EUROPEAN UNION AND GLOBAL EXPERIENCES IN COMBATING DISINFORMATION: A COMPARATIVE ANALYSIS[1]

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ABSTRACT

This study aims to draw attention to the danger of disinformation, which has become a global risk. The main claim of the study is that increasing disinformation forms a global tendency toward regulating social media and digital platforms. Methodologically, a hybrid method was preferred in the study. While addressing disinformation initiatives, the case study method was used, and while presenting strategies to combat disinformation in and among countries, comparative analysis was employed. In the study, findings and conclusions were reached that there is a relationship of direct proportionality between the growth and diversification of social media and digital platforms and the increase in disinformation, and that a general tendency has emerged worldwide toward regulating social media and digital platforms. It is anticipated that the study will contribute to the literature in terms of examining disinformation, which has become a current and global problem, from its international dimensions.

Keywords: European Union, disinformation, combating disinformation

JEL Codes: F55, K10, K33

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[1] Compliance with the ethical rules of the relevant study has been declared.

DEZENFORMASYONLA MÜCADELEDE AVRUPA BİRLİĞİ VE KÜRESEL DENEYİMLER: KARŞILAŞTIRMALI BİR ANALİZ

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ÖZ | Bu çalışma global bir risk halini alan dezenformasyon tehlikesine dikkat çekmeyi amaçlamaktadır. Çalışmanın temel iddiası, artan dezenformasyon vakalarına bağlı olarak günümüzde sosyal medya ve dijital platformların regüle edilmesi yönünde küresel bir eğilim oluştuğu şeklindedir. Yöntemsel olarak çalışmada hibrit bir yöntem tercih edilmiştir. Dezenformasyon girişimleri ele alınırken vaka analizi (örnek olay) yönteminden, dezenformasyonla mücadele stratejilerini ülkeler nezdinde ve arasında ortaya koyarken karşılaştırmalı analizden yararlanılmıştır. Çalışmada teknolojik gelişmeler ve dezenformasyon artışı arasında doğru orantılı bir ilişki olduğu, dünyada sosyal medya ve dijital platformları regüle etme eğiliminin belirdiği, dezenformasyonla mücadelede stratejisinde bastırıcı mücadeleden önleyici mücadeleye doğru bir dönüşüm yaşadığı şeklindeki bulgu ve sonuçlara ulaşılmıştır. Dezenformasyon konusunun güncel olması, küresel bir sorun olarak belirmesi ve ayrıca uluslararası boyutlarıyla ele alınması gibi nedenlerle çalışmanın literatüre katkı sağlaması öngörülmektedir.

Anahtar Kelimeler: *Avrupa Birliği, dezenformasyon, dezenformasyonla mücadele*

JEL Kodları*: F55, K10, K33*

Alan: *Siyaset Bilimi ve Kamu Yönetimi*
Türü: *Araştırma*

1. INTRODUCTION

Disinformation is defined as false information that is deliberately and usually covertly disseminated to influence people, societies, governments or to conceal the truth (MerriamWebster, 2024). Disinformation, which brings about social, economic or political crises by distorting accurate information for various purposes, has shown a significant upward trend in recent years. The development and proliferation of technology has undoubtedly played a significant role in this upward trend.

Today, technology has gained an important place in the daily lives of individuals, societies and states. For people, technology provides convenience and speed, participation in public services and decisions, entertainment and hobbies. Technology facilitates social access to information, raises awareness and consciousness, and offers important opportunities and possibilities for economic and cultural development. For governments, technology contributes to important and vital administrative practices such as increased efficiency, transparency, accountability, security, rapid decision-making, closer communication and faster interaction with citizens. Although technology offers such multifaceted benefits, it can also lead to serious problems such as disinformation.

The most important reason for this is that, thanks to technology, disinformation can exist all over the world very quickly, regardless of time and place, and can put countries in serious difficulties. Especially with the proliferation of digital platforms and social media, it has become easier to spread disinformation, that is, information that has been deliberately manipulated for various purposes. Disinformation, which is backed by the benefits of technology, causes distortion of accurate information, individuals to make wrong decisions, social insecurity, disruption of public functioning and damage to democracies. Many countries that foresee the danger of disinformation have implemented significant legal and institutional regulations against it.

In recent years, the European Union (EU) has been an important link in this struggle. In order to reduce the effects of disinformation and to develop effective policies against this problem, the EU has developed various strategies, legal and institutional arrangements. Having outlined the general framework of its policies, the EU has left the individual regulations to the member states. In this direction, many EU members, particularly Germany and France, have taken measures against disinformation in recent years. In addition, many countries around the world, such as the UK, Russia, India, Australia and Brazil have implemented public policies to combat disinformation.

The main claim of the study is that the EU's anti-disinformation policies focus on the regulation of digital platforms and ecosystems while striking a

balance between freedom of expression and censorship. The most important conclusion from this study is that the EU's anti-disinformation policies aim to make social media platforms and other actors in the digital ecosystem more responsible. It was also found that the EU strikes a delicate balance in protecting democratic values while trying to prevent disinformation.

This article focuses on disinformation, which has recently gained an international dimension and has occupied the agenda of countries in this respect. The aim of the study is to clarify the problem of disinformation and the fight against disinformation through global experiences and also to raise awareness against this problem. In this context, the policies and strategies implemented by the European Union in the fight against disinformation are examined first, and then the countries that are engaged in the fight against disinformation independently within the member states of the union are discussed. Finally, a comparative analysis of the policies of the EU and other countries of the world in the fight against disinformation has been made in order to address the issue in a broader context. The comparative analysis reveals the similarities and differences between the anti-disinformation policies adopted in different geographies, while also revealing which are the most effective practices and strategies that can be implemented on a global scale in the fight against disinformation.

