RESEARCH ARTICLE

Covid-19 and the Information Crisis of Liberal Democracies: Insights From Action Against Disinformation in Italy and the Eu

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ABSTRACT: Action against disinformation has become more important than ever in the context of the Covid-19 pandemic. This is due to the synchronous global scale of the problem and its potentially deadlier consequences as the public seeks out guidance regarding what they might do to lower the risk of infection. This article investigates the impact of the Covid-19 crisis on the regulation of social media platforms as it is mediated by the legacy of previous responses to disinformation. It shows that the Covid-19 crisis has catalyzed the shift to co-regulatory approaches that imposed reporting obligations on platforms at the European level. It also raises concerns about the implementation of the new European regulatory package that will largely depend on the initiatives of individual Member States such as Italy, where the low level of societal resilience to disinformation increases the incentives for political leaders to ignore the problem of disinformation.

KEYWORDS: Fake news, Free speech, Misinformation, Online platforms, Social media

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1. Introduction: Democratic regression and the emerging disinformation order

Patterns of more intense political polarization and declining levels of trust in representative institutions, weak and declining rule of law, and decreased protection of civil liberties began as mild and even ambiguous signs of democratic malaise at the turn of the century (Diamond 2015). These patterns have now morphed into a substantial democratic regression that affects many countries, including western countries where burgeoning populisms challenge the norms and conventional practices of liberal democracy (Norris and Inglehart 2019). The zeitgeist about the state of democracies – and the post-war international order – has swung from a mood of end-of-history optimism in the late 1980s and 1990s to a pervasive sense of global democratic retreat (Diamond 2021). There is no single explanation for this retreat, but there are several causes and factors that are deeply embedded in the current economic, social, and cultural conditions (McCoy, Rahman and Somer 2018; Przeworski 2019).

It is frequently claimed that misinformation puts democracy at risk (Jerit and Zhao 2020). As political knowledge is widely viewed as a foundation for democracy, misinformation has raised questions long before the advent of the social media (Kuklinski et al. 2000). Yet, the disintermediation of news sources sparked by the ubiquity of social media use has caused widespread alarm in recent years (Deibert 2020). The growth of alternative information channels, combined with the breakdown of trust in democratic institutions, are the defining elements of an emerging disinformation order (Bennett and Livingston 2018). The public is vulnerable as it is increasingly disconnected from politics amidst growing social fragmentation (Bennett and Pfetsch 2018). A paradoxical situation also arises in which the mainstream media's coverage of misinformation helps in its dissemination, even though its purpose is to correct online misinformation (Tsfati et al. 2020).

Recent worries that external players and illiberal forces might use social media to undermine democracy has reversed the discussion about the proliferation of digital information networks (Tucker et al. 2017). Once it was conventional wisdom that social media would enable greater access to information and facilitate decentralized protests against authoritarianism (Castells 2007; Diamond and Plattner 2012). Nowadays, the use of digital media by organized groups or ordinary citizens to engage in harassment and hate speech in online political conversations has been acknowledged as a potential threat to democracy, generally driving extremism and calls for offline violence (Siegel 2020). It has also been highlighted that online tools disproportionally favor the rise of populist movements because they allow them to maintain ideological consistency and circumvent traditional media intermediaries (Schaub and Morisi 2020). Another major concern has been that the flow of online information facilitates the emergence of ideological "echo chambers" since social media limits exposure to views that do not align with already-established beliefs (Sunstein 2018; Allcott et al. 2020). However, a growing body of work challenges this hypothesis, arguing that the increased exposure to cross-cutting online information leads to polarization (Settle 2018). These contrasting hypotheses result from the lack of a shared definition of polarization, ranging from ideological polarization of views on policy issues, to affective polarization that makes supporters of different political parties dislike the opposing political party, which makes it difficult to assess the overall effect of social media (Barberá 2020).

In the context of the Covid-19 pandemic, action against misinformation has become more salient than ever because of the synchronous global scale of the problem and its potentially deadlier consequences as the public seeks out guidance regarding what they could do to lower the risk of infection (Donovan and Wardle 2020). The uncertainty surrounding the novel coronavirus gave rise to an "infodemic" characterized by a mix of facts, rumours, and speculations, which created the demand that governments better communicate with the public (Coombs 2020). The term "infodemic" captures the over-abundance of information circulating online

following the Covid-19 outbreak, but it risks mischaracterizing the problems governments faced. Misinformation about Covid-19 has come in many different forms, from many different sources, and advancing many different claims concerning the spread of the virus and the actions taken by public authorities to address the pandemic (Hansson et al. 2021). The risk in not recognizing the diversity in the landscape of Covid-19 information crisis is the assumption that there could be a single response to different problems that are posed by the multitude of misinformation types (Brennen et al. 2020) Much of the discourse on the infodemic conflates different misinformation types that can be differentiated according to four overarching criteria: different definitions of misinformation place more or less emphasis on the truth value of information; there is variation in the area of focus (information or beliefs); disinformation may be presented in different formats, including the emulation of legitimate media outlets in the case of "fake news"; the intentions of the players who spread information may vary in terms of their level of awareness that the information is false (Wittenberg and Berinsky 2020).

For the purposes of this paper, we focus on disinformation that we define as the subset of misinformation that is false and deliberately created and disseminated for economic gain or to intentionally deceive the public (Wardle and Derakhshan 2017). In recent years, the disinformation threat has elicited government responses on national levels, and in the case of the EU, at the international level (Saurwein and Spencer-Smith 2020). Social media companies, for example, have come under attack for allowing disinformation to circulate unchecked on their platforms in the context of the 2016 US presidential election. In Europe, the 2016 Brexit referendum vote, and a series of major elections, including the 2017 French presidential elections and the 2019 European Parliament elections, intensified the level of engagement in the fight against disinformation and increased the focus on platform responsibility with respect to the way content is organized and distributed.

Given the normative hostility to restrictions on speech in liberal democracies, governments have been dilatory in adjusting regulatory regimes to capture the new realities of online disinformation. The initial response to disinformation has revolved around the promotion of media literacy complemented by efforts to increase the visibility of authoritative content. However, the initial light-touch approach to the regulation of social media platforms has not yielded the expected results, leading policymakers to increasingly turn to stricter approaches.

This article investigates the impact of the pandemic on regulatory policy responses that have been proposed as a solution to disinformation (Rochefort 2020). To preview our main findings, our research shows that the Covid-19 crisis has catalyzed the shift to co-regulatory approaches that put pressures on platforms to act and fulfil transparency obligations. The article is organized as follows. In the next section we review the regulatory approaches that have been proposed to address disinformation. In the research design section, we outline our framework regarding the pandemic's impact with respect to action against disinformation. In the empirical section, we track policy responses that have been enacted in Italy – a country with a traditionally low level of resilience to disinformation – in the context of the EU multilevel system before and after the Covid-19 crisis. The final sections outline our findings and conclusion.

