

TACKLING ONLINE DISINFORMATION

The Construction of ‘Trustworthiness’ and ‘Best Practices’ in the European Commission Discourse on COVID-19

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Abstract – Over the last few decades, misleading healthcare information and deceptions with false claims, conspiracy theories (CTs) and consumer fraud have endangered public health on a global scale. More recently, the COVID-19 pandemic has been accompanied by a substantial flow of false information and unceasing attempts by conspirators to influence debates in the official discourses, breeding on the fertile ground of people’s most basic anxieties and the present-day social and economic uncertainty.

This paper investigates the discourse of the European Commission on disinformation in order to achieve institutional legitimation through the linguistic and discursive construction of ‘trustworthiness’, ‘credibility’, and ‘transparency’. The analysis considers the documents produced by the European Commission over the last few years (2018-2021), to tackle the discourse that supports alternative views on official science. The results of the analysis reveal the EU discursive process of conceptualising ‘verifiably false or misleading information’ as ‘public harm’, while distancing it from the EU’s fight against disinformation’ that is discursively constructed as ‘the protection of the EU values’. In particular, the investigation will show how the lexical and phraseological interaction discursively removes the harmful potential of conspiracy theories activists, legitimises massive control measures as the most effective way to guarantee freedom of expression and pluralistic democratic debate, and empowers the EU’s image as the shield protecting the European citizens’ awareness and societal resilience (Flowerdew, Richardson 2018).

Keywords: disinformation; discourse; Systemic Functional Linguistics; European Commission; EU values

1. Introduction

Over the last few decades, misleading healthcare information and deceptions with false claims, conspiracy theories and consumer fraud have endangered public health on a global scale. ‘Fake news’ is not a new term, and its roots can be traced back to Johannes Gutenberg’s invention of the printing press

in 1439 to indicate falsehood printed as news.¹ As printing expanded, so did fake news, appearing as spectacular stories of sea monsters and witches or claims that sinners were responsible for natural disasters. Since then, fake stories have historically been produced to sell newspapers, entertain, or create fear and anger (Umberti 2016). Not only was real news hard to verify in that era, but, moreover, the concept of journalistic ethics or objectivity had not yet been developed. These accounts, Kalsnes observes:

give an indication of how the historic evolution of fake news is also related to the development of journalism as a profession, such as methods of verification and codes of ethics. They also indicate that fake news is not a new thing, neither as a term nor as a phenomenon. But the surge in the use of the term worldwide has created epistemological discussions of how digital disinformation dressed as news should be understood (2018, p. 3).

In recent years, new communication technologies, the digital transformation of news from offline to online distribution, and the rise of social media as a news distribution channel, have suggested newer definitions of fake news to describe a wide range of misinformation and disinformation ranging from lies, conspiracy theories, and propaganda to mistakes and entertainment (Wardle, Derakhshan 2017). As a matter of fact, defining fake news is fraught with difficulties because it could rather be classified according to various characteristics such as the source of the news, the content, the distribution method, and the intention (Gelfert 2018). The Oxford English Dictionary (OED) defines fake news “[a] news that conveys or incorporates false, fabricated, or deliberately misleading information, or that is characterised as or accused of doing so”; whereas, the UK Cambridge Dictionary defines fake news “false stories that appear to be news, spread on the internet or using other media, usually created to influence political views or as a joke”. Characterised by a close connection to news as a format and as an independent institution, three elements are recognisable in the various definitions of fake news: (i) the *format*, i.e., false information presented as news; the degree of *falsity*, i.e., partly or completely false information; and (iii) the *intention* behind it, i.e., to mislead readers and users for political, economic, or personal purposes (Kalsnes 2018, p. 3). In line with Carey’s (1992) description of communication as a representation of shared beliefs where people are drawn together in fellowship and commonality, fake news represent and confirm a particular view of the world that might be purposefully distorted with a particular slant, with digital and social media

¹ “The real story of ‘fake news’” <https://www.merriam-webster.com/words-at-play/the-real-story-of-fake-news> (14.01.2022).

amplifying it to large networks worldwide (Wardle, Derakhshan 2017; Demata *et. al* 2018).

Being a contested term that generally refers to a wide range of disinformation and misinformation circulating online and in the media (Marwick, Lewis 2017, p. 44), the European Union has suggested abandoning the term 'fake news' altogether. In January 2018, the European Commission set up the Independent High-Level Group to propose measures 'to counter fake news and disinformation spread online and prepare a report designed to review best practices in the light of fundamental principles, and suitable responses stemming from such principles.'² In particular, the *Report from the independent High-Level Expert Group on fake news and online disinformation* (hereafter, HLEG 2018) considers fake news an 'inadequate and misleading term to explain the complexity of the situation' and recommends using the term '*disinformation*' that includes all forms of 'false, inaccurate, or misleading information designed, presented and promoted to intentionally cause public harm or for profit' (2018, p. 10).³ In this regard, the approach recommended by the HLEG is based on a number of interconnected and mutually reinforcing short-term (1-2) and long-term responses (3-4): the former take action against the most pressing problems, the latter increase societal resilience to disinformation. These responses aim to:

1. promote media and information literacy to counteract disinformation and help users properly navigate the digital media environment;
2. develop tools for empowering users and journalists to combat disinformation and promote a positive engagement with fast-evolving information technologies;
3. improve transparency of online news, involving an adequate and privacy-compliant sharing of data about the systems that enable their spread online;
4. promote continued research on the impact of disinformation in Europe to evaluate the measures taken by different actors (i.e., users, journalists, editors, EU institutions, national governments, etc.) and constantly adjust the required responses (HLEG 2018, p. 5).

The COVID-19 pandemic has been accompanied by a substantial amount of disinformation and unceasing attempts by conspiracy theories (hereafter, CTs) actors to influence debates in the official discourses, breeding on the fertile ground of people's most basic anxieties and presenting malicious, far-

² <https://op.europa.eu/en/publication-detail/-/publication/6ef4df8b-4cea-11e8-be1d-01aa75ed71a1> (14.01.2022)

³ As stated in the Report, it does not cover issues arising from the creation and dissemination online of illegal content (i.e., defamation, hate speech, incitement to violence), which are subject to regulatory remedies under EU or national laws. https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1006 (14.01.2022).

fetched explanations on where the virus might have originated and on who is to blame for its spreading.⁴ The analysis considers a small corpus of documents produced by the European Commission over the last few years, to tackle the alternative views on the scientific response to COVID-19. To examine the selected linguistic data, firstly, I drew upon the *Critical Discourse Analysis* (CDA) approach to discourse (Fairclough 1992, 2001, 2013), analysing micro-textual elements on specific patterns of use, such as those from the area of semantics (Davidson, Harman 2012; Facchinetti *et al.* 2012), or appraisal (Hunston, Thompson 2003; Martin, White 2005). In this regard, the EU discursive process of conceptualising ‘verifiably false or misleading information’ as ‘public harm’ discloses a trend that falls under Flowerdew and Richardson’s (2018, p. 2) approach about ‘the creation of knowledge and meaning’,

discourse and language are seen in a dialectical relationship, with social structures affecting discourse and discourse affecting social structure. In the former process, while individuals may exercise discursive agency, this is done within the constraints imposed by social conventions, ideologies and power relations. In the latter process, rather than merely representing social reality, discourse(s) actually (re)create social worlds and relations [...] At the same time, discourse is seen as an essential component in the creation of knowledge and meaning.

