of the relevant article.

## 2.12. REPORTS AND FEEDBACK FROM PLATFORMS

There seems to be very little feedback in relation to the action taken by the platforms following completed factchecks as only five respondents mentioned such interaction. Facebook provides factcheckers that are members to its Third Part Fact Checking Program with generic quantitative information concerning the impact of factchecking activity, but this does not give breakdowns for each individual organisation. Nevertheless, it presents general conclusions about the reduction of the reach of material published on that platform after it has been flagged. It appears that no feedback is formally received from any other platform.

## 2.13. ACTIONS TAKEN BY PLATFORMS TO PROMOTE AUTHORITATIVE SOURCES OF INFORMATION

Very little information was provided by the factcheckers in response to this section of the questionnaire. Four organisations refer to the Facebook Third Party Fact Checking Program noting that this may eventually lead to the removal of pages that have been flagged. As noted in 2.8 above this is not surprising as Facebook has made clear in [March 2020](#) that it is removing COVID related content that could contribute to imminent physical harm. One respondent noted the [Claim Review plugin](#) used by Google to promote factchecked content.

## 2.14. PROPOSALS AND PRIORITIES BY FACTCHECKERS

At a more general level, one of the respondents suggests that it would be very challenging to prepare standard guidelines covering all platforms however they believe that platforms might be open to adopting a standard set of definitions and labels. It also advises against legislative action about content verification and specifically about the assessment of content truthfulness.

Four of the respondents underline the need to guarantee editorial freedom and independence for factcheckers especially regarding the choice and prioritization of items. One organisation notes that guidelines should focus on promoting the work done by factcheckers and reinforce their independence. One respondent specifically states that platform metrics should not impact factcheckers editorial independence. The importance of focusing on the virality and reach of misinformation as selection criteria in any guidelines was also noted. The danger of focusing on volume of factchecked items was highlighted as this could incentivize a focus on less contentious and potentially less harmful content.

Several respondents note that all major platforms should support factchecking of all posted content especially through the establishment of contractual agreements with factcheckers. One respondent argues that self-regulation by the platforms results in inconsistency of applying appropriate measures to tackle disinformation. Another respondent notes that the spread of disinformation through messenger applications needs to be addressed urgently. Two other organisations specifically underline the need for video sharing platforms to be included in the factchecking of the material on their platforms. One of these organisations refers particularly to YouTube and believes it should implement a policy like the Facebook Third Party Fact Checking Program. It argues that some publishers (of disinformation/misinformation) have left Facebook due to the impact that its factchecking scheme has on the accessibility of their content and are now relying on YouTube as their main channel for spreading disinformation/misinformation. If this is the case, then the lack of effective factchecking schemes on some platforms not only supports the spread of disinformation but could present an unfair competitive advantage to these platforms. Further research is required here.

In the same vein, two of the respondents argued that the scope of the factchecking should be extended to all possible types of disinformation regardless of their sphere and source. Specific reference was made here to paid advertising and political statements, but there is no consensus

about whether political statements should be included. For example, one respondent argues strongly that political claims should be excluded. Two organisations underline the necessity to provide some guidelines on how to approach political issues and the verification of content referred to as political speech. In any case, it is apparent from the responses elsewhere that special considerations should apply to factchecking political statements in relation to areas such as the objectivity of the factchecker and the existence of a balanced approach in the selection of statements.

Two respondents argue that labelling should be preferred over the removal of disinformation as this supports free public discussion and prevents users from being referred to other platforms. It is accepted by the respondents that removal is necessary in certain circumstances such as illegal content or dangerous health claims.

Three respondents request greater transparency and feedback from the platforms, particularly regarding the quality of factchecking and its impact in tackling disinformation. Clearer evaluation and appeal procedures are also requested and more information about the notifications that users receive once an item has been flagged.

The need for platforms to provide financial funding to factcheckers and promote their work is highlighted in several submissions. One respondent states that funding could be linked to the use of its material by the relevant platform. The view is expressed that platforms are avoiding formal engagement with accredited factchecker but are benefiting from the work of factcheckers. This ecosystem is not sustainable. The need to protect factcheckers against online and physical harassment and threats of legal action linked to their work as a result is also raised. One respondent requests regulatory intervention, with a possible role for EDMO in this regard.