2. A review of responses to disinformation

Due to their unique role as the intermediaries providing citizens with access to the digital public sphere, social media platforms are central points of control on the Internet (De Nardis and Hackl 2015). According to the libertarian view of the early theorists of digital politics, the technical features of the Internet would

inevitably create opportunities for the free flow of expression, and a laissez-fare relationship between government and the cyberspace could indeed have had a democratically transformative potential. This libertarian view has often been recalled by platform companies when they argue that they are simply neutral conveyors of users' content, meaning that they are not liable for what users do on a platform given that they take adequate steps to redress third party notices about content for uncontroversial issues ranging from terrorist incitement to child pornography. Platform companies have emphasized their role as hosts especially considering the economic incentive to not be overtly discriminatory since viral content, including disinformation, generates revenue.

Following 2016, the laissez-faire approach became untenable when large platforms, especially Facebook, came under sustained criticism for facilitating the circulation of disinformation in a series of critical elections in Europe and the United States. It is increasingly evident that a few, quasi-monopolist corporations exercised unprecedented amount of power over online information flows (McChesney 2014; Miller and Vaccari 2020). Concerns about the technical and political feasibility of regulatory approaches have sparked interest in how non-regulatory intervention might help raise public awareness that is essential for improving societal resilience to disinformation in the long run. In other words, advanced responses to disinformation tend to match the regulatory focus on the platforms supplying disinformation with media literacy projects focusing on the demand for information. These projects do not only make social media users more critical consumers of online information, but they also reduce the amount of disinformation shared unwillingly as well as encourage user correction of disinformation (Vraga, Tully and Bode 2020). Societal resilience is also improved when state authorities support independent fact-checkers, namely investigative journalists and researchers who play a key role in furthering the understanding of the mechanisms that sustain disinformation.

Regarding regulatory intervention, there is a spectrum of approaches already being implemented or under active consideration to regulate social media platforms. For the purposes of this study, regulatory responses to disinformation are typologized with respect to self-regulation, co-regulation, limited government regulation and comprehensive government regulation. Recent scholarship has identified similar categories as useful for analyzing regulatory responses to disinformation (Fukuyama and Grotto 2020; Marsden, Meyer and Brown 2020; Rochefort 2020; De Blasio and Selva 2021).

As for self-regulation, social media companies have implemented voluntary measures that were designed to head off possible avenues of regulation while also effectively maintaining the profitable status quo (Gorwa 2019). Social media companies have made efforts to improve both human and automated content moderation, and voluntary initiatives have been implemented in response to public concern about disinformation in areas in which government regulation is lacking (Gillespie 2018). Self-regulatory measures include: flagging contentious content; verification by independent third-party fact-checkers; additional reporting in conjunction with false posts; limiting the distribution of posts from content providers who repeatedly share false information and eliminating their ability to profit from such dissemination; allowing users to rank the trustworthiness of news sources; and imposing disclosure requirements on political ads and limiting foreign entities from purchasing political ads.

Due to concerns about free speech and liability for content, platforms have been reluctant to implement bans when they can appear to trigger partisan motivated reasoning about specific political parties being censored by Big Tech, especially in intensely polarized settings like the US where false claims have been advanced directly by former President Donald Trump. However, online platforms have faced growing pressure to act against Donald Trump after the insurrection at the US Capitol in January 2021. In an unprecedented move to address baseless election fraud claims and the incitement of violence, Facebook and Twitter took down Trump's accounts. While disinformation about election fraud dropped after the account suspensions, the controversial removal of an elected official from social media reignited debate around the censorship of information

published online. As highlighted by the Vice President of the European Commission for Values and Transparency, "the fact that big tech can permanently remove a sitting US President based on unclear criteria and without oversight can be dangerous for free speech" (Jourová 2021).

Self-regulation has been subject to criticism well before the attack on Capitol Hill (Suzor 2019). Critiques point to a lack of clear and non-discriminatory standards for dealing with disinformation, the opacity of algorithmic selection in advertising and news feed, a lack of due process and option for appealing content moderation decisions, and the reluctance of platforms to demonstrate openness and cooperation in independent oversight processes. The Covid-19 crisis has reinforced the push toward automated content moderation that has been justified as a necessary response to the urgency of managing the enormous scale of information flows across the major platforms (Meyer and Hanot 2020). This push has been prompted by the sudden and reactive introduction of rules that have further increased the instability of self-regulation. Yet, an almost fully automated system of self-policing carries with it the danger of hiding the inner workings of platforms as infrastructure of public speech in which the fundamentally political nature of content moderation is executed by algorithms (Gorwa, Binns, and Katzenbach 2020).

As for co-regulation, it seeks to provide forms of accountability for the platforms' conduct without making extreme changes to the status quo. These forms of "codeciding accountability" bring civil society organizations, academics, and other stakeholders together to establish regulatory cooperation between state authorities and platform companies (De Blasio and Selva 2021). Co-regulation enables voluntary initiatives within a framework of standards and procedural rules, including transparency reporting, third party audits, and other mechanisms to help oversee the practices of platform companies. It is governance involving players from government, civil society, and the market where decision-making is distributed across a polycentric arrangement: implementation responsibilities are largely taken on by companies, while the role of state authorities is limited to the role of orchestrators that steer the cooperation between companies, academia, and organizations in civil society that agree on principles and procedural mechanisms. Oversight by academia and civil society is expected to widen the extent to which platform companies are exposed to reputational risks. However, the lack of enforcement of sanctions by public authorities calls the effectiveness of these models into question since platform companies have been reluctant to grant access to their inner workings because they extract commercial value from users' data and algorithms.

As for limited regulation, it has been adopted by European countries to make platforms liable only for narrow categories of problematic content. As a matter of fact, scale problems make generalized regulation of online content unfeasible since it would impose an unbearable burden on state authorities regarding the administration of the law. In 2017, Germany introduced the Network Enforcement Act (NetzDG) that requires social media companies to block access to manifestly unlawful content under various sections of the Criminal Code (including hate speech, public incitement to crime, dissemination of depiction of violence, etc) within 24 hours of receiving notice of any of such content or within 7 days in less clear-cut cases. Platforms must also establish a complaints procedure and fulfill transparency obligations. Failure to comply with the act can result in a fine of up to 50 million euro. In France, the 2018 law regarding the fight against the manipulation of information allows judges to order the immediate removal of alleged "fake news" in the period leading up to elections. It also imposes disclosure obligations on platforms during elections (Craufurd Smith 2019).

However, limited regulation faces many challenges and shortcomings. First, by formalizing and reinforcing the role of platforms as governors of online speech, regulatory initiatives accept platform dominance and further reinforce the opinion power of social media (Helberger 2020). Indeed, these laws do little to modify platform business models, which are based on the extraction of behavioral data about users (Zuboff 2018).

Second, the regulation of problematic content would stand no chance in countries like the United States where platforms, as private entities, enjoy free speech rights protected by the First Amendment. Given the global scope of service provision by social media companies that operate across many jurisdictions, different conceptions across countries of the appropriate role of government intervention hinder the effectiveness of initiatives that are promoted at the national level (Saurwein and Spencer-Smith 2020). Finally, in countries like Germany where the conception of state intervention enabled the introduction of legislation imposing content liabilities on social media companies, while consequences for free speech have been not as severe as expected by those who raised criticism against the law, regulation did not really have an impact on content moderation. Although social media companies have fulfilled their transparency obligations by publishing reports, the informative value of the reports was too poor to provide substantial insight on content moderation policies (Heldt 2019).

