

# Comprehensive Analysis of Mechanisms to Address the Spread of Disinformation

Media Strategy of Montenegro 2023 - 2027

**Activity 1.3.2:** Preparing the Analysis of the needs for changes to existing mechanisms in order to sanction the spread of disinformation

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# About



## 01 EXAMINE

Examines Montenegro's current mechanisms for addressing disinformation.

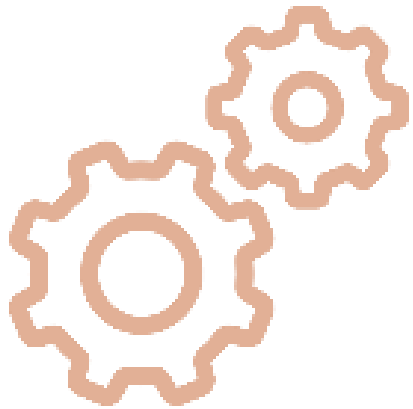
## 02 HIGHLIGHT

Highlights deficiencies and areas for improvement in legislation, institutional capacity, and societal resilience.

## 03 PROPOSE

Proposes detailed, evidence-based recommendations to strengthen Montenegro's ability to counter disinformation.

# Scope of the Analysis



A

Provide a detailed assessment of Montenegro's legal and institutional frameworks for combating disinformation.

B

Explore the role of media and technological platforms in amplifying or mitigating disinformation.

C

Propose actionable strategies to enhance societal resilience against the effects of disinformation.

# CHAPTER 1: Evaluation of Legislation

## Current Legal Frameworks

01 Penal Codes

02 Media Laws

03 Regulations Relevant to Disinformation

## Gaps and Inconsistencies

- Lack of a clear definition of disinformation
- Insufficient coordination among regulatory bodies
- Weak enforcement mechanisms
- legislation's primary focus on traditional media outlets neglects the pervasive nature of online disinformation
- Lack of sufficient legal protection for journalists
- Need for greater transparency and accountability in the process of removing illegal online content

## Legal Reforms Needed



Code of Journalistic Ethics and Code of practice



Safeguard against FIMI



Enhanced Provisions for Digital Platforms' Accountability

# CHAPTER 2: Institutional Capacity

01 The Media Council for Self-Regulation

02 Agency for Audiovisual Media Services (AMU )

03 Digital Enforcement Agencies

04 Ministry of Public Administration, Digital Society and Media

05 OSCE Mission to Montenegro

06 Computer Incident Response Team (CIRT)

## Strengths:

The regulatory bodies possess foundational legal frameworks (e.g., the Law on Media and the Law on Audiovisual Media Services), enabling oversight of broadcast and print media.

Institutions like AMU have demonstrated capacity in regulating traditional media content and responding to public complaints effectively.

## Weaknesses:

**Limited Digital Jurisdiction:** Institutions lack legal authority and technical infrastructure to monitor and penalize disinformation on social media platforms.

**Fragmentation:** The lack of inter-agency coordination results in inefficiencies, with regulatory bodies operating in silos.

**Resource Constraints:** Regulatory bodies like the Media Council and AMU face budgetary limitations that hinder their investigative capacity and operational efficiency.

# CHAPTER 3: Cooperation with Media and Social Networks

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- **Government-Media Collaboration**

- Limited Collaboration
- Challenges with Social Networks
- Media Influence and Independence
- Lack of Clear Strategy

- **Respective Approaches from other countries**

- Greek Task Force Initiative
  - Germany's Government-Press Partnership
  - United Kingdom's Trusted News Initiative (TNI)
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- **Proposals**

- MOUs with Social Media Platforms
- Social Network Accountability
- Collaborative Frameworks
- National Task Force

# CHAPTER 4: Media Literacy and Public Awareness

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- Current Media Literacy Initiatives
  - Government Initiatives on Media Literacy in Montenegro
  - Non-Governmental Organizations
  - International Organizations
- Impact of Media Literacy Initiatives
- Enhancing Media Literacy
  - Integration of Critical Thinking Modules
  - Nationwide Public Awareness Campaigns
- Good Practices
  - Greece pilot project on News Literacy and Social Media User Awareness
  - AI Literacy
  - Estonia's Emphasis on Digital Literacy in Schools
  - The Netherlands' Public Awareness Initiatives

