

Second report on the hub activity in monitoring the implementation of the CoC and DSA in the region

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Executive summary

This second report related to CEDMO's Work Package 5 (WP5) presents the main findings on the monitoring of the Code of Conduct (CoC) on disinformation implementation in the CEDMO region, with a particular focus on platform disengagement, the role of Digital Services Coordinators (DSCs), and the persistent challenges related to data access already identified in previous reporting. The analysis draws on cross-cutting findings from the two most recent CEDMO summary notes ¹(October 2025 and April 2026), allowing for a comparative perspective on evolving trends. This report also builds on a strong engagement from an important number of experts and organisations operating in the region, whose contributions provide a detailed and grounded assessment of current practices.

The analysis focuses primarily on the role of Very Large Online Platforms (VLOPs), designated under the Digital Services Act (DSA), and their adherence to the voluntary commitments outlined in the Code. The DSA establishes a new binding regulatory framework for online platforms in the EU, with the Code of Conduct on disinformation providing a primary framework for VLOPs to demonstrate their efforts to address disinformation. Effective implementation of both is therefore critical for the resilience of Europe's information space.

¹ Concise analytical document that synthesises evidence from multiple sources to assess how the Code of Conduct on Disinformation is being implemented in the region. It brings together insights from platform reporting (notably VLOPs' biannual reports), consultations with stakeholders such as fact-checkers, researchers, and media literacy organisations, contributions from Digital Services Coordinators, and targeted surveys or expert inputs.



The report is structured to examine the key operational and governance challenges identified through stakeholder engagement and platform transparency biannual reporting:

- Data Access
- Platform Engagement and fact-checking
- Media and Information Literacy
- National level implementation challenges
- Generative AI as an emerging risk multiplier.



Introduction

According to a senior official from a national authority responsible for countering hybrid threats the year 2025 was “marked by anti-system narratives framing political and societal developments as signs of totalitarianism, censorship, and democratic decline. These narratives, often linked to both supranational actors and national institutions, were widely disseminated across the quasi-media sphere and portrayed Western societies as “liberal dictatorships.”

They prominently focused on alleged election manipulation, the war in Ukraine and its domestic implications, and recurring migration-related themes. Rather than appearing in isolation, these narratives interacted and reinforced one another, shaping interpretations of a wide range of current events.

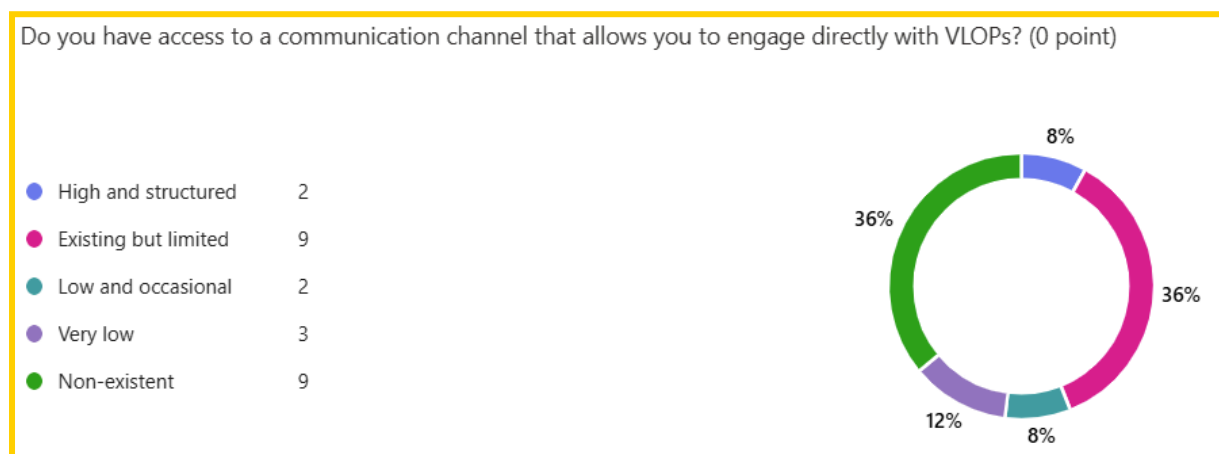
In this context, Very Large Online Platforms (VLOPs) play a central role in the dissemination and amplification of such content. The Code of Conduct on disinformation therefore establishes clear expectations for these platforms, aiming to ensure a more structured, transparent, and systemic response to such disinformation beyond isolated content moderation efforts.



1. Data access: a structural bottleneck across the ecosystem

Limited access to platform data is one of the most consistent findings across both summary notes (October 2025 and April 2026).

Researchers report only moderate satisfaction with their ability to access the data needed for their work (average score of 6.3/10), with significant disparities between organisations. Even when access is granted, it is often described as slow, opaque, and unstable. Processes involve long delays, unclear criteria, and inconsistent outcomes, and the limited opportunities for exchange with VLOPs further exacerbate the situation.



