



BUILDING INSTITUTIONAL CAPACITY FRAMEWORK FOR RESILIENCE TO DISINFORMATION IN BULGARIA

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With the start of its war of aggression in Ukraine, the Kremlin has intensified both its disinformation and political interference campaigns across Europe, with a particular focus on Central and Eastern Europe. Using instruments of state capture, including specifically focusing on key sectors such as energy, finance and banking, telecommunications, defence, and media, the Kremlin exploits and reinforces existing government vulnerabilities in these countries, in order to erode both their governments' Euro-Atlantic positions and public trust in democratic institutions and European policies and values.

The countries of CEE are particularly vulnerable to this threat, as some of them demonstrate **alarmingly high levels of cognitive capture** among the general population, political elites, and the media, swaying public opinion towards Russia and its authoritarian model.¹ In addition, the decline of traditional media and the rise of online news websites and social media platforms, which are able to generate, aggregate, and share content on a mass scale without a clear regulatory base, consistent content moderation framework, or transparent financial streams, has provided fertile ground for accelerated production and dissemination of disinformation and propaganda.

Efforts to counter pro-Kremlin disinformation must extend beyond information operations and strategic communication to **expose state and media capture** across the region, and to develop and effectively implement new and enhanced institutional and regulatory frameworks that will decouple countries' governance systems

¹ Center for the Study of Democracy, *Policy Agenda for Countering Media Capture in Europe*, Policy Brief No 116, October 2022.

KEY POINTS

- The responsibility for establishing an **effective disinformation resilience framework** lies primarily with the EU Member States, while the EU itself focuses on supporting the development of key measures such as a transparent and accountable online ecosystem, secure electoral processes, media literacy, quality journalism, and strategic communication.
- Bulgaria demonstrates alarmingly **high levels of cognitive capture** among the general population, political elites, and the media, swaying public opinion towards Russia and its authoritarian model.
- Countering pro-Kremlin disinformation must extend beyond information operations to **expose state and media capture** and to develop and effectively implement a framework for decoupling national governance system from Kremlin interests.
- The **enforcement gap regarding the transparency of media ownership and funding**, incl. the allocation of public money by government agencies, facilitates the high degree of media capture present in Bulgaria.
- Bulgaria must urgently develop a **comprehensive legislative framework** for the effective implementation of EU and international sanctions.
- The Ministry of e-Government must be legally mandated to **establish, coordinate, and implement a national policy** for countering foreign information manipulation and interference.
- Long-term political commitment is necessary for the development of **national counter-disinformation capacity**, building upon the existing initiatives currently led by civil society, media, and the private sector.



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from Kremlin interests. An effective response to foreign disinformation requires an integrated multi-stakeholder approach based on cooperation between national policy makers. Any actors seeking to organize such a response should devote particular focus to the media sector, civil society, the private sector, and coordination with European and Atlantic partners. In addition, the **policy agenda for capture-proofing Europe² necessitates a rapid response speed** at both the national and international level, particularly in addressing the drawbacks of EU policy design and implementation.

The last two years have been a turbulent period for Bulgarian politics and society, marked by an unprecedented four general elections and a presidential one, another wave of the COVID-19 pandemic accompanied by a peak in the death toll, war in Ukraine and skyrocketing energy prices. All of these factors have further polarized public opinion and political rhetoric across Bulgaria to unprecedented levels. Recent **election campaigns have reinforced the use of disinformation** in a toxic marriage with populist policy stances and wild conspiracy theories.³ Without concerted efforts to counteract election-related information manipulation and build long-term resilience to this ongoing trend, disinformation and propaganda threaten to delegitimize elections, reduce public trust in elected governments, and further weaken Bulgaria's democratic institutions.⁴ Taken in combination with the deterioration of media freedom and **the lack of credible policy responses to disinformation** by successive governments, these factors have made Bulgaria uniquely vulnerable to both domestic and foreign disinformation and propaganda, a trend which politicians have already effectively exploited. Moreover, political figures and parties already use social media as a major platform for communication and expanding their influence. Amplified by clusters of related news web pages and social media accounts, this trend has increased the public's susceptibility to online disinformation.⁵

The current Bulgarian disinformation environment is deeply entrenched and difficult to counteract, as tra-

ditional forms of disinformation are now also disseminated through modern means via social media platforms and digital media channels. The propagators of this new breed of disinformation utilize methods such as automated content creation and aggregation, amplification networks based on content-sharing by humans and/or bots, troll factories, mushroom websites,⁶ inauthentic accounts, algorithmic amplification, and last but not least, old-fashioned paid advertisements. The difficulties of effectively countering this broad array of tactics is exacerbated by the lack of relevant legislative framework and applicable measures across the rest of the EU.⁷

Furthermore, future regulatory frameworks designed to combat disinformation must account for the reality that some users may believe or share content containing disinformation without malicious intent.⁸ The fluid boundaries between different forms of false and misleading content often rely on intent and context, making it difficult for legislation and regulation to distinguish 'true disinformation' from legitimate speech or the unwitting dissemination of false information by innocent third parties.

