

Code of Practice on
Disinformation – Report of
the European Fact-Checking
Standards Network (EFSCN)
for the period 1 January to
30 June 2025

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Executive summary

The Code of Conduct on Disinformation (CoCD) serves as a benchmark for evaluating DSA compliance, especially regarding articles 34 and 35. Disinformation poses a persistent systemic risk to electoral integrity, individual and public health, and civic discourse. With the conversion of the Code into a Code of Conduct under the DSA, the European Fact-Checking Standards Network (EFCSN) believes it is essential to monitor and evaluate how platform-signatories are implementing the Code's measures. Although the submission of this report was not strictly required, the EFCSN has chosen to do so in recognition of the Code's pivotal role in ensuring that Very Large Online Platforms and Search Engines (VLOPSEs) adopt the "reasonable, proportionate and effective mitigation measures" that are required.

The CoCD remains fit for purpose: it was crafted through an unprecedented consensus that included major platforms, the European Commission, civil society, academics, and fact-checkers, and it still represents the most comprehensive action plan available to platforms for fulfilling their obligations under the DSA. Yet, recent developments—such as platforms unsubscribing from key commitments—demonstrate the fragility of this progress (for details, see also the recent EFCSN report "[The Moment of Truth for the Code of Conduct on Disinformation](#)"). Emblematic of this trend is Google's quiet announcement to kill the fact-checking snippet in search results in June 2025. To our knowledge, Google did not inform the Code of Conduct Permanent Task Force about it. This feature alone had enabled over 120 million fact-check impressions every six months in the EU, according to Google's own reports, and its removal threatens to undermine one of the most successful anti-disinformation interventions deployed on a VLOPSE. Such retrenchment jeopardizes the relevance of the Code at the very moment when its implementation is most crucial.

To provide more prompt contextual information, the EFCSN prepared a survey and circulated it among verified members focused on agreements between fact-checkers and online services, integration of fact-checks and proper access to information. A total of 40 organisations based in 27 different countries in Europe shared their data and impressions. The analysis of the answers to the survey was combined with information of the work conducted by the EFCSN and reflected within this report.

About the EFCSN

The European Fact-Checking Standards Network (EFCSN) is the representative of independent fact-checking organisations operating in Europe. In comparison to the previous report, the EFCSN has added two more members to its network. Therefore, the EFCSN is currently formed by 62 organisations, 41 of which are based in EU member states and 21 in other Council of Europe countries and Kosovo. Together, the EFCSN member organisations cover most official languages in the EU.

Each one of them has committed to the highest ethical, methodological and transparency standards as outlined in the European Code of Standards for Independent Fact-Checking Organisations, and has agreed to be evaluated for compliance by two independent assessors and the EFCSN Governance Body. The commitment of verified members with independent and quality fact-checking activities as well as the belief that promoting standards and collaboration is key in the fight against disinformation.

Collaboration is not only promoted among verified members of the EFCSN but with other Signatories of the Code of Practice on Disinformation. The Empowerment of Fact-Checkers Sub group within the permanent task-force, chaired by the EFCSN, is one of the meeting points where we are in contact

with other organisations and exchange relevant insights, including with representatives of VLOPs and VLOSEs. In addition, we evaluate reports submitted by major online services and make suggestions on actions under commitments on fact-checking that we hope lead to future improvements. Additionally, the EFCSN advocates for the integrity of information spaces and holds influential actors to account.

As the EFCSN submitted its last transparency report in March 2025, covering the reporting period July 1 to December 31, 2024, this report covers the period from January 1 to June 30, 2025.

| II. Scrutiny of Ad Placements | |
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| Commitment 2 | |
| Relevant Signatories participating in advertising commit to prevent the misuse of advertising systems to disseminate Disinformation in the form of advertising messages. [change wording if adapted] | |
| Measure 2.2 | We will be open to assist in the development of tools and methodologies by Relevant Signatories to identify content and sources as distributing harmful Disinformation, to identify and take action on ads and promoted content that violate advertising policies regarding Disinformation mentioned in Measure 2.1. |
| QRE 2.2.1 [insert wording if adapted] | The EFCSN has had no conversations with relevant signatories that touched on the specific issue of disinformation in ads in the last reporting period. The EFCSN remains open to assist in the development of tools and methodologies by relevant signatories to identify content and sources as distributing harmful Disinformation, to identify and take action on ads and promoted content that violate advertising policies regarding Disinformation mentioned in Measure 2.1. |

