Central European Digital Media Observatory

Third report on the hub activity in monitoring the implementation of the CoC and DSA in the region, contributing to the development of structural indicators and the data access framework

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Executive summary

This third and final report related to CEDMO's Work Package 5 (WP5) presents the main findings of the hub's monitoring of the implementation of the Code of Conduct (CoC) on Disinformation and of the Digital Services Act (DSA) in Poland, the Czech Republic and Slovakia. It draws on the four summary notes and on the two earlier WP5 reports produced between April 2025 and October 2026, and thus offers a view of the whole monitoring cycle, from the data-access survey of late 2024 to the biannual reports published by the Very Large Online Platforms (VLOPs) in March 2026.

The first report, published in April 2025, established a baseline on data access and fact-checking, and the second report, published in April 2026, presented the findings of the third and fourth summary notes. These are recalled here in condensed form. The emphasis is placed on what the fifth summary note adds: the operation of the Code's electoral mechanisms during the Czech parliamentary elections of October 2025, the further contraction of the commitments subscribed to by platforms, and the most recent experience of ground-level actors. The report closes with the hub's contribution to the development of structural indicators and of the data access framework.

Key findings

- **Platform disengagement is deepening and becoming more differentiated.** Meta, Google and LinkedIn have narrowed the perimeter of their commitments, while TikTok remains the partial exception. These withdrawals are not flagged as such in the reports.
- **Ground-level actors see no improvement.** None of the nine organisations consulted in 2026 reports better working conditions with the platforms, and five have no reachable contact at any platform.
- **The Rapid Response System passed a first, low-intensity test** during the Czech elections of October 2025. It proved workable but opaque, untested under stress, and operated without a fully empowered Digital Services Coordinator (DSC).
- **Media literacy efforts reported by platforms have a modest reach in the region,** and ground-level actors judge their effect insufficient.
- **Formal access to platform data still does not translate into usable access** for researchers, and the vetted-researcher regime under Article 40 of the DSA has yet to produce visible results in the region.
- **National implementation of the DSA remains incomplete:** Poland has no functioning framework and the Czech digital service coordinator was not yet in force during the elections.

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- **Ground-level actors mainly call for the implementation of obligations that already exist,** and the monitoring points to indicators that would make that implementation measurable.

Introduction

As recalled in the previous report, a senior official from a Czech national authority responsible for countering hybrid threats described 2025 as dominated by anti-system narratives portraying Western societies as "liberal dictatorships", centred on alleged election manipulation, the war in Ukraine and migration, and reinforcing one another. Two national elections held in the region during the cycle, the Polish presidential election of 2025 and the Czech parliamentary elections of October 2025, put the response of platforms to this environment to a concrete test.

Over the same period, the Code changed status. Its recognition as a Code of Conduct under the DSA, set out in the conclusions of the European Board for Digital Services in February 2025, embeds it in the DSA's systemic-risk framework: its effectiveness increasingly depends on whether platform reporting can feed meaningfully into risk assessment and enforcement.

The hub's method evolved accordingly. The second summary note relied on platform responses to an EDMO survey, which proved too scarce to support firm conclusions. From the third note onwards, CEDMO shifted the weight of its monitoring towards the documented experience of ground-level actors, combining questionnaires and bilateral interviews with the analysis of VLOP biannual reports and DSC contributions. This qualitative emphasis ensured that the withdrawal of platforms from parts of the Code did not undermine the quality of the monitoring itself. Table 1 summarises the material covered by this report.

Table 1. Summary notes covered by this report

Summary note	Main sources	Respondents and focus
Second (M12, April 2025)	EDMO survey of platforms, November 2024 to February 2025	Limited and uneven platform responses; descriptive overview by pillar and country
Third (M18, October 2025)	Expert questionnaire (September-October 2025), bilateral interviews	31 experts ; focus on the Code's three pillars and Article 40 DSA
Fourth (M24, April 2026)	VLOP reports for January-June 2025, contributions of the Czech	25 organisations (7 MIL, 5 fact-checking, 13 research), around 417 stakeholders

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Summary note	Main sources	Respondents and focus
	and Slovak DSCs, questionnaire, bilateral meetings	
Fifth (M30, October 2026)	VLOP reports for July-December 2025 (published March 2026), questionnaire, interview	9 organisations (4 research, 3 fact-checking, 2 MIL), around 195 stakeholders; dedicated section on the Czech elections

Sample sizes and questionnaires differ from one note to the next, so figures cannot be read as a strict time series. The consistency of the findings across notes, sources and stakeholder groups nevertheless gives the overall picture its robustness.

