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Monitoring Transparency: EU's Platform Governance in the Time of Information Disorders

Over the past twenty years, digital transformation has dramatically reshaped our information ecosystems, shifting control from traditional journalism to a few dominant online platforms. As the influential policy report of the Council of Europe (Wardle & Derakshan, 2017) depicts, this has resulted in diverse and widespread information disorders: unintentional and intentional viral circulation of false information online and deliberate distortion of facts to target specific individuals, groups, or institutions. The report labels these disorders mis-, dis-, and malinformation, respectively: Misinformation refers to the unintentional spread of false information, disinformation to the deliberate creation and sharing of falsehoods, and malinformation to the intentional distortion of facts to harm individuals or institutions.

As a vast body of research shows, online information disorders play a significant role in distorting information dissemination about key areas of current challenges such as climate change, armed conflicts and wars, and migration.[1] At the same time, the platforms that are the main arenas for disseminating false and misleading content have initially taken the position that they are not media organizations but intermediaries, thus exempt from editorial responsibility. This has posed a major governance challenge nationally and internationally. Numerous countries have instituted so-called disinformation laws, but regrettably, in many cases, such laws are used to promote censorship rather than trustworthy information spaces (e.g., Lim & Bradshaw 2023).

Given these challenges, the European Union (EU) has proactively implemented a range of measures to combat disinformation and safeguard democratic processes. Indeed, as early as 2018, disinformation was recognized as a threat to democracy by 83% of Europeans and perceived as "highly concerning" by 74% of the continent's internet users (Eurobarometer 2018). One of the key

[1] See, e.g., the research repository of the Harvard Misinformation Review, https://misinforeview.hks.harvard.edu/ and the research by the hubs of the European Digital Media Observatory EDMO: https://edmo.eu/resources/repositories/scientific-publications-repository/ .

actions was that the EU created EU vs Disinfo, a platform whose task is to detect and react to disinformation campaigns that have the potential to destabilize the Union or its member countries. Other initiatives to combat disinformation launched by the EU include the Social Observatory for Disinformation and Social Media Analysis (SOMA) and the European Digital Media Observatory (EDMO), a collaboration of national and regional hubs. SOMA and EDMO promote multistakeholder research and actions, including fact-checking and digital literacy education. The EU member countries joined forces in setting up an Action Plan against Disinformation (European Commission 2018) in line with their national defense and security strategies (see also, Dragomir et al. 2024).

Building on these initiatives, the EU has also introduced regulatory frameworks to ensure that online platforms assume greater accountability. In 2018, it spearheaded the creation and adoption of the Code of Practice on Disinformation (CoPD), a self-governance guide targeting tech platforms, the online ad industry, and the fact-checking community. The CoPD was strengthened in 2022 and further amended in 2024 (see, e.g., European Commission 2025), with the intention for the Code to become a co-regulatory instrument in the Digital Services Act (DSA).[2]

DSA is the EU law mitigating numerous risks and harms of digital platforms, such as illegal content, targeted advertising, and cyberbullying. DSA is also designed to simplify platforms' terms and conditions and make content moderation more transparent and contestable by users. The DSA includes special responsibilities for the so-called Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs), that is, those entities with over 45 million users in the EU (Facebook, Instagram, LinkedIn, Bing, TikTok, YouTube, and Google Search).

The CoPD includes numerous tasks, ranging from the demonetization of disinformation and preventing advertising systems from being utilized for disinformation dissemination to the transparency of political advertising, media- and digital literacy measures and other user-empowering actions, collaborations with fact-checkers, and overall bolstering of policies to address both misinformation and disinformation across their services. According to the CoPD, platforms must submit detailed descriptions of all their related activities, called transparency reports, twice a year.

When discussing the DSA and CoPD, it's worth noting how these measures have made a real difference in boosting transparency and accountability. For example, since the CoPD has been integrated into the DSA, platforms will have to publish more detailed transparency reports. These reports should shed light on how they moderate content and manage political advertising, making it easier for researchers, regulators, and the public to see what's really happening online (Borz et al., 2024). This openness could help in identifying disinformation trends more quickly and ensure that regulatory standards are applied more effectively (Nenadić, 2019).

In this contribution, we investigate how the CoPD is being implemented, focusing on the completeness and verifiability of the data that selected very large online platforms (VLOPs) include

[2] Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act) (Text with EEA relevance) PE/30/2022/REV/1 http://data.europa.eu/eli/reg/2022/2065/oj

in their transparency reports. By examining the CoPD's reporting mechanisms in detail, we explore how transparency and accountability are implemented in an environment where a few tech giants hold considerable global influence.