2. CONCEPT, FEATURES AND HISTORY

When we look at the etymology of the concept of disinformation, it is seen that it is the result of the combination of the Latin word "informem" (nominative informatio) (basic knowledge, concept, idea) with the prefix "-dis" meaning "negativity" or "contrast" (etymonline, 2024). With this combination, the concept started to be used in the sense of false information that is deliberately spread in order to mislead people or hide the truth (MerriamWebster, 2024). Disinformation refers to "misinformation (information) that intentionally aims to mislead the target audience" (Kırık & Tanrıverdi Yılmaz, 2018, p. 121). In other words, disinformation is the process of deliberately spreading false information and using it as a manipulation tool (Rid, 2020).

In the past, the concept of propaganda was preferred over the concept of disinformation. Propaganda has a deep-rooted historical background going back to Ancient Greece. In Ancient Greece, literature, poetry, theater, oratory, sculpture, architecture, legends and folk festivals were used as a form of propaganda (Taylor, 2003, p. 26). The propaganda was mostly about increasing loyalty to the existing regimes and sanctifying them. During the Roman Empire, on the other hand, propaganda was mostly used as a tool for wars and establishing superiority over other societies. Coins, literary works, monuments, monuments,

figures, sculptures and military qualities functioned as a kind of propaganda tool to spread the image of the emperor and the strong army (Hekster, 2007, p. 354). In this respect, propaganda has been used as a method of achieving certain results that cannot be achieved through pure military force, and as a means of gaining the internal loyalty and loyalty of other communities. In the Middle Ages, religious propaganda was used to gain support for the Crusades. Religious sermons, the Pope's letters inviting Christian geographies to war, and the calls of clergymen were used as important propaganda tools in this period, especially in wars for holy lands (Portnykh, 2019, p. 475). The first examples of modern propaganda techniques were put forward during the Napoleonic era. The views and opinions of the French people were systematically manipulated through newspapers, pamphlets, cartoons, plays, theaters, songs and public monuments, and such propaganda was used as a means of loyalty and commitment in the process of nation-state building and the formation of national identity (Forrest, 2004).

Propaganda made its most important breakthrough in the 20th century and showed its most memorable uses during the Cold War. During the two world wars and the social, political and economic rivalry of the bipolar world that lasted for nearly a century, propaganda had a worldwide impact. Therefore, propaganda has been one of the most important weapons in the arsenal of some countries (and especially superpowers such as the USA, Germany, the UK, the Soviet Union) in their social, political and economic wars throughout the 20th century. In other words, since the early days of the bipolar world, both poles have effectively used propaganda as a tool of unarmed warfare.

While propaganda was a more popular concept during the Cold War, today we see that disinformation has become a more widespread and popular concept. Although these two concepts are similar, there are some fundamental differences between them. Propaganda refers to the manipulation of the emotions and thoughts of the target audience in order to spread an ideology, and in this respect, it is a concept with a more political content and ideological aspect (Huang, 2015, p. 420). In other words, propaganda refers to a strategy used in a manipulative way to adopt a particular political view or a method used by two hostile countries to wear each other down. Propaganda and disinformation are similar in the sense that they distort information and do so for a specific purpose. However, propaganda differs from each other in that it has a more political orientation and disinformation has a broader purpose and use. Propaganda can take place within a public activity, in this respect it needs an ideology and a connection with a political power (Ellul, 1967, p. 1), but disinformation does not

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need these and similar elements. Because disinformation can be used as a more independent and broader manipulation tool.

As mentioned earlier, the concept of disinformation is more widely used in today's digital age. In the digital age, disinformation has gained a new dimension in terms of speed, reach and scale through platforms such as the internet and social media, and such platforms have become ideal tools for spreading disinformation. In other words, disinformation has systematically proliferated, especially due to advances in technology and the proliferation of modern communication tools. Accordingly, disinformation has acquired many characteristics today.

Some of the characteristics of disinformation, which has become an extremely complex phenomenon, can be given as follows: It is deliberate, it distorts facts and accurate information, it is not accidental, it targets emotions, it is carried out for a specific purpose, it is based on anonymous and misleading sources, it occurs in a wide variety of types (visual, audio, etc.) and channels (X, Instagram, Snapchat, etc.). As can be seen, disinformation spreads rapidly through digital platforms, increasing its capacity to reach target audiences and making it a global problem. This has turned disinformation into a global problem that can affect not only individuals but also societies and even states.

3. METHOD AND FINDINGS

A hybrid method was preferred in the study. The case analysis (case study) method was used in addressing disinformation initiatives, and comparative analysis was used in presenting counter-disinformation strategies within and between countries. Case study, being a research methodology generally seen in the social sciences, is a method that enables putting forth generalizations and systematic analyses on one or several units, society, group, country, or events (Heale & Twycross, 2018, p. 1). The following steps are generally followed in case study methodology (Cassell & Symon, 2004, p. 323; Yin, 2017, pp. 14-15).

Planning stage: is the stage in which it is determined and planned which case will be handled (it can be a single case or more than one case, it can be similar, it can be a group).

Research design: is the stage where the road map to be followed in case analysis is drawn. Which data will be used, which data will be collected, which method will be used, what will be mentioned in the analysis are determined at this stage.

Preparatory phase: is the phase in which the researcher makes all the necessary preparations before starting the case analysis and determines in

advance which questions will shape the study (basic question sentences such as why, why, how, which?).

Data collection: is the stage where data is collected within the scope of the case study. Data can be obtained from legislation, official documents, archival records, surveys, literature, reports and statistics.

Analysis: is the stage where the collected data is subjected to analysis. The data collected must first of all be reliable and able to answer the research questions. In data analysis; descriptive analysis: Detailed description of the case (Kemp, Hort, & Hollowood, 2018), thematic analysis: Analyzing the data into specific thematic categories (Sovacool, Iskandarova, & Hall, 2023, p. 3), comparative analysis: The comparative analysis of multiple cases, objects, characteristics, methods, etc. (Porta & Keating, 2008, p. 202), causal analysis: Analyzing the cause-and-effect relationship between cases (Marini & Singer, 1988, pp. 349-351).