Another respondent argues for more effective sanctions against those found to be repeatedly spreading disinformation and believes the current approach by the platforms is not sufficient. Finally, the need for ERGA to engage with a broad range of stakeholders such as the IFCN to ensure coordinated action is also highlighted in the responses.

## 2.15. RECOMMENDED MODELS FOR GUIDELINES

Most respondents did not answer to this question. Others explicitly state that they are not aware of specific guidelines and examples that could be used as a model of best practice. Two organisations refer to the Facebook Third Party Fact Checking Program. Another one mentions the IFCN Code while a third refers to an [Opinion of the European Economic and Social Committee regarding the effects of campaigns on participation in political decision making](#).



### 3. DRAFT CONCLUSIONS AND RECOMMENDATIONS

Eight draft conclusions and recommendations have emerged from the research and these are presented below. Some elaboration is provided where relevant.

1. *Factchecking should be extended to all major platforms, including video sharing platforms and platforms offering messenger services.*

*The current situation is unsatisfactory because it increases the potential for disinformation to spread due to inconsistency in the operation and implementation of factchecking. Unfair competition issues could also arise as users can move to platforms that do not factcheck content.*

2. *The possibility of extending factchecking to all types and sources of potential disinformation, including advertising should be considered.*

It is noted that special considerations apply regarding factchecking political statements and views differ about how this should be approached.

3. *Platforms and factcheckers need to be more transparent in relation to all aspects of their factchecking operations.*

Platforms should publish detailed annual country reports containing specific information about the nature and impact of factchecking on their platforms and the actions taken. Factcheckers should also publish annual activity reports and should enhance their process for interaction with the public in relation to their operations.

4. *The editorial freedom and independence of factcheckers should be protected.*

*Factcheckers should in principle be allowed to use their own transparent prioritisation criteria to select the items for factchecking. However, the metrics provided by the platforms should also be considered since they can indicate the virality and reach of relevant items.*

5. *Factchecking is under resourced across the EU and this means that it is not an effective response to disinformation. Most factcheckers are operating in a precarious position (insufficient funding, burnout, risk of online and offline abuse) and the current model may not be sustainable. Adequate resourcing of factchecking activities is a crucial element in the battle against disinformation.*

Factcheckers should be paid any time a platform uses their work to flag an item as containing false information. A central fund supported by all major platforms to finance factchecking activities should be considered. Further consideration is required in relation to the process and criteria that would be applied to implement this recommendation.

- 6. Labelling is preferred over the removal of false content however removal may be necessary in exceptional cases e.g. illegal content or statements that present a serious risk to human life or health. Some common labelling standards are desirable.*

Labelling constitutes a more efficient and appropriate means of boosting public awareness and supports freedom of expression. However, removal should be an option in very exceptional cases e.g. illegal content or statements that present a serious risk to human life and/or health and fall clearly in the scope of platforms' transparent policies and terms of use. Some common labelling standards are desirable as is better co-ordination between platforms in highlighting factchecked items to users.

- 7. The current accreditation system is effective and widely accepted by the factchecking community. However new accreditation models should be investigated and tested in order to increase the opportunities for the growth of fact-checking activities in Europe.*
- 8. Some common standards are required regarding the notion of factchecking and a factchecked item.*

## 4. FEEDBACK FROM STAKEHOLDERS ON THE RECOMMENDATIONS

In order, to provide an opportunity for a broader range of stakeholders to input into this process, a workshop to discuss the draft conclusions and recommendations was convened on October 19<sup>th</sup>, 2020. Participants at the workshop included Factcheckers, Video Sharing Platforms, EU Commission, ERGA members, [European Digital Media Observatory](#) (EDMO) and the European Platform for Regulatory Authorities. Full Fact and other interested third parties including academics and the Australian Communications and Media Authority (ACMA) also attended. Participants were asked to address two questions as outlined below.

1. What is your view of the findings and recommendations?
2. What action can be taken to address these – particularly in the context of the evolution of the Code of Practice on Disinformation?