Questionnaire of the Code of Conduct on disinformation implementation level in the CEDMO region

Several stakeholders note that effectively using VLOP data requires significant IT capacities to process it, creating barriers for smaller organisations that lack the infrastructure and expertise to process large-scale datasets.

This situation is forcing research organisations to rely on alternative methods such as web scraping to collect data. This raises significant methodological, legal, and ethical concerns, but also leads to lower methodological standards and poorer research quality.



*This project has received funding from the European Union DIGITAL-2023-DEPLOY-04.
Project number: 101158609*

These findings are reinforced by institutional perspectives. Both the report and DSC contributions stress that improving data access is essential for understanding systemic risks such as algorithmic amplification of disinformation and coordinated disinformation campaigns.

Overall, the issue is not the absence of tools, but their limited usability. Data access remains fragmented, non-standardised, and difficult to process, which directly limits the ability of researchers to fulfil their objectives.

2. Platform engagement and fact-checking: uneven cooperation and disengagement

A key development across the two summary notes is the increasingly explicit partial disengagement of several Very Large Online Platforms (VLOPs) from their commitments under the Code of Conduct.

Microsoft explicitly states that it did not subscribe to commitments 30 to 33 related to empowering the fact-checking community, marking a step back compared to its March 2025 report. Similarly, TikTok reports that it has withdrawn from commitments 31.3 and 31.4 concerning participation in the external fact-checking repository. Google allocated \$103,220 to GLOBSEC for prebunking and AI-related tools but does not participate in commitments related to structured support for fact-checking. LinkedIn has also withdrawn from all commitments supporting the fact-checking community, despite still contributing to them in the March 2025 reporting cycle.

VII. Empowering the fact-checking community

Commitments 30 – 33 - *Not subscribed*

September 2025 Report | LinkedIn



*This project has received funding from the European Union DIGITAL-2023-DEPLOY-04.
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Meta did not formally withdraw but frames its approach as being under reassessment, notably with the progressive introduction of alternative mechanisms such as community notes (participatory mechanism whereby users collectively add and rate contextual information on content).

Across the ecosystem, Meta remains the only platform consistently identified by respondents as offering relatively structured cooperation mechanisms, particularly through its tools for fact-checker integration and content visibility. However, stakeholders report a perceived regression in effectiveness, including reduced visibility of fact-checked content and less predictable cooperation frameworks regarding Meta's support mechanism for fact-checking.

These developments are reflected in the operational data reported by platforms and echoed in the European Fact-Checking Standards Network (EFCSN) report, [*The Great Retreat*](#) which documents a broader withdrawal of platform support for the fact-checking ecosystem. It also characterizes the community notes as limited in effectiveness and insufficient as substitutes for professional fact-checking.

TikTok, Meta, and others report collaborations with organisations such as Demagog², AFP, and other regional actors. There is also evidence of increasing volumes of fact-checking activity, particularly on TikTok, where the number of reviewed videos has grown across all three countries.

However, this apparent activity masks deeper structural weaknesses. Fact-checking partnerships are described by practitioners as uncertain, limited in reach, and constrained by operational challenges exacerbated by AICG (AI generated content) increasing the volume of disinformation to be dealt with. Funding remains uneven, and the visibility of fact-checked content is not guaranteed.

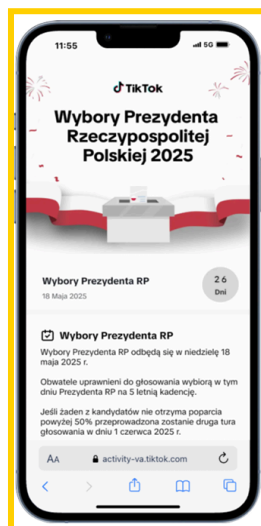
² Demagog.cz, Demagog.sk, Demagog.pl



3. Media and information literacy: increased efforts, limited impact

Since the commitments made by VLOPs under the Code of Conduct on Disinformation regarding data access for research and fact-checking have not yet been implemented seriously enough, user empowerment, and therefore media and information literacy, has moved to the forefront and become a crucial matter.

TikTok reports the rollout of three general media literacy campaigns across the EU, with Poland identified as a key target country. In addition, the platform conducted nine temporary election integrity campaigns and seven sessions of its Election Speaker Series, including activities in EU member states.



Poland Presidential Election, 2025 - TikTok in-app Election Centre

The TikTok reports also reflect a marked increase of content removals due to violation of harmful misinformation policy linked to fact-checking activity and substantial content moderation, particularly in Poland and the Czech Republic. This may be related to the recent elections held in both countries (Poland in May-June 2025 and the Czech Republic in October 2025).



LinkedIn highlights the adoption of C2PA “Content Credentials” technology to label AI-generated content but does not provide country-level evidence of cooperation with media literacy actors. Meta reports broader awareness campaigns, such as youth well-being initiatives, but these do not appear to specifically target the CEDMO countries in the reporting period, pointing to an uneven geographical distribution of efforts.