From a genre-based analysis (Swales 1990; Bhatia 1993, 2008) of the European Commission Press Releases in 2020 and 2021 first, and the comparison of the results with the textual and discursive resources deployed in the *Joint Communication (2020)8 final* and *Communication (2021)262 final*, it is possible to appreciate how they function as systems of meanings (Halliday, Matthiessen 2013, 2014; Halliday, Webster 2014), and are processed at the level of meaning, context of situation (register), and context of culture (genres). In particular, this analysis attempts to reveal how the lexical and phraseological interaction discursively removes the harmful potential of CTs actors, legitimises massive control measures as the most effective way to guarantee freedom of expression and pluralistic democratic debate, and empowers the EU’s image as the shield protecting the European citizens’ awareness and societal resilience (van Dijk 2011; Bloor, Bloor 2018). To make a methodological premise, regarding the language data, which is the object of the analysis, I refer to the data as a small corpus on the premises of Sinclair’s statement that

⁴ As part of the comprehensive approach to tackle the negative impact of conspiracy theories, the European Commission and UNESCO are publishing a set of accessible educational materials with the aim to help citizens identify – and counter – conspiracy theories.

a small corpus is seen as a body of relevant and reliable evidence, and is either small enough to be analysed manually, or is processed by the computer in a preliminary fashion [...]; thereafter the evidence is interpreted by the scholar directly (Sinclair 2001, p. xi).

Being the scope of this study to investigate the distinguishing marks of the European Commission documents on COVID-19 disinformation as new discursive spaces for the EU construction of 'trustworthiness' and 'best practices', and given the small number of the EU documents specifically devoted to COVID-19 disinformation, the conclusion from the above considerations is that there is justification for seeing the language data in the present study as a small, specialised corpus.

The paper is divided into 5 sections. After a brief introduction in Section 1, Section 2 deals with the topic providing definitions of disinformation and CTs, outlining some trends in genre analysis and Systemic Functional Linguistics, and suggesting new perspectives on meaning in discourse. Section 3 provides some context about the European Commission and its work in counteracting COVID-19 disinformation. Section 4 delves into the analysis of selected documents, focusing on the linguistic and discursive levels (Subsection 4.1 and 4.2). Section 5 summarises the findings and presents some final remarks for future research.

2. CTs and the EU

Historically, vaccine hesitancy has originated from a lack of knowledge, false religious beliefs, or anti-vaccine misinformation. The roots of this dispute stretch back over the centuries to Edward Jenner's first successful smallpox vaccination in 1796 and the subsequent efforts to spread the practice of vaccination to Europe and the world.⁵ Since then, the word *vaccine/vaccination* not only has carried emotional weight as a scientific endeavour to control smallpox⁶, but has also provoked immediate associations with other words, i.e., autism, influenza, anti-vaxxer, etc. (Stern, Merkel 2005). Figure 1 below is a reproduction of a satirist cartoon from the Becker Library's archival collection of smallpox caricatures and represents the public concern over the effects of smallpox vaccination in early 19th-century Europe.

⁵ The *OED* credits the French for coining the term *vaccine* in 1800 and *vaccination* in 1803; according to an article in the *British Medical Journal*, however, the term was used as an adjective in 1799 by British general practitioner Dr. Edward Jenner as a combination of the Latin word *vacca* (En. *cow*) and the Latin word *vaccinia* (En. *cowpox*), and the noun *vaccination* was introduced by his friend Richard Dunning in 1800 (Baxby 1999).

⁶ The History of the Word 'Vaccine' | Merriam-Webster (14.01.2022).



Figure 1
Bernard Becker Medical Library Archives.⁷

As it has been scientifically demonstrated throughout history, disinformation and misinformation about vaccines decreases people’s confidence in medical science and healthcare professionals. Despite more than a 200-year history of vaccines and a modern understanding of immunology, the current situation regarding anti-vaccine beliefs raises the concern whether people will believe and accept the new COVID-19 vaccines despite all anti-vaccine movements, CTs and COVID-19-related myths (Larson *et al.* 2011; Dubé *et al.* 2013; Thanh Le *et al.* 2020; Ullah *et al.* 2021). Researchers have worked collaboratively to develop the vaccines against COVID-19⁸. However, the vaccination program is still considered unsafe and unnecessary by many individuals, both in developed and developing countries, and the lack of knowledge, disinformation, and CTs are now considered to be the greatest threat to the success of vaccination programs (Hullah *et al.* 2021). Picture 2 below is a screenshot of a video that promotes vaccine hesitancy in the midst of COVID-19 pandemic spread.

⁷ James Gillray’s cartoon “The Cowpox: Or, the Wonderful Effects of the New Inoculation” depicts just-vaccinated men and women sprouting cow features while an indifferent Edward Jenner is about to wound the arm of a frightened woman. This print is part of a collection of nine prints housed in the Bernard Becker Medical Library Archives beckerarchives.wustl.edu (14.01.2022).

⁸ The spread of coronavirus disease 2019 (COVID-19), caused by severe acute respiratory syndrome-related coronavirus 2 (SARS-CoV-2), has resulted in an unparalleled humanitarian and economic crisis (Ullah *et al.* 2021).



Figure 2
Screenshot of a video that promotes vaccine hesitancy at bitchute.com/archive.⁹

According to a study conducted by Schmid and Betsch (2019) on anti-vaccination CTs, the conspiratorial denial of the efficacy and safety of vaccinations can be reduced by rebuttal messages. When an appeal to a conspiracy between government and pharmaceutical industries is left unchallenged, people’s intention to vaccinate and their attitude towards vaccinations tend to decline significantly. By contrast, when the conspiracy is rebutted either by pointing out that much of the research in support of vaccinations has been conducted by independent, publicly funded scientists, or by correcting false assertions and emphasizing how vaccinations improve public health, then exposure to the CTs tends to reduce its effect (Orosz *et al.* 2016).

In line with this study, to counteract CTs on COVID-19 vaccination campaign, the EU has created an Action Research Network of 150 scholars (Comparative Analysis of Conspiracy Theories – COMPACT) from across Europe who are investigating the causes and consequences of conspiracy theories¹⁰. The *COMPACT Guide to Conspiracy Theories 2020* is among the recent results of the EU research network of scholars¹¹. The Guide is meant

⁹ In line with the COVID-19 CTs, it reports the false claim that the Pfizer vaccine is actually made of graphene oxide, a toxic compound.

¹⁰ www.conspiracytheories.eu (14.01.2022).