1. Platform engagement: from partial disengagement to a contracting perimeter

The disengagement did not begin with these reports. The hub's first report already recorded, in the platforms' March 2025 Subscription Documents, the starting point of this movement: Google withdrew entirely from the fact-checking chapter, excluding commitments 30, 31 and 32 and judging cooperation with fact-checkers neither relevant nor practicable for Search and YouTube; Meta, following its chief executive's announcement of 7 January 2025 ending the Third-Party Fact-Checking Programme in the United States, though not in the EU or the CEDMO countries, stated its intent to keep the applicability of the fact-checking chapter under assessment; and TikTok committed to the relevant measures only on condition that other signatories did likewise. The European Fact-Checking Standards Network publicly expressed its disappointment on 22 January 2025.

The second report documented an increasingly explicit partial disengagement in the reports published in September 2025. Microsoft no longer subscribed to commitments 30 to 33 on empowering the fact-checking community, TikTok withdrew from measures 31.3 and 31.4 on the external fact-checking repository, LinkedIn withdrew from all fact-checking commitments, Google did not participate in them, and Meta framed its practices as under reassessment in light of Community Notes. Several organisations linked this trend to the political climate surrounding the second Trump administration rather than to technical considerations.

The reports of March 2026 show that this movement has continued and become more differentiated. Meta answers "no" to the question of whether it plans further measures over the next six months to substantially improve its implementation of commitments 17, 18, 19,

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21, 23, 24, 30 and 31; its only positive answer concerns commitment 28 on the tools made available to researchers, and its fact-checking chapter remains under reassessment. Google and YouTube do not subscribe to commitments 30 to 33. LinkedIn unsubscribed from commitments 26 and 27 on researcher data access and reports no new measure under commitment 28. TikTok stands out as the partial exception, with thirteen IFCN-accredited fact-checking partners, up from twelve in the previous period but below the fourteen of a year earlier. To this formal retreat is added a more discreet erosion of tools: Google Trends is no longer presented as a means of public access to data, and the European Media and Information Fund (EMIF), endowed with €25 million by Google in 2021, received its last scheduled payment in February 2026. Because signatories must report new measures but not the abandonment of a commitment, a programme or a practice, these contractions remain largely invisible in the reports themselves.

Table 2. Changes in the commitments of signatories, as documented by the fourth and fifth summary notes

Signatory	Reports of September 2025 (January-June 2025)	Reports of March 2026 (July-December 2025)
Meta	Practices framed as under reassessment in light of Community Notes	No further measures planned on commitments 17, 18, 19, 21, 23, 24, 30 and 31; only commitment 28 (research tools) to be improved; fact-checking chapter still under reassessment
Google / YouTube	No participation in the fact-checking commitments	Commitments 30 to 33 not subscribed; Google Trends no longer presented as public data access; final EMIF payment (February 2026)
Microsoft	Commitments 30 to 33 no longer subscribed (step back from March 2025)	Not reassessed in the fifth summary note
LinkedIn	Withdrawn from all fact-checking commitments	Unsubscribed from commitments 26 and 27 (researcher data access); no new measure under commitment 28
TikTok	Unsubscribed from measures 31.3 and 31.4 (fact-checking repository)	Thirteen IFCN-accredited partners (twelve previously, fourteen a year earlier); Science

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Signatory	Reports of September 2025 (January-June 2025)	Reports of March 2026 (July-December 2025)
		Feedback added on advertising-related fact-checking

This trajectory has a direct counterpart on the ground. In 2026, none of the nine organisations consulted reports an improvement in its working conditions with the platforms: five describe them as slightly deteriorated and four as stable (Figure 1). Five have no reachable contact person at any platform. The two organisations with contacts at several platforms are bound to them by paid partnerships, but financial dependence does not guarantee access: a third organisation that also relies significantly on platform funding has no reachable contact at all. Where a degradation is reported, it concerns Meta, with one organisation describing a channel used to surface content for verification as "essentially obsolete" and another a cooperation reduced to the bare minimum and more transactional than before 2025.