In parallel, stakeholders consistently assess the impact of these initiatives as insufficient. The scale of platform interventions remains limited compared to the volume and dynamics of disinformation. Moreover, platform design continues to undermine these efforts, as recommendation systems prioritise engaging, emotionally charged content over educational or corrective information. Finally, around one third of organisations identify algorithmic opacity as a barrier to effective media literacy, as it hinders explanations of information flows and platform dynamics.

4. Governance complexity and uneven coordination

The summary notes provide detailed evidence of governance challenges, particularly through the contributions of Digital Services Coordinators (DSCs) and stakeholder assessments in each country.

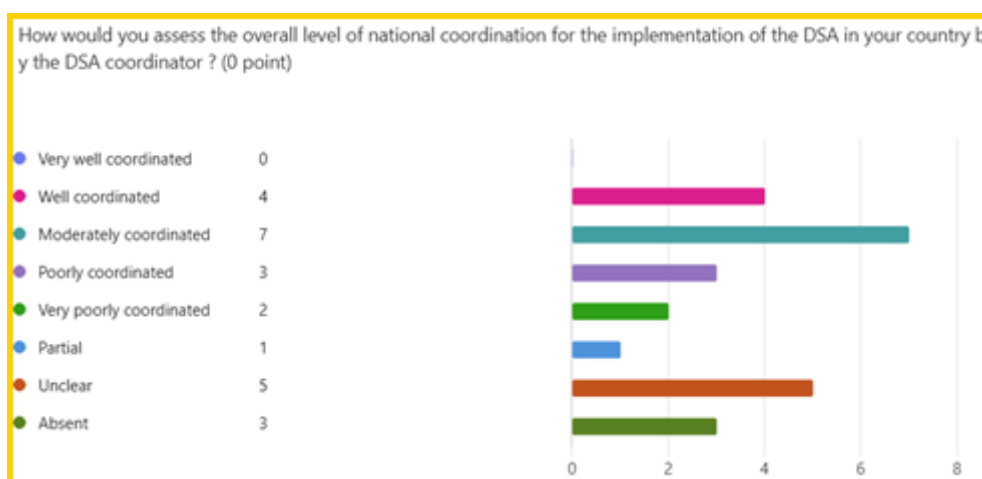
In the Czech Republic, the Czech Telecommunication Office (CTU), designated as DSC, reports that national DSA implementing legislation was not yet in force during the reporting period. Consequently, it lacks investigative and enforcement powers, limiting its role to communication with platforms and awareness-raising, particularly during the 2025 parliamentary elections.

In Slovakia, the DSC (CMS) presents a more developed institutional approach but highlights structural constraints linked to governance complexity. CMS also stresses the need to standardise reporting formats to make platform data usable for national risk assessments. Stakeholder views remain mixed: while 11 organisations report



coordination as “well” or “moderately coordinated”, 14 assess it as “poorly coordinated” or “absent,” echoing the previously identified structural constraints and highlighting the gap between institutional efforts and perceived effectiveness.

In Poland, the situation is more acute, as the DSA implementing legislation was vetoed, leaving the country without a functioning national framework. As a result, both the DSA and the Code are perceived by stakeholders as having limited practical relevance, with some organisations explicitly describing them as “not very useful” in their day-to-day work.



Questionnaire of the Code of Conduct on disinformation implementation level in the CEDMO region

Across the CEDMO region and beyond, a key issue concerns the usability of platform reporting within the DSA framework. While VLOPs publish transparency reports, these do not enable meaningful comparison of indicators, limiting their use for systemic risk assessments due to a lack of standardisation.



5. Generative AI as an emerging risk multiplier

Generative AI is identified in this second report as a cross-cutting factor that intensifies existing challenges.

Platforms have introduced technical solutions such as watermarking and content labelling, about which stakeholders on the ground remain sceptical regarding their effectiveness.

AI-generated content increases the volume and complexity of disinformation, making detection and verification more resource-intensive. Even when individual pieces of content can be debunked, the scale of production creates a structural burden for fact-checkers.



Footage of the Tel Aviv missile attack produced by AI.

Screenshot taken on the Sprawdzam website on April 24, 2026 by Amine Bidar

More broadly, its rapid evolution widens the gap between the detection of risks for users and the response provided by MIL initiatives, while at the same time the improvement of AI models enhances the sophistication and performance of fake accounts, further complicating researchers' ability to analyse online behaviours. Rather than creating entirely new problems, it exacerbates those already identified in the earlier report.



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6. Conclusion: toward a more operational regulatory ecosystem

Both summary notes converge on the need for a more operational, coherent, and effective implementation of the Code of Conduct on disinformation by the VLOPs in Poland, Slovakia, and the Czech Republic. The number of organisations involved in the summary notes confirm that the CEDMO region is not lacking in actors, expertise and demonstrates that resources are already in place to address disinformation in a meaningful way.

