

Policy recommendations on the fairness of election campaigns on social media

Researchers from Political Capital and Mérték Media Monitor and journalists from Lakmusz have regularly [published](#) research and fact-checking articles on electoral disinformation during the 2024 campaign period. We have tracked, analysed and verified paid content promoted during the campaign and identified who is funding it. We also attempted to show, for the first time in Hungary, how much money each social media platform is making by promoting false and misleading information.

Based on the analysis, the following policy recommendations are made.

Recommendations for platforms

1. Platforms have already taken effective steps to ensure transparency in political advertising and promotion. However, we recommend that they disclose the exact amount of such spending.
2. Experience has clearly shown that the practice of classifying individual advertisements as political advertising is not uniform even within a given platform and that different platforms use different criteria. The Code of Practice also provides for cooperation between platforms in order to develop a uniform and transparent definition of political advertising (Commitment 3). Although a uniform definition had to be adopted in the first year of application of the Code of Practice, it seems that there is a chance to develop a uniform definition once the Regulation on transparency and targeting of political advertising enters into force. It is proposed that platforms should develop an interpretative recommendation for the definition of political advertisement in the Regulation (Article 2(2)) before the entry into force of the Regulation, which will help to categorise advertisements with examples.
3. Platforms are crucial for electoral campaigns, and it is, therefore, essential to establish transparent, consistent, and predictable practices for political communication, particularly for electoral campaigns. Currently, decisions on political content, particularly sponsored political content, do not meet these conditions.
4. We recommend that platforms seek to obtain and publish data on the actual funders of political advertising. Currently, the funding background of political advertising can be obscured by the reporting of entities that have no real activity other than funding advertising on the platforms. The publication of real business data alone would significantly increase transparency.
5. We recommend to very large online platforms and search engines to set up independent monitoring bodies, at least during election campaigns, composed of experts with knowledge of the language, social context and electoral rules of the country concerned to support platforms in assessing political messages.
6. It is recommended that platforms take the initiative to work more closely with national fact-checking organisations that follow international standards and consider the results of their fact-checking activities in the fight against political disinformation.

Recommendations to domestic stakeholders

1. Although very little experience has yet been gained with the Digital Service Coordinator, it will be an important player in the assessment of systemic risks in the operation of the platform in the Member States, based on European legislation. It is recommended that the Digital Service Coordinator develops a strategy for election campaigns to monitor and assess the impact of systemic risks related to the operation of platforms on election campaigns, involving the widest possible range of stakeholders.

Recommendations to the national legislator

1. Campaign financing in European Parliament and local elections is essentially unregulated, creating a serious imbalance between competing candidate organisations. It is recommended that legislators also set a ceiling and transparency for campaign spending in these elections.
2. We recommend that a regulation be established requiring campaign expenses to include the expenditures of all organisations that publish advertisements or paid content on behalf of a candidate organisation.
3. We recommend that political advertisers should be able to demand that the actual sponsors of political advertising be identified and publicly available, regardless of the advertising platform.

Recommendations to the European Union institutions

1. All the proposals concerning platforms are also proposals for the Commission, as platforms can essentially be persuaded to increase transparency through regulatory instruments.
2. Despite several provisions on complaint handling, justification and disclosure of decisions and transparency in the Digital Services Act and the self-regulatory code on disinformation, the functioning of platforms remains completely opaque. To monitor the fairness of election campaigns, it would also be of the utmost importance that platforms publish the various transparency reports (Code of Practice Commitment 36-36; DSA Articles 15, 24 and 42) and decisions on infringing or illegal conduct (DSA Dashboard) in a clear and uniform structure and with uniform content. We propose that the Commission adopt a Recommendation setting out a common structure and minimum content for reports and data.
3. We suggest that the Commission clarifies in an interpretative Recommendation that the justification of decisions taken by platforms (Article 17 DSA) should also be made public in an anonymised manner.
4. As the Digital Service Coordinator can be an effective facilitator of the debate on the assessment of systemic risks to the functioning of platforms in the Member States, we propose to strengthen and detail the European requirements for the independence of the Digital Service Coordinator (Article 50 DSA). If the Member State designates the media regulator or its decision-maker as the digital service coordinator, the Commission should necessarily take into account the findings on the

independence of the media regulator in the annual rule of law report when assessing independence.

5. While state-sponsored disinformation is not currently a common phenomenon in EU Member States, there is no effective European instrument to detect and combat it. The European Media Freedom Act regulates the distribution of state advertising, but does not ensure that these rules are enforced. Furthermore, the European Union must take every opportunity to state that state-supported and therefore systemic disinformation is incompatible with European values and excludes the democratic formation and expression of will and, ultimately, the possibility of free and fair elections. It is proposed that state-sponsored disinformation should be a condition of the rule of law that also justifies the suspension of European funding.

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