Regarding comprehensive forms of government regulation, antitrust is the primary instrument for dealing with the immense power of platforms whose editorial decisions affect public discourse in the countries they operate in due to their sheer scale (Napoli 2019). Dispersing excessive concentration of power is essential to preventing private companies from becoming guardians of public interest. However, the very nature of digital markets poses severe constraints on the effectiveness of antitrust remedies like data portability (Fukuyama and Grotto 2020). This has led scholars to consider the idea of regulating social media platforms as public utilities. Like antitrust, this would imply a comprehensive regulation of platforms as indispensable infrastructure for the modern economy. A public utility approach could involve separating the conduit functions of platforms from their paid services. Another variation of this approach might include the creation of new public platforms offering an alternative to the private companies. However, this invasive intervention in digital markets would be unprecedented, and it would face significant costs and technical difficulties (Rochefort 2020).

It is also worth noticing that comprehensive regulatory approaches like antitrust and public utility would seem to lack a constituency sufficient to sustain the ambitious goal of tackling platform dominance. Companies with platform power benefit from the tacit allegiance of consumers, who can oppose to regulations that threaten these platforms (Culpepper and Thelen 2019). In the current political environments, where large segments of the political players are a major source of disinformation, it is also unlikely that political leaders will forge a diffuse coalition that seeks the passage of comprehensive regulation (De Blasio and Sorice 2019).

3. Multilevel Governance and COVID-19 disinformation: The Italian case

Our research focuses on Italy, which is a case worthy of investigation for several reasons, the most obvious being that it was the first Western country to be affected by Covid-19. The lack of information about the virus and its consequences for people's safety, the uncertainty as to how it might be transmitted, and the dissemination of various types of disinformation about the novel coronavirus worked together to increase the stream of the infodemic. The chaotic flow of communication compounded an information crisis that had already dogged Italy over the last decade in a context marked by low levels of resilience to online disinformation (Humprecht, Esser and Van Aelst 2020).

Italy suffers from a general lack of trust in public institutions, with the government and news media being the least trusted institutions (Lovari 2020). This lack of trust is extended to science, as revealed by the diffusion of conspiracy theories in the marketplace of ideas around vaccination (Lovari, Marino and Righetti 2021). Specifically, voting for Italian parties usually depicted as populist, such as the Northern League or the Five Star Movement, is strongly connected with higher level of conspiracism (Mancosu, Vassallo and Vezzoni 2017). This means that the success of populist parties – as revealed by the sharp increase of their vote share –

has contributed to amplify the information crisis, which is also exacerbated by the under-development of skills related to the use of digital media (Eurobarometer 2020).

Pressures for action against disinformation have been particularly intense in Italy where there is one of the highest percentages of citizens in Europe who deem disinformation a problem for their country and are most likely to say that national authorities should tackle disinformation (Eurobarometer 2018). However, demand for action against disinformation did not translate into platform accountability regulated by law as it happened in France and Germany before the pandemic. Rather, the Italian model of platform accountability has been characterized by the strong role of the media regulator (Autorità per le Garanzie nelle Comunicazioni – AGCOM), which encouraged self-regulation by platforms in the absence of regulatory measures taken by the government or parliament (De Blasio and Selva 2021).

Drawing on the historical institutionalist research framework, we sketch three hypothetical alternative implications of the pandemic for action against disinformation (Fioretos, Falleti and Sheingate 2016). The first implication assumes that the Covid-19 crisis has led to radical change of action against disinformation as it constituted a condition maximizing the salience of the problem. The second implication assumes that gradual change has followed the Covid-19 crisis, drawing on "reiterated problem solving" research (Haydu 2010), which highlighted that the ways that the policymakers addressed previous crises affects both how the next crisis is diagnosed and what remedies are available. Finally, the third implication assumes that two conditions have inhibited change. First, the significant costs and technical difficulties that any invasive regulation of social platforms face. Second, the fragmentation of Italian governing coalitions that makes it difficult to address a controversial issue such as the regulation of online platforms. Previous studies on national responses to disinformation also highlighted the limitations faced by individual states in regulating global companies. Many countries, including Italy, have conducted their efforts within the EU framework, which is perceived as increasing the chances of effective regulation of global companies (Schia and Gjesvik 2020).

Given the multi-level governance of disinformation in Europe, the empirical analysis tracks the evolution of responses to disinformation in both the EU and Italy in the period 2017-2020. The sources of empirical evidence include secondary literature and official documents. The desk analysis is also underpinned by four semi-structured interviews with officials from the units that have responsibilities for tackling disinformation in the EU and Italy. Empirical sources have been analyzed alongside three dimensions. The first dimension refers to how the crisis can affect the patterns of governance in terms of actors that are involved in the action against disinformation. The second dimension refers to the normative goods at stake. Drawing on Tenove (2020), we identify three normative goods of democracy that policymakers have claimed to be threatened by disinformation: the self-determination of polities by their own citizens; accountable representation through fair elections; and public deliberation promoting opinion and will formation. The third dimension refers to the regulatory approach adopted to tackle disinformation that we have already typologized with respect to self-regulation, co-regulation, limited government regulation and comprehensive government regulation (see Section 2).

4. Empirical analysis

4.1 Governance reactions by the EU before the pandemic

Over the past two decades the EU has developed a legislative framework that aimed to ensure the free flow of digital services for a fully functioning Internal Market (De Blasio 2018). This framework is meant to stimulate economic growth while also recognizing the global nature of online services. It consists of provisions that tackled areas causing fragmentation of the Internal Market and legal uncertainty across Member States like the General Data Protection Regulation (EU) 2016/679, the Copyright in the Digital Single Market Directive (EU) 2019/790 and the E-commerce Directive 2000/31/EC. The latter Directive endorsed the laissez-faire approach that leaves online flows of information unregulated by protecting social media companies from liability for information posted on their platforms if they do not have knowledge of illegal content (Saurwein and Spencer-Smith 2020).

Since 2015, disinformation has been addressed as a threat to self-determination following revelations that Russia was conducting a cyber-war on the Internet. The conclusions of the European Council meeting of March 2015 established the East StratCom Task Force as a part of the European External Action Service that acts against Russian disinformation campaigns. Its flagship project is "EU vs Disinfo", a website that was launched in 2017 to identify and refute Russian disinformation. Concerns for self-determination also led the European Commission to include action against disinformation in the framework that was adopted in April 2016 to raise awareness and resilience against hybrid threats, which are coordinated by hostile state or non-state players with the deliberate goal of harming democratic states. This framework was revamped in June 2018, when the European Commission and the High Representative of the Union for Foreign Affairs and Security Policy adopted a Joint Communication that served to inform the European Council of the work already under way and identify areas where action should be intensified.

Ahead of the European elections in May 2019, disinformation had been on the agenda as a threat to accountable representation. In early 2018, the Commission established a High-Level Expert Group on fake news and online disinformation (HLEG), which advised against simplistic solutions. According to the HLEG (2018), any form of censorship, whether public or private, should clearly be avoided. The HLEG recommended instead the adoption of a multi-dimensional approach where short-term responses to the most pressing problems are complemented by longer-term responses to increase societal resilience to disinformation, within a framework for ensuring that the effectiveness of these responses is continuously evaluated by research on the impact of disinformation, while new evidence-based responses are developed. The HLEG suggested, as a first step, a self-regulatory approach based on a clearly defined multi-stakeholder engagement process, framed within a binding roadmap for implementation, and focused on a set of short and medium-term actions. This should have been in parallel to interventions that strengthened media literacy and the diversity of the digital information ecosystem, actions that by their own very nature take longer time to have effect. In a second step, an intermediate evaluation of the effectiveness and efficiency of the self-regulatory measures should have then led the Commission to re-examine the matter in Spring 2019, with a view to deciding whether further measures, including co-regulatory interventions and antitrust regulation, should have been considered for the next Commission term.