EU framework

The EU approach towards disinformation does not envisage unified EU legislation directly targeting disinformation and foreign information manipulation and interference, but instead recommends the implementation of legal and financial instruments in number of interconnected domains:

- A more transparent, reliable, and accountable online ecosystem, with greater control over ad placement, transparency of sponsored content, closure

² Center for the Study of Democracy, *Countering the Kremlin Playbook in Europe after Russia's Invasion of Ukraine*, Policy Brief No. 115, October 2022.

³ Center for the Study of Democracy, *Disinformation Narratives in the November 2021 Bulgarian Elections Campaign: Key Actors and Amplifiers*, Policy Brief No 105, November 2021.

⁴ Arnaudo, D. et al. *Combating Information Manipulation: A Playbook for Elections and Beyond*, International Republican Institute, 2021.

⁵ Center for the Study of Democracy, *Disinformation Narratives in the November 2021 Bulgarian Elections Campaign: Key Actors and Amplifiers*, Policy Brief No 105, November 2021.

⁶ Websites that publish fake news, manipulated or "deep fake" pictures and videos, conspiracy theories, rumors, and wild speculations. They appear quickly "on demand", benefiting from the ease of creating whole networks of linked websites with similar structure and automated content sharing. Usually fully anonymous, these websites do not name authors, reference sources, or use proper dating. Furthermore, titles are provocative and formulated as "click-bait" to trigger emotional, knee-jerk reactions from readers.

⁷ Filipova, R., Vladimirov, M., & Gerganov, A., *Tackling Kremlin's Media Capture in Southeast Europe Shared Patterns, Specific Vulnerabilities and Responses to Russian Disinformation*, Sofia: Center for the Study of Democracy, 2021.

⁸ Lewandowsky, S. et al., *Technology and Democracy: Understanding the influence of online technologies on political behaviour and decision-making*. Luxembourg: Publications Office of the European Union, 2020.

of fake profiles, metrics on reliability of sources, reporting tools, access for fact-checkers and researchers to data from platforms, etc.;

- Secure and sustainable electoral processes;
- Promoting education and media literacy;
- Support for quality journalism as an essential element of a democratic society;
- Countering internal and external threats of disinformation through strategic communication.

Although the **European Democracy Action Plan** includes countering disinformation as one of its major aims, together with promoting free and fair elections and strengthening media freedom, it has thus far seen **poor implementation in practice**. One of the Plan's core objectives is to transform the *Code of Practice on Disinformation*, adopted in 2018, into an instrument for the co-regulation of obligations and liability of online platforms. Recognising the lack of genuine progress in implementing the Code, the Commission pushed for consensus on the *Strengthened Code of Practice on Disinformation* in 2022. This new code is intended to become part of a broader regulatory framework, in combination with the expected legislation on *Transparency and Targeting of Political Advertising*, the *Digital Services Act* (DSA) and the *Digital Market Act* (DMA). Enacting these co-regulatory instruments would lead to a new wave of obligations and responsibilities for social media platforms, and create a legally binding disinformation oversight framework for the first time.⁹

While the Code itself is not a legally binding instrument, many of its norms and suggested measures are embedded in the DSA. While the DSA creates obligations for online platforms to moderate content and implement transparency in data collection, the *Digital Market Act* regulates the anti-competition rules targeting “gatekeeper platforms” such as Alphabet/Google, Amazon, Meta, Microsoft, and Apple, imposing requirements for them to receive consent before utilizing personal data for targeted advertising, incl. micro-targeting for political purposes, or tracking users outside of the gatekeepers’ core platform services.