¹¹ Identifying conspiracy theories | European Commission (europa.eu), https://conspiracytheories.eu/wp-content/uploads/2020/03/COMPACT_Guide-2.pdf (14.01.2022).

to help EU citizens to understand why conspiracy theories are so popular, explain how to identify the traits of conspiratorial thinking, and suggest effective debunking strategies. Divided into two parts – (i) Understanding Conspiracy Theories, and (ii) Recommendation for Dealing with Conspiracy Theories – the Guide’s main points are reported below:

- (i) CTs are based on the belief that events are secretly manipulated behind the scenes by powerful forces. Over the past twenty years, their significance and popularity has been increasing steadily, especially online. At times they can be dangerous. They can lead to a loss of faith in medical and scientific expertise, to political disengagement, and even to violence. Conspiracy theories are therefore a challenge for a broad variety of stakeholders (*COMPACT Guide to Conspiracy Theories* 2020, p. 6);
- (ii) generally speaking, CTs have 6 things in common:
 - 1) supposed, secret design or machinations;
 - 2) a conspirating group;
 - 3) a type of proof supporting the CT;
 - 4) a supposed logical explanation of events that are difficult to understand, with the intention of giving us a false perception of being in control and taking action;
 - 5) a suspicion about who is benefiting from the situation and, thus, identifying them as the real conspirators. Evidence is purposefully constructed to prove the theory;
 - 6) most believe the proof is real, whereas others intentionally manipulate people for different reasons (i.e, economic, political, ideological, etc.).

As explained in the *Guide* (Paragraph 1.1, p. 4) and clearly stated in the *Conspiracy Theory Handbook* (2020: 3), “conspiratorial thinking is characterised by being hyperskeptical of all information that does not fit the theory, over-interpreting evidence that supports a preferred theory, and inconsistency”. Furthermore, social media have amplified the power of CTs via: (i) a creation of a world in which any individual can potentially reach as many people as mainstream media, and (ii) the lack of traditional gatekeepers (i.e., newspaper editors) protecting against misinformation that spreads farther and faster online than real information, often propelled by fake accounts or bots¹² (*Conspiracy Theory Handbook* 2020, p. 4). Viewed this way, CTs become ‘as-if’-theories that allow their adherents to make sense of a world that is causally unclear in a way that may often yield quite adequate predictions¹³.

¹² A computer program that runs automated tasks over the internet (OED).

¹³ Internet Encyclopedia of Philosophy at [Conspiracy Theories | Internet Encyclopedia of Philosophy \(utm.edu\)](https://www.iep.utm.edu/conspiracy-theories/) (14.01.2022).

In the fight against disinformation and CTs, it becomes crucial to 'influence discourse' (Fairclough 2012; van Dijk 2011) and shape a more macro narrative about following cause and effect. The fairly textured discourse of CTs generates various categorisations attributable to different groups in society, outcasts groups that breach the in-group's standards of normative behaviour, and eventually serves to breach the power structures and status quo (Bhatia 2018). By focusing on the meaning-making resources of language within specific social and cultural contexts, Halliday's (1978) *Systemic Functional Theory* (SFL) represents a valuable instrument for the investigation of the grammatical choices that are available in a language and discourse. These choices are contained in system networks, which offer model options that carry significant meaning (for instance, the difference between negative and positive evaluation) available to speakers to create meaning in context (Halliday, Matthiessen 2013). These system networks are organised according to metafunctions that the resources have in practical contexts:

- the *experiential* and *logical meanings* structure the experience of the world, and of our own consciousness, by the content component of language (mainly in terms of participating entities, processes and circumstances);
- the *interpersonal meaning* constructs social relations using language to act (i.e., asking questions, giving information, etc.) and/or express subjective judgments and opinions (mood, modality, appraisal, politeness, etc.);
- the *textual meaning* transposes experiential and interpersonal meanings into cohesive and coherent chunks of language in use (i.e., texts are created by indicating topic and relevance in the language used) (Bloor, Bloor 2014; Halliday, Webster 2014).

The analysis of the selected European Commission documents draws on insights from the SFL approach to further explore the European Commission communication strategies to construct a relationship among the EU institutions, EU citizens, and 'the interested stakeholders' (Fairclough 2012). Through a deliberate and conscious construction and use aimed to achieve a specific purpose, it may be that a specific genre is geared towards a socially accepted and shared knowledge and objectives (Swales 1990; Bhatia 1993). These observations are in line with Bhatia's suggestion to get in some contexts a "deeper understanding of the immediate, as well as the broader context, including intertextuality and more importantly interdiscursivity, in addition to lexico-grammar, textualization, and textual organization" (2008, p. 174).

To date, much of the research on disinformation and CTs on COVID-19 vaccination campaign has been conducted with the intention to illustrate

how disinformation is achieved through language. Indeed, an analytical focus should be balanced with a parallel attention on the empowerment-discourses designed to build ‘trustworthiness’, not ‘public harm’ and successfully reorder information and reliability without necessarily struggling against them. Starting from Martin and Rose’s (2007) idea of strategically redistributing power among the discourse participants through discourse, this study attempts to identify the linguistic/discoursal strategies used by the European Commission against COVID-19 disinformation to empower both the EU institutions and the EU citizens / interested stakeholders (i.e., positioning these latter as agents of social change, informing them about what they can accomplish, and advising them on possible future actions), and to outcast groups that breach the standards of normative behaviour from the society (i.e., sustaining the EU’s status quo and power structures) (Fairclough 1989; van Prooijen 2018).

3. Working documents of the European Commission

The European Union (EU) has been actively tackling disinformation since 2014.¹⁴ In its role of developing the EU's overall strategy and designing and implementing EU policies, the European Commission has played an active role in the field of ‘communication’ and ‘disinformation’¹⁵. In October 2018, the *EU Code of Practice on Disinformation* (hereafter, *Code of Practice*) signed by the European Institutions, Facebook, Google, Twitter and Mozilla, as well as trade associations representing online platforms and the advertising industry, represented the first self-regulatory tool to tackle disinformation. Then, the *Joint Communication* to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions of December 2018 (hereafter, *Action Plan against Disinformation* 2018, p. 5) followed suit presenting four pillars for the EU’s fight against disinformation: “1) improving the capabilities to detect, analyse and expose disinformation; 2) strengthening coordinated and joint responses; 3) mobilising the private sector to tackle disinformation; 4) raising awareness

¹⁴ Following a decision of the European Council in March 2015, the East StratCom Task Force in the European External Action Service (EEAS) was set up. In 2016, the *Joint Framework on countering hybrid threats* (https://ec.europa.eu/commission/presscorner/detail/en/IP_16_1227 (14.01.2022)) was adopted, followed by the *Joint Communication on increasing resilience and bolstering capabilities to address hybrid threats* in 2018, https://ec.europa.eu/commission/presscorner/detail/en/IP_18_4123 (14.01.2022).