Sharing the results: This is the final stage of case analysis, where the findings and results of the research are compiled and systematized.
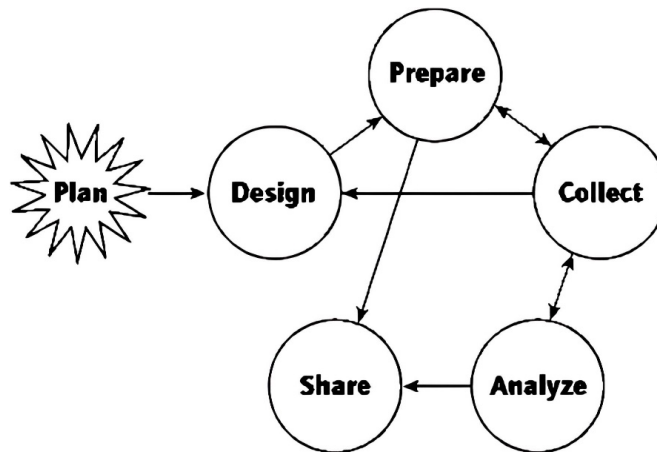

Figure 1: Case Study

Source: (Yin, 2017, p. 2)

This study has many objectives such as drawing attention to disinformation, which has become a global problem and the importance of combating disinformation, revealing new strategies in combating disinformation at the international level, analyzing global experiences with current disinformation

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cases and finally raising awareness against disinformation. The study is expected to contribute to the literature by revealing the development of the disinformation phenomenon, its trends and mechanisms of struggle through comparative country examples.

Some of the findings and conclusions from the study are as follows:

- There is a direct proportional relationship between the digital transformation realized through technological advances and the increase in disinformation.
- Due to the increase in disinformation, both in the European Union and other countries, many legal and institutional regulations have been implemented in recent years.
- Disinformation mostly occurs on social media and digital platforms.
- Due to increasing disinformation attempts, there has been a tendency both in the European Union and in other countries around the world to regulate social media and digital platforms and also to impose various responsibilities on them.
- It is understood that the European Union's strategy in combating disinformation is preventive (taking measures to prevent disinformation from occurring) rather than suppressive (taking steps to address disinformation after it has occurred).

4. GLOBAL IMPACTS OF DISINFORMATION: AN ANALYSIS THROUGH CASE STUDIES

Under this heading, how disinformation affects countries at the global level is revealed through current cases. First, the disinformation strategies of the European Union are discussed, and then Germany and France, which make separate regulations within the member states, are discussed in this context. Then, countries that are not members of the European Union, such as the UK, Australia, India and Russia, which have been subjected to a lot of disinformation and have implemented important regulations in recent years, are discussed. In order to understand countries' efforts to combat disinformation, it is first necessary to clarify the dangers posed by disinformation and its impacts on countries. In this context, the effects of disinformation on countries can be broadly outlined as follows:

- **Impacts on Democratic Functioning and Processes**

Elections are of vital importance for societies to make healthy political choices. Disinformation can directly affect election results by directing voter behavior, especially during election periods. In such important periods, spreading

misleading information through fake accounts, creating public perception about candidates and thus influencing voter behavior are among the important disinformation attempts encountered recently (Barojan, 2021, pp. 63-64). In addition, disinformation has the potential to threaten electoral security and bring about social and ideological polarization.

Case Example: A study analyzed the dynamics of fake news on Twitter (X) during the presidential elections held in the US in 2016. Accordingly, 30 million tweets from 2.2 million users were analyzed over a 5-month period during the election process and it was found that 25% of them spread fake or extremely biased news (Bovet & Makse, 2019, p. 1). During these elections, it also came to the fore that Russia had purchased political advertisements to manipulate the US elections.

- **Negatively Impacts Public Health**

During crisis periods with national and international dimensions, such as pandemics, disinformation has caused the spread of anti-vaccination sentiments or fake treatment methods through false and misleading information, leading to weaknesses in the fight against the pandemic and an increase in the number of casualties.

Case Example: A 2023 study strikingly demonstrated the negative effects of disinformation on public health. At the beginning of the pandemic, during a period when no medical product had been developed for the treatment of the disease, it was observed that chlorine dioxide — a bleaching agent used for textiles or paper, which also has disinfectant properties — began to appear on social media platforms as a "miraculous cure." In this study, the spread of information about chlorine dioxide on Twitter (X) from December 1, 2019, to November 30, 2021, was analyzed using a graph network, and the results showed that messages promoting misinformation spread more widely compared to those based on more reliable information (Sauvayre, 2023, pp. 1-2).

- **Leads to the weakening of social trust and stability**

Disinformation especially affects public administration, public administrators, and politicians significantly. Disinformation affects public administration, public administrators and politicians very much. A possible disinformation attempt against the public administration can undermine trust in the government, official authorities, institutions and official data, and can also lead to social conflicts.

Case Example: In 2017, systematic hate speech on social media accounts led to massive social violence in Myanmar. In a study, social media posts between 2012 and 2017 were analyzed and it was found that a lot of disinformative content was shared between these dates, resulting in the rise of large social organizations,

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racist discourse and ultra-nationalist tendencies (Schissler, 2024). Following these developments, the government intervened in the Myanmar region and approximately 1 million Muslims from Rakhine were forced to migrate.

- **Causes economic damage**

Disinformation has the potential to open the door to very important problems at the macro and micro levels. At the macro level, disinformation can mislead the economic forecasts of governments, disrupt market functioning and economic stability, and open the door to manipulative attacks through misleading and false financial information. At the micro level, it can affect the future strategies and expectations of companies, causing them to make wrong decisions, adversely affecting their credibility, causing firm losses, and causing investors to withdraw from the economy. In other words, disinformation can negatively affect businesses on a global scale, reduce sales, disrupt supply chains and operations, damage customer confidence and lead to reputational losses that are difficult to repair (Baltezarevic, 2024, p. 460). Especially in recent years, it has been determined that major manipulations have been made on stocks with false financial information spread by financial bots that have proliferated on social media (Petratos, 2021, pp. 765-766).

Case Example: In September 2008, an old article about the 2002 bankruptcy of the parent company of United Airlines was reposted on social media and many people had the false perception that the company had filed for a new bankruptcy. This caused a 76% drop in the company's shares within a few minutes and NASDAQ halted all trading, but even though the news turned out to be disinformation, the company closed the day 11.2% below its previous closing value (Carvalho, Klagge, & Moench, 2011).