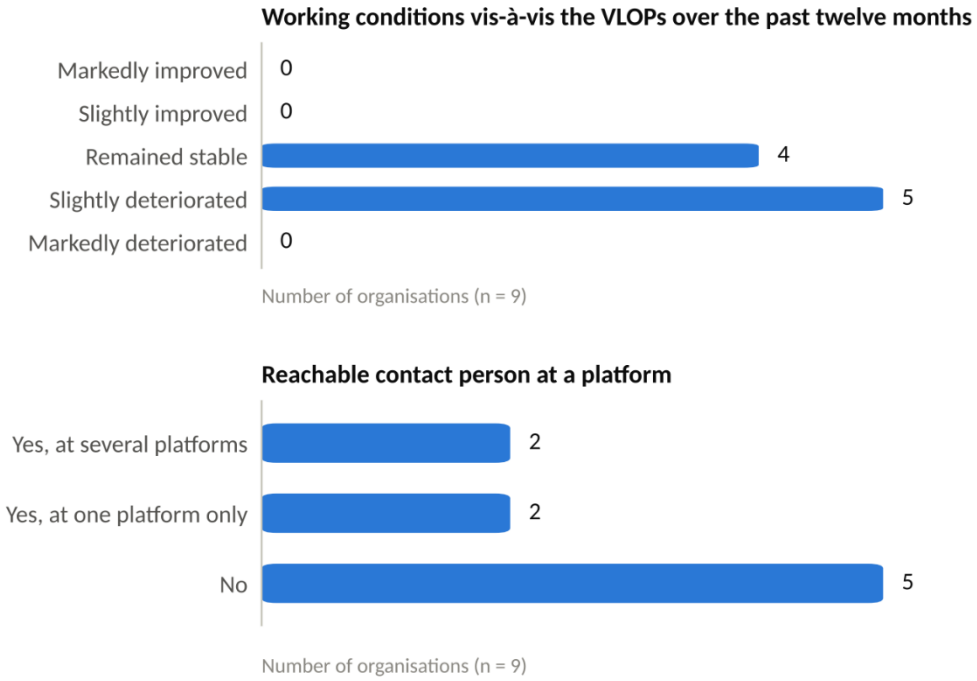

Figure 1. Working conditions with the VLOPs and availability of a platform contact. Source: CEDMO questionnaire for the fifth summary note (2026), 9 organisations.

2. Fact-checking: a recognised mechanism, structurally fragile

As the first report recorded, the three CEDMO countries have full coverage of fact-checkers accredited by the International Fact-Checking Network (IFCN) or the European Fact-Checking

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Standards Network (EFCSN), Demagog in all three, alongside organisations such as Fakenews.pl in Poland, and AFP across the region. The fragility documented here therefore stems not from a lack of accredited organisations but from the conditions of their cooperation with platforms.

The third and fourth notes established a stable diagnosis, detailed in the second report. Meta remains the only ecosystem offering structured cooperation and visibility tools for fact-checkers, but its implementation is perceived as regressing and uncertain: fact-checkers report slower enforcement, weaker transparency on reach reduction and less visible warning labels. Google's removal of ClaimReview data from search results was described as a major setback, and TikTok's fact-checking was seen as largely invisible on the platform, even as the number of videos fact-checked there grew in all three countries. Partnerships exist, but they are uncertain, limited in scope and constrained by operational difficulties, a picture consistent with the European Fact-Checking Standards Network report The Great Retreat. The core issue, as Petr Gongala, coordinator of Demagog.cz, put it, is timing: by the time content is detected and verified, it has often already reached tens of thousands of users.

The fifth note confirms this diagnosis and adds two elements. Ground-level actors now formulate precise expectations: guaranteeing the sustainability of Meta's fact-checking programme and restoring it to its 2024 scope, developing comparable programmes on other platforms, and making TikTok's programme more transparent. The Czech elections also exposed a structural blind spot of the programme, discussed in the next section: content shared by political figures falls outside its scope.

3. Electoral integrity and the Rapid Response System

The cycle covered two national elections in the region. Around the Polish presidential election of 2025, the fourth note recorded TikTok's election-integrity campaigns and Meta's partnership with Poland's National Electoral Commission. In the Czech Republic, the Czech Telecommunication Office (CTU), designated as DSC, could only establish communication channels with platforms and raise awareness of their obligations during the 2025 parliamentary elections, for lack of investigative and enforcement powers.

The fifth note is the first to examine the Code's electoral mechanisms in operation. Ahead of the Czech parliamentary elections of October 2025, TikTok launched an in-app Election Centre with a section on spotting misinformation and ran an election-integrity campaign with its Czech fact-checking partner Demagog.cz; it also reports co-chairing the Task Force's elections working group. Meta pointed users to authoritative electoral information through "Election Day Information" notices, and Microsoft reports participation in the Task Force's Crisis Response Subgroup and Elections Working Group.

The Rapid Response System (RRS) of the Permanent Task Force was activated for these elections. In the interview conducted for the fifth note, Petr Gongala describes reasonnable

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expectations, since the mechanism is oriented primarily towards illegal content rather than lawful-but-harmful disinformation, and moderate satisfaction, "because nothing terrible happened." He flags a lack of transparency on who participates, what triggers activation and how fact-checkers are involved, and cautions that, without clear safeguards, a rapid content-removal channel risks being perceived, or used, as an instrument of censorship. Platforms took part in calls and acted on some inputs; TikTok acted against inauthentic accounts.