¹⁵ It is the only institution that can propose legislation in European Community law, and as such, a large proportion of its documents relate to the legislative process.

and improving societal resilience”¹⁶. In the subsequent *Joint Communication* of June 2019, the European Commission and the High Representative of the Union for Foreign Affairs and the Security Policy concluded that while the European elections of May 2019 were not free from disinformation, the actions taken by the EU have contributed to narrow down the space for third-country influence as well as coordinated campaigns to manipulate public opinion.¹⁷

In line with this action, a separate webpage in the European Commission website “Shaping Europe’s digital future” has been specifically created to ‘tackle online disinformation’. Here it is clearly stated that:

Large-scale disinformation campaigns are a major challenge for Europe and require a coordinated response from EU countries, EU institutions, social networks, news media and EU citizens. The Commission has developed a number of initiatives to tackle disinformation¹⁸.

Among the EU’s latest initiatives, there is the COVID-19 monitoring and reporting programme, carried out by signatories of the Code of Practice, that acts as a transparency measure to ensure accountability in tackling disinformation¹⁹. This was officially stated first in the Press Release “Coronavirus: EU strengthens action to tackle disinformation” of the 10th of June 2020 (hereafter, PR2020), where the European Commission and the High Representative announced their intention ‘to assess their steps to fight disinformation around the Coronavirus pandemic and propose a way forward’. This official announcement was, then, restated and emphasised in the Press Release of the 26th of May 2021 (hereafter, PR2021), where the European Commission and the High Representative proposed a guidance to strengthen the Code of Practice on Disinformation²⁰.

In the practice of SFL analysis (see Section 4 here), the *textual meaning* could be exemplified showing how elements of texts of PR2020 and PR2021 cohesively and coherently refer to the preparatory documents of the EU legislation on COVID-19 disinformation issued by the European

¹⁶ https://ec.europa.eu/info/sites/default/files/eu-communication-disinformation-euco-05122018_en.pdf (14.01.2022), see p.5.

¹⁷ The Commission issues large numbers of working documents every year. As a result of changes introduced by the Lisbon Treaty, in 2012 a new category of documents viz., *Joint Communications*, was introduced. These documents, which were formerly part of the so-called second pillar of the European Union (Common Foreign and Security Policy or CFSP), have been fully integrated into the EU’s legal system and are jointly issued by the European Commission and the High Representative of the Union for Foreign Affairs and Security Policy.

¹⁸ <https://digital-strategy.ec.europa.eu/en/policies/online-disinformation> (14.01.2022).

¹⁹ <https://digital-strategy.ec.europa.eu/en/policies/online-disinformation> (14.01.2022).

²⁰ https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1006 from the Press Material of the Spokesperson’s Service - European Commission at <https://ec.europa.eu/commission/presscorner/home/en> (14.01.2022).

Commission: the *Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions. Tackling COVID-19 disinformation - Getting the facts right* - Brussels, 10.6.2020 JOIN(2020) 8 final²¹ (hereafter, JOIN2020), and the Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions. *European Commission Guidance on Strengthening the Code of Practice on Disinformation* - Brussels, 26.5.2021 COM(2021) 262 final²² (hereafter, COM2021). Then, the *experiential* and *logical meanings* can raise awareness of how the European Commission represents reality in fairly negative or positive ways (i.e., mainly in terms of processes, participant roles, circumstance ‘etc.’); whereas, the *interpersonal meaning* can point to the nature of the interactive relationship perceived by the European Commission with the EU citizens and other stakeholders (i.e., mood, declarative or interrogative) (Halliday, Matthiessen 2013, pp. 61-63) in both the Press Releases (PR2020-PR2021) and the preparatory documents of the EU legislation (JOIN2020-COM2021).

4. Analysis

4.1. European Commission Press Releases on COVID-19 disinformation

In this section, the investigation focuses on the linguistic resources (Bhatia 2008) which are employed by the European Commission to construct ideas designed to effect social change. In particular, the analysis of the key words related to the idea of *disinformation* around Coronavirus reveals the communicative strategies of the European Commission addressing the changing relationship between EU institutions, EU citizens and the interested stakeholders in the field of information. In this regard, it is interesting to look at the PR2020 and PR2021 on disinformation that exemplify how the language used presents the EU’s policy as an inevitable consequence of the way the world is.

Contextually, the mode of PR2020 is a short report or bulletin, written-to-be-spoken. In terms of regularities of organization, the document has a fairly standardised structure with some scope for variation within this general discourse structure of the European Commission Press Releases. The analysis

²¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020JC0008> (14.01.2022).

²² <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=COM:2021:262:FIN> (14.01.2022).

reveals a typical use of lexico-grammar to signal movement between various rhetorical moves (Bhatia 2008):

1st move - identifying important themes (themes of some significance are expressed by nominalised forms, example 1 below);

2nd move - elaboration on themes and evidence for claims (use of present continuous when referring to current action and perfect tense when referring to outcomes, examples 2 and 3 below);

3rd move - looking forward (a continued challenge signaled by expressions such as *there is a need to provide / to enhance cooperation, ensuring freedom of expression, empowering citizens*, example 5 below).

PR2020 starts with a paragraph declaring:

- (1) Today, the Commission and the High Representative are assessing their steps *to fight disinformation* around the coronavirus pandemic and are proposing *a way forward*. This follows the tasking by European leaders in March 2020 *to resolutely counter disinformation* and *reinforce resilience* of European societies. The coronavirus pandemic has been accompanied by *a massive wave of false or misleading information*, including attempts by foreign actors *to influence EU citizens and debates*. The Joint Communication analyses the immediate response and proposes *concrete action* that can be quickly set in motion (My emphasis).

Right from the beginning, it is possible to identify some features that are typical of the 'empowerment-discourse' made in history to combat terrorist attacks (Silberstein 2002; Graham *et al.* 2004; Bhatia 2018):

- (i) the creation of a legitimate and wholly good authority (the Commission and the High Representative are assessing their steps *to fight disinformation* around the coronavirus pandemic and *to propose a way forward*);
- (ii) appeal to the cultural values and traditions (the tasking by European leaders ... *to resolutely counter disinformation* and *reinforce resilience* of European societies);
- (iii) the construction of an evil 'other' (*a massive wave of false or misleading information* ... attempts by foreign actors *to influence EU citizens and debates*) and the appeal for unity behind the good and legitimate source of authority (The Joint Communication analyses the *immediate response* and proposes *concrete action* ...).