- **Threatens national security and negatively affects international image**

Disinformation has both national and international effects. At the national level, disinformation is carried out with the aim of disrupting the social cohesion and dialogue of countries, exploiting social weaknesses, spreading conspiracy theories at the social level and enabling the spread of ideas that are not supported by facts (Sarts, 2021, pp. 23-25). Disinformation at the international level is often carried out by foreign states or non-state actors to deliberately spread false or unbalanced information in the target country and to create confusion in that country (Gerrits, 2018, p. 6). Therefore, disinformation attempts can cause internal unrest in the target country, open the door to social conflicts by manipulating the perception of different segments in that country, and negatively affect the international image by increasing conflicts between countries (Sohn, Edwards, & Petersen, 2024).

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Case Example: In May 2017, there were many posts on social media through fake accounts and bots claiming that Qatar was covertly supporting Iran and also providing support to illegal armed organizations. The flow of negative information and disinformation against Qatar soon took its toll and in June 2017, some countries such as the United Arab Emirates (UAE), Bahrain, and Egypt, led by Saudi Arabia, decided to cut diplomatic relations with Qatar and imposed a blockade against it, resulting in the Gulf Crisis (Jones, 2019, pp. 1389-1390).

- **Damages the knowledge ecosystem**

The information ecosystem refers to the processes of producing, storing, disseminating, receiving and using information. The spread and proliferation of fake news causes the information ecosystem to erode over time. This situation makes it difficult for the public to access accurate information and leads to social conflicts (Wardle, 2024, pp. 334-335).

Example Case: During the Covid-19 pandemic, many unscientific WhatsApp and social media channels were identified about homemade medicines and traditional treatment methods for the treatment of coronavirus as an alternative to the scientific information provided by the official authorities (Kanozia, Kaur, & Arya, 2021). These disinformation channels disrupted the information ecosystem created by the official authorities and caused many problems in the fight against the pandemic.

4.1. The European Union in combating disinformation

The European Union (EU) has adopted various regulations to establish a set of standards and measures for member states to combat disinformation. The main purpose of these regulations is to ensure that member states become more resilient against disinformation. The European Union's first attempts to combat disinformation date back to 2015. In 2015, the European Council called for an action plan to counter disinformation campaigns coming from Russia, in cooperation with the Union's Member States and institutions. Two years later, in 2017, the European Commission established a High-Level Expert Group (HLEG) to advise on countering disinformation (Jerónimo & Sanchez Esparza, 2022, pp. 3-4).

The European Union took the next step in combating disinformation on 26.04.2018 with a communiqué entitled "Combating Online Disinformation: A European Approach" on 26.04.2018. The Communication is the result of extensive consultations with citizens and stakeholders by the European Commission, the executive body of the Union and the designer and coordinator of key policies. The Communication outlines the importance of combating disinformation, ways and means, measures to counter it and finally some

recommendations. The Communication argues that the European Union is based on democracy, free and independent media and freedom of opinion, but that disinformation undermines democratic processes, undermines trust in institutions and the media, and empowers radical and extremist ideas and activities.

Some remarkable details in the report are as follows (European Commission, 2018a, p. 6):

- Public awareness of disinformation needs to be raised.
- The spread of disinformation distorts public opinion and influences policy-making processes.
- Disinformation also often promotes radical and extremist ideas and activities.
- Disinformation can reduce trust in science and empirical evidence.
- Disinformation erodes trust in institutions, digital and traditional media and undermines democracies by preventing citizens from making informed decisions.
- There is no single best way to combat disinformation. Therefore, there should be no expectation that a single solution can address all disinformation challenges. At the same time, inaction is not an option.
- Areas such as climate change, migration, public safety, health and finance are among the critical issues that generate the most disinformation.

In response to these negative effects of disinformation, strategies to combat disinformation have also been proposed. Accordingly, some of these strategies include the creation of digital ecosystems based on transparency and prioritizing high-quality information, enhancing cooperation in all areas, empowering citizens against disinformation, and protecting democracies and policy-making processes.

Another important step taken by the European Commission to combat disinformation is the 'Action Plan against Disinformation' of 05.12.2018. The plan emphasized that disinformation poses a major challenge for European democracies and societies, undermines citizens' trust in democracy and institutions, causes polarization in public opinion, and sabotages democratic decision-making processes, and therefore must be tackled while remaining true to the values of the European Union (European Commission, 2018b, pp. 11-12).

This action plan envisages inter-country coordination and cooperation against disinformation. Accordingly: a) Improving the ability of Union institutions to detect, analyze and expose disinformation, b) Coordinating and strengthening joint responses to disinformation, c) Mobilizing the private sector to combat disinformation, d) Raising awareness and building public resilience...

are among the action plan's strategies to combat disinformation (European Commission, 2018b, p. 5). It is also envisaged that these strategies will be strengthened by other steps such as education and media literacy, supporting fact-checkers, researchers and civil society.

In the following period, the European Union introduced two more important regulations against disinformation. The first of these is the Disinformation Code of Practice dated June 16, 2022, and the other is the EU Digital Services Act, which entered into force on August 25, 2023. The Disinformation Code of Practice establishes self-regulatory standards for online platforms in the fight against disinformation. Accordingly, these platforms should prevent the spread of disinformation, guarantee the transparency of political advertisements, cooperate with fact-checkers, establish cross-platform cooperation on disinformative behaviors and practices, and facilitate researchers' access to data, cutting off disinformation disseminators' revenues from platforms, listing the tactics, techniques and procedures frequently used by disinformation actors, periodically updating this list, setting clear policies against them, and platforms empowering and informing researchers and users... such as the European Commission (European Commission, 2022).