| II. Scrutiny of Ad Placements | |
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| Commitment 3 | |
| Relevant Signatories involved in buying, selling and placing digital advertising commit to exchange best practices and strengthen cooperation with relevant players, expanding to organisations active in the online monetisation value chain, such as online e-payment services, e-commerce platforms and relevant crowd-funding/donation systems, with the aim to increase the effectiveness of scrutiny of ad placements on their own services. [change wording if adapted] | |
| Measure 3.1 | [insert wording if adapted] |
| QRE 3.1.1 [insert wording if adapted] | The EFCSN remains accessible and open for conversations with relevant actors in order to provide information regarding possible misuse of advertisement systems and tackling purveyors of harmful disinformation. |

| IV. Integrity of Services | |
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| 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. [change wording if adapted] | |
| Measure 16.1 | [insert wording if adapted] |

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| QRE 16.1.1 [insert wording if adapted] | We actively participate in the sub-groups established within the Code, for instance the Crisis Subgroup, to share relevant information provided by our verified members. We have actively contributed to the development of the Rapid Response System for elections which is part of the CoCD framework. Our members also participate in events and open discussion where topics such as information manipulation, foreign interference in information space and incidents regarding disinformation campaigns are addressed and discussed upon. |
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| V. Empowering Users | |
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| 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] | |
| Measure 17.2 | [insert wording if adapted] |
| QRE 17.2.1 [insert wording if adapted] | <p>Promoting media literacy for the public benefit is part of the purpose of the Association. The EFCSN also aims to increase capacities of fact-checking organisations and offers internal training on several fields of action. In this reporting period the EFCSN has carried out two projects:</p> <ol style="list-style-type: none"> 1. In January, the EFCSN started a new project titled "Prebunking at Scale". It aims to enhance public resilience against dis- and misinformation by proactively addressing emerging false claims and narratives before they gain widespread traction by combining the strengths of two of the most widely used interventions against the spread of disinformation: prebunking and debunking. In the first six months of the project, the EFCSN and 46 of its member organisations created a network-approved definition and methodology for prebunking, rooted in the experience of our journalists and fact-checkers and in academic research. This empowers all EFCSN members to produce highly effective prebunking materials adhering to industry-wide best practices. Publication of the project's content is scheduled to begin in October 2025. We are also building an advanced, AI-powered, social and traditional media monitoring and analysis tool, which will predict in which language and about which topic misinformation might appear. Based on these predictive alerts, participating organisations will be able to publish prebunking materials just in time before users are exposed to misinformation. The Prebunking at Scale project is funded by Google.org. 2. As part of the FactCRICIS project, con-funded by the EU, we have published the EuroClimateCheck database. It allows users to browse verified fact-checks, debunks and prebunks addressing misinformation and disinformation about climate change, curated by European fact-checking organizations. |
| Measure 17.3 | [insert wording if adapted] |

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| QRE 17.3.1 [insert wording if adapted] | EFCSN's verified members and other fact-checking organisations that collaborate with the Association work closely with on media literacy initiatives and share of practices and learnings. Moreover, we exchange insights with other relevant stakeholders such as the EDMO and its national hubs, or ERGA in order to build more complete and updated knowledge. |
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| V. Empowering Users | |
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| Commitment 21 | |
| Relevant Signatories commit to strengthen their efforts to better equip users to identify Disinformation. In particular, in order to enable users to navigate services in an informed way, Relevant Signatories commit to facilitate, across all Member States languages in which their services are provided, user access to tools for assessing the factual accuracy of sources through fact-checks from fact-checking organisations that have flagged potential Disinformation, as well as warning labels from other authoritative sources. [change wording if adapted] | |
| Measure 21.1 | We are open to collaborate with Relevant Signatories by partnering with them to provide context and insights to develop and apply policies, features, or programs across Member States and EU languages to help users benefit. |
| QRE 21.1.1 We will report on our engagement with Relevant Signatories on the policies, features, or programs they deploy to meet this Measure and on their availability across Member States, including information obtained by polling our members. | <p>Verified members of the EFCSN have reported the following regarding their impressions on current policies, features, or programs:</p> <ul style="list-style-type: none"> • Almost 65% strongly agree and 22.5% agree that responses to disinformation in X/Twitter are inadequate, ineffective or nonexistent. For Telegram, the responses are similar with 67.5% agreeing or strongly agreeing with the aforementioned statement. In the case of Telegram, approximately a third of respondents noted that they don't know. Both services are described as key services in hosting disinformation and their participation in the Code is crucial for a coordinated and adequate response to the problem. • Impressions on the responses by YouTube are quite unambiguous, with 52.5% strongly agreeing and 37.5% agreeing to actions being inadequate, ineffective or nonexistent. The lack of fact-checking and an ineffective flagging system are mentioned by respondents. The information panels that YouTube does apply are considered as unhelpful and in some cases could even mislead users. • When asked about Google Search responses to disinformation, respondents strongly agree (20%) or agree (47.5%) they are inadequate, ineffective or nonexistent (while 2.5% disagree, 30% say they don't know). Two concerning developments were highlighted by survey respondents: <ol style="list-style-type: none"> 1. That AI overviews in search results are a new vector through which disinformation can be spread. As one respondent noted on this, "Like all AI chatbots, Gemini hallucinates and draws incorrect conclusions. This is deeply concerning, especially as users are presumably relying less and less on traditional search results to verify the sources of information." |