This first paragraph (example 1) is immediately followed by two extracts taken from the speeches respectively given by the High Representative/Vice-President Josep Borrell and the Vice-President for Values and Transparency

Věra Jourová, in which they promote major EU actions to counter COVID-19 disinformation:

- (2) High Representative/Vice-President Josep Borrell said: “*Disinformation in times of the coronavirus can kill. We have a duty to protect our citizens by making them aware of false information, and expose the actors responsible for engaging in such practices. In today's technology-driven world, where warriors wield keyboards rather than swords and targeted influence operations and disinformation campaigns are a recognised weapon of state and non-state actors, the European Union is increasing its activities and capacities in this fight.*”
- (3) Vice-President for Values and Transparency Věra Jourová said: “*Disinformation waves have hit Europe during the Coronavirus pandemic. They originated from within as well as outside the EU. To fight disinformation, we need to mobilise all relevant players from online platforms to public authorities, and support independent fact checkers and media. While online platforms have taken positive steps during the pandemic, they need to step up their efforts. Our actions are strongly embedded in fundamental rights, in particular freedom of expression and information.*”

As well as in the creation of a narrative about a socio-political phenomenon such as terrorism, in both extracts ‘the logic of binarism’ (Lazar, Lazar 2004) establishes as a political fact the existence of a clear and specific threat (*Disinformation in times of the coronavirus can kill* (Borrell); *Disinformation waves have hit Europe during the Coronavirus* (Jourová)). Further, binarism eludes the different kinds of degrees of threat, to constitute a largely undifferentiated enemy (*warriors wield keyboards rather than swords [...] disinformation campaigns are a recognised weapon of state and non-state actors* (Borrell); *to fight disinformation [...] to mobilise all relevant players [...] to step up their efforts*) (Jourová)), and allow ‘us’ and ‘them’ to be represented in clear, simple and unidimensional lines (*We have a duty to protect our citizens [...] European Union is increasing its activities and capacities in this fight* (Borrell); *They originated from within as well as outside the EU [...] Our actions are strongly embedded in fundamental rights* (Jourová)) through a strategic narrative (Lazar, Lazar 2004). By means of the “out-casting process, a process by which individuals and/or groups are systematically marked and set aside as outcasts” (Lazar, Lazar 2004, p. 227), the dichotomy between ‘us’ (EU institutions, EU citizens, interested stakeholders) and ‘them’ (out-groups) becomes legitimate because it is made to appear clear and ingrained in conventional wisdom (Bauman 1990; van Dijk 1995; Lazar, Lazar 2004, pp. 226-227).

Then, PR2020 presents a section with a list of ‘key aspects’ introduced by the sentence:

- (4) The crisis has become a test case showing how the EU and its democratic societies deal with the disinformation challenge. The following aspects are key for a stronger and more resilient EU.

Here (examples 4 and 5), the strengthening overreaching narrative enforces a dominant definition of what is 'good' (*democratic societies, stronger and more resilient EU, empowering citizens, raising citizens awareness and increasing societal resilience*) and 'bad' (*the crisis, test case, disinformation challenge*), who is 'we/us' (*the Commission, stronger and more resilient EU, other international actors*) and 'they/them' (*myths around the coronavirus, practices that infringe consumer protection law*) (Chang, Mehan 2006):

- (5) Understand: First, *it is important to distinguish between illegal content and content that is harmful but not illegal*. [...] there is a need to provide more data for public scrutiny and improve analytical capacities.

Communicate: *During the crisis, the EU has been stepping up its work to inform citizens about the risks and to enhance cooperation with other international actors to tackle disinformation*. The Commission has been rebutting *myths around the coronavirus*, which have been viewed more than 7 million times.

Cooperation has been an important cornerstone of the fight against disinformation: [...] many consumers were misled to buy overpriced, ineffective or potentially dangerous products, and platform have removed millions of *misleading advertisements*. The Commission will continue to cooperate with online platforms [...]

Transparency: The Commission has closely monitored the actions of online platforms under the Code of Practice on Disinformation. *There is a need for additional efforts, increased transparency and greater accountability*.

These 'key aspects' further confirm the existence of a dichotomising discourse which shapes and reshapes what 'we' understand as 'objective reality' (*During the crisis, the EU has been stepping up its work to inform citizens about the risks and to enhance cooperation with other international actors to tackle disinformation misleading advertisements ...; Cooperation has been an important cornerstone of the fight against disinformation ...*, example 5).

The last part of the PR2020 presents two final sections providing some background in terms of the European Union actions already taken to tackle disinformation, and some useful links for those who need further information. The analysis of PR2021 reveals that it follows the same standardised format with a typical use of lexico-grammar to signal movement between the rhetorical moves found in PR2020, and shown in the extracts below:

- (6) Today, the Commission publishes its guidance on how the Code of Practice on Disinformation, the first of its kind worldwide, should be strengthened *to become a more effective tool for countering disinformation. It sets out Commission expectations, calls for stronger commitments by the signatories and foresees a broader participation to the Code.* Based on a robust monitoring framework and clear performance indicators, *signatories should reduce financial incentives to disinformation, empower users to take an active role in preventing its spread, better cooperate with fact-checkers across EU Member States and languages, and provide a framework for access to data for researchers* (1st move - identifying important themes)
- (7) Thierry Breton, Commissioner for Internal Market, said: “We need to *rein in the infodemic and the diffusion of false information putting people's life in danger.* Disinformation cannot remain a source of revenue. *We need to see stronger commitments by online platforms, the entire advertising ecosystem and networks of fact-checkers. The Digital Services Act will provide us with additional, powerful tools to tackle disinformation* (2nd move - elaboration on themes and evidence for claims).

The main difference has been found in the 3rd rhetorical move - ‘looking forward’ – that, in comparison with the other moves, constitutes the main and more extended part in PR2021 (from *A strong, stable and flexible Code to support the fight against disinformation. The Guidance calls for reinforcing the Code by strengthening it in the following areas* section, to the *Next Step* and *Background* final sections), as example 8 below illustrates:

- (8) A strong, stable and flexible Code to support the fight against disinformation. The Guidance calls for *reinforcing the Code by strengthening it in the following areas*; larger participation with *tailored commitments; must take responsibility* and better work together [...] *exchanging information* on disinformation [...]; include *tailored commitments* to ensure transparency; *empower users* to understand and flag disinformation; *users need* to have access to tools to better understand and safely navigate [...]

Next step

The Commission *will call upon* [...]; It also encourages [...]; the Commission will reach [...]; The signatories should proceed swiftly [...]; the Commission will also propose this year a legislation to improve the transparency [...]

Background

The coronavirus crisis starkly illustrated the threats and challenges disinformation poses to our societies. The ‘infodemic’ has posed substantial risks to personal and public health systems, crisis management, the economy and society. *It has shown that, despite*

important efforts taken to date, there is an urgent need to step-up efforts to fight disinformation. The EU approach to countering disinformation is deeply rooted in the protection of freedom of expression and safeguarding an open democratic debate. It aims to create more transparency and accountability in the online environment and empower citizens. It goes hand in hand with the other aims of the European Democracy Action Plan, namely promoting free and fair elections and protecting media freedom and pluralism. The EU has mobilised industry, media, academia, public authorities and civil society and encourages a broader participation in the Code (3rd move – looking forward)

An interesting aspect of the two PRs (2020 and 2021) is the time sequence of events; they begin with present implications of past events and go towards future events or expectations. The amount of engagement with past events depends on how well the EU institutions have performed in the preceding years. If the EU institutions have performed well, it is more likely to find an elaborate account of the achievements. In the event of unexpected and impending challenges (*The coronavirus crisis starkly illustrated the threats and challenges disinformation poses to our societies...* (PR2021)), we find a detailed and elaborate engagement with future and expected events as the analysis of PR2021 has revealed in its final sections (example 8).