Enacted in 2023, the EU Digital Services Act is one of the most comprehensive steps taken by the European Union to combat disinformation. It regulates a wide range of online intermediaries, content providers and platforms such as digital marketplaces, social networks, content sharing platforms, app stores and imposes obligations on them according to their level and size (Turillazzia, Taddeoa, Florid, & Casolaria, 2023). The aim of the law is to ensure the security, fundamental rights and freedoms of users, to prevent disinformation and the spread of illegal and harmful activities online, as well as to ensure a transparent online platform environment (European Commission, 2023). The law covers a wide range of large, medium and small platforms, including Amazon Store, Booking, Apple Store, Aliexpress, Google Play, Google Maps, YouTube, Facebook, X (Twitter), Instagram, Bing, Pinterest, TikTok... to name a few. The law aims to prevent both individual (e.g. violations of personal rights) and public harms (e.g. election processes).

This regulation imposes an obligation on digital platforms to monitor and remove illegal content, to share more data with researchers and auditors, to request less personal data, and to be more careful when sharing topics, content and posts related to sexual orientation, religious beliefs, race, migrants, children and young people.

Finally, the European Union has approved the Digital Markets Law, which supports and complements the Digital Services Law, to gradually enter into

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force. This law was enacted to regulate and supervise digital companies, which have proliferated and diversified over time, to ensure their functioning in a certain order, to enable them to continue their existence under equal competitive conditions with each other, to impose various rights and obligations on them, and to create a fair, effective and transparent digital sector.

Considering all these legal regulations, the following conclusions can be drawn:

- With these legal regulations, the European Union Digital platforms do not have unlimited sovereignty and freedom, and disinformation is one of the biggest problems of the digital age.
- At the core of these legal regulations is the idea of preventing the negative impact on personal rights and public functioning, and regulating and controlling social media and digital platforms.
- With the regulations of the European Union, the strategy to combat disinformation has undergone a significant transformation. There has been a transformation from a reactive to a proactive strategy. Accordingly, instead of combating disinformation after it occurs, an understanding that envisages taking measures against disinformation before it occurs has been adopted.
- The European Union has emphasized freedom of expression in its regulations.
- The European Union has implemented regulations that impose responsibility on platforms that mediate disinformation as well as those that spread it. In this responsibility, which we can call "intermediary responsibility", digital platforms have important obligations in issues such as the detection, monitoring and control of the source of disinformation.
- When the regulations of the European Union are examined, it is seen that administrative sanctions such as fines rather than prison sentences come to the fore.

The European Union has set a general framework for combating disinformation and tried to establish a standard in this regard. Apart from these regulations, member states have also independently enacted disinformation laws and thus tried to adapt their domestic laws to the fight against disinformation. In the following sections, various legal regulations enacted by both EU and non-EU member states to combat disinformation are discussed.

- **Germany**

In recent years, as in the rest of the world, a number of significant regulations have been implemented in Germany as a result of the intense disinformation environment surrounding important issues such as migrants and political

elections. In Germany, the fight against disinformation generally proceeds along two lines. On the one hand, the active participation of civil society organizations in the process and raising public awareness on this issue, and on the other hand, the implementation of legal regulations.

Civil society initiatives are very active against disinformation. Some of these initiatives contribute to the fight against disinformation by debunking misinformation (Faktencheck21), some by disseminating reliable information (correctiv.org), and some by contributing to the development of digital media literacy (DigiBitS, Klicksafe) (Bayer, 2021).

The Network Enforcement Act (NetzDG), which was passed by parliament in October 2017 and entered into force on January 1, 2018, has been one of the important regulations in the fight against disinformation in Germany. The law contains binding provisions for internet platforms designed to enable users to share any content with other users for profit or to make such content available to the public.For example, social network providers that receive more than 100 complaints about illegal content within a calendar year are required to prepare reports on illegal content complaints on their platforms every six months. These reports must be published in the Federal Gazette and on the social network provider's website no later than one month after the end of the relevant six-month period.

According to the law, social media platforms with more than 2 million users (such as Facebook, Instagram, YouTube, Twitter (X) and Google) are obliged to remove or block illegal posts and content within 24 hours. They are also required to remove all illegal content within 7 days of its publication and to keep the removed or deleted content for at least 10 weeks. Platforms that fail to fulfill these obligations may be fined up to 5 million Euros depending on the nature of the offense.

The law is the first of its kind in Europe and imposes an obligation on social media platforms to remove, delete and block illegal content. However, the law has also been criticized. At the forefront of these criticisms is the emphasis on freedom of expression. The second criticism is the lack of a clear definition of what constitutes "clearly illegal" content, and the third is that the 24-hour period is considered too short to verify the accuracy of information.

- **France**

Two legal regulations enacted in recent years stand out in the fight against disinformation in France. The first of these came into force in 2018 and the other in 2020. Although both were enacted within the scope of combating disinformation, they differ from each other in terms of the areas and issues they

regulate. If we talk about their contents together with the reasons for their emergence respectively, we can say the following.

After 2015, a series of developments in France accelerated the steps to combat disinformation. Following the 2015 terrorist incidents, the clashes and the intensive disinformation attempts on social media platforms during the 2017 elections, the government submitted a draft law to the parliament in the form of the "Law on Combating Disinformation". However, after this bill was rejected twice, necessary amendments were made, the name of the bill was changed to the 'Law against Information Manipulation' and it was resubmitted to parliament (Guillaume, 2019, p. 3). The bill was adopted and became law on November 20, 2018.

This law focuses more on disinformation that occurs during election periods. The main objective of this law, which makes significant changes to the electoral law, is to ensure that electoral processes are conducted in a fair, open, transparent, impartial and stable manner. The law authorizes judges to order the immediate removal of "fake news" published during election campaigns. Accordingly, judges are authorized to stop the dissemination of fake or misleading news and information online for three months before the election. In addition, candidates, political groups and parties have the right to file a lawsuit against fake news on issues related to them and the relevant judge must rule on the application within 48 hours.