MEDIA  
LITERACY

& PUBLIC  
AWARENESS

# CHAPTER 5: International Context and Best Practices

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- **European Union**

- Platform Accountability
- Algorithmic Transparency
- Fact-Checking Collaborations
- Public Awareness Initiatives

- **United States**

- Government-Led Initiatives
- Platform Cooperation
- Public-Private Partnerships
- Media Literacy Programs

- **UNESCO**

- UNESCO's Media and Information Literacy (MIL) Framework
- The United Nations Verified Initiative
- International Collaboration

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- **Detailed Case Studies**

- EU Level
- France
- Estonia
- Greece
- Lithuania



# CHAPTER 6: Technological Solutions

## Identification of Disinformation

- A Natural Language Processing (NLP)
- B Machine Learning (ML)
- C Network Analysis
- D Image and Video Analysis

## Monitoring of Disinformation

- A Social Media Monitoring Tools
- B Fact-Checking Platforms
- C Media Monitoring Tools

## Limiting the Spread of Disinformation

01 Content

02 Algorithmic

03 Digital Literacy

04 Government

# CHAPTER 7: Stakeholder Engagement



## **Inclusive Consultation Process**

Journalists and Media Professionals  
Civil Society Organizations (CSOs)  
Academic Experts



## **Building Consensus**

# Key Recommendations

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- 01 Establish a National Task Force for Disinformation
- 02 Institutional Capacity Building for Ministry of Foreign Affairs
- 03 Legal Reforms
- 04 Technological Solutions
- 05 Media Literacy and Public Awareness
- 06 Stakeholder Collaboration
- 07 International Cooperation

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# Media Strategy of Montenegro 2023 – 2027

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**Activity 1.3.2:** Preparing the Analysis of the needs for changes to existing mechanisms in order to sanction the spread of disinformation

2024

**Purpose:** To provide a detailed evaluation of the current mechanisms in place to address disinformation, identify areas requiring reform, and propose recommendations to strengthen Montenegro's ability to counter disinformation effectively.

Prepared for:  
Government of Montenegro

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Issued  
12/20/2024

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# **Comprehensive Analysis of Mechanisms to Sanction the Spread of Disinformation**

## EXECUTIVE SUMMARY

The proliferation of disinformation poses a significant threat to democratic processes, public trust, and social cohesion. Addressing this challenge requires a comprehensive and multifaceted approach, encompassing legal frameworks, institutional capacities, media cooperation, public education, and technological advancements. This paper undertakes a detailed analysis of the existing mechanisms in Montenegro aimed at combating the spread of disinformation, with the primary objective of identifying necessary changes and improvements. This analysis is structured around several key areas: a thorough evaluation of current legislation to pinpoint legal voids; an examination of the capacity of relevant institutions and their practical application of existing measures; an exploration of potential cooperation with media outlets and social networks; an assessment of the role of education and media literacy in fostering critical thinking; a review of international best practices and standards; engagement with relevant stakeholders to gather diverse perspectives; and a consideration of technological solutions that can aid in identifying and mitigating disinformation. By systematically examining these elements, this paper aims to provide concrete recommendations for enhancing Montenegro's response to the evolving challenges of disinformation.

## MORE DETAILS

Disinformation is not merely an issue of misleading content; it is a strategic threat capable of undermining national security, eroding trust in public institutions, and distorting democratic discourse. This report aims to provide an in-depth analysis that:

### 01 EXAMINE

Examines Montenegro's current mechanisms for addressing disinformation.

### 02 HIGHLIGHT

Highlights deficiencies and areas for improvement in legislation, institutional capacity, and societal resilience.

### 03 PROPOSE

Proposes detailed, evidence-based recommendations to strengthen Montenegro's ability to counter disinformation.

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# INTRODUCTION

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Disinformation as a phenomenon can be understood through the lens of agenda-setting theory and the concept of the "marketplace of ideas." Agenda-setting theory posits that media influences not only what people think about but also how they think about it, making disinformation campaigns particularly insidious. By leveraging false narratives, perpetrators of disinformation disrupt the public's ability to prioritize legitimate concerns, creating a distorted reality.