However, their collective effectiveness remains constrained by persistent structural weaknesses such as the absence of a Polish DSC and the non legislative implementation of the DSA in the Czech Republic. Fragmented and difficult-to-use data access mechanisms, selective platform engagement, lack of transparency, and inconsistencies during existing collaborations continue to limit the work against disinformation.

An effective implementation of the Code will require real engagement from the VLOPs to support the disinformation documentation, to protect and equip users against disinformation, and ease the use of their reports in enforcement and risk assessments. The report also notes that the economic model of VLOPs, together with the influence of the Trump administration, may act as obstacles to the effective implementation of solutions.

Without such adjustments, the gap between regulatory ambition and operational reality is likely to persist. This would not only continue to weaken the effectiveness of responses to disinformation in Central Europe but would also risk undermining the broader credibility of the European approach to tackling disinformation.



Annex 1: CEDMO fourth summary note

This note, prepared within the CEDMO project, examines the implementation of the Code of Conduct on Disinformation in Poland, Slovakia, and the Czech Republic. It is based on three main sources: VLOPs' biannual reports (January-June 2025), contributions from Digital Services Coordinators, and input from researchers, fact-checkers, and media literacy experts across the region. While more recent reports were available, they were not integrated due to timing constraints.

Drawing on data from 25 organisations and over 400 stakeholders, the analysis highlights key trends, gaps between platform commitments and on-the-ground experiences and situates these findings within the broader framework of the Digital Services Act.

Introduction

A senior official from a national authority of the Czech Republic responsible for countering hybrid threats describes the year of 2025, in terms of trends in manipulative information influence related to internal security, as “primarily marked by anti-system narratives. These were constructed through framing events and phenomena as signs of the introduction of totalitarianism, censorship, persecution of individuals for their opinions, and other activities conflicting with the Constitution. The implementation of these processes is, within the quasi-media scene, associated both with supranational entities and the Czech government and its representatives/institutions, as well as with the media and other entities such as the educational or non-profit sector. Within the EU and Western countries more broadly, this is portrayed as a so-called “liberal dictatorship” enforcing undesirable conformity on the majority population.



These phenomena were reflected particularly in narratives about alleged manipulation of election results, which became one of the dominant themes of the year. Intensive media attention also focused on the conflict in Ukraine, its causes, manifestations, and real or alleged (internal security-related) implications for the

Czech Republic. This area was notably influenced by a paradigm shift associated with the arrival of a new U.S. presidential administration, linked to a more accommodating stance toward the Russian Federation and accusations against EU states of censorship practices and other signs of democratic decline. Additionally, long-standing and periodically recurring narratives related to migration continued to appear prominently, although at the domestic level they lacked a unifying central theme. These narratives overlapped, reinforced each other as axioms, or provided interpretative frameworks for individual events across a broad spectrum of current issues.”

In this context, where disinformation dynamics operate across multiple issue areas and tend to compound one another, VLOPs have a key role to play, as they represent a significant share of the information ecosystem through which these narratives are produced, amplified, and consumed. Their capacity to shape visibility, circulation, and framing of content makes them central actors in addressing these dynamics. Within this framework, the Code of Conduct on Disinformation sets out concrete expectations for VLOPs and aims to move beyond isolated content moderation towards a more structured, systemic, and accountable approach.

1. DSA implementation in the CEDMO region: heterogeneous coordination, contingent on national political contexts

The institutional picture of DSA implementation in the CEDMO region is one of structural incompleteness, characterised by time gap delays in national transposition and limited operational capacity on the part of designated Digital Services Coordinators.



In the Czech Republic, the Czech Telecommunication Office (CTU), which is the national regulatory authority for electronic communications and postal services, has been designated as DSC but explicitly acknowledges that national implementing legislation has not yet entered into force. As a result, the CTU has not yet obtained the full range of powers required to perform DSA tasks, including formal

investigations or enforcement measures. Its engagement during the 2025 parliamentary election period was thus focused on establishing communication channels with platforms and ensuring awareness of their obligations, rather than engaging in more in-depth oversight activities. This institutional assessment is corroborated by the questionnaire responses: among the organisations from the Czech Republic, stakeholders addressing institutional coordination largely describe the situation as unsatisfactory, with assessments ranging from “poorly coordinated” to “unclear,” and two respondents specifically pointing to limited institutional capacity and the absence of a fully established national framework to support effective DSA implementation.

In Slovakia, the Council for Media Services (CMS), national regulatory authority for media services and Slovak DSC, presents a somewhat more active posture. In principle, the Code requires that data and information be provided in standardized formats, including Member State breakdowns, which should allow national regulatory authorities such as CMS to assess implementation within their jurisdiction. In this context, CMS has taken several proactive steps, including publishing monitoring reports evaluating platform functionalities during electoral periods and assessing compliance with obligations under the Slovak Act on Media Services, aligned with both DSA requirements and Code commitments. Slovakia also participates in ERGA (European Regulators Group for Audiovisual Media Services), currently transformed into the European Board for Media Services, where additional monitoring exercises have been conducted through contracted entities. Views of the Digital Services Coordinators within the [European Board for Digital Services were outlined within the](#)



Conclusions of the Board recognising the Code of Practice as a Code of Conduct under DSA in February 2025.