Among the four respondents operating in the Czech Republic, one was associated with an election-monitoring arrangement through EDMO or CEDMO, one through the CTU, and two not at all. One found the RRS "somewhat effective"; another "somewhat ineffective", describing platform responses as slow and unenthusiastic, with problematic content quietly deleted but no public-facing reporting; the two others did not take part. One respondent who flagged election-related posts through Meta's fact-checking programme points to a structural blind spot: the most viral posts could not be rated because they were shared by political figures, whose statements fall outside the programme's scope.

The Czech case suggests that these mechanisms are workable in a low-intensity electoral environment, but that they remain untested under stress and constrained by their opacity and by the absence of a fully empowered DSC, the national implementing legislation not yet being in force.

4. Media and information literacy: increased efforts, limited reach

The second report showed that platform media literacy activity was growing in the reports but remained geographically uneven, with TikTok's campaigns focusing on Poland and Meta's youth campaigns bypassing the region. Ground-level actors consistently described its effect as insufficient: recommendation systems favour emotionally charged, polarising content, business models built on engagement work against user resilience, and around one third of organisations cited algorithmic opacity as a barrier to explaining how information spreads.

The March 2026 reports confirm this pattern. Meta published its first Media Literacy Annual Plan in July 2025, but its youth-oriented campaigns ran in eight EU countries, none in the CEDMO region, and it plans no further measures on this commitment. Google's "Hit Pause" campaign recorded around 16,000 impressions in Poland, 4,700 in the Czech Republic and 2,000 in Slovakia, and its "Super Searchers" programme trained sixteen people in a single European session. TikTok reports the most region-specific activity, including campaigns on the war in Ukraine covering all three countries with FakeNews.pl and Lead Stories, and the Czech election campaign with Demagog.cz; Microsoft's contribution focuses on AI literacy. In 2026, no media literacy respondent reports that platform campaigns clearly reach its audiences. Their needs are precise: accessible explanations of recommender systems, resources on how generative AI works, verification tools for non-professionals, and data on audiences' real exposure.

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5. Data access: a structural bottleneck across the ecosystem

Data access has been the most consistent finding of the whole cycle, and the first report captured its starting point. Drawing on a GLOBSEC survey of researchers conducted in late 2024, it found that the eighteen respondents from the CEDMO region rated the adequacy of their data at 4.6 out of 10, that only three had obtained API access, in some cases after waiting seven to nine months, and that the discontinuation of CrowdTangle in August 2024 had left a gap only partly filled by Meta's Content Library and by costly commercial tools.

A year later, the third note measured the same bottleneck directly among 20 research organisations (Figure 2): they rated the adequacy of their data at 6.3 out of 10 on average, only 8 had applied for direct access to platform data, and 13 did not intend to apply for vetted-researcher status under Article 40(4) of the DSA. Respondents described the accreditation process as administratively heavy, pointed to unclear definitions of a "research organisation" and to timeline management incompatible with event-driven research, and called for templates, procedural guidance and legal and technical training. The fourth note confirmed that the problem lies less in the absence of tools than in their usability: official APIs are hard to obtain, require IT capacities that smaller organisations lack, and push researchers towards scraping, with methodological, legal and ethical costs.