Moreover, the "marketplace of ideas" assumes that truth will emerge from free and transparent discourse. However, the digital age has complicated this ideal. Echo chambers, algorithm-driven content curation, and the weaponization of information have created an environment where disinformation can thrive. This highlights the need for robust mechanisms to ensure accountability and the dissemination of accurate information.

Digital platforms have transformed the dissemination of information, amplifying the reach and impact of disinformation. Social media algorithms, designed to prioritize engagement, often promote sensational or misleading content, inadvertently aiding disinformation campaigns. The anonymity and speed afforded by digital platforms further complicate efforts to trace and sanction offenders.

The European Union has taken significant steps to address these challenges through robust policies and legislation. The **European Democracy Action Plan (EDAP)**, adopted in 2020, underscores the need to counter disinformation as part of a broader strategy to strengthen democracy. EDAP prioritizes enhancing the transparency of online platforms, supporting independent media, and promoting media literacy among citizens. Similarly, the **Digital Services Act (DSA)** introduces strict obligations for large online platforms to monitor and

mitigate the spread of harmful content, including disinformation, emphasizing accountability and transparency.

The **Code of Practice on Disinformation**, a self-regulatory initiative by online platforms and other stakeholders, serves as another pillar of the EU's approach. It encourages voluntary commitments to counter disinformation while ensuring compliance with broader regulatory frameworks such as the General Data Protection Regulation (GDPR). These measures collectively reflect the EU's recognition of disinformation as a multidimensional issue requiring legal, institutional, and societal responses.

In Montenegro, these global challenges are compounded by regional vulnerabilities, including political polarization, media fragmentation, and limited digital literacy. The country's aspiration to align with EU standards provides an opportunity to integrate best practices and legislative frameworks into its approach. By adopting measures inspired by the EDAP and the DSA, Montenegro can enhance its legal and institutional capacity to counter disinformation effectively.

## SCOPE AND OBJECTIVES



**This report builds on existing research and international best practices to:**

- A** | Provide a detailed assessment of Montenegro's legal and institutional frameworks for combating disinformation.
- B** | Explore the role of media and technological platforms in amplifying or mitigating disinformation.
- C** | Propose actionable strategies to enhance societal resilience against the effects of disinformation.

# CHAPTER 1: Evaluation of Legislation

## 1.1 Current Legal Frameworks

The aim of the current section is to assess the existing legal frame which regulates disinformation, in order to identify legal void which could contribute to spreading disinformation, as well as to analyze the possibility of improving legal provisions in order to better face modern challenges. Under this scope a detailed evaluation of Montenegro's existing penal codes, media laws, and other regulations that address the issue of disinformation. Key findings from this evaluation include:

### 01 Penal Codes

Montenegro's penal codes, particularly Articles 398 and 399 of the Criminal Code, address the dissemination of false information that could incite panic or threaten public safety. However, enforcement mechanisms are inconsistent and often lack clarity. There is limited capacity to address disinformation in the digital domain, particularly on social media platforms.

### 02 Media Laws

The Law on Media (2020) emphasizes transparency and journalistic accountability but fails to adequately address the unique challenges posed by digital disinformation. Article 23 of the law requires media outlets to ensure accuracy and verify sources, but it does not mandate proactive measures by media outlets or digital platforms to combat false narratives.

### 03 Regulations Relevant to Disinformation

The Law on Electronic Communications and the Law on Election of Councillors and Members of Parliament contain provisions that indirectly touch upon disinformation, such as regulating election-related communications and preventing the misuse of digital channels. However, these regulations are fragmented and lack a unified approach to dealing with the issue across sectors.

In more detail, initially, freedom of expression has been stipulated by the Article 47 of the Constitution of Montenegro, according to which everyone is entitled to the right to freedom of expression by speech, writing, picture, or in some other form, and that this right may be limited only by the right of others to dignity, reputation, and honour<sup>1</sup>. The limitation of freedom of expression has been determined by international standards. However, any limitations on freedom of speech must be applied restrictively, meaning that any interference with freedom of speech must take place under certain conditions<sup>2</sup>.