Our data comprises the transparency reports from January to June 2024, published in September 2024, by the four main platforms and their services: Meta (Instagram & Facebook), Google (Search & YouTube), Microsoft (LinkedIn & Bing), and TikTok. To achieve this, we employed a structured framework developed collaboratively by a central team in consultation with the European Digital Media Observatory (EDMO) network and representatives from all associated hubs. This framework is built upon a predefined grid designed to measure compliance across several key commitments outlined in the Code of Practice on Disinformation. The specific commitments we evaluated include:

- Enhancing Media Literacy (Commitment 17)
- Better Equipping Users to Identify Disinformation (Commitment 21)
- Empowering the Research Community (Commitment 26)
- Governance Structure for Data Access (Commitment 27)
- Cooperation with Researchers (Commitment 28)
- Cooperation with the Fact-Checking Community (Commitments 30 & 31)
- Fact-Checkers' Access to Relevant Information (Commitment 32)

Our assessment framework is divided into two main sections. The first examines the quality and completeness of the information reported by the platforms, determining whether they have provided sufficient documentation, transparency, and relevant qualitative and quantitative data. The second section evaluates the evidence supporting the reported information, focusing on its verifiability and corroboration by external sources.

A dedicated team of 11 researchers conducted this assessment. To ensure reliability and consistency, two independent reviewers were assigned to analyze each platform's service. The evaluation process involved several key steps:

1. Reviewing Transparency Reports: Researchers examined the latest transparency reports submitted by each platform, covering the period from January 1, 2024, to June 30, 2024.
2. Systematic Assessment: Using the predefined evaluation grid, each platform's reported information was systematically analyzed based on the specified criteria.
3. Cross-Validation: Independent reviewers cross-validated their findings to identify any discrepancies and ensure objectivity.
4. External Verification: When applicable, external data sources were consulted to verify the accuracy of the reported metrics and claims.
5. Compilation of Findings: A comprehensive assessment report was compiled, summarizing each platform's compliance level across the evaluated commitments.

While this assessment offers a structured evaluation of compliance, certain limitations must be acknowledged. Our analysis is based solely on publicly available transparency reports and additional sources where applicable. The ability to verify reported data varies by platform, depending on the extent of their public disclosures. Additionally, some commitments require qualitative assessments, which may introduce a degree of subjectivity despite our rigorous

cross-validation efforts. Nonetheless, the methodology applied in this assessment ensures a thorough and robust evaluation of platform compliance with the EU Code of Practice on Disinformation.

In addition to analyzing these reporting practices, our study also considers how stronger platform governance, enhanced media literacy, ongoing support for fact-checking, and improved data access for researchers can help meet the challenges posed by today's evolving digital media landscape. We reflect on recent developments that have called into question VLOPs' commitments to accurate reporting and public responsibility, thereby challenging the effectiveness of existing regulatory frameworks.

While our analysis is ongoing and scheduled for completion in March, we can already conclude the following:
Our findings emphasize that robust platform governance is crucial to mitigating the concentration of power among VLOPs, whose control over content distribution plays a significant role in shaping public discourse. At the same time, fostering media literacy empowers citizens to critically assess the information they encounter online while democratizing data access for researchers is essential for conducting independent analyses that can lead to more effective regulations.

By synthesizing empirical evidence with a critical review of current transparency reporting practices, this contribution suggests recommendations for enhancing accountability and transparency within digital ecosystems. Ultimately, our study contributes to ongoing debates on digital regulation and fact-checking by proposing strategies to strengthen governance and bolster resilience in the face of rapid technological change.

All EU actions against information disorders, the CoPD included, are linked to the rights-based approach by the EU, laid out in the 2022 Declaration of Digital Rights and Principles (see, European Commission 2024). Among other things, the Declaration guides the EU in its international relations, helping to shape a global digital transformation that puts people and human rights at its center. This underlines the importance of the CoPD in the situation where, on the one hand, U.S.-based platforms strip down their actions against disinformation under the guise of "freedom of speech" (e.g., Kaplan 2025) and, on the other, where the Chinese TikTok, viewed as a security threat by several countries (e.g., Yang 2024), is becoming a significant source of news for many Europeans, yet the one where disinformation is the hardest to detect (Newman 2024).

On 13 February 2025, the EU endorsed the voluntary CoPD's official integration into the DSA's framework (European Commission 2025). As such, the CoPD will become a relevant benchmark for determining DSA compliance regarding disinformation risks for the providers of VLOPs and VLOSEs that adhere to and comply with its commitments. The CoPD conversion into DSA will take effect from 1 July 2025. In the context of the EU, this is an urgent and vital action in promoting a healthier information space – that, in the best case, will, by example, enhance actions against information disorders worldwide. Such measures as the CoPD are key in supporting more trustworthy information dissemination about and for other global challenges, as well as for international solidarity and human rights. Our research showcases one way the EU efforts regarding platforms and the CoPD can be supported by monitoring the actual actions of the signatories.

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