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| | <p>2. In June, Google announced that it will stop using the fact-checking snippets in search which was based on ClaimReview data. Out of the 22 respondents that represented fact-checking organizations that use ClaimReview, 81.8% expect that this decision will make the disinformation problem in Google Search worse, 13.6% that it will make it slightly worse, 4.5% don't know. However, it is hard to determine whether Google's decision already had an impact on referral traffic due to the timing (announcement was made at the end of the reporting period).</p> <ul style="list-style-type: none"> Regarding TikTok, fact-checkers strongly agree (20%) or agree (45%) on the inadequacy, ineffectiveness or non-existence of responses, which indicates a slight improvement in comparison to the previous survey. Respondents are critical with the transparency of the fact-checking program. The lack of labelling and of local expertise for fact-checking in several European countries is also flagged by respondents. Regarding Facebook, 17.5% strongly agree and 35% agree that responses to disinformation in the platform are inadequate or ineffective, a stark increase to our previous survey results (6.1%, 15.2% respectively). 35% disagree, 12.5% say they don't know. Instagram gets slightly more positive impressions, with 15% strongly agreeing and 30% agreeing with the statement. Uncertainty is slightly higher with 27.5% saying they don't know. Respondents mention the issue of verification of political figures and greater transparency in how Meta's program operates as areas of improvement. A disconnect between Microsoft's LinkedIn and Bing and the European fact-checking community is reflected in the high rate of respondents that do not know about the company's responses to disinformation (82.5%, 77.5% respectively don't know). |
| Measure 21.2 | We will, in light of scientific evidence, undertake and/or support research and testing conducted by relevant signatories on warnings or updates targeted to users that have interacted with content that was later actioned upon for violation of policies mentioned in this section. We will disclose and discuss findings within the Permanent Task-force in view of identifying relevant follow up actions. |
| QRE 21.2.1 [insert wording if adapted] | The EFCSN remains accessible to support research and testing efforts. |
| Measure 21.3 | Where Relevant Signatories employ labelling and warning systems, we will be open to provide input in order for the design to be in accordance with up-to-date scientific evidence and help analyze the users' needs on how to maximize impact and usefulness of such interventions, for instance such that they are likely to be viewed and positively received. |
| QRE 21.3.1 We will report on our engagement with Relevant Signatories where we provide input on their procedures for developing and deploying labelling or warning systems, as well as maximizing its usefulness for the user, including information obtained by polling our members. | <p>The EFCSN has repeatedly given feedback to relevant signatories as a reaction to their submitted reports, also regarding the use of labels and warning systems. For instance, the EFCSN and several members have participated in a workshop held by TikTok at this year's GlobalFact summit and provided feedback on TikTok's concept and implementation of footnotes.</p> <p>Additionally, in several publications and discussions we have pointed out that community notes as they are currently implemented by some VLOPs are an inadequate labelling system as they are often too slowly or not at all deployed, prone to manipulation, do not penalize repeat offenders and are often reliant on fact-checking insights that could be more effectively applied by using more tailored systems.</p> |