The right to freedom of speech, according to the Article 10 of the European Convention on Human Rights may be restricted in order to protect national security, territorial integrity, or public safety; prevent disorder or crime; protect health or morals; protect the reputations or rights of others; prevent the disclosure of information received in confidence; or, maintain the authority and impartiality of the judiciary<sup>3</sup>.

Regarding disinformation, although the Montenegrin regulations do not define what is considered “fake news,” the Criminal Code of Montenegro (CC) provides for the criminal offence of “causing panic and disorder” (Article 398), which, in early 2020, served as the legal basis of arrests of an FOS Media<sup>4</sup> portal journalist, and editors of the right-wing portals in4s.net and borba.me<sup>5</sup>. Said journalist was arrested amid the tensions related to the adoption of the Law on Freedom of Religion when she published “ROSU Forces in Montenegro on Christmas Eve,” while the editors of the two mentioned media outlets were arrested after publishing news that there had been an explosion in Villa Gorica, which is used by the state protocol. The

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<sup>1</sup> Article 47 of the Constitution of Montenegro (“Official Gazette of Montenegro”, No. 001/07 dated 25 October 2007, 038/13 dated 2 August 2013). Available at: <https://bit.ly/3zP5h2e>. Accessed on: 27 November 2024

<sup>2</sup> Response of the Protector of Human Rights and Freedoms to the letter dated 17 September 2021

<sup>3</sup> European Convention on Human Rights. Available at: <https://bit.ly/2WULrVW>. Accessed on: 26 November 2024

<sup>4</sup> Čađenović, Ivan, Nikolić, Biljana, FOS journalist suspected of causing panic and disorder detained, Vijesti Online, 6 January 2020. Available at: <https://bit.ly/3eu0Tft>. Accessed on: 9 December 2024

<sup>5</sup> Čađenović, Ivan, Raičević and Živković out on bail, Vijesti Online, 13 January 2020. Available at: <https://bit.ly/3hYu2RS>. Accessed on: 9 December 2024

criminal offence of “causing panic and disorder” is punishable by up to three years of imprisonment for journalists and all those who “using the media or other means of public information or similar means or at a public meeting” disclose or disseminate “false news or allegations” thereby causing “panic, or serious disruption of public order or peace, or thwarting or more significantly hindering the enforcement of decisions and measures of state authorities or organizations exercising public powers<sup>6</sup>.”

The arrests of journalists have been condemned by the NGO Human Rights Action, who pointed out that the Criminal Code does not provide what is considered “false news,” nor what is considered to be “causing panic,” nor does it provide for circumstances that justify such actions, which can easily be interpreted as a violation of the freedom of expressions, i.e. interpretations that are contrary to international standards. The criminal offence of “causing panic and disorder,” which sanctions “false news” as a form of defamation, deviates from the legal order of Montenegro since it contains the punishment of imprisonment and formulations that depart from international standards of freedom of expression.

Moreover, the Constitution of Montenegro<sup>7</sup> provides that the competent court may prevent the dissemination of information and ideas via the media only if so required in order to avert invitation to the forcible destruction of the order defined by the Constitution; preservation of territorial integrity of Montenegro; prevention of propagating war or incitement to violence or performance of criminal offenses; prevention of propagating racial, national and religious hatred or discrimination. Moreover, the Constitution prohibits infliction or encouragement of hatred or intolerance on any grounds and prohibits discrimination on any grounds.