At the same time, the CMS highlights the increasing complexity of the governance landscape, pointing to the multiplication of actors involved (including the Commission, DSCs, the European Board for Digital Services, and auditors). It also stresses the need to further operationalise the standardisation of reporting formats under the Code, so that available data can be more effectively used at national level. More

broadly, it underlines the need to strengthen the evidence base underpinning systemic risk assessments, notably through improved data availability and access conditions for regulators and researchers.

This diagnosis is reflected in the assessments of Slovak organisations. The 11 organisations reported coordination levels ranging from “well” to “moderately coordinated”, while 14 reported levels from “poorly coordinated” to “absent”. Despite the CMS’s institutional activity, the governance complexity it identifies appears to constrain its practical impact on ground-level actors. As the Code of Conduct becomes embedded within the DSA’s systemic risk mitigation framework, its effectiveness increasingly depends on the extent to which its outputs, such as platform reporting, can meaningfully feed into risk assessment processes. The current gap between available transparency data and their operational use points to a structural limitation in the co-regulatory architecture, particularly in a context where national enforcement mechanisms remain in development.

The situation in Poland is described as the most severe. Two organisations that responded to the questionnaire note that the bill implementing the DSA was vetoed by the President, effectively leaving Poland without a functioning national DSA implementation framework. Both Polish organisations that responded to the questionnaire rate the DSA and the Code of Conduct on disinformation as “not very useful” in their day-to-day work, a direct consequence of its non-implementation at the national level.



2. Fact-Checking: A recognised mechanism, but structurally fragile and threatened by platform disengagement

The semi-annual reports of VLOPs present a relatively detailed picture of content moderation and fact-checking activity in Poland, Slovakia, and the Czech Republic, though the depth and comparability of data vary significantly across platforms.

Regarding TikTok, Demagog.pl appears as the only clearly identifiable formal fact-checking partner involved in content verification activities. By contrast, other organisations active in the disinformation space, such as FakeNews.pl, Radio Zet, and Orientuj.sie, are primarily engaged in the context of media literacy and election integrity campaigns, rather than through sustained, contractual fact-checking arrangements. Similar collaborations are maintained in the Czech Republic. The TikTok report indicates that fact-checking coverage is provided in the Slovak language, but, unlike in other country cases, it does not explicitly name Lead Stories (an independent fact-checking organisation and member of the International Fact-Checking Network (IFCN)) as the partner responsible for Slovakia; however, given its role elsewhere in the report, it is likely that this coverage is conducted through Lead Stories.

TikTok also reports the highest volume of moderation activity in the region. The number of fact-checked videos in Poland rose from 622 in the previous reporting period to 920, in the Czech Republic from 200 to 210, and in Slovakia from 138 to 194. These increases are notable. The vast majority of removals, over 17,000 in Poland and 4,100 in the Czech Republic are driven by policy guidelines and knowledge-based repositories.

Meta reports policy violation actions across the region, with Poland recording 107 actions, the Czech Republic 10, and Slovakia 3. Meta also notes its partnership with Poland's National Electoral Commission ahead of the presidential elections, aimed at promoting civic engagement. In the report, Meta's fact-checking partners in the region include AFP and Demagog.cz for the Czech Republic, AFP and Demagog.pl



for Poland, and AFP, Demagog.cz, and Demagog.sk for Slovakia. However regarding fact-checking in Slovakia, [Demagog.cz](https://demagog.cz) has indicated that they do not and cannot fact-check Slovak content even though they are indicated on [Meta's website](#) and report as doing such.

Google's YouTube reports removals for violations of its Misinformation Policies, with 155 videos removed in Poland, 70 in the Czech Republic, and 13 in Slovakia. A grant of \$103,220 was directed to GLOBSEC, a platform combining prebunking, AI content recognition, and civic education, a relevant investment given GLOBSEC's strong institutional presence in the Central European region.

Furthermore, several factors indicate a partial disengagement regarding structured mechanisms supporting fact-checking. Google is not participating in any commitments in this area, while Microsoft and LinkedIn have withdrawn from several or all commitments to support the fact-checking community, to which they were still contributing in the March 2025 report. Meta, for its part, explicitly frames its practices as being in a phase of reassessment, especially in light of the rollout of alternative tools such as community notes. This trend of disengagement is highlighted in the report *The Great Retreat* published by the EFCSN. The report documents a rollback, sometimes explicit but often more discreet, of structured mechanisms to support fact-checking, whether through formal withdrawals from commitments, reduced visibility of fact-checked content, or the gradual disappearance of certain associated features. This development is part of a broader shift in platforms' strategies, marked by a move toward alternative tools such as community notes, whose effectiveness nevertheless remains limited, and which cannot serve as a substitute for structured professional fact-checking mechanisms. Fact-checking organisations in the CEDMO region maintain active partnerships with several platforms, but the organisations that responded to the questionnaire consistently highlight the fragility and limited scope of these arrangements. Among the five fact-checking organisations that responded to the questionnaire who work directly within fact-checking programmes, a shared picture emerges: partnerships exist, but they are characterised by uncertainty, limited scope, and operational constraints that reduce their effectiveness.