4.2. JOIN2020, COM2021 and the fight against disinformation

At this point, the analysis has concentrated on the discursive and textual features of the two European Communications on COVID-19 disinformation, namely JOIN2020 and COM2021. Generally speaking, Joint Communications (JOIN) and Communications (COM) are part of a standard procedure followed by the European Commission when it faces a policy challenge. They are policy papers, addressed to the European Parliament and the Council, to inform them about a specific situation and usually include proposals for solving the problem. As clearly explained in the *Fact Sheets on the European Union 2021*, “the power of proposal is the complete form of the power of initiative, as it is always exclusive and constrains the decision-making authority to the extent that it cannot take a decision unless there is a proposal and its decision has to be based on the proposal as presented”.²³

Following the SFL approach, the analysis reveals that the *experiential*, *interpersonal* and *textual meanings* found in JOIN2020 and COM2021 are strongly permeated by the discursive strategies of PR2020 and PR2021. The two texts have a total amount of 19,369 tokens, with COM2021 being relatively longer than JOIN2020. In terms of the textual meaning, being the European Commission’s role to write JOINS and COMs that present a brief,

²³ <https://www.europarl.europa.eu/factsheets/en/sheet/25/the-european-commission> (14.01.2022).

clear, and accurate outline of the major points of the legislative proposal, and make use of an easy-to-read format, both texts present sections numbered consecutively, and organised into units/paragraphs and subunits/subparagraphs that are preceded by an ‘Introduction’ and ended by a ‘Conclusion’.

In terms of the experiential and logical meanings, the paragraph ‘Introduction’ sets the tone and the register of both documents, structuring the experience of the world by the content component of language (i.e, participating entities, processes, and circumstances):

- (9) The COVID-19 (‘Coronavirus’) pandemic has been accompanied by an unprecedented ‘infodemic’²⁴. A flood of information about the virus, often false or inaccurate and spread quickly over social media, can – according to the World Health Organisation (WHO) – create confusion and distrust and undermine an effective public health response. Responding to the call of the members of the European Council and EU Foreign Affairs Ministers, as well as to the concerns of the European Parliament, this Joint Communication focuses on the immediate response to disinformation around the coronavirus pandemic, looking at the steps already taken and concrete actions to follow, which can be quickly set in motion based on existing resources (JOIN2020, p. 1).
- (10) The ‘infodemic’ – the rapid spread of false, inaccurate or misleading information about the pandemic – has posed substantial risks to personal health, public health systems, effective crisis management, the economy and social cohesion [...]. From its inception, the EU approach to countering disinformation has been grounded in the protection of freedom of expression and other rights and freedoms guaranteed under the EU Charter of Fundamental Rights [...]. To this end, the EU has sought to mobilise all relevant stakeholders, including public authorities, businesses, media, academics and civil society (COM2021, p. 1).

As the readers/addressees need to feel the information being given is relevant, some linguistic strategies are used in JOIN2020 and COM2021 to attract their attention. In this case, the analysis reveals few occurrences of *we/our/us*. This may be due to the intention of the discourse producers to provide a clear reference to the European Commission or the EU institutional organizations themselves:

- (11) The COVID-19 ‘infodemic’ has demanded a rapid response from the EU and its Member States. Disinformation can have severe consequences: it can lead people to ignore official health advice and engage in risky

²⁴Footnote 1 of JOIN2020 provides some information about the origin of the term ‘infodemic’: “The term has been used and described by WHO: ‘infodemics are an excessive amount of information about a problem, which makes it difficult to identify a solution. They can spread misinformation, disinformation and rumours during a health emergency. Infodemics can hamper an effective public health response and create confusion and distrust among people’ [...]”.

- behaviour, or have a negative impact on *our* democratic institutions, societies, as well as on *our* economic and financial situation (JOIN2020, p. 2).
- (12) Fact checking is fundamental for all of *us* to have access to reliable information as well as to a plurality of views (JOIN2020, p. 9).
 - (13) The pandemic has also elevated the role digital technology plays in *our* lives, making it increasingly central to how *we* work, learn, socialise, provide for material needs, and participate in the civic discourse (COM2021, p. 1).

Even though present in a small number, personal pronouns *we/our/us* when used help to discursively construct an intimate tone between text producers and the target-readers (Maillat, Oswald 2009; Fairclough 2013), and similarly the target-readers to feel part of a universal community (Ott, Cameron 2000; Hunston, Thompson 2003). In this regard, the analysis reveals an interesting difference in the number of occurrences between JOIN2020 (*we* 0 occurrence, *our* 12 occurrences, *us* 1 occurrence) and COM2021 (*we* 1 occurrence, *our* 2 occurrences, *us* 0 occurrence). This may be due to the European Commission's intention to principally address the 'other/relevant stakeholders' in a 'call to arm discourse' (Silberstein 2002; Graham *et al.* 2004) to tackle online disinformation and assess the trustworthiness of information sources:

- (14) This Guidance sets out the Commission's views on how platforms and other relevant stakeholders should step up their measures to address gaps and shortcomings in the Code and create a more transparent, safe and trustworthy online environment (COM2021, p. 3).

Overall, sentences are fairly short and technical jargon is rarely used. Active voice is the norm (Cooperation with social media platforms *is* a key element...; "This 'infodemic' *feeds* on people's most basic anxieties (JOIN2020); "This Guidance *calls for* developing the Code...; Empowering users *is* key to limiting the impact of disinformation (COM2021)), with few instances of passive voice ("*it is important* to determine..."; "*The EU Rapid Alert System has been used* to share information and analysis to generate a comprehensive picture of the information environment around COVID-19..." (JOIN2020); "*information manipulation is used* with the effect of causing significant public harm..."; "*The techniques identified should be* sufficiently defined..." (COM2021)) that serves to discursively construct a set of responsibilities for readers/addressees as active participants, who are presented with possible scenarios and actions to think about and act upon. In this regard, it is interesting to notice that the expressions 'there is a need' and 'sb/sth needs', as well as the passive form 'sth is needed', are used to

construct a dual nature of disinformation as a two-way phenomenon that involves EU institutions and online platforms:

- (15) Against this background, *one of the lessons learned from this crisis is the need to clearly differentiate between the various forms of false or misleading content revealed by the ‘infodemic’ and to calibrate appropriate responses* (JOIN2020, p. 3)
- (16) *A calibrated response is needed from all parts of society, depending on the degree of harm, the intent, the form of dissemination, the actors involved and their origin. Thus, misinformation can be addressed through well-targeted rebuttals and myth busting and media literacy initiatives; disinformation, on the other hand, needs to be addressed through other means, including actions taken by governments, as spelled out amongst others in the Action Plan against Disinformation* (JOIN2020, p. 4)
- (17) [...] *there remains a need to further improve the EU’s capacity to deliver timely, consistent, coherent and visible messages to external audiences globally [...]* (JOIN2020, p. 5)
- (18) *There is therefore a need for additional efforts and information-sharing by social media platforms, as well as increased transparency and greater accountability. This highlights the need to enforce and strengthen the policies that the platforms have committed to implement under the Code of Practice* (JOIN2020, p. 8)
- (19) In addition, *there is a need for dedicated research infrastructure to detect, analyse and expose disinformation and foreign influence operations across the whole EU territory* (JOIN2020, pp. 9-10)

and carries with it ‘obligations’ as well as ‘rights’ for all:

- (20) *there is an urgent need to step-up efforts to fight disinformation* (COM2021, p. 1)
- (21) *There is a need for stronger and more specific commitments in all areas of the Code to address gaps and shortcomings, including new and emerging risks* (COM2021, p. 4)
- (22) *Users need to be empowered to contrast this information with authoritative sources and be informed where the information they are seeing is verifiably false* (COM2021, p. 5)

However, the initial suggestion of an ‘agreed response system’ underpinning a dynamic two-way ‘fight against disinformation’ becomes a one-way path that mainly online platforms active in the EU, as well as other relevant players (i.e., ‘other/relevant stakeholders’), are expected to go through:

- (23) For a consistent and effective application of the commitments, *a shared understanding among signatories of ‘political advertising’ and ‘issue-based advertising’ is needed which adequately takes into account the existing applicable national legal frameworks* (COM2021, p. 9).

Modals, such as *should*, *can*, *could*, *may*, and *might* (Table 1) mostly serve an ‘advisive role’ (Tsui 1994),

modals	JOIN2020 7,699 tokens	COM2021 11,670 tokens
<i>should</i>	25	71
<i>can</i>	16	28
<i>could</i>	6	30
<i>shall</i>	0	1
<i>may</i>	4	11
<i>might</i>	0	2
<i>must</i>	3	1

Table 1
Number of occurrences in JOIN2020 and COM2021.

suggesting a course of action, and accommodate general epistemic statement about what is ‘advisable’ and ‘convenient’, or ‘probable’:

- (24) When such behaviours are illegal, they *should* be addressed by the competent authorities in line with applicable legal norms (JOIN2020, p. 4).
- (25) Building on experience in fighting COVID-19-related disinformation so far, the EU *can* take further concrete and short-term actions to help empower citizens, building better cooperation within the EU and with partners around the world (JOIN2020, p. 11).
- (26) It *can* affect the right of voters to receive information, since micro-targeting allows political advertisers to send tailored messages to targeted audiences, while other audiences may be deprived of this information (COM2021, p. 11).
- (27) The Commission *may* also provide further guidance on how signatories *should* address remaining shortcomings and gaps in the Code (COM2021, p. 24).

Here, a variety of elements are shown as ‘advisable’ or ‘convenient’ in the effort to step up the fight against disinformation, conveying the European Commission’s representation of reality in authority-marking scheme, and eventually being reinforced by the expressions: ‘the Commission/the EU’ will support... (4 times) / will propose... (4 times) / will continue... (4 times (JOIN2020)); the signatories should report... (12 times (COM2021)) and the Code should provide...” (9 times (COM2021)).

In the case of COM2021, the prominent use of modals like *should* (0,60%), *could* (0,25%) and *can* (0,23%) might be explained with the European Commission's intention to denote and connote:

- future obligation, dynamic necessity or advisability:
 - (28) Online platforms and all other players of the online advertising ecosystem *should* thus take responsibility and work together to defund disinformation. Furthermore, the revised Code *should* step up commitments to limit manipulative behaviour, strengthen user empowerment tools, increase the transparency of political advertising, and further empower the research and fact-checking community [...] The strengthened Code *should* also aim to achieve a broader participation with new signatories, including additional online platforms active in the EU as well as other relevant players (COM2021, p. 3).

- informal request, generalization, or suggestion by implication:
 - (29) New signatories *could* also include other stakeholders that *can* have a significant impact through their tools, instruments, solutions or relevant specific expertise, including fact-checkers, organisations providing ratings relating to disinformation sites or assessing disinformation, as well as providers of technological solutions that *can* support the efforts to address disinformation. Such organisations *can* contribute considerably to the efficient implementation of the Code and its success (COM2021, p. 7).

- tentative invitation, general possibility, or suggestion in consideration of the urgent need to improve the efforts to fight COVID-19 disinformation set forth by the JOIN2020 (Facchinetti *et. al.* 2012):
 - (30) However, wider participation from both established and emerging platforms *could* provide a more comprehensive and coordinated response to the spread of disinformation (COM2021, p. 8).

Interestingly enough, *must* (3 occurrences in JOIN2020, and 1 occurrence in COM2021) substitutes *shall* (0 occurrence in JOIN2020, and 1 occurrence COM2021) in its mandatory function, or it rather imposes a legal obligation on the readers/addressees (“Public authorities *must* ensure transparency of their work...” (JOIN2020), “...very large platforms *must* take risk mitigation measures” (COM2021)). This is perfectly in line with the modal revolution in legal writing and the growing tendency of ‘shall-free legislation’ (Garzone 2013, p. 69) embraced by the Plain English Movement (Williams 2006).

Occasionally, JOIN2020 and COM2021 have marked evaluative lexis

to engage directly with the reader/addressee:

- (31) Such content is not necessarily illegal but can *directly endanger* lives and *severely undermine* efforts to contain the pandemic (JOIN2020, p. 3).
- (32) The Commission will *strongly* encourage other relevant stakeholders [...] (JOIN2020, p. 10).
- (33) Signatories should also specifically consider the situation of children *who can be particularly vulnerable* to disinformation (COM2021, p. 14).
- (34) *This work critically depends* on access to platform data. (COM2021, p. 18).

In some cases, while emphasizing dangers, the European Commission is also encouraging by introducing a need to do something about prevention:

- (35) Coordination and collaboration with actors at both EU and global levels, together with the WHO and online platforms, *will be essential* to monitor and *effectively respond* to these challenges (JOIN2020, p. 5).
- (36) A *better understanding* of the functioning of online services, as well as tools that foster more responsible behaviour online or that enable users to detect and report false and/or misleading content, *can dramatically limit* the spread of disinformation (COM2021, p. 14).

As a matter of fact, *directly, strongly, particularly, critically, effectively, dramatically*, are not particularly evaluative in their meaning (Hunston, Thompson 2003), but in the context of COVID-19 disinformation they take on an emotive and forceful meaning.

Mirroring the PR2020 and PR2021, JOIN2020 and COM2020 start off identifying both EU institutions and EU citizens as priorities when it comes to tackle disinformation:

- (37) The COVID-19 'infodemic' has demanded a rapid response from the EU and its Member States. Disinformation can have severe consequences: it can lead people to ignore official health advice and engage in risky behaviour, or have a negative impact on our democratic institutions, societies, as well as on our economic and financial situation. *The crisis has opened the door to new risks, for citizens to be exploited or be victims of criminal practices in addition to targeted disinformation campaigns by foreign and domestic actors seeking to undermine our democracies and the credibility of the EU and of national or regional authorities.* Combatting the flow of disinformation, misinformation and foreign influence operations, including through proactive and positive communication, calls for action through the EU's existing tools, as well as with Member States' competent authorities, civil society, social media platforms and international cooperation, enhancing citizens' resilience.