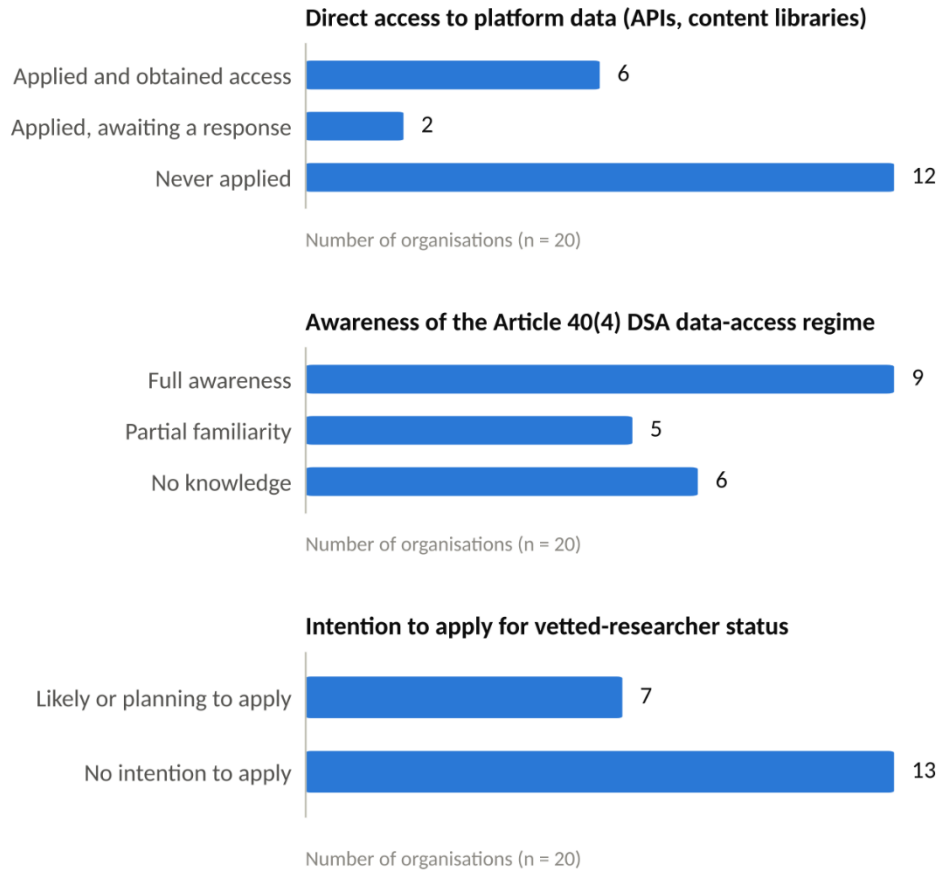

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Figure 2. Access to platform data and awareness of the Article 40 DSA regime among research organisations. Source: CEDMO third summary note (October 2025), 20 organisations.

The fifth note shows that platform declarations have progressed while ground experience has not. Meta reports a December 2025 partnership with the Secure Data Access Centre (CASD) for the independent review of research proposals; TikTok reports more than 900 research teams using its tools and new filters by views and comments; Microsoft Bing points to a Qualified Researcher Programme aligned with Article 40(12) of the DSA. At the same time, LinkedIn left the research data access commitments. -One research organisation requested TikTok's Research API and received only the Video Content Engine, which it found "basically useless" for scientific research; others scale back projects, rely on scraping after formal ethics assessments, or devote a very significant share of their budget to acquiring data. YouTube's researcher programme recorded a single unique researcher in the Czech Republic and none in Poland or Slovakia.

6. Governance complexity and incomplete national implementation

The institutional picture set out in the fourth note, based on the contributions of the Czech and Slovak DSCs, has not changed in substance. In the Czech Republic, the CTU lacks investigative and enforcement powers because the national implementing legislation is not in force, which still applied during the October 2025 elections. In Slovakia, the Council for Media Services (CMS) is more active, publishing monitoring reports on platform functionalities during elections, but it stresses the growing complexity of a governance landscape involving the Commission, DSCs, the European Board for Digital Services and auditors, and the need to standardise reporting formats so that data can be used nationally; Slovak organisations were divided on the quality of coordination (11 positive, 14 negative). In Poland, where the first report had already noted in early 2025 that no Digital Services Coordinator had yet been designated and the draft legislation remained under review, the implementing bill was subsequently vetoed by the President, leaving the country without a functioning framework, and Polish respondents described the DSA and the Code as "not very useful" in their daily work. The third note added a regulatory dimension: uncertainty over key DSA definitions leads to uneven application of Article 40(4) across Member States.

Across the region, the usability of platform reporting remains the central issue. Reports are not harmonised and offer no clear benchmarks, which limits cross-platform and cross-country comparison and their use in systemic-risk assessment. The forthcoming first audit of the Code is expected to begin addressing the absence of an independent evaluation of signatory performance.

7. Generative AI as a risk multiplier

Generative AI appears throughout the cycle less as a theme in itself than as an amplifier of existing difficulties: synthetic content is harder to detect and attribute, platform labels remain

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incomplete and dependent on voluntary metadata, and the volume of AI-generated material creates a structural burden for fact-checkers with finite resources. Platforms have introduced watermarking and labelling technologies, such as Google's SynthID and C2PA Content Credentials. In 2026, one respondent cites SynthID as a useful new tool while stressing that its guidelines forbid relying on a single detection tool, and respondents call for mandatory, automatic watermarking of synthetic content and for media literacy resources that explain how generative AI works.

8. Conclusion: a more structured framework that has lost momentum

Across four summary notes, the CEDMO monitoring confirms that the region does not lack actors, expertise or institutional awareness to address disinformation. It also shows a framework that has become more structured and more firmly embedded in the DSA, but that has lost momentum. Three conditions persist. Platform disengagement is deepening while becoming more differentiated, with Meta, Google and LinkedIn narrowing the perimeter of their commitments and TikTok remaining the partial exception. The national backbone of the DSA remains incomplete, with no functioning framework in Poland, legislation not yet in force in the Czech Republic during the 2025 elections, and acknowledged governance complexity in Slovakia. Finally, opacity now extends from algorithms and data access to the electoral mechanisms themselves.