The co-regulatory framework established by the DSA, DMA, the *Code of Practice on Disinformation*, and the expected legislation on *Transparency and Targeting of Political Advertising* is designed to achieve three primary goals: (1) the establishment of legally binding obligations enforced by the EC under DMA and DSA, (2) self-regulation through self-imposed commitments and measures set by the Code for its signatories and overseen by the Commission, civil society, and professional organisations, and (3) the creation of national **Digital Services Coordinators** (DSCs) in the Member States, who will be responsible for supervising the intermediary services established in their respective member states. DSCs should cooperate with each other, other national competent authorities, and the Commission. They should remain fully independent in their decision-making and not seek instructions from their governments or other bodies, particularly online platforms. While not yet implemented, DSCs are meant to facilitate the Member States’ efforts in two directions:

- To coordinate national regulators involved in oversight of social media platforms, as DSA regulates diverse issues such as consumer protection, media regulation, and data protection, for which countries often have separate authorities rather than one dedicated regulatory body;
- To personally perform important oversight functions (e.g. serving as a complaints body for users, or vetting researchers’ requests to platforms for data access), and to strengthen the coordination of these efforts on the EU level.¹⁰

Whether the DSA will be implemented effectively remains uncertain, but the end result will depend on the manner of its enforcement. Also intended to serve as a policy tool for maintaining a balance of power among global tech giants and national governments, the DSA envisions the European Commission as the **primary regulator for very large online platforms** (VLOPs) and search engines. In this regard, the DSA empowers the Commission to impose fines of up to 6% of the global turnover of a service provider, incl. VLOPs, in the most serious cases of violation.

The Commission also utilizes the mandate of the European External Action Service (EEAS) to coordinate and facilitate its work on foreign information manipulation and interference with other EU institutions, Member

⁹ European Commission, *Communication from the Commission to the European Parliament and the Council on the Fifth Progress Report on the implementation of the EU Security Union Strategy* (COM/2022/745 final).

¹⁰ Jaurisch, J., *Platform oversight: Here is what a strong Digital Services Coordinator should look like*, Policy Brief, Stiftung Neue Verantwortung, 2022.

States, and other international organisations such as NATO, as well as civil society, academia, media, and the private sector. In 2015, EEAS created three Strategic Communications (StratCom) Task Forces to monitor and counteract foreign disinformation activity in the Eastern Partnership, Southern Neighbourhood, and Western Balkans. The General Affairs Council Conclusions in 2019 explicitly broadened the EEAS StratCom division's mandate to include new threat actors and geographic regions, calling for: (1) proactive communication and awareness raising, (2) support for independent media and (3) detection and analysis of malign activities by these threat actors, as well as the creation of appropriate countermeasures.¹¹ **The most active Task Force has been East StratCom**, which was created to address Russia's ongoing disinformation campaigns. Its flagship initiative, **EUvsDisinfo**, monitors, analyses, and responds to pro-Kremlin disinformation, information manipulation, and interference, working jointly with Member States and Eastern Neighbourhood countries. Despite the promising initial results, including the strengthening of cooperation between civil society, media professionals, and private sector, **the uptake and impact of East StratCom's desired outcomes have remained limited.**

As a part of its efforts to improve Member States' national capacity for building resilience to disinformation, the Commission has also mobilized its research and innovation pillar through allocation of millions of euros in funding for related research and development, as well as for the establishment of a **network of fourteen¹² European Digital Media Observatory hubs** covering all Member States. The Bulgarian-Romanian hub, established in January 2023, is among the newest of these observatories.

Another important component of the EU's institutional framework for countering disinformation, is the Special Committee on *Foreign Interference in all Democratic Processes in the European Union, including Disinformation* (ING1), created by the European Parliament in 2021. Its successor, ING2, was tasked with following up on ING1's findings.¹³ Among these findings was the need for regular research and polling to monitor media literacy and public support and perceptions of the most widespread disinformation narratives, as well as

the need to coordinate with technology platforms to prevent their algorithms from boosting content originating from inauthentic accounts and channels, thereby artificially driving the spread of harmful disinformation.

ING1's activities and findings focused mainly on understanding the dissemination mechanisms and overall effects of disinformation, such as the powerful and lasting cognitive impact that results when disinformation and manipulative propaganda is spread by individuals in positions of public trust with high levels of political authority and visibility.¹⁴ With ING2, by contrast, **the European Parliament has concentrated on identifying legal loopholes and determining the necessary regulatory and institutional measures to close them.** With regard to manipulative online practices, ING2's recommendations include the following: self-imposed commitments to integrity by political candidates and political parties, such as refraining from the dissemination of misinformation or disinformation, self-regulation of the PR industry through a strengthened Code of Ethics, and last but not least, restricting the usage of online influence techniques designed to amplify content on social media.¹⁵ However, due to these recommendations' reliance on 'soft measures' and **without any legally binding regulation, ING2's overall impact remains questionable.**