There was also an opportunity to provide written comments before October 26<sup>th</sup>. The outcomes of the workshop are presented below.

Overall, the stakeholders represented at the workshop endorsed the research as providing good baseline information on the position of fact checking across the EU. There was also general agreement that the recommendations are balanced and reflect the scale and scope of the challenges that need to be addressed in order to establish an effective factchecking infrastructure that can effectively contribute to the fight against disinformation. The recommendations are high level and require further elaboration and clarification. This requires the input of all stakeholders and the workshop was a good start in this regard.

It was noted that the signatories to the Code continue to develop, implement and review their own initiatives in relation to their supports for factchecking and factcheckers. However, these initiatives are determined by the individual platforms and are not co-ordinated or implanted evenly across the EU. Platforms expressed a commitment in principle to engage and further develop their activities in this area in the context of the evolution of the Code. It was noted that the platforms have different arrangements with different fact checkers and many of these are informal. The need for more formal partnerships between the platforms and the factcheckers was expressed as was the importance that these should respect the independence of factcheckers which is crucial. Issues in relation to privacy and the nature of user interactions need further consideration in the context of the recommendation to extend factchecking to messenger services. In addition, new arrangements between factcheckers and platforms would need to be developed to operationalise the recommendations in relation to reporting, complaints handling and resources

It was acknowledged that the issue of resourcing is also a critical issue that will require a more co-ordinated and effective response. Concern was expressed about the situation where some countries have no factcheckers and the lack of regional factcheckers in some bigger countries. The need to further develop and expand the infrastructure and supports for factchecking is urgent.

Transparency is a shared priority and the need to make improvements here is acknowledged by all stakeholders. The value of greater harmonisation in relation to processes for labelling, follow-up and reporting was highlighted. The question of the definition of fact checks was also raised as was the challenges of dealing with fact checks that are in a “grey area” (false or not) and “deep fakes”.

There is less agreement on how accreditation should be progressed. While there was strong support for the work of the IFCN, it was noted that not all factcheckers are part of this network. The possibility of developing an alternative based on principles that would reflect European values was raised as was a peer to peer accreditation system. A dialogue between standalone fact checking organisations and in-house fact checking teams could be promoted in order to establish such principals which would be validated by the fact checkers themselves. All such systems should ensure that the independence of factcheckers is protected. It was noted that further clarity would be useful about the role EDMO can play in strengthening factchecking. EDMO stated that it could provide resources to fact checkers such as mapping fact checking and establishing repositories for media literacy tools and research. However, the exact working programme is still evolving and needs to reflect available resources.

It was clarified following the workshop that the [European Digital Media Observatory](#) (EDMO) is planning to create a dedicated platform that factcheckers operational in the EU. EDMO will identify some membership criteria, but this is will not be an accreditation system as operated by the IFCN. ERGA supports such a development and believes that a Factcheckers Forum, created by EDMO could be a useful first step in this regard. This Forum could also support the development and implementation of initiatives to Strengthening Factchecking including those set out in this Report particularly in the context of the evolution of the Code of Practice. One such initiative could be the development of a virtual space where the public could access Factchecking Reports and factcheckers could be informed about, and review, the reports of other factcheckers. This could then inform action taken by platforms in relation to flagging or even the removal of content.

The value of ERGA’s contribution to the evaluation of the Code of Practice on Disinformation was highlighted by the EU Commission. ERGA’s contribution is a useful reference point in considering feedback from the signatories to the Code about how they believe the Code can be improved. The ERGA recommendation that a Co-regulatory framework is required to address the weaknesses in the Code identified to date was again noted. It was suggested that these recommendations in relation to strengthening factchecking could also be applied more broadly to other aspects of the Code e.g. harmonisation of processes, harmonisation of definitions and data access. These all required further discussion and debate

Finally, the value of information exchange and relevant co-operation with others outside the EU that are active in this area was also highlighted. Current relevant initiatives in the Council of Europe, by regulators in other jurisdictions such as Australia and at an NGO level e.g. Full Fact were highlighted. Given the global nature of the challenges and the players involved, ERGA needs to engage with such initiatives and share experiences.