Self-regulation was also advocated by the European Data Protection Supervisor (EDPS), who issued an opinion on online manipulation and personal data in March 2018. The EDPS also argued that regulatory authorities in each area of law have limited competences and thus limited tools at their disposal. Given the potential risks of manipulation through online microtargeting, there was the need to explore the prospects of cooperation between data protection authorities, electoral, and media regulators at the EU and national level.

Following the HLEG recommendations, the April 2018 Communication on "Tackling Online Disinformation" emphasized a "multi-stakeholder" approach in which civil society and private actors, notably social media platforms, played a key role in the fight against disinformation. As a follow-up, in October 2018 the Commission introduced the EU Code of Practice on Disinformation, the first worldwide self-regulatory set

of standards to fight disinformation voluntarily signed by Google, Facebook, Twitter, Mozilla and associations and members of the advertising industry. Signatories committed to acting in five areas: scrutiny of ad placements; political and issue-based advertising; integrity of services; empowering consumers; and empowering research community (European Commission, 2018: 4-8).

In December 2018, the Commission adopted an Action Plan against Disinformation, which responded to the calls from the European Council for measures to protect the democratic systems of the EU and its Member States in view of the upcoming European elections and more than 50 elections being held in Member States by 2020. It built on existing Commission initiatives and it stepped up efforts to secure free and fair electoral processes. It was based on four pillars: reinforcing the task forces of the European External Action Service to improve the capabilities of the EU to detect, analyse and expose disinformation; establishing a Rapid Alert System to provide alerts regarding disinformation campaigns in real time; ensuring a close and continuous monitoring of the implementation of the Code of practice; and raising awareness of the negative effects of disinformation, supporting independent fact-checkers, and promoting media literacy (European Commission and the High Representative of the Union for Foreign Affairs and Security Policy 2018).

The fourth pillar revolved mostly around the launch of the European Digital Media Observatory (EDMO), a hub for fact-checkers, academics, and other relevant stakeholders to collaborate with each other and actively link with media organizations, media literacy experts and provide support to policy makers. In October 2019, the Commission launched the first call for tenders for the creation of the EDMO, whose governance structure was independent from public authorities.

However, the efforts of the European Commission focused mostly on monitoring the implementation of the Code of Practice (Saurwein and Spencer-Smith 2020). The Action Plan entrusted the European Regulators Group for Audio-visual Media (ERGA) with the task of assisting the Commission in the assessment of the effectiveness of the Code during the first year of implementation. The signatories submitted annual self-assessment reports that were published in October 2019. In addition, the Commission published a summary and a brief analysis of the reports, highlighting that the consistency and level of detail in the reporting varied by platform and with respect to the five areas. The Commission observed that the platforms provided information on EU-specific metrics regarding the implementation of the Code; however, these metrics mainly focus on the number of accounts taken down or ads rejected. They did not enable a qualitative insight into the actual impact of the self-regulatory measures. The Commission also pointed out that the provision of data to the research community was episodic and arbitrary and did not respond to the demands of researchers for independent scrutiny. Furthermore, more detailed insights were required about disinformation campaigns and consumer empowerment tools in place (European Commission 2019: 2-9). The self-assessment reports were the starting point for a comprehensive assessment of the Code's effectiveness, which was expected for the first half of 2020. Based on this comprehensive assessment, the Commission was expected to decide whether the self-regulatory approach via the Code of Practice on disinformation was satisfactory or whether further regulatory measures should have been taken.

4.2 Governance reactions by the EU after the pandemic

The Covid-19 infodemic has revealed that disinformation poses serious threats not only to the self-determination of the EU, but also to public deliberation. The external challenge, relating to the disinformation campaigns of competing geopolitical players, was paralleled by the internal challenge that revolved around

vulnerability to false and misleading narratives that fed on the anxieties of the public, who were struggling to make sense of the unfolding response to a novel virus (Veritier, Bioba and Koops 2020). Building on previous experience in fighting disinformation, EU institutions deployed a multi-dimensional approach that required a thorough understanding of the disinformation problem and evidence of its impact. The legacy of pre-Covid-19 responses to disinformation led policymakers to downplay the crisis as an opportunity for sweeping change. Any invasive approach to comprehensive regulation of platforms would have taken years to enact, thus putting at risk the stability of the digital economy that was much needed to sustain prompt recovery. Furthermore, it was likely to face legal and political challenges that made prospects for enforcement uncertain.

Awareness regarding the complexity of comprehensive regulatory reform prompted a response characterized by the coexistence between two threads of policy initiatives. On the one hand, actions inherited from the past were quickly set in motion to address the crisis in the short-term. On the other hand, the EU developed further actions as the crisis evolved to address the shortcomings of previous responses. Specifically, short-term actions were meant to build ground for a longer-term approach as part of the European Democracy Action Plan and the Digital Services Act-DSA (European Commission and the High Representative of the Union for Foreign Affairs and Security Policy 2020).

In March 2020, the Commission launched a specific webpage addressing false claims related to Covid-19, promoting content that is authoritative and helping separating facts from fiction. In June 2020, the EDMO started its activities. In the same month, the Commission launched the second call for proposals to extend the reach of the EDMO. The second phase of the project will fund the creation of digital media research hubs across Europe through the Connecting Europe Facility.

As for the security dimension of the disinformation problem, it was addressed in the short-term by creating a special section of the Rapid Alert System to facilitate the exchange of Covid-19 related information between the EU and its Member States. The EEAS has also stepped up its efforts to address foreign influence operations, publishing regular reports analyzing the Covid-19 information environment. In June 2020, the European Parliament established a special committee on foreign interference in all democratic processes in the EU, including disinformation. It has been tasked to identify possible areas that would require legislative and non-legislative actions vis-à-vis social media platforms, to suggest coordinated action at the EU level for tackling hybrid threats, and to counter information campaigns and strategic communication of malign third countries that harm the EU.

Cooperation with social media platforms has been a key element in developing both a comprehensive assessment of the challenge and an effective response to the infodemic. Since the beginning of the crisis, the Commission has underlined the need for online platforms to ensure full implementation of their commitments under the Code of Practice. The responses of platforms to this challenge have been closely monitored. However, in May 2020 the ERGA released its assessment of the implementation of the Code of Practice, highlighting that it was difficult to assess the timeliness, completeness and impact of self-regulatory measures as public authorities were still very much reliant on the willingness of platforms to share information. Drawing inspiration from the experience gained with the monitoring of the Code of Practice ahead of the 2019 European elections, the Commission established a structured reporting exercise that required platforms to release monthly reports on their actions to address Covid-19 disinformation available (European Commission 2020). However, the monthly reports disclosed by the Code signatories highlighted that there were still substantial gaps in the accountability of social platforms.

