# Code of Practice on Disinformation – Report of Alliance4Europe for the period 2024

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# Executive summary

For the European Elections, Alliance4Europe convened a network that now consists of around 42 organisations and 130 researchers, fact-checkers, academics, and journalists, later named the Counter Disinformation Network. The network now consists of 47 organisations and over 200 participants from 12 EU and 5 non-EU countries.

Network participants produced 37 alerts in 2024, sent out to government agencies, EU institutions, social media platforms, and advocacy groups. The Code of Pratice Rapid Response System was utilized to flag the alerts which touched elections and the relevant platforms.

The members of the network managed to identify:
- 700 channels violating sanctions against Russian media or sanctioned individuals on social media platforms;
- 611 influence operation ads not labeled as political or touching social issues at the time of posting;
- 131 instances of unlabelled AI-generated images used by European political parties;
- Identified an enforcement issue in enforcing Meta's Ad policy towards Chinese state-controlled media

- 1.6k Doppelganger tweets;
- over 800 organisations targeted by a Russian influence operation;
- Approximately 99k violations against the French election silence period;
- two platforms' reporting systems falling short of their DSA obligations during the French elections;

Our reports have according to members of the community contributed to:
- the takedown of a network of inauthentic Facebook pages operated from West Africa, targeting France with unlabelled political ads;
- Geo-fencing or takedown of over 100 pages violating sanctions against Russia.
- the labelling of unlabelled political ads;
- submission of evidence to EU institutions and national authorities;
- over 40 meetings with officials from different EU countries and institutions raising our findings;
- over 60 articles in the press, reaching over 2 million readers.
- Having Meta change their internal proceedings
- Providing actionable intelligence to the Europan Commission, members of the European Parliament, the European External Action Service, and several EU member state government institutions on the EU, French, Romanian, and German elections.
- Connected smaller organisations with EU officials, providing expert voices a way into Brussels.

A4E also provided over 70 researchers, fact-checkers, academics, and journalists with training on the use of the DISARM framework.

The Code of Practice on Disinformation Election Working Group and the RSS are to be attributed to parts of the success of the network.

| III. Political Advertising | |
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| Commitment 12 | |
| Relevant Signatories commit to increase oversight of political and issue advertising and constructively assist, as appropriate, in the creation, implementation and improvement of political or issue advertising policies and practices. [change wording if adapted] | |
| Measure 12.1 | Alliance4Europe worked to research, monitor and report on the use of online political or issue advertising across Member States. Our reports highlighted systemic issues with one specific social media platforms regulation of state controlled media ads. |
| Measure 12.2 | N/A |
| Measure 12.3 | A4E have alerted fellow Signatories to issues in the implementation or enforcement of political or issue advertising policies or of this Code. |
| **QRE 12.1.1 (for measures 12.1-12.3)** [insert wording if adapted] | Alliance4Europe has monitored the ad libraries of social media platforms for unlabelled political and social issues ads. In 2024, we identified 611 unlabelled ads and reported them to the social media platforms through the CoP RRS. In these conversations, we highlighted the underlying techniques used to circumvent their ad policies. We also publicly published reports on these cases. |

| III. Political Advertising | |
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| Commitment 13 | |
| Relevant Signatories agree to engage in ongoing monitoring and research to understand and respond to risks related to Disinformation in political or issue advertising. [change wording if adapted] | |
| Measure 13.1 | Alliance4Europe worked individually and together through the Task-force to identify novel and evolving disinformation risks in the uses of political or issue advertising and discuss options for addressing those risks. |
| Measure 13.2 | Alliance4Europe consulted with the Task-force and other relevant stakeholders to assess the opportunity and impact of short election "blackout periods" for political or issue advertising. |

| Measure 13.3 | N/A this reporting period. |
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| **QRE 13.1.1 (for measures 13.1-13.3)** [insert wording if adapted] | A4E worked to identify novel and evolving disinformation risks in the uses of political or issue advertising and discuss options for addressing those risks together with other members of the Counter Disinformation Network and the CoP RRS taskforce. We identified TTPs employed by threat actors to circumvent Meta's automated content moderation systems. |

## IV. Integrity of Services

### Commitment 16

Relevant Signatories commit to operate channels of exchange between their relevant teams in order to proactively share information about cross-platform influence operations, foreign interference in information space and relevant incidents that emerge on their respective services, with the aim of preventing dissemination and resurgence on other services, in full compliance with privacy legislation and with due consideration for security and human rights risks.

| Measure 16.1 | Alliance4Europe shared relevant information about cross-platform information manipulation, foreign interference in the information space and incidents via the CoP rapid response system and through our Counter Disinformation Network Slack Workspace. | | |
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| **QRE 16.1.1** | Alliance4Europe has developed a one-page template to summarise cases, allowing readers to quickly get an overview of a the case, the TTPs and narratives used, the impact, actions we have taken, and recommendations. | | |
| **SLI 16.1.1 – Numbers of actions as a result of information sharing** | We measure the actions taken based on the number of alerts sent. | | |
| | Nr of actions taken (total) | Type of detected content | Other relevant metrics |
| **Data** | 37 | AI content, Silence Period violations, Unlabelled ads, influence operations, CIB networks, Sanctions violations | |
| Measure 16.2 | A4E has published 37 alerts who show the tactics and techniques employed by threat actors, showing how these over time change. | | |
| **QRE 16.2.1** | A4E has alerted affected platforms about the tactics and techniques we have spotted being used on their platforms, providing them with the tools they need to mitigate them. | | |