One organisation present in Slovakia and Czech Republic, reports participation in Meta's Third-Party Fact-Checking Program, noting that despite Meta's January 2025 announcement of the programme's discontinuation, nothing substantial has yet changed operationally, though the uncertainty about the programme's future is itself a source of concern. The same organisation reports that past support from Google has ended without continuation, and that cooperation with TikTok has remained limited and ad hoc. A second fact-checking organisation, representing a larger organisation active across two CEDMO countries, is a partner in TikTok's third-party fact-checking programme and describes the engagement as relatively structured, but flags a critical operational challenge: platforms are increasingly shielding their content, making it harder to identify what is going viral, precisely the information most needed for effective fact-checking work.

Petr Gongala, coordinator of the Czech fact-checking project Demagog.cz explained during an exchange with us that “while verifiable claims can be addressed, the core issue is timing: by the time fact-checkers detect a piece of content, it has often already reached tens of thousands of users. Additional delays between detection and publication further reduce the practical impact of fact-checking, which frequently comes too late to curb dissemination.”

One Slovak organisation that responded to the questionnaire recounts a recent failed collaboration attempt with Meta, in which a proposed media literacy campaign was poorly coordinated and ultimately abandoned. While this is a single experience, it illustrates a broader concern shared by two other organisations about the reliability and quality of platform engagement with civil society partners. Two other organisations observe that the political climate surrounding the second Trump administration has visibly affected platform compliance, with VLOPs scaling back their engagement with the Code.



3. Media literacy: A growing presence in platform reports, an effect judged clearly insufficient by ground-level actors

TikTok reports three general media literacy campaigns rolled out in the EU in partnership with regional organisations, with Poland featuring prominently as a focus country. Nine temporary election integrity campaigns were also run in the region, and seven Election Speaker Series sessions were held, including sessions in EU Member States. These efforts represent a relatively active engagement with the Polish civil society ecosystem, though the Czech Republic and Slovakia receive comparatively less specific attention in the presented data.

LinkedIn's adoption of C2PA "Content Credentials" technology for AI-generated content labelling is relevant across the region, though country-level engagement with media literacy actors remains unspecified in the presented data. Meta's broader youth well-being campaign, while generating significant reach across five targeted EU Member States, does not appear to extend to CEDMO countries in the reported period, reflecting a geographic unevenness in platform investment.

Among the organisations that responded to the questionnaire, assessments of the impact of platform media literacy measures are consistently critical. At least four organisations from Slovakia and the Czech Republic point to algorithm-driven amplification of emotionally charged, polarising, or harmful content as a structural problem. Two other organisations insist on how algorithms systematically expose younger users to harmful content for which they lack critical defences.

One of these organisations frames the issue in terms of a fundamental tension: platforms possess the technical capacity to strengthen user resilience, but their business models are built around engagement maximisation, which systematically works against that goal. A third of the organisations that responded to the questionnaire point to the opacity of content moderation and algorithmic processes as an additional obstacle, noting that the lack of transparency makes it difficult to explain to audiences why certain content is amplified or suppressed, thereby undermining trust and educational efforts.



Peter Jančárik, Head of Content Moderation in Czech Republic at Seznam, made an additional contribution, stating that “platform algorithms favour emotionally engaging content, which makes it harder for media literacy initiatives to gain visibility. Organisations must therefore create attention-grabbing content, even on complex topics, while avoiding clickbait or manipulative practices. This creates tension between maintaining ethical standards and adapting formats to remain visible in an environment that ultimately makes their work more difficult”.

These observations suggest that the Code's current architecture, which focuses primarily on moderation outputs and transparency reporting, does not sufficiently address the upstream design choices, notably algorithmic ranking and engagement optimization, that shape the VLOPs' environment.

4. Data access for research: The principal blind spot of the code's effectiveness

VLOPs report significant investments in researcher data access infrastructure. Meta's Content Library now serves over 990 researchers globally, offering access to public data via a graphical interface and API. LinkedIn reports expanded API access for disinformation research and participation in an EDMO training series in January 2025. TikTok's Research API and Video Content Engine have been further enriched, including a compliance API launched in June 2025 that improves the data refresh process, alongside the continued availability of the Commercial Content API and Content Library. TikTok also provides a fact-checker dashboard with quantitative information on queued videos and review times.

However, six research organisations that address data access described the experience significantly diverging from the picture presented in platform reports. The dominant finding is that official platform APIs are difficult to obtain and poorly adapted to research needs. Three research organisations note that researchers are often compelled to resort to scraping, a practice that may violate platform Terms of Service, creating methodological problems, ethical and legal exposure, and point to the



removal of previously available search features on major platforms as a concrete regression in research capacity that newer tools have not offset.