These findings supported the European Commission's reflections on pertinent policy initiatives, including the European Democracy Action Plan and the DSA, which aim to introduce more obligations for online platforms. The European Action Plan was released in December 2020. It included the introduction of a more robust framework for monitoring the implementation of a strengthened version of the Code of Practice,

building on the experience of the Covid-19 disinformation monitoring exercise. The initiatives foreseen under the European Democracy Action Plan are complementary to the measures that were proposed under the DSA. On the one hand, the DSA ensures removal of illegal content (e.g., hate speech, incitement to violence, defamatory information, etc.). On the other hand, it sets out a framework that addresses the call of the European Council for measures that refine the responsibilities of online platforms to safeguard a free and pluralistic media system.

The new framework is meant to minimize the spread of harmful, but not necessarily illegal content such as disinformation by introducing: transparency requirements for content ranking algorithms and advertising systems for large online platforms that reach 45 million active monthly users, as well as the obligation to self-assess on a yearly basis the systemic risks arising from operation of their services and take action against them; the possibility for the European Commission to invite very large online platforms to subscribe to codes of conduct when necessary to mitigate systemic risks; public scrutiny mechanisms like independent audits on a yearly basis, and mandatory data disclosure by platforms; and the introduction of a new network of national authorities, known as Digital Services Coordinators (DSCs), with enforcement powers including the ability to impose fines, require the provision of information, investigate complaints, and carry out on-site inspections. The European Commission will have the same set of powers with respect to large online platforms. A European Board for Digital Services will also be established to ensure the consistent application of the DSA across Member States. However, the DSA does not outline what kind of independence is required from DSCs and which mechanisms will ensure that the European Commission and Member States jointly regulate online platforms.

4.3 Governance reactions in Italy before the pandemic

The 2016 US election and Brexit referendum vote were the starting point for efforts to combat disinformation as a threat to accountable representation. These efforts were led by the media regulator's concerns about the impact of disinformation on the integrity and fairness of the electoral process. The AGCOM was keen on tackling disinformation since its regulatory functions extended from telecommunications to audio-visuals and publishing with a view to ensuring media pluralism and fair information. In late 2017, AGCOM set up a Technical Roundtable that included representatives from Google, Facebook, and the mainstream media. This collaborative approach enabled the regulator to collect data about disinformation in Italy that constituted the knowledge base for potential future regulation. Ahead of the 2018 general elections, AGCOM released guidelines for ensuring pluralism and fairness of information, providing examples of self-regulatory measures. However, the power imbalance between global corporations and a single country like Italy manifested itself in the lack of attention that online platforms paid to measures that had been recommended by AGCOM. This led the AGCOM to intensify its efforts with the framework of initiatives undertaken by the ERGA, since actions at the European level were more likely to succeed.

In 2019, AGCOM led the ERGA task force that assessed the implementation of the EU Code of Practice. The regulator also kept investigating the spread of online disinformation in Italy in view of the upcoming European elections. It released multiple issues of reporting resulting from its monitoring system, but they did little to raise the political leaders' awareness of problems and solutions concerning disinformation. In a context marked by polarization among parties over regulatory responses to disinformation, the few attempts to address disinformation had been accused of being politically biased against parties like the Northern League who were

alleged to be involved in disinformation campaigns. In September 2019, some center-left MPs proposed the institution of a Parliamentary Committee on fake news, but polarization prevented the governing and opposition parties from reaching an agreement.

Since September 2019, uncertainties in legal disputes have hindered the adoption of any regulatory measures. Facebook shut the accounts of Casapound and Forza Nuova (far-right political movements) because they were spreading hate-speech in violation of the company's policies. Casapound appealed against Facebook to the civil Court of Rome. The latter ruled that the party had been excluded from political debate and ordered the reactivation of the account. In February 2020, a different section of the same court refused Forza Nuova's appeal, stating that Facebook can obscure or delete anything that violates the terms and conditions that everyone must accept when registering on the platform. Thus, an impasse was reached not only at the political, but also at the judicial level that shrunk the space for any regulatory intervention. Considering this impasse, in February 2020 AGCOM published the results of an inquiry into Big Data that had been undertaken together with the antitrust and data protection regulators. It highlighted risks arising from disinformation and recommended a co-regulatory approach in which the implementation of self-regulatory measures would be overseen by AGCOM to secure the accountability of the various platforms (AGCOM2020a).

4.4 Governance reactions in Italy after the pandemic

The Covid-19 infodemic, as it did at the European level, contributed to shifting the Italian policy makers' attention towards disinformation threats against self-determination and public deliberation. Threats to self-determination have been addressed since the end of March 2020, when the Parliamentary Committee for the Security of the Republic (Copasir) reported that external players were waging a coronavirus disinformation war against the EU and Italy. Regarding threats to public deliberation, AGCOM focused its action on the transparency and trustworthiness of online information to safeguard public health. According to AGCOM (2020b, p. 49), "in the specific case of the pandemic, where information quality is one of the key principles for contagion containment, the importance of preventing, promptly detecting and combating pathological disinformation phenomena once again emerges in all its evidence." The Italian information system was already facing the critical issue of disinformation before the health emergency. It was precisely in the emergency that "disinformation showed its danger, directly affecting citizens' safety and health" (AGCOM 2020b, p. 75).

The media regulator benefited from the collaborative approach with the regulatees that it had promoted before the outburst of the Covid-19 crisis. Special actions to combat disinformation on contagion-related issues were launched by the technical roundtable that had gathered online information players since late 2017. The media regulator also kept monitoring online disinformation in line with previous initiatives and consolidated methodologies, but with a specific focus on issues that emerged in the context of the Covid-19 crisis. By means of quantitative data, the release of special issues in the report on online disinformation dedicated to Covid-19 made it possible to analyze the growing trend of information and disinformation about the coronavirus and the incidence of content conveyed by disinformation websites on the total amount of coronavirus news disclosed online. AGCOM also set up an inter-institutional group with the Italian Data Protection Authority to jointly assess online platforms initiatives from a holistic point of view by covering both the right to information and the right to privacy. Finally, the media regulator established a data science task force composed of research partners that offered to support the regulator pro bono to produce analyses on the effects of true and false information on the virus and its diffusion.

According to AGCOM (2020b), action against Covid-19 disinformation has highlighted several issues that should be solved by means of legislative reforms to bring large multinational corporations in the bedrock of

constitutional duties. Specifically, a legal framework for accountability would allow the regulator to intervene earlier and more effectively to protect public deliberation. In June 2020, the President of AGCOM urged the Parliament to shift to a co-regulatory approach by vesting the independent authority with audit and inspection powers to oversee the implementation of self-regulatory measures adopted by online platforms (AGCOM2020c). In June 2020, AGCOM also contributed to the public consultation on the draft DSA that had been initiated by the European Commission. In its submission, the media regulator called for a European regulatory framework that was needed to address disinformation more directly and in greater depth, thus ensuring consistent implementation across Member States.