## V. Empowering Users

### Commitment 17

| In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, Relevant Signatories commit to continue and strengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups. [change wording if adapted] | | | | | |
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| Measure 17.2 | Alliance4Europe has developed and run activities to improve media literacy and critical thinking, including running campaigns to raise awareness about disinformation and the TTPs being used by malicious actors. | | | | |
| **QRE 17.2.1** [insert wording if adapted] | Conducted 6 workshops and presentations targeting a broad European Audiences.<br>Conducted one large media campaign to inform the public about Doppelganger.<br>Contributed to twice to TVP's Anatomy of Disinformation series.<br>Ran an information campaign on Operation Overload's use of QR Codes. | | | | |
| **SLI 17.2.1 - actions enforcing policies above** | Methodology of data measurement [suggested character limit: 500 characters] | | | | |
| | Nr of media literacy/ awareness raising activities organised/ participated in | Reach of campaigns | Nr of participants | Nr of interactions with online assets | Nr of participants (etc) |
| **Data** | 10 | 500,000 | 200 | N/A | N/A |

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| **VII. Empowering the fact-checking community** |
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| Commitment 30 |
| Relevant Signatories commit to establish a framework for transparent, structured, open, financially sustainable, and non-discriminatory cooperation between them and the EU fact-checking community regarding resources and support made available to fact-checkers. |

| Measure 30.1 | Alliance4Europe has established MoU's with Fact-checking organisations, EDMO Hubs, and leaders of EDMO hubs to join A4E's Counter Disinformation Network. Their membership enable easy and quick collaborations between fact-checkers, OSINT researchers, academics, and journalists. We provided fact-checkers with data access, free trainings, and a space for coordination. The agreement does not entail any obligations nor in any way control. |
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| **SLI 30.1.1 - Member States and languages covered by agreements with the fact-checking organisations** [change wording if adapted] | Number of languages covered: Polish, Swedish, English, Danish, Finish, French, German, Moldovan, Italian, Belarusian. |
| | Nr of agreements with fact-checking organisations |
| **Data** | 10 |
| Measure 30.3 | Actions taken by Alliance4Europe to facilitate cross-border collaboration between fact-checkers. |

| QRE 30.3.1 [insert wording if adapted] | Alliance4Europe has brought together fact-checkers with other counter-disinformation practitioners from different EU countries, giving them a space to coordinate their work and launch larger projects. |
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| IX. Permanent Task-Force |
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| Commitment 37 |
| Signatories commit to participate in the permanent Task-force. The Task-force includes the Signatories of the Code and representatives from EDMO and ERGA. It is chaired by the European Commission, and includes representatives of the European External Action Service (EEAS). The Task-force can also invite relevant experts as observers to support its work. Decisions of the Task-force are made by consensus. [change wording if adapted] |

| Measure 37.1 | Alliance4Europe participated in the Task-force and contribute to its work. |
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| QRE 37.6.1 [insert wording if adapted] | Alliance4Europe has consistently participated in the task-force of the Rapid Response System, working on the European Parliament Elections, French Elections, and Romanian Elections. We have also participated in the discussions on the Code conversion. |

| X. Monitoring of Code |
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| Commitment 39 |
| Signatories commit to provide to the European Commission, within 1 month after the end of the implementation period (6 months after this Code's signature) the baseline reports as set out in the Preamble. |

| X. Monitoring of Code |
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| Commitment 42 |
| Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. |

| **X. Monitoring of Code** |
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| Commitment 43 |
| Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. [change wording if adapted] |

| **X. Monitoring of Code** |
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| Commitment 44 |
| Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. [change wording if adapted] |

# Reporting on the service's response during an election

## Reporting on the service's response during an election

Threats observed or anticipated at time of reporting: Alliance4Europe is seeing an increased use of AI in influence operations. We are also concerned about the uneven enforcement of sanctions by the social media platforms, allowing influence operation actors to operate on social media, spreading their illegal content.

We are also observing how anonymous accounts and CIB networks are still operating freely, engaging in influence operations while hiding their affiliations.

- 700 channels violating sanctions against Russian media or sanctioned individuals on social media platforms.
- 611 influence operation ads not labeled as political at the time of posting.
- 131 instances of unlabeled AI-generated images used by European political parties.
- 1.6k Doppelganger tweets.
- Over 800 organizations targeted by a Russian influence operation.
- Approximately 99k violations against the French election silence period.
- Two platforms' reporting systems falling short of their DSA obligations during the French elections.
- Serious attempts to manipulate the Romanian elections results through coordinated inauthentic behavior trying to manipulate TikTok's algorithm.

Mitigations in place – or planned - at time of reporting:

Alliance4Europe is working to convene a wide range of civil society actors who can work together to on a systemic level analyse and tackle these threats.

[Note: Signatories are requested to provide information relevant to their particular response to the threats and challenges they observed on their service(s). They ensure that the information below provides an accurate and complete report of their relevant actions. As operational responses to crisis/election situations can vary from service to service, an absence of information should not be considered a priori a shortfall in the way a particular service has responded. Impact metrics are accurate to the best of signatories' abilities to measure them].