

A multitude of trends are converging to undermine the foundations of information integrity globally. AI-powered disinformation, weak laws and regulations and struggling news organisations are just a few of the factors making it ever harder for people to rely on the information they access.

Since the threats to information integrity are varied and complex, there isn't a single fix that will solve everything. What is needed is a comprehensive, multi-faceted approach that reflects the complex and highly diverse nature of those threats: an approach based on collective and strategic action by local, regional and global actors with a shared interest in ensuring that everyone can make informed decisions based on access to trustworthy and timely information.

The IMS Information Integrity Solution Papers address a range of key threats to information integrity. The papers do not purport to be silver bullets, individually or together, nor do they claim to be exhaustive. Instead, they propose a variety of experience-based, workable solutions to mitigate some of the most prominent threats to information integrity and to the ability of people everywhere to access the kind of trustworthy and timely information they need in order to shape their own lives.

This paper addresses the need for policies and regulatory frameworks that have the public interest at heart.

Information integrity needs policy and regulation with the public interest at heart

THE PROBLEM

Balancing freedom of expression with the need to regulate harmful online content is one of today's most pressing governance challenges. Disinformation undermines democratic institutions, weakens trust and can directly endanger lives. Yet, laws intended to curb harmful content risk being misused as tools of censorship. This is a challenge even democracies face, as seen in the past years in, for example, India, where legislation intended to manage information ecosystems has been weaponized to silence dissent.

There are certain policy and regulatory approaches already being tested that show promise for building stronger, more democratic digital spaces. The EU Digital Services Act (DSA), Digital Markets Act (DMA), European Media Freedom Act (EMFA) and AI Act are complementary frameworks that aim to safeguard freedom of expression and democratic values. However, while they hold promise, they are limited by the fact that they can achieve their potential only when they are implemented with the support of certain enabling conditions. These include (but are not limited to) the following:

- Rule of law and independent courts.
- Media freedom and pluralistic debate.
- Strong and independent regulators insulated from political capture.
- Civil society oversight to ensure accountability.

Policies and regulations meant to protect information integrity can only be successful if they are sensitive to the context of the ecosystem where they are being implemented, if they account for the transnational nature of digital platforms and if they keep pace with rapidly evolving AI technologies.

A COMPREHENSIVE AND STRATEGIC APPROACH

IMS promotes information integrity by strengthening independent media and civil society to hold governments and platforms accountable. In restrictive environments, we support litigation and build civil society alliances to safeguard freedom of expression. In more open contexts, we engage in reform efforts and support the strengthening of institutional capacities of governmental entities to align national regulation with international human rights standards.

Our role is both technical and connective: convening policymakers, civil society and media actors; fostering inclusive coalitions; and amplifying under represented regions' perspectives in global debates.

While EU regulations, such as the DSA, can be applicable and beneficial where enabling conditions exist, their effective implementation in non-EU settings – where such conditions may be limited or absent – requires careful consideration of complementary legislation, strengthened institutional capacity and international collaboration for knowledge exchange.

The High-Level Expert Group on Resilience Building in Eastern Europe (HLEG) brings together policymakers, regulators, media actors and civil society actors from Ukraine, Moldova and the wider region to develop practical responses to specific information integrity challenges. The HLEG has delivered impact through evidence-based, human rights-aligned recommendations. These recommendations include strengthening independent regulatory frameworks; fostering cross-border cooperation between Digital Service Coordinators (who are overseeing compliance of large online platforms); promoting early media literacy, prebunking and counter-narrative strategies; and clarifying political advertising rules.

The initiative has also generated practical recommendations for social media platforms to mitigate systemic risks during electoral periods and set up a community-driven shadow risk assessment framework. This initiative exemplifies capacity-sharing between EU and non-EU regulatory contexts, providing valuable insights that can guide implementation, inspire EU regulators and potentially set global trends for digital governance in the years to come.

The Media, Exchange, Regulation, Integration, Transparency (MERIT) Forum, facilitated by IMS in Ukraine and Armenia, brings together journalists, media lawyers, academics and government representatives to exchange expertise and co-develop tangible solutions to information integrity challenges. Its impact lies in strengthening national media legislation and promoting enabling legislative standards: for example, by drawing inspiration from the DSA, DMA and EMFA. Its success relies on an inclusive multi-stakeholder approach, a human right-based and diversity-focused framework and practical capacity sharing that equips regulators and media actors to foster effective reforms.

Brazil's General Personal Data Protection Law (LGPD) has created a strong data protection regime in the country. Brazil is advancing a two-pronged strategy: one bill would place digital platforms under the National Data Protection Authority (ANPD), empowering it to sanction platforms for harms like misinformation, child protection failures, and internet fraud. Another bill would strengthen the antitrust authority (CADE) to address monopolistic practices and market concentration and introduce new rules for content moderation and child protection online. What sets Brazil apart is not just legislation but active enforcement. In 2024, the Brazilian Federal Supreme Court suspended X (formerly Twitter) for refusing to remove harmful content targeting election officials and LGBTQ+ activists, reinforcing the court's commitment to democracy and vulnerable groups.

We urge governments, civil society and international organisations to:

- **End impunity for dominant tech companies through global accountability:** Establish binding international standards for information integrity, akin to frameworks for nuclear weapons or climate change.
- **Embed civil society oversight in regulatory and policy processes:** Ensure communities have a direct role in shaping rules on information integrity.
- **Build alternative online infrastructure for trust:** Support open-source communication platforms that empower journalism and public interest media.
- **Invest in coalitions:** Scale initiatives like HLEG and MERIT, ensuring that experiences from regions like Eastern Europe inform other regional and global approaches.