Moreover, Vojtěch Kupka, Communications and Data Specialist at Charles University, part of the CEDMO project team, stated in an exchange with us that “while access is formally granted, in practice, obtaining and using the data remains challenging as generating the API access key requires a level of technical IT expertise. For organisations without strong IT capacity, the official guidance is often insufficient to enable effective use”. He insisted on the fact that “requesting access to platform data often leads to a deterioration in both data quality of their work and the overall research process, due to the lengthy and cumbersome procedures required to obtain access, which is a cost that many research organisations cannot afford”. Additionally, he explained that their experience suggests that “relying solely on legal obligations is often insufficient to incentivise platform action. More effective engagement can involve demonstrating the operational or economic value of cooperation, for example through research that aligns with platforms’ own interests.”

Two organisations from the Czech Republic that responded to the questionnaire explicitly raise the ethical dimensions of current data access conditions, with one noting that challenges related to harmful content and AI-generated material have increased considerably and will require the development of additional security and defensive mechanisms.

The Slovak DSC similarly underscores the need for improved data access conditions for regulators and researchers as a prerequisite for understanding systemic risks, including amplification mechanisms, recommender systems, and cross-platform coordination of disinformation. Addressing this gap, through more accessible, ethically viable, and functionally adequate data access conditions, is thus a shared priority identified by institutional actors, civil society, and the research community alike.



5. Generative AI: A transversal risk factor

The transparency reports document several AI-related initiatives. All images generated with Imagen 2 in Google's consumer products are marked by SynthID, a tool developed by Google DeepMind that adds a digital watermark directly into the pixels of generated images, imperceptible to the human eye but detectable for identification purposes. LinkedIn has adopted the C2PA "Content Credentials" technology to include metadata labelling, including data about whether content is created using AI, on content containing the C2PA technology. The Slovak DSC notes that some developments have already taken place within the Code, particularly in relation to AI-generated content and the emergence of new forms of content production linked to artificial intelligence.

However, the ground-level assessment of these measures is clearly more critical. Four organisations flag AI-generated content as an amplifier of existing data access difficulties: synthetic content makes disinformation harder to detect and attribute, platform labelling tools remain incomplete, and while individual AI-generated items may be easy to debunk, their aggregate volume creates a structural challenge for fact-checking organisations with finite resources, a constraint further exacerbated by the uncertainty and heterogeneity of platform-based funding.

Thus, as Marie Bohner, head of development and partnerships for digital investigations at AFP, pointed out in an interview, AI appears less as a theme in itself than as an amplifier of already existing and identified difficulties : the risk of potential overload for fact-checking due to large quantities of AI slop and content not labelled as AI-generated; the need for media literacy initiatives more specifically focused on understanding what generative AI is and how it works; and the exacerbation of difficulties linked to the need for access to platform data for both journalists and researchers.



Annex 2: CEDMO third summary note

This note, prepared within the CEDMO project, examines the implementation of the Code of Conduct on Disinformation in Poland, Slovakia, and the Czech Republic. It is based on three main sources: VLOPs' biannual reports (June-December 2024), contributions from Digital Services Coordinators, and input from researchers, fact-checkers, and media literacy experts across the region. Structured around the Code's three pillars, empowering users, researchers, and fact-checkers, it examines cooperation with Very Large Online Platforms, access to data, and perceptions of transparency and compliance.

Although based on a relatively small sample, the analysis relies on a mixed-methods approach combining quantitative and qualitative data, as well as triangulation across multiple sources. This ensures that the findings provide a meaningful and reliable overview of regional trends and challenges, supported by insights from both CEDMO partners and external experts.

A. Empowering Users (4 respondents)

Evidence from the CEDMO network indicates that fact-checking and MIL organisations have only limited visibility over user engagement on major platforms, as well as restricted access to the relevant data needed to assess this engagement in relation to the CoC. Only a handful of respondents reported interactions with platforms enabling them to evaluate tools or relevant data. Facebook was the most frequently assessed platform, yet only one organisation reported sufficient engagement to evaluate compliance. Similarly, Google Search had a single respondent with relevant experience.



Perceptions of compliance with the CoC were mixed, but predominantly negative. Respondents described Facebook's adherence as weak, with one respondent noting that "the rules are not being followed." Google Search received a slightly more positive assessment.

Engagement with MIL experts appears minimal. Facebook's only reported partnership, with Demagog, was rated "fair," while Google's collaboration through events and workshops was rated "good." Neither platform demonstrated evidence of systematic consultation with experts or integration of research insights into their tools.

Given the very small number of respondents, these observations are indicative rather than representative of broader trends within the fact-checking and MIL communities.

B. Empowering the Research Community (20 respondents)

In total, 20 organisations participated in this part of the survey, 11 from Czechia, 5 from Slovakia, and 4 from Poland. The sample included a diverse mix of actors: academia (8), NGOs (6), combined NGO-academic institutions (1), research centres or think tanks (3), one small platform, and one technological company.