Government and civil society preparedness in Bulgaria

Over the last year of turbulent geo-political divisions, marked by the Kremlin's brutal and unprovoked invasion of Ukraine, Europe's rude wakeup call regarding its dependence on Russian oil and gas, and the subsequent spike in energy prices and inflation across the continent, Bulgaria has remained missing in action in the EU's efforts to counter foreign information manipulation and interference. The country's prolonged political instability and inability to form a lasting government has reinforced the importance of remaining in alignment with common European policies, as the pro-European and pro-Atlantic orientation of successive caretaker governments has been repeatedly called

¹¹ European Union External Action Service. *Tackling disinformation: Information on the work of the EEAS Strategic Communication division and its task forces*, 12.10.2021.

¹² As of January 2023.

¹³ European Parliament, *European Parliament resolution of 9 March 2022 on foreign interference in all democratic processes in the European Union, including disinformation*, 9 March 2022.

¹⁴ Bayer, J. et al., *Disinformation and propaganda: impact on the functioning of the rule of law and democratic processes in the EU and its Member States*. European Parliament, 2021.

¹⁵ Jones, K., *Legal Loopholes and the Risk of Foreign Interference*. Brussels: European Parliament, 2023.

into question. The rise to political prominence of the openly pro-Russian ‘Revival’ party, which could take third or fourth place in Bulgaria’s expected 2 April elections, has also been a cause of grave concern for observers on both sides of the Atlantic in recent months, seen by many as a worrying sign of accelerating cognitive capture of the Bulgarian public by Kremlin-aligned disinformation narratives.

Bulgaria remains among the most vulnerable members of NATO and the EU to Russian disinformation narratives.¹⁶ **Disinformation is continuously spread throughout the country’s media landscape by informal networks of influence**, including politicians, academics, influencers, journalists, and tycoons, whose interests often overlap or become entangled with those of the Kremlin or other authoritarian governments. Pro-Kremlin disinformation is consistently present in both conventional and social media, with content on social media trending more explicit and extremist by comparison. Dissatisfaction with democracy, low journalistic standards, and an above-average tendency to consume news primarily from social media all increase the pressure on journalists to publish sensationalist material echoing feelings of disempowerment and disillusionment; editors and reporters often parrot information from Russian news agencies and outlets almost verbatim.

Despite the **shift in public opinion away from the Kremlin in 2022**,¹⁷ high levels of state capture and corruption, combined with Russia’s decades-old direct and indirect presence in the region, allow the Kremlin to retain both direct and indirect support from numerous government representatives. Russia and its agents also frequently exploit political indecisiveness and ambiguities in public opinion regarding strategically significant issues in areas such as national security, energy, and foreign policy.¹⁸ Current and former prime ministers, cabinet ministers, and presidents have repeatedly attempted to “balance” their public positions towards Russia and its perceived interests in Europe against the interests of the EU and NATO, presenting Bulgaria as a ‘neutral’ party in any confrontations between the East and West. Political parties have directly echoed pro-Russian disinformation narratives in parliament on numerous occasions, with the anti-EU and anti-NATO ‘Revival’ party providing the most extreme example of

this trend. Bulgaria’s continued attempts at maintaining strategic ambiguity have had a strong influence on the messaging of most media channels in the country, including mainstream, online media, and even social media.

Among the critical governance gaps that has enabled the entrenchment of Russian-aligned outlets and narratives in Bulgarian media is the **enforcement gap regarding the transparency of media ownership and funding**, incl. the allocation of public money by government agencies. The *Law on the Mandatory Deposit of Printed and Other Publications*,¹⁹ which mandates that each publisher of a periodical print newspaper must report beneficial ownership to the Bulgarian authorities on an annual basis, has been poorly implemented and has not prevented the widespread obfuscation of ultimate beneficial ownership across the Bulgarian media market. The Rapid Alert System points of contact, another instrument designed to coordinate efforts in building resilience to disinformation on the EU level, has been formally implemented in Bulgaria since 2019, but has never functioned as intended. In addition, while initially included in the vice-premier’s cabinet, the point of contact was later relocated to the Ministry of Foreign Affairs, lowering the level of formal political commitment towards enacting this measure.