Ground-level actors do not ask for new initiatives so much as for the effective implementation of existing obligations, and for the means to measure it. Without comparable data, traceable commitments, usable research access and a fully empowered DSC in each country, the gap between regulatory ambition and operational reality is likely to persist, weakening the response to disinformation in Central Europe and the credibility of the European approach.

Annex 1: CEDMO fifth summary note

Implementation of the Code of Conduct on Disinformation in the CEDMO Region - Poland, Slovakia, Czech Republic

1. Resources and stakeholders mobilised

This note is the fifth monitoring exercise conducted under the CEDMO project on the implementation of the Code of Conduct on Disinformation (hereinafter "the Code") in Poland, Slovakia and the Czech Republic. It draws on three complementary sources: the biannual reports published by the Very Large Online Platforms (VLOPs) under the Code for the second half of 2025 (July-December 2025); the institutional picture established in the previous cycle through the contributions of the Digital Services Coordinators (DSCs) of Slovakia and the Czech Republic; and the direct experience of ground-level actors: research, fact-checking and media literacy organisations, gathered through a dedicated questionnaire and targeted interviews.

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For this round, the questionnaire gathered responses from nine organisations operating in the CEDMO region: one that operates in Poland, Slovakia, and Czech Republic three based in the Czech Republic, three in Poland and two in Slovakia. By field of activity, four work primarily on disinformation research, three on fact-checking and two on media and information literacy (MIL). Reflecting the specific focus of this final cycle, the mechanisms designed for electoral periods, the questionnaire included a dedicated section addressed to organisations based in the Czech Republic, where parliamentary elections were held during the reporting period. In keeping with established practice, questionnaire responses are presented in aggregated and anonymised form, while the names of platforms and of the partner organisations they declare in their reports are retained.

The note seeks to identify prevailing trends, highlight points of tension between platform declarations and ground-level experience, and situate these findings within the broader regulatory framework established by the Digital Services Act (DSA), with particular attention this round to the operation of the Permanent Task Force and its Rapid Response System during an electoral period.

2. Cross-cutting findings: a more structured but static framework, a disengagement that is deepening yet increasingly differentiated

This final monitoring round points to a framework that is more structured but has lost momentum:

- Platform disengagement is deepening and becoming more differentiated. Meta, Google and LinkedIn are pulling back from their commitments, while TikTok remains the partial exception. These withdrawals are not flagged in the reports.
- Ground-level actors see no improvement. None of the nine respondents reports better working conditions, and five have no reachable contact at any platform.
- The Rapid Response System proved workable during the Czech elections, but it remains to be tested under stress. It operated without a fully empowered Digital Services Coordinator.
- Media literacy campaigns have a modest reach in the region. No respondent reports that its audiences are clearly reached.
- Formal access to platform data still does not translate into usable access for researchers.
- Ground actors mainly call for the implementation of obligations that already exist.

The partial disengagement of major platforms from their Code commitments identified as the most visible trend in the previous note continues, but a comparison of the March 2026 reports with those that preceded them shows that it has become more differentiated across signatories, and that the perimeter of commitments actually subscribed to keeps contracting platform by platform and chapter by chapter. The clearest signal comes from Meta, which answers “no” to the question of whether it plans, over the next six months, to put further

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measures in place to substantially improve the maturity of its implementation, and does so for commitments 17, 18, 19, 21, 23, 24, 30 and 31. The sole positive answer concerning commitment 28 on the tools made available to researchers. Meta also maintains the formulation that the applicability of its fact-checking chapter remains under reassessment in light of the deployment of Community Notes. Google and YouTube do not subscribe to commitments 30 to 33 on empowering the fact-checking community. LinkedIn, having already withdrawn from the fact-checking commitments, unsubscribed during this period from commitments 26 and 27 on researcher data access, and its chapter on commitment 28 contains no new measure. Against this largely static-to-receding posture, TikTok stands out as the partial exception: it reports thirteen IFCN-accredited fact-checking partners across the EU, EEA and wider Europe, up from twelve in the previous period, though still below the fourteen of a year earlier, having added Science Feedback on the advertising-related perimeter.

To this formal retreat is added a more discreet erosion of the tools themselves. Google Trends, presented in earlier reports as a means of public access to data, is no longer described as such; and the European Media and Information Fund (EMIF), endowed with €25 million by Google in 2021 and having supported 121 projects across 28 countries, received its last scheduled payment in February 2026, winding down one of the significant funding vehicles available to the field. Because the reporting framework requires signatories to flag new measures but not the abandonment of an engagement, a programme or a practice, these contractions remain largely invisible in the reports themselves a gap that a dated, explicit indication of any withdrawal would help to close.