When asked whether they currently have sufficient data to conduct their ongoing or upcoming research effectively, respondents gave an average score of 6.3 out of 10, indicating moderate adequacy but significant variation across organisations.

Only 40% of surveyed organisations (8 out of 20) reported applying for direct access to platform data through APIs or content libraries. Of these, six successfully obtained access, while two were still awaiting a response at the time of the survey. The majority, over half of respondents, have never applied, citing procedural uncertainty, unclear eligibility rules, or lack of institutional capacity, as well as low awareness of the process, administrative burden, and doubts about the relevance or usefulness of the available data. Others indicated that they either worked with their own datasets,



relied on external monitoring tools, or already received access through existing cooperation with Meta.

Among the organisations that obtained access, Meta's platforms (Facebook and Instagram) were the most frequently cited, with two organisations reporting access through the Meta Content Library or participation in the Meta Fact-Checking Programme. TikTok access was granted to two organisations, though both described the process as lengthy, opaque, and inconsistent, involving repeated rejections, contradictory eligibility criteria, and several months of correspondence before partial or unstable access was achieved. YouTube's API and the Meta Ads Library were used by two respondents, primarily via external manuals or informal channels rather than through direct cooperation with the platforms. One respondent reported combined access to multiple platforms, including Facebook, Instagram, TikTok, X, YouTube, and Wikipedia, describing the process as "sometimes seamless, sometimes complicated." Overall, these findings confirm that access procedures remain fragmented and non-standardised, with usability and transparency varying widely across platforms.

Awareness of the access to private data governed pursuant to Article 40(4) of the DSA remains uneven. Out of 20 respondents, nine declared full awareness, five reported partial familiarity, and six had no knowledge of the regime at all.

When asked about plans to apply for vetted-researcher status under Article 40(4) DSA, only seven organisations indicated that they were likely or planning to apply, while the remaining thirteen did not intend to do so. Among those considering application, most expressed concerns about the length and complexity of the vetting process, including the requirement to prove independence and institutional eligibility. Several organisations found the definition of "research organisation" unclear, particularly for NGOs and hybrid entities that combine policy and analytical work.



Awareness of the vetting conditions under Article 40(8) was limited, and few respondents were confident their organisations could meet all requirements. The timeline prescribed by the Delegated Act was widely viewed as unfeasible: only two respondents considered it realistic, while most anticipated that it would delay or undermine time-sensitive projects such as election monitoring.

The main anticipated hurdles include:

- Administrative and legal complexity, particularly GDPR alignment and the need to document lawful processing bases;
- Excessive procedural delays incompatible with real-time or event-driven research;
- Ambiguity in evaluation criteria and lack of clarity about the responsibilities of vetted researchers versus data holders;
- Reluctance of platforms to cooperate even within the DSA framework.

Across responses, there was strong demand for capacity-building and procedural guidance from the European Commission and national Digital Services Coordinators. Suggested forms of support included:

- Model templates and boilerplate documents for vetting applications;
- Step-by-step procedural guidance and examples of compliant research documentation;
- Legal and technical training on GDPR, data storage, and security requirements;
- Practical workshops or webinars sharing early experiences and best practices.

Overall, respondents viewed the current vetting regime as administratively heavy and insufficiently operationalised, with high compliance costs that risk excluding smaller research entities thereby limiting the diversity and agility of the EU's public-interest research ecosystem.



C. Empowering the fact-checking community (7)

Within the CEDMO network, most fact-checking organisations work primarily with Meta platforms, especially Facebook and, to a lesser extent, Instagram, while interactions with other major platforms remain rare or superficial. This concentration seems to point out Meta's relatively established collaboration frameworks but also creates room for improvement for meaningful engagement opportunities from other VLOPs. Despite these partnerships, fact-checkers express significant concerns about Meta's compliance with the CoC. They report ongoing issues such as the persistent spread of false content, slow and inconsistent enforcement, weak transparency over content reach reduction, and a visible decline in the prominence of false-information labels. While Meta's Third-Party Fact-Checking program remains functional, several organisations note that user-facing warnings have become less visible, shifting from full overlays to smaller, less noticeable labels.

Instagram maintains similar integration mechanisms, often applying full-screen overlays that make fact-checks clearer to users, though its average effectiveness is rated slightly lower than Facebook's. In contrast, Google Search and TikTok show little or no meaningful integration of fact-checking content. Google's decision to remove Claim Review data from search results was described as a major setback, while TikTok's fact-checking efforts were described as largely invisible within the platform, limited to content published independently by fact-checkers themselves. Overall, Meta is described as the only ecosystem offering structured cooperation and visibility tools for fact-checkers, though its implementation is perceived as regressing. Other major platforms were reported as providing minimal transparency, limited access, and no substantial mechanisms to embed verified information in a way that reaches users effectively.