The adoption of a multilevel framework was also urged by the Italian government in its submission to the consultation on the DSA package. In response to growing concerns about disinformation, the Italian government opted to conduct most of its regulatory effort within the European framework, which was regarded as being more effective than regulation at the domestic level where polarization among parties over regulatory responses to disinformation made the introduction of a platform accountability regime set by law unlikely. Polarization also affected the establishment of a task force within the Prime Minister's Office, which included experts and representatives from the Ministry of Health, the Civil Protection Department, and the AGCOM. The task force had no connection to Parliament and this fueled protest from opposition parties that charged the task force with putting free speech at risk. It was entrusted to analyse the phenomenon and design appropriate policy initiatives like the promotion of collaboration with fact-checkers and the encouragement of citizens' activism in signaling disinformation. However, the task force has not yet outlined concrete responses to tackling online disinformation. A key effort was also conducted by the Ministry of Health that adopted a specific digital communication strategy to face the emergency (Lovari 2020). In March 2020, the Ministry of Health set up a section of its website dedicated to debunking hoaxes and started a collaboration with a major search engine to readdress citizens' online searches to institutional sources. Along these lines, in August 2020 the Ministry of Education created a webpage that provided reliable information on the procedures for the reopening of schools.

5. Discussion of findings

The empirical analysis has tracked the impact of the Covid-19 crisis alongside three dimensions of the response to disinformation: the patterns of governance, the normative goods of democracy at stake, and the regulatory solutions that have been adopted.

With regard to the patterns of governance, the response to the infodemic has maintained the pre-existing "multi-stakeholder" governance arrangements in which decision-making is distributed within a triangle that includes: platform companies and other groups of media and advertising companies; civil society groups, researchers and independent fact-checkers; and public authorities led by unelected officials like the European Commission and the AGCOM. However, the situation changed somewhat during the pandemic because the problem of disinformation has gained the attention of a broader set of political players at both the EU and Italian level of governance. Nonetheless, the increased salience of the disinformation issue has not turned into comprehensive regulatory reform, since many political players have charged regulation of putting free speech at risk.

Our analysis also revealed a shift in the attention to different normative goods that are threatened by disinformation. Unlike electoral disinformation that had been at the center of the regulatory debate before the

pandemic, Covid-19 disinformation could be detrimental to public health and make efforts to achieve public acceptance of mitigation measures and vaccination more challenging. Awareness regarding disinformation peaked in the context of the infodemic when online dissemination of false claims became a major societal issue well beyond the realm of electoral politics and threats to the quality of public deliberation could no longer be ignored. As the threat to public deliberation was widely recognized, the question has no longer been if, but when and how regulatory reform would be undertaken and with what effects. The urgency of the crisis led policymakers to focus on the platforms supplying disinformation in the short-term to provide the impression that they are quickly responding to the infodemic while measures focusing on the demand for disinformation have remained comparatively weak as they pay off in the long run.

Empirically, our findings provide support for the second alternative scenario outlined in the research framework, as the response to the pandemic implied a gradual change of regulatory responses to disinformation. At both the national and EU level of governance, action against disinformation has been based on how policymakers have worked with problems, tools, and options inherited from the past. Building on previous experience in fighting disinformation, the European Commission and AGCOM has deployed a multi-dimensional approach that required a thorough understanding of the disinformation problem and evidence of its impact. Specifically, the European Commission has continued to follow the multi-dimensional approach that had been proposed by the HLEG in the early stage of the fight against disinformation. Given the complexity of disinformation as a multi-faceted and evolving problem, effective action required incremental changes sequenced over time in response to findings from continuous evaluation.

More specifically, the pandemic intensified monitoring exercises in both the EU and Italy that revealed how platform companies were not willing to address calls for transparency. In doing so, the Covid-19 crisis accelerated the shift towards the co-regulatory approach that had been set in motion by the adoption of self-regulatory measures like the EU Code of Practice. The aim of co-regulation is to overcome the absence of clear standards for what companies should do to tackle disinformation on their platforms that makes it difficult for users to understand and uphold their rights. Based on this approach, public authorities will issue guidance setting out how platforms should step up their measures to address the shortcomings identified in the contexts of the Covid-19 disinformation monitoring exercise. Public authorities will also set up a more robust framework regarding the recurrent monitoring of strengthened self-regulatory measures.

6. Conclusions

As the response to disinformation is rapidly evolving, it is far too early to claim that the Covid-19 crisis has been an opportunity for sweeping change. Action against the infodemic has been shaped by previous responses to disinformation that encouraged policymakers to tackle the complexity of the problem by resorting to a multi-dimensional and multi-stakeholder approach that underpinned a gradual shift towards co-regulation. This shift has targeted the transparency and the consistency of platform companies' policies against disinformation. By exposing the inadequacies of self-regulatory measures by virtue of enhanced monitoring over platform companies' policies, the Covid-19 crisis has led an ever-increasing number of policymakers to call on public authorities to go beyond ensuring that tech companies enforce their own policies, community standards and terms of service.

The infodemic has made policymakers realize that disinformation threatens the normative good of epistemic quality that is associated with an infrastructure of informed dialogue and democratic deliberation. Disinformation players not only propagate deceptive claims, but they also often seek to exacerbate ambiguity and uncertainty in the public sphere so that individuals lose trust in authoritative sources of information

because they are flooded with alternative narratives of events. The decontextualization of misleading claims as they cross platforms may contribute to a broader systemic harm such as "epistemic cynicism," a belief that is fruitless to seek substantiated accounts of public matters (McKay and Tenove 2020).

In Europe, the focus on disinformation as a threat to public deliberation fueled the consolidation of the multilevel accountability network that had emerged before the pandemic (Saurwein and Spencer-Smith 2020). This network revolves around the central role of the European Commission that has been enhanced by the increasing involvement of political players in Member States like Italy where the government has chosen to pursue regulation of digital platforms within the new framework set forth by the Digital Services Act package. The consolidation of the multilevel accountability network hinges upon the perception that EU-wide regulation of major tech companies is far more likely to succeed than regulation at the level of individual states. Yet, a multilevel approach to disinformation should clearly allocate accountability in a shared and cooperative structure. The variety of players involved in multilevel arrangements brings heightened risks of confusion around accountability and the shirking of responsibility.

This raises concerns about the implementation of the new European framework in which Member States are likely to need to make some changes at the national level to give effect to European regulations. Faced with the pressure to act quickly against disinformation, delegation to the European level had many advantages for national governments like the Italian one, most notably offloading controversy and postponing difficult implementation decisions in a context marked by polarization among parties over regulatory response to disinformation. While the main themes of the European package are straight forward and seemingly in line with broad consensus on the need to tackle disinformation, it is likely that there will be differing views about the balance between freedom of speech and quality of public deliberation considering the established pattern of fragmentation by which European countries have different approaches to platform accountability. Therefore, it remains to be seen what of the European package may withstand the contentious process regarding which players (elected or unelected) get to exert control over the implementation of the new regime for online platforms and at which level (national or European).

Finally, it would be advisable to consider findings from research on the recent 2020 electoral cycle in the US. It indicates that the official positions of leaders like the former President of the United States Donald Trump allow highly effective misinformation campaigns to be conducted directly through mainstream media, rather than relying on online media as they did when they sought to advance their then-still-insurgent positions in previous electoral cycles (Benkler et al. 2020). European countries have historically applied much stricter rules on traditional media so the spread of disinformation across these outlets has been less prevalent. Nevertheless, the balance between requirements on traditional media and online platforms should be a concern for policymakers (Harcourt 2021).