In addition, the law imposes obligations on social media platforms to prevent disinformation from disrupting public order or affecting the validity of an election. It requires online platforms to take measures against the dissemination of false, misleading and fraudulent information and to submit reports detailing these measures to the French National National Broadcasting Authority (CSA: Conseil supérieur de l'audiovisuel). Finally, the law authorizes the CSA to suspend broadcasting services to television controlled by a foreign government if it finds that it has deliberately broadcast false information. Another piece of anti-disinformation legislation is the Online Anti-Hate Act (also known as the Aviva Act[2]), which came into force on July 1, 2020. The Aviva Act essentially focuses on hate speech on social media platforms. It requires online platforms to remove content that incites hatred, racist or anti-religious rhetoric and actions within 24 hours from the time it is posted, and within one hour for more serious offenses such as terrorist acts or propaganda. [3] The law also provides for administrative fines of up to €1.2 million for social media platforms that fail to fulfill these

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[2] It is called the Avia Law because French parliamentarian Laetitia Avia led the drafting of the law.
[3] This provision, which is one of the fundamental provisions of the law, was annulled by the French Constitutional Court.

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obligations. What is noteworthy about this law is that it does not impose any penalties on individuals who spread disinformation, but instead provides for administrative fines on the social media platforms that facilitate it.

In addition to the above-mentioned countries, many EU member states, including Austria, Croatia, Cyprus, Czech Republic, Greece, Latvia, Lithuania, Malta, Romania, Slovakia, Malta, Romania and Slovakia, have implemented serious regulations against disinformation. Although these countries have not enacted a standalone disinformation law or a safe internet law like France and Germany, their criminal codes include various administrative and financial penalties for disinformation (Fathaigh, Helberger, & Appelman, 2021, p. 8).

For example, Latvia is the most recent of these countries to adopt a disinformation law. In 2024, amendments to the Criminal Code introduced criminal liability for attempts to influence the electoral process through digital technologies such as artificial intelligence and deep-fake video. Accordingly, a prison sentence of up to five years is foreseen for the deliberate production or dissemination of false and discrediting information about a political party, parliamentary, municipal council or European Parliament candidate using deep-fake technologies during the pre-election campaign period or on election day. However, lighter penalties, including community service, may also be imposed.

Considering the European Union's strategies to combat disinformation and country case studies: It is seen that a multidimensional approach is adopted in the fight against disinformation. The components of this approach can be discussed under the following headings:

- **Public policy making**: The European Union has elevated the fight against disinformation to the level of public policy. In this context, disinformation was first identified as an important problem, the problem was defined, solution strategies were formulated, and then these strategies were implemented at the legal and institutional level.
- **Regulation:** The European Union in the fight against disinformation: European Approach to Combating Online Disinformation, Action Plan against Disinformation, Digital Services Act, Disinformation Code of Practice, Digital Markets Act, etc., the European Union has increased the responsibilities of digital platforms and regulated them. In this context, many responsibilities have been imposed on digital platforms, such as fact-checking, removing incriminating content, submitting periodic reports to the authorities, and sharing information with the authorities.
- **Development and dissemination of digital media literacy, basic education programs and awareness campaigns against disinformation:** Digital media literacy programs and trainings are

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envisaged to ensure that both public administrators and citizens are resilient to disinformation initiatives and are able to take a critical approach to the information and content shared. In this context, in 2018, the European Commission established a High-Level Expert Group (HLEG) to advise on policy initiatives to counter fake news and disinformation spread online. This initiative was followed by the launch of the European Digital Media Observatory (EDMO) project in 2020. EDMO is a project to coordinate the fight against disinformation. While supporting digital media literacy and awareness campaigns, these two initiatives perform many functions such as mapping fact-checking organizations in Europe, mapping, supporting and coordinating research activities on disinformation at the European level, and providing support to public authorities (EDMO, 2024; HLEG, 2018).

- **Transparency and Accountability:** Social media platforms are envisaged to be transparent and accountable to both the public and public authorities. Accordingly, legal arrangements have been made to ensure that digital platforms are transparent and accountable to their interlocutors on issues such as membership requirements, advertising algorithm policies, personal information sharing, and content removal.

- **International Cooperation:** The fight against disinformation has ceased to be a phenomenon that countries can deal with alone in today's global world. Because with digitalization, it has become very difficult to identify and track the source and entrepreneur of disinformation. For this reason, the European Union envisages making the process more effective by establishing cooperation protocols with both countries and international organizations in the fight against disinformation. In this way, it aims to increase information sharing between countries, identify the source of disinformation, develop rapid response mechanisms and minimize the cross-border effects of disinformation.

- **International Standards:** The development of common rules and standards in the fight against disinformation through cooperation protocols and agreements between countries, in other words, placing the fight against disinformation on a global solidarity basis, is also among the basic predictions.

- **Legal Sanctions:** One of the most effective strategies to combat disinformation is legal sanctions. The European Union has regulated legal sanctions in criminal, administrative and financial dimensions and thus pursued a strategy of deterrence against disinformation.

- **Data Verification Networks - Fact Checkers - Rapid Alert System:** Verification networks and fact-checkers that detect, verify and publicize false information are important components of the fight against disinformation. The proliferation of such practices or the support of fact-checking organizations makes the fight against disinformation more effective and sustainable. This is because these practices increase the reliability of the information ecosystem, facilitate access to accurate information for individuals, societies and states, and create a stronger resistance to disinformation. In 2019, the European Union established the Rapid Alert System (RAS) to share insights and coordinate responses to disinformation campaigns among the Union institutions and Member States. The RAS is based on open-source information, as well as information from universities, fact-checking organizations, online platforms and international partners (European Union, 2019).

4.2. Other countries in combating disinformation

Disinformation, which is created, presented and disseminated in order to deliberately deceive individuals, societies and states for various purposes and causes significant damage as a result, is being fought against not only in the European Union but also in many countries around the world. In general, it is seen that a wide range of policies and strategies are implemented in countries outside the European Union. It is seen that the regulations are especially directed towards social media platforms and digital media. In the following sections of the study, the strategies and policies of some countries outside the European Union to combat disinformation are discussed.