This trajectory has a concrete counterpart on the ground. None of the nine respondents reports an improvement in its working conditions vis-à-vis the platforms over the past twelve months: five describe them as “slightly deteriorated” and four as “stable.” New platform tools that genuinely help ground-level work remain rare: among the respondents who answered the question, only one cites such a tool, Google’s SynthID watermark detector for AI-generated content, while stressing that its editorial guidelines forbid relying on a single detection tool to reach a conclusion; the only other development cited as promising is regulatory rather than platform-driven: the vetted-researcher data-access route under Article 40 of the DSA, discussed below. Where a degradation is reported, it concerns Meta: one organisation notes that a channel previously used to surface content for verification on the platform has become “essentially obsolete” and is no longer used, while another describes its day-to-day cooperation with Meta’s fact-checking programme as reduced to the bare minimum and more transactional than the partnership it had been before 2025. Access to the platforms is itself unevenly distributed. Five of the nine respondents have no reachable contact person at any platform. The only two with contacts at several platforms are bound to them by paid partnerships, yet financial dependence is no guarantee of access: a third organisation for which platform funding also represents a significant share of resources reports no reachable contact at all. The six others receive no platform funding, and two organisations mention Google funding that came to an end.

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Asked to name three concrete actions that signatory platforms could take over the next twelve months, the six respondents who answered converge on a short and precise agenda. Data access comes first, with calls for easier access, for greater transparency on engagement data and for cooperative implementation of Article 40 of the DSA, without the blocking that has repeatedly characterised voluntary access schemes. Transparency follows, in particular recommendation and moderation algorithms on Facebook and Instagram, so that civil-society organisations can understand how their own educational content is distributed. Fact-checking is the third strand: respondents ask platforms to guarantee the sustainability of Meta's fact-checking programme and restore it to its 2024 scope, to develop comparable programmes on other platforms, and to make TikTok's programme more transparent. Respondents also call for a dedicated direct line guaranteeing a platform response within a few hours in cases of viral disinformation and deepfakes; mandatory, automatic watermarking of synthetic content; fully searchable advertising repositories with structured data on sponsors, spending and targeting; and more effective action against accounts that repeatedly spread disinformation and against bots and coordinated inauthentic activity, one organisation reporting waves of hostile comments whenever it publishes on the European Union or on support for Ukraine. Most of these demands call less for new initiatives than for the effective implementation of commitments and obligations that already exist under the Code and the DSA.

A second cross-cutting finding, already central to the previous note, concerns the quality and comparability of the data produced by the monitoring framework. Platform reports remain unharmonised and no clear benchmark measures exist, which makes meaningful cross-platform and cross-country assessment difficult; the absence of an independent system capable of systematically evaluating signatory performance compounds this weakness, a gap the forthcoming first audit of the Code is expected to begin addressing. The newer reports illustrate the asymmetry between declared activity and regional reality: platform-reported media-literacy reach in the CEDMO countries is modest, and uptake of researcher programmes is minimal. Finally, the growth of AI-generated content recurs across all sources as a transversal amplifier of existing difficulties, and the DSA's limited operational reality across the region continues to constrain the Code's accountability architecture, both discussed below.

4. Electoral integrity and the Rapid Response System: the Czech parliamentary elections of October 2025

The Czech parliamentary elections of early October 2025 fell within this reporting period. On the platform side, the measures declared are broadly consistent with those seen elsewhere in Europe. TikTok launched an in-app Election Centre for the Czech elections from early September 2025, including a dedicated section on spotting misinformation, and ran a temporary media-literacy election-integrity campaign with its Czech fact-checking partner Demagog.cz; it also reports co-chairing the Task Force's elections working group and maintaining a Transparency Centre global elections hub. Meta points users to authoritative electoral information through "Election Day Information" notices, and Microsoft reports

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active participation in the Task Force's Crisis Response Subgroup and Elections Working Group.

The RRS was activated for the Czech elections. The interview conducted for this note with Petr Gongala, coordinator of Demagog.cz, offers a detailed account. He describes expectations of the mechanism as relatively modest, since it is oriented primarily towards illegal content rather than the broader category of lawful-but-harmful disinformation, and reports reasonable overall satisfaction, though largely because in his words, "it went well because nothing terrible happened." He flags a lack of transparency around the mechanism: who participates, what triggers activation, and whether and how fact-checkers are involved. He also cautions that, absent clear safeguards, a rapid content-removal channel of this kind carries a latent risk of being perceived, or used, as an instrument of censorship. Platforms, for their part, took part in a number of calls and acted on some of the inputs provided; TikTok specifically acted against inauthentic accounts and continued its media-literacy cooperation.