Authors' Note

References

AGCOM (2020a), *Big Data Joint Survey: Guidelines and Policy Recommendations,* Rome: Italian Communications Regulatory Authority.

AGCOM (2020b), *Communications in 2020. The impact of coronavirus in regulated areas*, Rome: Italian Communications Regulatory Authority.

AGCOM (2020c), *Parliamentary Hearing of 9 June 2020*. Published June 9, 2020. Retrieved February 8, 2021 https://www.agcom.it/documents/10179/18952580/Audizione+al+Parlamento+09-06-2020/0a9f973c-cd7f-4c90-9ef1-dbe1b3f0dc29?version=1.1.

Allcott H., L. Braghieri, S. Eichmeyer, M. Gentzkow (2020), "The Welfare Effects of Social Media", *American Economic Review,* 110(3): 629-676.

Barberá, P. (2020), "Social Media, Echo Chambers, and Political Polarization", in N. Persily and J.A. Tucker (eds), *Social Media and Democracy: The State of the Field and Prospects for Reform*, Cambridge: Cambridge University Press, pp. 34-55.

Benkler Y., C. Tilton, B. Etling, H. Roberts, J. Clark, R. Faris, J. Kaiser and C. Schmitt (2020), *Mail-In Voter Fraud: Anatomy of a Disinformation Campaign*, Berkman Center Research Publication No. 2020-6. Published October 1, 2020. Retrieved April 12, 2021 (https://cyber.harvard.edu/publication/2020/Mail-in-Voter-Fraud-Disinformation-2020).

Bennett W.L., B. Pfetsch (2018), "Rethinking Political Communication in a Time of Disrupted Public Spheres", *Journal of Communication*, 68: 243-253.

Bennett W.L., S. Livingston (2018), "The disinformation order: Disruptive communication and the decline of democratic institutions", *European Journal of Communication*, 33(2): 122-139.

Brennen J.S., F.M. Simon, P.N. Howard, and R.K. Nielsen (2020), *Types, Sources, and Claims of COVID-19 Misinformation*. Published April 7, 2020. Retrieved April 12, 2021 (https://reutersinstitute.politics.ox.ac.uk/types-sources-and-claims-covid-19-misinformation).

Castells M. (2007), "Communication, Power and Counter-Power in the Network Society", *International Journal of Communication*, 1(1): 238-266.

Coombs W.T (2020), "Public Sector Crises: Realizations from Covid-19 for Crisis Communication", *Partecipazione&Conflitto*, 13(2): 990-1001.

Craufurd Smith R. (2019), "Fake news, French Law and democratic legitimacy: lessons for the United Kingdom?", *Journal of Media Law*, 11(1): 52-81.

Culpepper P.D., K. Thelen (2019), "Are We All Amazon Primed? Consumers and the Politics of Platform Power", *Comparative Political Studies*, 53(2): 288-318.

De Blasio E. (2018). *Il governo online*. Roma: Carocci.

De Blasio E., M. Sorice (2019), "E-Democracy and Digital Activism: From Divergent Paths to a New Frame", *International Journal of Communication*, 13: 5715-5733.

De Blasio E., D. Selva (2021), "Who Is Responsible for Disinformation? European Approaches to Social Platforms' Accountability in the Post-Truth Era", *American Behavioral Scientist*, https://doi.org/10.1177/0002764221989784.

Deibert R.J. (2020), "The Road to Digital Unfreedom: Three Painful Truths About Social Media", *Journal of Democracy*, 30(1): 25-39.

DeNardis L., A.M. Hackl (2015), "Internet governance by social media platforms", *Telecommunications Policy*, 39(9): 761-770.

Diamond L. (2015), "Facing up the Democratic Recession", *Journal of Democracy*, 26(1): 141-155.

Diamond L. (2021), "Democratic regression in comparative perspective: scope, methods, and causes", *Democratization*, 28(1): 22-42.

Diamond L., and M.F. Plattner (eds. 2012), *Liberation Technology: Social Media and the Struggle for Democracy*, Baltimore: The Johns Hopkins University Press.

Donovan J., and C. Wardle (2020), *Misinformation is Everybody's Problem Now*. Published August 6, 2020. Retrieved April 12, 2021 (https://items.ssrc.org/covid-19-and-the-social-sciences/mediated-crisis/misinformation-is-everybodys-problem-now/).

Eurobarometer (2018). *Fake news and disinformation online*. Flash Eurobarometer 464. Released March 12, 2018. Retrieved April 12, 2021 (https://data.europa.eu/euodp/en/data/dataset/S2183_464_ENG).

Eurobarometer (2020). *Attitudes towards the impact of digitalisation on daily lives*. Special Eurobarometer 503. Revised December 19, 2019. Retrieved April 12, 2021 (https://data.europa.eu/euodp/en/data/dataset/S2228_92_4_503_ENG).

European Commission (2018). *Tackling online disinformation: a European Approach*, COM(2018) 236 final. Published April 26, 2018. Retrieved April 12, 2021 (https://ec.europa.eu/transparency/regdoc/rep/1/2018/EN/COM-2018-236-F1-EN-MAIN-PART-1.PDF).

European Commission (2019). *Code of Practice on Disinformation – First Annual Reports October 2019*. Published October 29, 2019. Retrieved April 12, 2021 (https://ec.europa.eu/digital-single-market/en/news/annual-self-assessment-reports-signatories-code-practice-disinformation-2019).

European Commission (2020). *Assessment of the Code of Practice on Disinformation*, SWD(2020) 180 final. Published September 10, 2020. Retrieved April 12, 2021 (https://ec.europa.eu/transparency/regdoc/rep/10102/2020/EN/SWD-2020-180-F1-EN-MAIN-PART-1.PDF).

European Commission and the High Representative of the Union for Foreign Affairs and Security Policy (2018). *Action Plan against disinformation*, JOIN(2018) 36 final. Published December 5, 2018. Retrieved April 12, 2021 (https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018JC0036&from=en).

European Commission and the High Representative of the Union for Foreign Affairs and Security Policy (2020). *Tackling COVID-19 disinformation – Getting the facts right*, JOIN(2020) 8 final. Published June 10, 2020. Retrieved April 12, 2021 (https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020JC0008&from=EN).

Fioretos O., T.G. Falleti and A. Sheingate (eds.2016), *The Oxford Handbook of Historical Institutionalism*, Oxford: Oxford University Press.

Fukuyama F., and A. Grotto (2020), "Comparative Media Regulation in the United States and Europe", in N. Persily and J.A. Tucker (eds), *Social Media and Democracy: The State of the Field and Prospects for Reform*, Cambridge: Cambridge University Press, pp. 199-219.

Gillespie T. (2018), *Custodians of the Internet: Platforms, Content Moderation, and the Hidden Decisions that Shape Social Media*, New Haven CT: Yale University Press.

Gorwa R. (2019), "What is platform governance?", *Information, Communication & Society*, 22(11): 854-871.

Gorwa R., R. Binns, C. Katzenbach (2020), "Algorithmic content moderation: Technical and political challenges in the automation of platform governance", *Big Data & Society*, 7(1): 1-15.