V. Empowering Users

Commitment 25

In order to help users of private messaging services to identify possible disinformation disseminated through such services, Relevant Signatories that provide messaging applications commit to continue to build and implement features or initiatives that empower users to think critically about information they receive and help them to determine whether it is accurate, without any weakening of encryption and with due regard to the protection of privacy. [change wording if adapted]

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| Measure 25.1 | We will be open to act as a third-party partner and work with relevant signatories to design and implement features to facilitate users' access to authoritative information without any weakening of encryption and with due regard for the protection of privacy. |
| QRE 25.1.1 [insert wording if adapted] | Six organisations reported having an agreement with Meta for WhatsApp which involve fact-checking coverage and/or tiplines. All of these organisations believe that their agreement with WhatsApp has an overall beneficial impact for their organisations; most of them also state, that they have clear knowledge of how their insights are used (only one disagrees) and that they have efficient tools provided by Meta to carry out the service (4 agree, 2 disagree). |

VII. Empowering the fact-checking community

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. [change wording if adapted]

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| Measure 30.1 | We will assist Relevant Signatories in setting up agreements between them and independent fact-checking organisations (as defined in whereas (e)) to achieve fact-checking coverage in all Member States. These agreements should meet high ethical and professional standards and be based on transparent, open, consistent and non-discriminatory conditions, and will ensure the independence of fact-checkers |
| QRE 30.1.1 We will poll verified members of the EFCSN in order to offer contextual information to data reported by Relevant Signatories within this QRE | <ul style="list-style-type: none"> No organisations that participated in the survey reported having agreements of any kind in place with LinkedIn, X/Twitter, or Telegram. Only one organisation that participated in the survey reported having an agreement with Bing. Two organizations reported on signing an agreement with YouTube during the reporting period. Neither of the agreements are for the provision of fact-checking coverage of a country for YouTube. 11 agreements were signed specifically during the reporting period (January 1 - June 30), 3 of them with Google, 5 with Meta (FB & IG) and 3 with TikTok. For TikTok, the majority of agreements are focused on providing fact-checking coverage of a European country (88.9%), with 71.4% stating that they have a clear knowledge of how the platform uses the fact-checks provided, a significant improvement from the previous survey in which 62.5% disagreed with having a clear understanding. However, almost two-thirds of respondents report that TikTok does not provide efficient tools to monitor the service. |

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| | <ul style="list-style-type: none"> • In the case of Meta, all agreements are focused on providing fact-checking coverage of a European country. Regarding Facebook and Instagram, 85.7% strongly agree or agree that they have clear knowledge of how their fact-checks are used, but only 42.8% that efficient tools supported for monitoring disinformation in this service (down from 69.2%), which likely is a result of the replacement of CrowdTangle by the MCL. • None of the agreements signed with Google provides fact-checking coverage. They are oriented towards the organisation of training, content creation or supporting other activities. 80% of organisations that have an agreement with Google report having clear knowledge of the use of their insights and 70% agree they count on efficient tools. |
| Measure 30.2 | We will intercede for the community of independent European fact-checking organisations in order to assure relevant signatories provide fair financial contributions for their work to combat Disinformation on their services. |
| QRE 30.2.3 We will poll verified members of the EFCSN in order to offer contextual information to data reported by Relevant Signatories within this QRE. | <p>Out of the fact-checking organisations that participated in the survey, only one had an agreement with Microsoft's service Bing. No organisation reported an agreement with X/Twitter, Telegram or YouTube. Concrete data on the adequacy of their financial contributions to fact-checkers cannot be provided on those services but considering the non-existence of agreements it can be assumed that their financial contributions are very much limited.</p> <p>Regarding agreements signed with the various online services, fact-checking organisations in the survey believe these collaborations have a beneficial impact for them.</p> <p>Moreover, fact-checkers shared impressions on the signatories fair financial contributions to fact-checkers:</p> <ul style="list-style-type: none"> • No fact-checking organization in our survey sample thinks that LinkedIn provides fair financial contributions for the work fact-checkers do, 65% don't know, 35% think they don't • For Bing, only 2.5% believe that it provides fair financial contributions, 65% don't know, 32.5% think they don't. • Only 10% think TikTok provides fair financial contributions for their work, 47.5% don't know, 42.5% think they don't. • 62.5% do not believe Google Search provides fair financial contributions, 7.5% believe they do, while 30% don't know. • 65% do not believe YouTube provides fair financial contributions while 35% don't know. • 57.5% believe Meta provides fair financial contributions, 30% don't think so, 12.5% don't know. |
| Measure 30.3 | [insert wording if adapted] |
| QRE 30.3.1 We will report on actions taken to facilitate the cross-border collaboration between fact-checkers. We will also poll verified members of the EFCSN in order to offer contextual information to data reported by Relevant Signatories within this QRE | <p>The EFCSN, aside from ensuring high-standards for fact-checking organisations, offers access to a close-knit community where members can exchange knowledge, research, trends and other insights, as well as find opportunities to collaborate.</p> <p>Over the course of the reporting period, the EFCSN has coordinated several projects to facilitate cross-border collaboration between fact-checkers:</p> |