- **United Kingdom**

As a result of the recent rise of far-right protests in the UK, anti-immigrant sentiment, the negative effects of social media platforms on children and young people, and finally the challenges posed by major social media platforms, a legal regulation was enacted. The Online Safety Act was submitted to the House of Commons on March 17, 2022 and then entered into force with Royal Assent on October 26, 2023. The Online Safety Act was enacted to implement a series of practices such as preventing illegal content from being seen in the first place and then ensuring that it is removed as soon as possible, making it mandatory to remove content that encourages harm to oneself or others, preventing children from accessing harmful and age-inappropriate content, developing practices for age control and limitation, and ensuring that digital platforms are transparent against risks and dangers.

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In the law, posts that encourage child abuse, violence, harming oneself or others, suicide, the sale of illegal substances (such as drugs), or hate crimes are considered high-risk posts and platforms are obliged to remove them. Finally, the Office of Communications (Ofcom), which regulates and supervises the UK's communications, TV, fixed and mobile line, telecommunications, is responsible and authorized for the oversight and supervision of this law (Ofcom, 2024).

As can be seen, the law does not only include regulations for digital platforms and online content but also introduces a series of measures aimed at specific groups in society (children and young people). In other words, this law aims to impose an obligation on social media platforms to remove illegal content and to protect vulnerable individuals in the online environment (Dittel, 2022, p. 185).

- **India**

India is one of the countries with the highest number of internet users in the world due to its population. According to 2024 data, with more than 900 million internet users, India is the second largest online market in the world after China (Statista, 2024). Especially during the Covid-19 pandemic, many disinformation news on issues such as the emergence of the disease, its treatment, and vaccination have occupied the country's agenda. For example, while the number of false and fake news recorded in 2018 was 280 and 486 in 2019, it increased by 214% to 1527 in 2020, when the pandemic broke out (Ghosh, 2020, p. 10). Due to the increasing fake news and disinformative content in India, a "Bill on Prohibition of Fake News on Social Media" was prepared in 2023 to combat disinformation. This regulation provides for imprisonment from three to seven years, a fine or both imprisonment and fine for those who spread fake news or misleading information, endanger the sovereignty, unity and integrity of the country or public order.

- **Russia**

A number of laws against disinformation have been enacted in Russia since 2019. On 18.03.2019, the Law on Fake News and the Law on Disrespect for Authorities and the State, on 31.03.2020, the Covid-19 Fake News Law, on 04.03.2022, the Law on Disinformation on Military Activities (Sherstoboeva, 2024, p. 42). These laws aim to make the fight against disinformation more effective by amending various legal regulations such as the Criminal Code, the Code of Administrative Offenses and the Law on Information Technology and Information Protection. Accordingly, The Law on Fake News and the Law on Disrespect for Authorities and the State, which entered into force on 18.03.2019, are essentially amendments to some articles of the Law on Information, Information Technology and Information Protection, which entered into force in 2016. With these amendments, it paved the way for those who spread fake news and openly disrespect the authorities to be punished with administrative fines and

administrative detention for up to 15 days (Barata & Dairbekov, 2019). In 2020, with the Covid-19 pandemic affecting the whole world, there was an increase in disinformation news. Due to this situation, the Fake News Law entered into force on 31.03.2020. This law amends the Criminal Code and the Code of Administrative Offenses and imposes administrative and criminal sanctions on natural and legal persons who cause disinformation in extraordinary situations such as epidemics, disasters, emergencies. Recently, with the war in Russia against Ukraine, there has been an intense increase in disinformation news and posts. In response, amendments were made to the Criminal Code on 04.03.2022 and criminal liability was imposed on those who spread disinformation about the Russian army and the war.

- **USA**

Disinformation cases in the US are particularly intense during election periods. For example, during the US presidential elections in 2016, the revelation that Russia had purchased political advertisements to manipulate the US elections caused a huge repercussion in the country. The US, which has also experienced a great deal of disinformation on issues such as political corruption, climate change, electoral politics and the Covid-19 Pandemic, has implemented a series of regulations in response to these events. The first of these is The Honest Ads Act, which entered into force on October 19, 2017, and underlines that political advertisements cannot be purchased directly or indirectly by a foreign citizen in order to prevent disinformation in elections. Another legal regulation is the "Safe Web Act", which entered into force in 2020. With this law, it was tried to prevent sales to consumers with disinformation advertisements, false and distorted information.

In 2022, the Law on Education against Misinformation and Disinformation was drafted. This draft law Supporting information and media literacy education, establishing a commission to prevent misinformation and disinformation, and providing grants to non-profit organizations to combat misinformation and disinformation. Similarly, the Digital Citizenship and Media Literacy Act was introduced in 2022. This legislation includes provisions such as grants to state and local educational institutions, public libraries and qualified non-profit organizations to develop and promote media literacy and digital citizenship education for elementary and middle school students. This law aims to create disinformation awareness in the whole society, including young age groups.

In the US, regulations against disinformation have also been made at the state level. For example, in 2022, the Assembly Resolution No. 587 of the State of California came into force. The law obliges social media companies to inform

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their users about the content and terms of their services, as well as the actions the company plans to take in case of violations of the terms, such as content removal or banning. It also requires platforms to be more vigilant about hate speech, racism, disinformation, harassment and foreign political interference. The law stipulates fines of up to $15,000 per day per violation for companies that do not comply with the rules (Theofilos, 2024, pp. 132-133).

- **Australia**

Australia enacted the Online Safety Act in 2021 to limit the impact of online platforms, especially on children and young people. This law introduced a series of measures to make online platforms more trustworthy. In this context, regulations were made on many of these issues, such as removing harmful content such as violence, terrorism, racism, hate speech, educating the public about disinformation, promoting digital media literacy, holding providers more responsible for the safety of users. In the following period, a draft law was prepared and submitted to parliament in 2024, which envisages amendments to this law. This draft law envisages setting the minimum age limit on social media at 16, protecting children and young people from disinformation, and placing the responsibility for the harms of online platforms (such as Snapchat, TikTok, Instagram and X) directly on social media platforms, not just on parents or young people. It also provides for criminal sanctions for online safety violations and fines of up to $49.5 million to combat systematic disinformation (Rowland, 2024).