However, there have still been scattered **efforts to build a national framework for tackling disinformation**. Bulgaria’s Minister of E-Government²⁰ has implemented several measures aimed at combatting the spread of disinformation. In coordination with the cybersecurity unit of the General Directorate Combating Organized Crime (GDCCO), the ministry blocked 45,000 IP addresses associated with the Kremlin’s hybrid operations targeting Bulgaria during the first week of Russia’s invasion of Ukraine.²¹

In addition, the ministry has established a direct line of contact with Meta to discuss Facebook’s response to inauthentic behaviour, existing content moderation issues related to the suspension of personal and institutional accounts due to anti-Kremlin positions,²²

¹⁶ Center for the Study of Democracy, *GLOBALSEC Vulnerability Index 2021: Bulgaria*, 2021.

¹⁷ Alpha Research, *The Russia – Ukraine war: a radical shift in public attitudes towards the Russian president ...*, February 2022.

¹⁸ Center for the Study of Democracy, *Policy Agenda for Countering Media Capture in Europe*, Policy Brief No 116, October 2022.

¹⁹ Lex.bg, Law on the Mandatory Deposit of Printed and Other Publications and for the Disclosure of Distributors and Suppliers of Media Services, promulgated in SG No. 108 of 29 December 2000, last amended in SG No. 17 of 26 February 2019.

²⁰ Bozhidar Bozhanov, in the cabinet from December 2021 to August 2022.

²¹ Atanasova, M., *45,00 internet addresses were blocked in relation to hybrid attacks*, Fakti.bg, 27 February 2022.

²² Free Europe, *“The blocked block.” Why there are protests and what we know about moderation on Facebook*, 18.01.2023.

and the identification of disinformation on a broader scale. As a result of these discussions, plans were drafted for an analytical unit to monitor disinformation and a new institution to exchange information with relevant authorities domestically and abroad, and a proposal for amendments to the *Digital Service Act* in the framework of the European Council's discussion on it was prepared. Finally, the ministry took measures to promote a media literacy training course offered to civil servants by the Institute of Public Administration.²³

The issues of **transparency of moderation** by large technological platforms such as Facebook and legally defined avenues for users to appeal a ban to an independent third party (e.g., their national DSC) should be addressed and expanded upon in Bulgaria's regulatory and institutional framework, building on the already adopted rules of the DSA but amended as necessary by national legislation.

However, the ministry's activities have been limited by the fact its founding documents do not specify countering disinformation as one of its responsibilities. This role has been inferred either under the topic of 'information society', for which the ministry is primarily responsible, or under the cyber security framework, which is delegated to various institutions such as the State Agency for National Security, Council for Electronic Media (CEM), and GDCOC. The responsibility for developing disinformation resilience also lies in part with the Commission for Consumer Protection, which is charged with handling the issue of demonetisation of websites that spread disinformation, incl. "mushroom" websites and the webpages of pro-Kremlin news outlets. These websites usually do not use global ad providers such as Google Ads due to their restrictions regarding disinformation, relying instead on local ad networks for generating their advertising revenue.

In the context of unclear institutional responsibilities and a pervasive lack of political commitment to countering disinformation, the various initiatives started by the Ministry, have been abandoned by the following caretaker governments, and following this, there has been a lack of a serious, good-faith political debate on combatting disinformation and related issues, such as the need to build a basic institutional and regulatory framework for resilience to malign information operations. Any attempts toward this end, such as a proposal

for a new bill, have remained unsuccessful. A draft bill submitted by the "Democratic Bulgaria" coalition was intended to complement the EU's existing DSA, which requires more transparency and information from social media platforms such as Facebook and Twitter. The bill aimed to ensure more effective identification and regulation of inauthentic behaviour in social media, referring to both automated bots and fake accounts as tools for spreading disinformation. However, the bill has failed to reach even preliminary discussions in Bulgaria's parliament.²⁴

The inaction of the Bulgaria's national media regulator in developing and implementing counter-disinformation policies has also led to **delayed and partial implementation of EU sanctions on Kremlin-backed media outlets in Bulgaria** until recently. This outcome partially stems from Bulgaria's existing legislative deficit – namely, the lack of legislation providing a legal basis for the application of EU sanctions on a national level.²⁵ Despite this setback, a draft *Decree of the Council of Ministers on the Coordination of the Implementation of the EU Restrictive Measures* was published for public discussion, but ultimately not adopted.