Hansson S., K. Orru, S. Torpan, A. Bäck, A. Kazemekaityte, S.F. Meyer, J. Ludvigsen, L. Savadori, A. Galvagni, A. Pigrée (2021), "COVID-19 information disorder: six types of harmful information during the pandemic in Europe", *Journal of Risk Research*, DOI: 10.1080/13669877.2020.1871058.

Harcourt A. (2021), "Legal and regulatory responses to misinformation", in H. Tumber and S. Waisbord (eds), *The Routledge Companion to Media Misinformation and Populism*. London: Routledge, pp. 437-448.

Haydu J. (2010), "Reversals of fortune: path dependency, problem solving, and temporal cases", *Theory and Society*, 39(1): 25-48.

Helberger N. (2020), "The Political Power of Platforms: How Current Attempts to Regulate Misinformation Amplify Opinion Power", *Digital Journalism*, 8(6): 842-854.

Heldt A. (2019), "Reading between the lines and the numbers: an analysis of the first NetzDG reports", *Internet Policy Review*, 8(2), DOI: 10.14763/2019.2.1398.

HLEG (2018), *A multi-dimensional approach to disinformation: Report of the independent High-level Group on fake news and disinformation*, Luxembourg: European Commission. Published April 30, 2018. Retrieved April 12, 2021 (https://op.europa.eu/en/publication-detail/-/publication/6ef4df8b-4cea-11e8-be1d-01aa75ed71a1/language-en).

Humprecht E., F. Esser, P. Van Aelst (2020), "Resilience to Online Disinformation: A Framework for Cross-National Comparative Research", *The International Journal of Press/Politics*, 25(3): 493-516.

Jerit J., T. Zhao (2020), Political Misinformation, *Annual Review of Political Science*, 23: 77-94.

Jourová, V. (2021), *After Trump, we must fight to rebuild the ruins of democracy*, EURACTIVE. Revised 14 January 2021. Retrieved April 12, 2021 (https://www.euractiv.com/section/digital/opinion/after-trump-we-must-fight-to-rebuild-the-ruins-of-democracy/).

Kuklinski J.H., P.J Quirk, J. Jerit, D. Schweider, R.F. Rich (2000), "Misinformation and the Currency of Democratic Citizenship", *Journal of Politics*, 62(3): 790-816.

Lovari A. (2020), "Spreading (Dis)Trust: Covid-19 Misinformation and Government Intervention in Italy", *Media and Communication*, 8(2): 458-461.

Lovari A., V. Marino, N. Righetti (2021), "Blurred Shots: Investigating the Information Crisis Around Vaccination in Italy", *American Behavioral Scientist*, 65(2): 351-370.

Mancosu M., S. Vassallo, C. Vezzoni (2017), "Believing in Conspiracy Theories: Evidence from an Exploratory Analysis of Italian Survey Data", *South European Society & Politics*, 22(3): 327-344.

Marsden C., T. Meyer, I. Brown (2020), "Platform values and democratic elections: How can the law regulate digital disinformation?", *Computer Law & Security Review*, 36, 105373.

McChesney R. (2014). *Digital Disconnect: How Capitalism is Turning the Internet Against Democracy*. New York: The New Press.

McCoy J., T. Rahman, M. Somer (2018), "Polarization and the Global Crisis of Democracy: Common Patterns, Dynamics and Pernicious Consequences for Democratic Polities", *American Behavioral Scientist*, 62(1): 16-42.

McKay S., C. Tenove (2020), "Disinformation as a Threat to Deliberative Democracy", *Political Research Quarterly*, https://doi.org/10.1177/1065912920938143.

Meyer T., C. Hanot (2020), *How platforms are responding to the 'disinfodemic'*. Published September 28, 2020. Retrieved April 14, 2021 (https://www.disinfo.eu/publications/how-platforms-are-responding-to-the-disinfodemic).

Miller M.L., C. Vaccari (2020), "Digital Threats to Democracy: Comparative Lessons and Possible Remedies", *The International Journal of Press/Politics*, 25(3): 333-356.

Napoli P. (2019), *Social Media and the Public Interest: Media Regulation in the Disinformation Age*, New York: Columbia University Press.

Norris P., and R. Inglehart (2019), *Cultural Backlash: Trump, Brexit, and Authoritarian Populism*, Cambridge: Cambridge University Press.

Przeworski A. (2019), *Crises of Democracy*, Cambridge: Cambridge University Press.

Rochefort A. (2020), "Regulating Social Media Platforms: A Comparative Policy Analysis", *Communication Law and Policy*, 25(2): 225-260.

Saurwein F., C. Spencer-Smith (2020), "Combating Disinformation on Social Media: Multilevel Governance and Distributed Accountability in Europe", *Digital Journalism*, 8(6): 820-841.

Schaub M., D. Morisi (2020), "Voter mobilisation in the echo chamber: Broadband internet and the rise of populism in Europe", *European Journal of Political Research*, 59(4): 752-773.

Schia N.N., L. Gjesvik (2020), "Hacking democracy: managing influence campaigns and disinformation in the digital age", *Journal of Cyber Policy*, 5(3): 413-428.

Settle J.E. (2018), *Frenemies: How Social Media Polarizes America,* Cambridge: Cambridge University Press.

Siegel A. (2020), "Online Hate Speech", in N. Persily, and J. A. Tucker (eds.), *Social Media and Democracy: The State of the Field and Prospects for Reform*, Cambridge: Cambridge University Press, pp. 56-88.

Sunstein C.R. (2018), *#republic: Divided Democracy in the Age of Social Media*, Princeton: Princeton University Press.

Suzor N.P. (2019), *Lawless: The secret rules that govern our digital lives*, Cambridge UK: Cambridge University Press.

Tenove C. (2020), "Protecting Democracy from Disinformation: Normative Threats and Policy Responses", *The International Journal of Press/Politics*, 25(3): 517-537.

Tsfati Y., H.G. Boomgarden, J. Strömbäck, R. Vliegenthart, A. Damstra, E. Lindgren (2020), "Causes and consequences of mainstream media dissemination of fake news: literature review and synthesis", *Annals of the International Communication Association*, 44: 157-173.

Tucker J.A., Y. Theocharis, M.E. Roberts, P. Barberá (2017), "From Liberation to Turmoil: Social Media and Democracy", *Journal of Democracy*, 28(4): 46-59.

Veriter S.L., C. Bjola, J.A. Koops (2020), "Tackling COVID-19 Disinformation: Internal and External Challenges for the European Union", *The Hague Journal of Diplomacy*, 15: 569-582.

Vraga E.K., M. Tully, L. Bode (2020), "Empowering Users to Respond to Misinformation about Covid-19", *Media and Communication,* 8(2): 475-479.

Wardle C., and H. Derakhshan (2017), *Information Disorder: Towards an Interdisciplinary Framework for Research and Policymaking*, Strasbourg: Council of Europe. Published September 27, 2017. Retrieved April 12, 2021 (https://rm.coe.int/information-disorder-toward-an-interdisciplinary-framework-for-researc/168076277c).

Wittenberg C. and A.J. Berinsky (2020), "Misinformation and Its Correction", in N. Persily and J.A. Tucker (eds), *Social Media and Democracy: The State of the Field and Prospects for Reform*, Cambridge: Cambridge University Press, pp. 163-198.

Zuboff S. (2018), *The Age of Surveillance Capitalism*, New York: Public Affairs.

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