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| | <ul style="list-style-type: none"> • FactCRICIS: European Fact-Checking Response in Climate Crises supports fact-checkers to identify and debunk disinformation campaigns related to climate change and other crises, fostering more rapid, impactful and coordinated responses within and across European borders. The EFCSN has established a comprehensive package of practical resources (a database of climate researchers and experts, the pooling of detected climate change-related misinformation in the EuroClimateCheck database etc.) designed to bolster the preparedness of European fact-checkers to respond to climate mis/disinformation and foster cross-border collaboration. • Prebunking at Scale: This project aims to enhance public resilience against dis- and misinformation by proactively addressing emerging false claims and narratives before they gain widespread traction by combining the strengths of two of the most widely used interventions against the spread of disinformation: prebunking and debunking. In the first six months of the project, the EFCSN and 46 of its member organisations created a network-approved definition and methodology for prebunking, rooted in the experience of our journalists and fact-checkers and in academic research. This empowers all EFCSN members to produce highly effective prebunking materials adhering to industry-wide best practices. Publication of the project's content is scheduled to begin in October 2025. We are also building an advanced, AI-powered, social and traditional media monitoring and analysis tool, which will predict in which language and about which topic misinformation might appear. Based on these predictive alerts, participating organisations will be able to publish prebunking materials just in time before users are exposed to misinformation. The Prebunking at Scale project is funded by Google.org. • Democracy matters. Facts matter. Conference: Held on March 25–26, 2025 at the European Parliament, underscored the collaborative role of fact-checkers, journalists, academics, and policymakers in defending democracy against disinformation. Co-organised by the EFCSN, the European Parliament, and EDMO, the event stressed that fact-checkers are not only part of journalism but also the frontline defenders of democratic resilience. The conference provided ample room for deepening cooperation. • Regular community engagements: The EFCSN regularly convenes and facilitates collaboration amongst its member organizations. We hold regular member meetings, usually online, if feasible in-person, and offer our members digital communication spaces for asynchronous cooperation. The latter facilitated the uncovering of an international transportation scam. |
| Measure 30.4 | To develop the Measures above, we will be open to engage in consultations. |
| QRE 30.4.1 [We will report on the conversations with Relevant Signatories we engage in, including the development of the framework of cooperation described in Measures 30.3 and 30.4. Furthermore, we will poll verified members of the EFCSN in order to offer contextual information to data reported by Relevant Signatories within this QRE | <p>The EFCSN stands ready to engage in conversation with Relevant Signatories on the issues regarding this commitment.</p> <p>The fact-checking community is willing to enter agreements with relevant signatories. Out of organisations that currently do not have a contract with them, 96.7% of them would consider an agreement with Google provided that fair remuneration is contemplated, 97.4% would consider the same with YouTube, 96.8% with TikTok, 70% with LinkedIn, 59% with Bing. On non-signatories, 72.5% would be interested in entering an agreement with X/Twitter and 77.5% with Telegram.</p> |