In the absence of a proper legal framework regulating the application of international and EU sanctions, Bulgaria's national regulatory agencies saw internal resistance against their implementation, particularly in the media sector. The chair of the Council of Electronic Media, Bulgaria's national media regulator, abstained during a vote to implement the third EU sanctions package, which targets media outlets controlled by Russia and spreading Kremlin disinformation.²⁶ In addition, the CEM chair has qualified the application of EU sanctions as "unconstitutional censorship" in public statements.²⁷ However, as of the application of the third EU sanctions package on 1 March 2022, CEM has implemented indefinite restrictions on the retranslation and broadcasting of TV programs owned by *Russia Today*, *Sputnik*, and their affiliates in Bulgaria.²⁸ De facto, however, this decision was pre-empted by Bulsatcom – the largest satellite TV provider in the country, which had

²³ Bozhanov, B., *What the state is doing against disinformation*. 01.04.2022, Personal blog.

²⁴ *Draft law supplementing the e-commerce law*. National Assembly.

²⁵ Ognyanova, N. *Again on the application of EU sanctions on Kremlin propaganda media*. 04.01.2023. Personal blog.

²⁶ Council of Electronic Media. *Minutes of an extraordinary meeting held on 01.03.2022*.

²⁷ Dir.bg, *Sonya Momchilova told Dir.bg: They want us to become Roskomnadzor and to sanction media*, 19.04.2022.

²⁸ Council of Electronic Media, *Minutes of an extraordinary meeting held on 01.03.2022*.

ceased broadcasting *Russia Today* a week earlier – on the day of the Russia’s invasion of Ukraine.²⁹

In the context of unclear responsibilities, the Bulgaria’s national media regulator and the Communications Regulation Commission (CRC), which is responsible for the licensing of audio-visual services in Bulgaria, **have still not reacted to the sixth EU sanctions package**, which adds three new media outlets to the list of sanctioned entities and restricts the advertisement of any product or service affiliated with the sanctioned entities. This requires national authorities to investigate and monitor if such content is available across all national media, but there has been no public information regarding such an investigation. Still, CRC has announced the implementation of the ninth EU sanctions package, which came into effect on 1 February 2023, extending the list of restricted media outlets.³⁰

In the absence of a coordinated state policy for resilience to disinformation, **civil society, media, and the private sector** have taken the initiative to counter it. One important step towards the creation of a trustworthy information space for Bulgarian citizens, was the establishment of Bulgaria’s first **fact-checking initiative** in 2016 by the online news outlet Media-pool. However, in the years since its creation, it has published only a few articles annually. Following a sharp increase in fact-checking and debunking activities in other European countries in 2021, three other fact-checking initiatives were established in Bulgaria, laying the foundation for the development of national debunking and fact-checking capacity. In March 2021, Agence France-Presse (AFP) established the Bulgarian component of their international fact-checking initiative, which now covers more than 80 countries globally. **AFP Proveri** is also the only Bulgarian-language initiative which coordinates directly with Meta as part of its global *Third-Party Fact-Checking Program* to identify, review, and rate viral misinformation across Facebook, Instagram, and WhatsApp. In May of the same year, the Association of European Journalists – Bulgaria established **Factcheck.bg**, the largest recent initiative in this field. In November 2021, the Bulgarian National Radio established **BNR Factcheck** – the first and currently only fact-checking initiative run by a public media organization. Two of these initiatives – AFP’s global program and Factcheck.bg – have been endorsed by the International Fact-Checking Network at the Poy-

nter Institute for Media Studies in the United States, reflecting an adherence to the grounding principles of the largest international network of fact-checkers.

Despite these promising signs, the total number of fact-checks in Bulgarian media has remained limited, and more vitally, fact-checking organisations have met with little success in disseminating their efforts to the general public and state institutions. The use of fact-checking reports should be **integrated into Bulgarian public authorities’ future coordinated strategic communication activities** through StratCom and other instruments.

Public authorities should not seek to determine the line between disinformation or propaganda, as this could be construed as censorship. However, they must be able to identify specific disinformation narratives and communicate the government’s official position on these issues in a timely and clear manner. Otherwise, ministers may be pushed to use their personal social media accounts to refute factually incorrect information that is publicly disseminated in the media by other participants in the political debate.

Bulgaria’s StratCom activities should not be limited to malign foreign information manipulation and interference; they should cover a wide range of issues, including the state’s capacity to respond to social crises and natural disasters such as recent incidents of flooding, refugee waves, etc. The current public administration lacks the professional capacity and elaborated procedures and protocols necessary to conduct strategic communication; addressing this institutional weakness must be a key government priority due to the potential short-term, visible impact.