This work must be done in full respect of freedom of expression and other fundamental rights and democratic values (JOIN2020, p. 2).

- (38) Public authorities must ensure transparency of their work, which contributes to building trust towards citizens and allows for scrutiny of decision-making (JOIN2020, p. 10)

or, the EU rights and freedoms of the EU citizens:

- (39) From its inception, the EU approach to countering disinformation has been grounded in the protection of freedom of expression and other rights and freedoms guaranteed under the EU Charter of Fundamental Rights. In line with those rights and freedoms, rather than criminalising or prohibiting disinformation as such, the EU strategy aims to make the online environment and its actors more transparent and accountable, making content moderation practices more transparent, empowering citizens and fostering an open democratic debate. To this end, the EU has sought to mobilise all relevant stakeholders, including public authorities, businesses, media, academics and civil society (COM2021, p. 1).

However, the European Commission already signals a preference for the relevant stakeholders' role and their embracement of the values guaranteed under the EU Charter of Fundamental rights as the main driver of "clear and accessible communication and accurate information" (JOIN2020, p. 7), and "reliable information for public interest" (COM2021, p. 15). To further index this preference, JOIN2020 and COM2021 specifically call for an effort to stress respect for the identities of the Member States and the European Union and for their fundamental rights and freedoms:

- (40) The current COVID-19 crisis has shown the risk that some measures designed to tackle the 'infodemic' can be used as a pretext to undermine fundamental rights and freedoms or abused for political purpose in and outside the European Union. Hence, the need to be vigilant and uphold our fundamental rights and common values, which should be central to our response to COVID-19. In this context, free and plural media is key to address disinformation and inform citizens (JOIN2020, p. 10).
- (41) The Guidance is based on the Commission's experience to date in monitoring and evaluating the Code and on the Commission's report on the 2019 elections. It also contributes to the Commission's response to the December 2020 European Council conclusions. To collect input to the Guidance, the Commission organised multi-stakeholder discussions as well as a workshop for Member States. This Guidance sets out the Commission's views on how platforms and other relevant stakeholders should step up their measures to address gaps and shortcomings in the Code and create a more transparent, safe and trustworthy online environment (COM2021, p. 3).

Overall, both texts construct the European Commission's identity, and more broadly the EU's identity, as both fixed and inevitably attached to a series of values and practices that are presented as inherently positive and European. In relation to this perceived need to preserve the freedom of expression and other rights and freedoms guaranteed under the EU Charter of Fundamental Rights, JOIN2020 and COM2021 discursively construct the position of the European Commission and EU institutions as a legitimate and good authority, objectify disinformation as a 'threat' of 'common values and democratic institutions', and call 'for support cooperation and sharing of best practice' mobilising 'all relevant stakeholders, including public authorities, businesses, media, academics and civil society'.

The micro-linguistic data examined from SFL perspective have shown the most relevant elements (i.e., pronouns, adjectives, active/passive voice, questions, modal verbs, etc.) that shape aspects of knowledge and relationships in the language and discourse of the European Commission deployed in JOIN2020 and COM2021. Linguistic data, such as modals *should*, *can* and *could*, co-occurring with other grammatically structured features of the texts, reveal a specific interest to construct direct concern and contact with the EU institutions, and 'other stakeholders', who are encouraged to take an active role against COVID-19 disinformation. Eventually, tackling disinformation as an undertaking relies upon the European Commission organizational capacity of discourse to mobilise forces, direct resources, and legitimise actions, and to create 'the enemy' via a discursively objectification of disinformation as a 'threat' and a 'public harm' against which the European Commission, 'in the full respect of democratic values, calls for action through the EU's existing tools, mobilising the Member States' competent authorities, civil society, social media platform, international cooperation and enhancing citizens' resilience' (JOIN2020 and COM2021).

5. Conclusions

Misleading healthcare information and deceptions with false claims, CTs and consumer fraud have endangered public health on a global scale. More recently, the COVID-19 pandemic has been accompanied by a substantial wave of disinformation and CTs attempts to influence debates in the official discourses, breeding on the fertile ground of people's most basic anxieties and the present-day social and economic uncertainty. In its role of developing the EU's overall strategy and designing and implementing EU policies, the European Commission has played an active role in the field of 'communication' and 'disinformation'.

This paper has investigated the discourse of the European Commission in a small corpus of documents, viz. PR2020 and PR2021, and JOIN2020 and COM2021, to tackle COVID-19 disinformation that supports alternative views on official science. By focusing on the meaning-making resources of language within the European Commission's 'fight against COVID-19 disinformation' documents, the SFL has become a valuable instrument for the investigation of the grammatical choices that are available in a language and discourse. Drawing upon genre studies that reveals how a specific genre is geared towards a socially accepted and shared knowledge and objectives (Swales 1990; Bhatia 1993), and following the SFL approach, which offers model options that carry significant meaning available to speakers to create meaning in context, the analysis has revealed that the experiential, interpersonal and textual meanings found in JOIN2020 and COM2021 (Subsection 4.1) are permeated by the discursual strategies (i.e. the outcasting process, dichotomizing narrative) of PR2020 and PR2021 (Subsection 4.2). The results of analysis have revealed the European Commission's discursive process of conceptualising 'verifiably false or misleading information' as 'public harm', while distancing it from the 'European Commission's fight against disinformation' that is discursively constructed as 'the protection of the EU values'. The analysis has shown how linguistic data, such as short-length sentences, the avoidance of technical jargon, pronouns *we* and *you* co-occurring with other grammatically structured features of the texts, reveal a specific interest to construct direct concern and contact with readers/addressees, who feel part of a universal community and are encouraged to become active agents in the fight against disinformation. In this regard, the definition of what is 'good' (*authoritative sources, clear and accessible communication and accurate information*) and 'bad' (*false, inaccurate, or misleading information, the COVID-19 disinformation threat*), as well as the recognition of who is 'we/us' (*our democracies, all EU institutions, other international actors*) and 'they/them' (*fraudulent websites, foreign interference in the information space*) are effectively supported by the over-reaching narrative of the selected documents. Eventually, the phraseological interaction discursively removes the harmful potential of CTs actors legitimising significant control measures as the most effective way to guarantee 'freedom of expression and other rights and freedoms' (PR2020, COM2020), and the EU's image as the shield protecting and 'empowering European citizens and fostering an open democratic debate' (PR2021, JOIN2021).

Future research might consider the impact of the upcoming European legislation on tackling disinformation with the target-readers/addressees, for instance, the narrative that the two main decision-making bodies of the EU, namely the European Parliament and the Council of the European Union, will

construct to raise socio-political support and sustain the EU's power structures.

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