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| | Moreover, fact-checking organisations are already investing time and work in monitoring disinformation in these platforms regardless of agreements and financial contributions given the need. Specifically, 100% organisations without agreement with Meta do, 84% for TikTok, 82.5% for Twitter, 60% for Telegram, 71.1% for YouTube, and 40% for Google Search. |
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| VII. Empowering the fact-checking community | |
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| Commitment 31 | |
| Relevant Signatories commit to integrate, showcase, or otherwise consistently use fact-checkers' work in their platforms' services, processes, and contents; with full coverage of all Member States and languages. [change wording if adapted] | |
| Measure 31.3 | [insert wording if adapted] |
| QRE 31.3.1 [insert wording if adapted] | It is regrettable that all platform-signatories unsubscribed from this measure with their updated subscriptions documents from January 2025. A fact-checking repository will add great value and insights for all stakeholders working on countering disinformation. The EFCSN had tabled a proposal detailing a general overview of how the repository should be envisioned, a description of the data that members of the EFCSN will provide through the tool, information on the expected volume and scope, and a proposed timeline to continue with the discussions. Unfortunately, platform-signatories decided to unsubscribe before the proposal was assessed and debated comprehensively. The EFCSN remains committed to developing and implementing such a repository. |
| Measure 31.4 | [insert wording if adapted] |
| QRE 31.4.1 [insert wording if adapted] | Within the steps proposed by the EFCSN for the establishment of the repository and as discussed in the Empowerment of fact-checker SG, we explored various ways in which the disinformation repository can be useful for a wide set of users, including researchers and universities. Even without platform-signatories support, the EFCSN will continue on this trajectory. Successful pilot projects and discussions with several stakeholders have taken place during the reporting period. |

| VII. Empowering the fact-checking community | |
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| Commitment 33 | |
| Relevant Signatories (i.e. fact-checking organisations) commit to operate on the basis of strict ethical and transparency rules, and to protect their independence. [change wording if adapted] | |
| Measure 33.1 | [insert wording if adapted] |

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| QRE 33.1.1 [insert wording if adapted] | The EFCSN was established by a wide group of European fact-checking organisations that wanted to raise the bar and work according to the highest standards in ethics, transparency, methodology, and independence as outlined in the Code of European Standards for Independent Fact-Checking Organisations (2022). Our members agree for their actual adherence to those standards to be evaluated by two different independent academic experts every two years, and EFCSN has a complaint procedure to deal with alleged non-compliance by its members. The Code of the EFCSN is contemplated under Measure 33.1 as an instrument to comply with it. | |
| SLI 33.1.1 – number of European fact-checkers that are IFCN-certified [change wording if adapted] | Methodology of data measurement: We have taken into account fact-checking organisations based in EU Member or Council of Europe states, plus Belarus and Kosovo. For both networks, we have included the status of the organisations as for September 2024 | |
| | Nr of fact-checkers IFCN-certified | Nr of members of EFCSN |
| Data | 69 signatories 10 organisations under renewal | 62 verified members 1 under review |

| VIII. Transparency Centre | |
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| Commitment 34 | |
| To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website. [change wording if adapted] | |
| Measure 34.3 | [insert wording if adapted] |
| Measure 34.4 | [insert wording if adapted] |

| VIII. Transparency Centre | |
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| Commitment 35 | |
| Signatories commit to ensure that the Transparency Centre contains all the relevant information related to the implementation of the Code's Commitments and Measures and that this information is presented in an easy-to-understand manner, per service, and is easily searchable. [change wording if adapted] | |
| Measure 35.2 | [insert wording if adapted] |
| Measure 35.3 | [insert wording if adapted] |
| Measure 35.4 | [insert wording if adapted] |

| VIII. Transparency Centre | |
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| Commitment 36 | |

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| Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner. [change wording if adapted] | |
| Measure 36.1 | [insert wording if adapted] |
| QRE 36.1.1 (for the Commitments 34–36) [insert wording if adapted] | EFCSN has not taken part of the task-force subgroup in charge of the Transparency Center but we have been in contact with other signatories in order to follow the development and correct functioning of the tool. Furthermore, we are available to signatories or other relevant actors that want to receive input from our association. |

| 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 | [insert wording if adapted] |
| Measure 37.2 | [insert wording if adapted] |
| Measure 37.3 | [insert wording if adapted] |
| Measure 37.4 | [insert wording if adapted] |
| Measure 37.5 | [insert wording if adapted] |
| Measure 37.6 | [insert wording if adapted] |
| QRE 37.6.1 [insert wording if adapted] | <p>As a signatory of the Code, the EFCSN is currently part of the Task-force, specifically of the following sub-groups:</p> <ul style="list-style-type: none"> • Empowerment of fact-checkers SG, which the EFCSN chairs, • Monitoring & Reporting SG, • Crisis Response SG, • Ad Scrutiny SG, • Outreach and Integration of New Signatories SG and • Generative AI SG. |

| X. Monitoring of Code |
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| Commitment 38 |