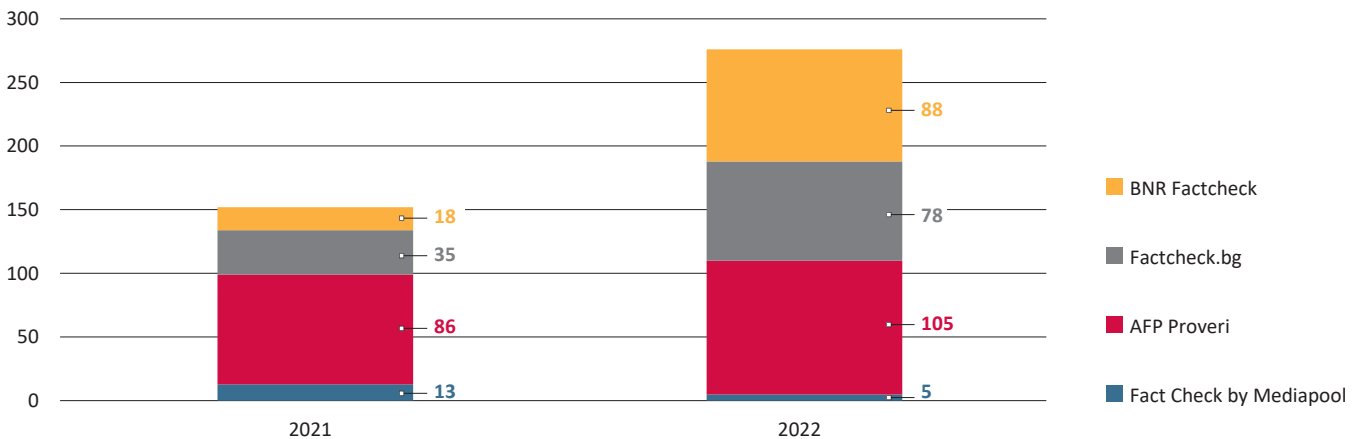
In addition to these fact-checking initiatives, civil society organizations, media practitioners, and academic researchers have also been active in delivering general and specialized **trainings on media literacy** to a diverse range of groups, including students, journalists, librarians, and the general public. However, their efforts have remained isolated and often uncoordinated, while Bulgaria’s formal education institutions have not yet recognized media literacy as part of the official curricula.

Another effort to improve institutional coordination and collaboration for building resilience to disinformation in Bulgaria was the establishment of the Bulgarian Coalition against Disinformation in April 2022. This coalition brings together roughly 60 organisations, including representatives from media outlets, fact-checking initiatives, civil society organisations, the European

²⁹ Dnevnik Daily, *Bulsatcom ceased the broadcasting of Russian Today; telecoms with free calls to Ukraine*, 25.02.2022.

³⁰ Communications Regulation Commission, *Extension of the list of entities creating and distributing television content subject to restrictive measures with effect from 01.02.2023*.

Figure 1. Number of publications by Bulgarian-language fact-checking initiatives



Source: Center for the Study of Democracy

Commission office in Bulgaria, the Ministry of e-Government, and the Ministry of Defence. However, due in part to the lack of political commitment to counter disinformation by Bulgaria’s recent caretaker governments, the coalition has remained largely stalled in its agenda.

What’s next?

The EU must strengthen its capacity to deliver positive change in the Member States with regard to judicial independence, media freedom, civil society development, and the digital information ecosystem, based on the good governance recommendations provided by the Rule of Law initiative and the European Semester.³¹

- The EU must strengthen and integrate the different tools for countering foreign malign influence into a **comprehensive response system** (e.g., the Security Union Strategy), including but not limited to foreign information manipulation and interference (European External Action Service), investment screening, media freedom, anti-money laundering, and beneficial ownership transparency. It should bring together different EC bodies to create and implement this response system, including Europol and its Cybercrime Centre (EC3), the EU Agency for Cybersecurity (ENISA), and the European Digital Media Observatory, as well as its regional hubs.

- The EU should **strengthen its capacity to target strategic corruption and state capture** from authoritarian regimes in its Member States by expanding the scope of its “Magnitsky”-type legislation to include corruption as well as human rights violations, as is the case in the respective U.S. and UK acts.
- The EU should introduce **final beneficial ownership transparency** of corporations active on its territory, and could pilot this initiative with media outlets. The voluntary Media Ownership Monitor could serve as a starting point, but should expand into obligatory regulations.
- The EU must also work to strengthen **instruments for countering media capture** and building resilience to disinformation through the **EU cohesion and structural funds** (DG Regio) and the **pre-accession programs** under DG NEAR, focusing particularly on Member States from Central and Eastern Europe, as well as countries from the Western Balkans and the Eastern Neighborhood, which remain particularly vulnerable to Russian and other foreign disinformation and propaganda.
- To this end, the **model of U.S. government support for media freedom in CEE in the early 1990s** should be revisited. Its success in reinventing public media in post-communist Europe stemmed from its delivery method – not by government bureaucracies, but through the activism of independent professionals. Specifically, the establishment of the International Media Fund in the early 1990s – an initiative with an independent board and private sector support – should be emulated.