As can be seen from the above-mentioned country case studies outside the European Union, the effects of disinformation have become one of the biggest threats of many states in the globalizing world. Countries have developed strategies to combat disinformation with different methods depending on their social, political and administrative realities. However, it should be noted that combating disinformation is a problem that requires cooperation not only at the national level but also at the global level. Especially in today's world where disinformation spreads rapidly with technological developments, it is seen that international cooperation, norms and standards should be determined and various practices should be implemented as well as the individual efforts of the countries. Sharing knowledge, experience and know-how among countries and adopting a multi-partner approach in the fight against disinformation will play a key role in the fight against disinformation.

5. COMPARATIVE ANALYSIS

In this study, the anti-disinformation policies of the European Union and other countries in the world are discussed. Under this heading, these policies are

generally presented through a comparative analysis. Comparative analysis is a method used to reveal similarities and differences, to make generalizations or to develop general models and finally to identify cause and effect relationships.

First of all, if we reveal the basic similarities: All the countries studied have imposed certain obligations on social media platforms. These obligations are generally in the form of removal of illegal content, self-regulation, openness and transparency. In addition, most legal regulations have been enacted to protect children and young people from the negative effects of social media and to prevent disinformation in electoral processes. Again, legal regulations indicate that the primary source of disinformation is social media and digital platforms.

Countries have envisaged different types of sanctions in the fight against disinformation. Some countries provide for fines, some for imprisonment, and some for both imprisonment and fines. For example, India and Russia provide for imprisonment, while the European Union provides for fines. Again, while the European Union strikes a balance between freedom of expression and censorship in the fight against disinformation, this issue has not been on the agenda in other countries. On the other hand, while the focus of the EU in combating disinformation (Germany and France) is on public order, electoral processes and illegal content, Australia and the UK focus on the online safety of children and young people. The US, on the other hand, has focused on media literacy and has put forward a more awareness and education-based fight. In terms of platform obligations, countries such as Germany, France and the UK demand content removal and reporting from platforms, while the US and Australia demand platforms to be more transparent and accountable. India and Russia stand out with tough regulations criminalizing the dissemination of disinformation and imposing criminal sanctions. In light of this information, the main factors shaping countries' strategies to combat disinformation are social problems and disinformation attempts against democratic and political processes.

Table 1: Comparison of Counter Disinformation Strategies

Country	Legal Regulation	Disinformation Focus	Platform Obligations	Imprisonment	Fines	Focus Groups
Germany	- NetzDG	Removal and reporting of illegal content	Removal of illegal content within 24 hours, fines up to €5 million	No	Yes (up to €5 million)	General users and social media platforms
France	- Law against Information Manipulation - Avia Law	Preventing disinformation during election periods	Removing fake news during election periods, reporting to CSA	No	Yes (up to €1.2 million)	Electoral process, candidates and political groups
UK	- Online Safety Act	Protecting children and young people from harmful content online	Removal of harmful content, child protection measures	No	Yes	Children and young people
USA	- Honest Ads Act -Secure WEB Act -Law on Education against Misinformation and Disinformation	Disinformation in elections, social media regulations, media literacy	Transparency of political advertisements, media literacy training programs	No	Yes ($15,000 daily fine)	Consumers, voters, educational institutions

Australia	- Online Safety Act	Online safety of children and young people and platform responsibility	Removal of harmful content online, platform responsibility	No	Yes (up to $49.5 million)	Children and young people
India	- Bill to Ban Fake News on Social Media	Spreading fake news and disturbing public order	Imprisonment and fines for spreading fake news	Yes (3-7 years)	Yes	General users and social media platforms
Russia	-Fake News Act -Covid-19 Fake News Act - Disinformation of Military Activities Act	Fake news, disrespect for the government, military disinformation	Administrative penalties and detention for spreading false news	Yes (detention up to 15 days - imprisonment up to 15 years)	Yes	General users, media, government critics

6. CONCLUSION

Disinformation is the deliberate dissemination of false information for various purposes. Disinformation, which has the potential to cause social, political, and economic crises in a short time and on a large scale, has become widespread today and has increased its impact with advances in technology. Accordingly, many countries around the world, especially the European Union, have put into practice significant regulations and policies in the fight against disinformation. In this study, the phenomenon of disinformation, which has become an important problem all over the world, and the current course of the struggle carried out against it have been addressed. Within this scope, the findings and conclusions of the study are, in general terms, as follows.

There is a directly proportional relationship between the spread and increased use of social media and digital platforms and the rise of disinformation. As can be understood from the case examples addressed in the study, many large-scale disinformation attempts occur on these channels.

Another conclusion drawn from the study is that the course of the fight against disinformation proceeds along a thin line between democratic oversight and authoritarian intervention. Based on the legal regulations and policy documents presented in the study: some countries combat disinformation with deterrent policies (for example, EU policies), while other countries do so with punitive policies (for example, Russia, India).

In general, there is a worldwide tendency toward regulating social media and digital platforms (legal regulation and, within this framework, increasing responsibilities). In other words, the regulation policy pursued within the scope of combating disinformation is not specific to certain countries but has emerged as a general trend.

Considering the country examples included in the study and the policies they have pursued, it is seen that ensuring that social media and digital platforms have an accountable, auditable, more open, and transparent structure is at the center of the regulations made within the scope of combating disinformation.

The analyses and comparisons included in the study show that the fight against disinformation is not limited solely to technical and legal regulations; moreover, they indicate that countries also put into practice various policies such as increasing the level of individual and societal awareness, strengthening national and international cooperation, and spreading social-media literacy and awareness. Therefore, there is no single method for combating disinformation. As can be seen from the country examples provided in the study, the fight against disinformation today is carried out with a multifaceted approach that includes technological, economic, legal, and social combat strategies.

The study reveals that the fight against disinformation is not limited to certain countries but is on the agenda of almost all countries, and that many countries around the world, especially the European Union and its member states, have implemented significant public policies in this field.

7. CONFLICT OF INTEREST STATEMENT
There is no conflict of interest between the authors.

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CA: Idea, Design, Supervision, Collecting and processing resources, Analysis and interpretation, Literature review, Writer, Critical Review

10. ETHICS COMMITTEE STATEMENT

Ethics committee approval is not required for the study

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