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| The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes to ensure the implementation of their commitments under the Code. [change wording if adapted] | |
| Measure 38.1 | [insert wording if adapted] |
| QRE 38.1.1 [insert wording if adapted] | <p>In order to work and report on our commitments under the Code, the EFCSN counts on a Policy Task-force formed by representatives of some verified members of the association as well as the EFCSN Coordinator. Jointly, they are in charge of duties related to both reporting information and engaging with relevant actors, including the Task-Force and other signatories.</p> <p>The elected Governance Body of the EFCSN is ultimately responsible for following the development of the Code and ensuring its compliance. Meanwhile, verified members of the association continuously contribute by giving insights based on their experience that the EFCSN can report on to contextualise information provided by other signatories or flag possible breaches in commitments. For the task of reporting on the EFCSN commitments, verified members respond to a survey that helps reflect their impressions on the disinformation landscape and contextualise the information provided by other Signatories.</p> |

| 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. [change wording if adapted] |

| X. Monitoring of Code | |
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| Commitment 40 | |
| Signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code’s Commitments and Measures by each Signatory, service and at Member State level. [change wording if adapted] | |
| Measure 40.1 | [insert wording if adapted] |
| Measure 40.2 | [insert wording if adapted] |
| Measure 40.3 | [insert wording if adapted] |
| Measure 40.4 | [insert wording if adapted] |

| | |
|--------------|-----------------------------|
| Measure 40.5 | [insert wording if adapted] |
| Measure 40.6 | [insert wording if adapted] |

| X. Monitoring of Code | |
|--|-----------------------------|
| Commitment 41 | |
| <p>Signatories commit to work within the Task-force towards developing Structural Indicators, and publish a first set of them within 9 months from the signature of this Code; and to publish an initial measurement alongside their first full report. To achieve this goal, Signatories commit to support their implementation, including the testing and adapting of the initial set of Structural Indicators agreed in this Code. This, in order to assess the effectiveness of the Code in reducing the spread of online disinformation for each of the relevant Signatories, and for the entire online ecosystem in the EU and at Member State level. Signatories will collaborate with relevant actors in that regard, including ERGA and EDMO. [change wording if adapted]</p> | |
| Measure 41.1 | [insert wording if adapted] |
| Measure 41.2 | [insert wording if adapted] |
| Measure 41.3 | [insert wording if adapted] |

| X. Monitoring of Code | |
|---|--|
| Commitment 42 | |
| <p>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]</p> | |

| X. Monitoring of Code | |
|---|--|
| Commitment 43 | |
| <p>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]</p> | |

X. Monitoring of Code

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:

During the reporting period, several member states held national elections that were subject of disinformation:

- Federal parliamentary election in Germany in February; EFCSN member [CORRECTIV tested](#) how TikTok handled misinformation content during the election campaign and reported 201 false claims about the election. These included misleading "decision-making aids" with an overview of the election manifestos and fake quotes from politicians on the topic of migration and asylum. The company found violations of its guidelines in only 21 cases.
- Presidential election in Romania in May; following the annulment of the 2024 election due to alleged Russian interference, the Romanian presidential election was heavily contested and saw significant disinformation. EFCSN member Funky Citizens extensively monitored and investigated the disinformation landscape ahead of the election and documented, inter alia, [coordinated disinformation](#) aimed at delegitimizing the results, [artificial amplification tactics](#), and suspected [inauthentic engagement](#).
- Snap legislative election in Portugal in May; the election campaign saw an uptick in misleading and false claim circulating by social media accounts as well as politicians. EFCSN member Poligrafo has [published numerous fact-checks](#) surrounding the elections.
- Presidential election in Poland in May; EFCSN member Demagog reported on a [dubious ad campaign](#) promoting Rafał Trzaskowski and criticizing his rivals, Karol Nawrocki and Sławomir Mentzen. Nearly half a million złoty was spent promoting these ads , prompting accusations of attempted illegal campaign financing.

Mitigations in place – or planned – at time of reporting: [suggested character limit: 2000 characters].

For the elections mentioned above,several EFCSN members contributed to the RRS. These contributions were facilitated by EDMO.