³¹ Partially the following recommendations are based on: Center for the Study of Democracy, *Policy Agenda for Countering Media Capture in Europe*, Policy Brief No 116, October 2022

- The U.S. Agency for International Development (USAID) should reinstitute instruments and platforms for **supporting good governance and media freedom initiatives on a regional level**, which would increase the likelihood of positive peer pressure among national governments.

The creation of a **national resilience framework for Bulgaria** requires the development of policies and institutional frameworks addressing both **“offline” and digital infrastructure**. The former refers to institutions, regulations, financial instruments, educational curricula, textbooks, communication and computer networks, etc., while the latter refers to online systems and solutions that allow for digital identity, data exchange, identification and verification of misinformation, monitoring and exposure of inauthentic behaviour in the online domain, etc., all of which comprise essential layers of digital readiness of the society and help expand access to reliable, trustworthy and ethically verified information. The national resilience framework would require better coordination and synergy of efforts both among respective state authorities and with civil society organisations, media, academia, and the private sector, aiming at:

- Establishing counter-disinformation and malign information operations and horizontal cross-sectoral policy coordination as **responsibilities of the Ministry of e-Government**;
- Developing further **institutional capacity for strategic communication** among all public institutions, with a focus on the most relevant ministries and state agencies, e.g. the ministries of economy, energy, interior, defence, foreign affairs, the State Agency for National Security, etc.;
- Creating a new department at the Ministry of e-Government to **improve coordination between the state authorities** responsible for countering foreign information manipulation and interference, as well as with relevant international and foreign organisations;
- **Preparing the necessary national legislation** and respective institutional framework (e.g. Digital Services Coordinators under the DSA), to allow for effective implementation of the DSA, DMA, and other relevant EU regulations;
- Design a legally independent national DSC, with a dedicated research budget and data science unit, as deemed necessary to identify and understand the systemic platform risks the DSA must attempt to mitigate.³²
- Preparing the necessary national legislation for the effective **implementation of EU sanctions against Russia**, incl. those in the media sector;
- Establishing effective communication channels with **“big tech” platforms**, and leveraging the existing EU co-regulatory framework, e.g. DSA, DMA and the Code of Practice or Disinformation to the fullest possible extent;
- Coordinating with the European Commission and relevant national authorities to create mandatory national and EU **regulations for tech platforms**, in order to improve identification of inauthentic behaviour, i.e. coordinated activities of automated bots and human-led accounts by large troll farms, and implementing concrete measures against these practices.
- **Enhancing civic education** in Bulgarian public schools and including media literacy in the formal education curriculum from primary school to university, with a focus on both students and teachers. Particular attention should be paid to training teachers, in order to benefit from the multiplication effect of the “train the trainers” approach;
- Developing a range of **nonregulatory interventions** on the basis of a collaborative and recurring format for policy and operational dialogue among different elements of the stakeholder community.³³
- Introduction of a **cross-sectoral and asymmetric sanctions framework**, as well as diplomatic sanctions, travel bans, asset freezes, and the stripping of EU residence permits from foreign individuals and their family members associated with foreign interference attempts, which should target the decision-makers and bodies responsible for malign media manipulation as precisely as possible.³⁴

³² Jaurisch, J., *Platform oversight: Here is what a strong Digital Services Coordinator should look like*, Policy Brief, Stiftung Neue Verantwortung, 2022.

³³ Bjola, C. and Pamment J. (eds.), *Countering Online Propaganda and Extremism. The Dark Side of Digital Diplomacy*. Routledge, 2018.

³⁴ European Parliament, *European Parliament resolution of 9 March 2022 on foreign interference in all democratic processes in the European Union, including disinformation* (2020/2268(INI)), 2020.

- Adopting technology solutions **via public-private partnerships with the IT sector** to detect and investigate recurrent disinformation and the actors that produce and amplify it.
- Supporting the development of **fact-checking and debunking tools and platforms** to facilitate the identification of disinformation narratives. Furthermore, utilizing of the results of local and foreign fact-checking and debunking initiatives by state authorities and public officials.