Of the four Czech-based respondents, one was associated with an election-monitoring arrangement at the initiative of EDMO or CEDMO, one at the initiative of the CTU as designated DSC, and two not at all. Assessments of the RRS diverged: one respondent found it "somewhat effective," another "somewhat ineffective", describing platform responses channelled through the system as slow and unenthusiastic, resulting in the quiet deletion of the problematic content but no public-facing reporting, while the two others did not take part. Outside the RRS, election-related reporting to platforms remained limited: two respondents did not report any such content, one never did so outside the RRS, which made the system its only channel of this kind, and one flagged posts through Meta's fact-checking programme without observing anything particular in the platform's responsiveness. This last respondent points to a structural blind spot: the most viral election-related posts could not be rated within the programme, because they were shared by political figures, whose statements fall outside its scope.

The decisive contextual factor is that the exercise unfolded without a fully empowered DSC, the national implementing legislation not yet being in force. The Czech case suggests that these mechanisms are workable in a low-intensity electoral environment, but that they remain untested under stress and that their value is constrained both by their opacity and by the incomplete deployment of the DSA's national architecture.

5. Media and information literacy: a wider reported footprint, an effect still judged insufficient

Platform reports document continued media-literacy activity, but of uneven relevance to the region. Meta published its first Media Literacy Annual Plan in July 2025; yet its 2025 youth-oriented campaigns ran in eight EU countries, none of them in the CEDMO region, and Meta states that it does not plan further measures to improve this commitment, confirming the geographic unevenness already noted. Google's "Hit Pause" campaign on YouTube is live across the EEA but recorded only modest impressions in the region (around 16,000 in Poland, 4,700 in the Czech Republic and 2,000 in Slovakia), while its "Super Searchers" train-the-trainer programme trained only sixteen people across a single

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European session in the period. TikTok reports the most region-specific activity: general media-literacy campaigns spanning fourteen countries including Poland, seventeen localised campaigns on the war in Ukraine covering Slovakia, the Czech Republic and Poland (partnering FakeNews.pl in Poland and Lead Stories elsewhere), and the Czech election-integrity campaign with Demagog.cz. Microsoft's contribution is oriented towards AI literacy, through a partnership with WITNESS on AI-detection literacy for journalists and fact-checkers, Minecraft Education materials, its Search Coach tool, and support for the Poynter Institute's newsroom toolkit.

Ground-level assessments remain consistently critical and echo the structural tension identified previously: algorithmic amplification of emotionally charged, polarising content works against educational objectives, while the opacity of recommendation and moderation systems makes it difficult to explain to audiences how information spreads and why certain content is amplified or suppressed. One media-literacy respondent singles out Facebook and Instagram as the hardest environments to work with pedagogically, citing limited algorithmic transparency and the rapid spread of emotionally charged content. Asked what they most lack, MIL respondents point to accessible explanations of how recommender systems work, resources on how generative AI actually functions rather than only on spotting AI-generated content, verification tools adapted to non-professional use, and data on audiences' real exposure. On whether platform awareness campaigns reach their audiences, assessments range from "partially" to "not measured", none reports that its audiences are clearly reached.

6. Data access for research: the persistent gap between formal availability and practical usability

Platforms again report significant investment in researcher data access. Meta describes continued enrichment of its Content Library, a December 2025 partnership with the Secure Data Access Centre (CASD) to provide independent review of research proposals, a new application portal, expanded coverage of public profiles and a grant of output ownership to researchers, and flags this commitment as the one area in which it plans further improvement. TikTok reports that its research tools are used by more than 900 research teams, highlights a compliance API launched in June 2025 and new filtering of results by views and comments, and lists numerous academic workshops and webinars. Microsoft Bing points to a Qualified Researcher Programme aligned with Article 40(12) of the DSA and to low-cost APIs, and the vetted-researcher data-access route under Article 40 has now entered into practice, which respondents identify as a potentially important future source, though to their knowledge no application had yet been approved.

The experience reported from the ground diverges markedly from this picture. The dominant finding remains that formal access does not translate into usable access. One research organisation reports having requested TikTok's Research API but received only the more limited Video Content Engine, which it found "basically useless" for scientific research; another relies on open tools such as the Google Fact Check Tools API and the Ads Transparency Centre, rated as genuinely accessible, while noting that it has had to scale back the scope of its projects for want of data. Several researchers continue to resort to scraping or third-party aggregation tools where legally and ethically defensible, one describing a formal ethics-assessment process undertaken precisely because official channels were inadequate, another flagging the limited methodological transparency of such tools. The cost of data weighs heavily: among research respondents, the share of budget devoted to acquiring third-party data ranges from negligible to "very significant." The regional uptake figures reinforce the point,

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YouTube's researcher programme recorded a single unique researcher in the Czech Republic and none in Poland or Slovakia, and none of the Google academic grants announced in the period went to organisations in the region.

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