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<sup>6</sup> Human Rights Action, A statement on the occasion of invoking the provisions related to the criminal offence “Causing panic and disorder” and imprisonment of journalists on that occasion, 13 January 2020. Available at: <https://bit.ly/3DjwkVx>. Accessed on: 7 December 2024

<sup>7</sup> Article 50 of the Constitution of Montenegro (“Official Gazette of Montenegro”, No. 001/07 dated 25 October 2007, 038/13 dated 2 August 2013). Available at: <https://bit.ly/3zP5h2e>. Accessed on: 09 December 2024

Additionally, although not directly referring to disinformation, the Law on Media prohibits the publication of information in the media that expresses ideas, claims, and opinions that incite, spread, encourage or justify discrimination, hatred, or violence against a person or group of persons on the grounds of their personal characteristics, political, religious and other beliefs, xenophobia, racial hatred, anti-Semitism or other forms of hatred based on intolerance, including intolerance expressed in the form of nationalism, discrimination and hostility against the minority people and other minority national communities<sup>8</sup>. As the mentioned themes can be in many cases connected with disinformation and FIMI efforts, respective legislation can be related to the overall framework of addressing disinformation challenges. Furthermore, all online media are obliged to remove a comment containing illegal content without delay and no later than within 60 minutes of learning or receiving a report from another person that it features illegal content<sup>9</sup>.

Under the same framework, the Law on Electronic Media stipulates that an AVM service must not incite, enable incitement or spread hatred or discrimination on the grounds of race, ethnic background, skin colour, sex, language, religion, political or other belief, national or social background, financial standing, trade union membership, education, social status, marital or family status, age, health status, disability, genetic heritage, gender identity or sexual orientation<sup>10</sup>. The law provides for a fine of 500 to 6,000 euros for any legal entity that broadcasts programmes that emphasize and support violence, drug addiction, or similar forms of criminal conduct. Moreover, the issue of offensive and hate speech has been treated in the

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<sup>8</sup> Article 36 of the Law on Media (“Official Gazette of Montenegro”, No. 46/2010, 40/2011 – other law, 53/2011, 6/2013, 55/2016, 92/2017, and 82/2020 – other law). Available at: <https://bit.ly/3Dtv95U>. Accessed on: 9 December 2024.

<sup>9</sup> Article 26 of the Law on Media (“Official Gazette of Montenegro”, No. 46/2010, 40/2011 – other law, 53/2011, 6/2013, 55/2016, 92/2017, and 82/2020 – other law). Available at: <https://bit.ly/3Dtv95U>. Accessed on: 9 December 2024.

<sup>10</sup> Article 48 of the Law on Electronic Media (“Official Gazette of Montenegro”, No. 046/10 dated 6 August 2010, 040/11 dated 8 August 2011, 053/11 dated 11 November 2011, 006/13 dated 31 January 2013, 055/16 dated 17 August 2016, 092/17 dated 30 December 2017). Available at: <https://bit.ly/3ARhvJ6>. Accessed on: 7 December 2024.

Rulebook on Programme Standards in Electronic Media<sup>11</sup> and the Rulebook on Commercial AVM Communications<sup>12</sup>.

Finally, the Law on Media stipulates that the media outlets can establish a joint external self-regulatory body<sup>13</sup>, but also that each media outlet is entitled to establish an internal self-regulatory body and that the operating costs of various self-regulatory mechanisms shall be financed from the state budget. The law stipulates that a request for financing may be submitted by a self-regulatory body established at least three years prior to the submission of such request.

## 1.2 Gaps and Inconsistencies

- Lack of a clear definition of disinformation, which creates ambiguity in enforcement.
- Insufficient coordination among regulatory bodies, such as the Agency for Electronic Media (AEM) and the Data Protection Agency, to address cross-platform disinformation campaigns.
- Weak enforcement mechanisms that fail to deter organized campaigns or repeated offenders.
- The legislation's primary focus on traditional media outlets neglects the pervasive nature of online disinformation, failing to adequately address online platforms and user-generated content.
- Lack of sufficient legal protection for journalists, as evidenced by past arrests for "causing panic and disorder," highlighting the need for safeguards for good-faith reporting, even if inaccuracies occur.

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<sup>11</sup> Rulebook on Programme Standards in Electronic Media. Available at: <https://bit.ly/3ogLner>. Accessed on: 7 December 2024

<sup>12</sup> Rulebook on Commercial AVM Communications. Available at: <https://bit.ly/3EZyWtg>. Accessed on: 7 December 2024

<sup>13</sup> Article 12 of the Law on Media ("Official Gazette of Montenegro", No. 46/2010, 40/2011 – other law, 53/2011, 6/2013, 55/2016, 92/2017, and 82/2020 –other law). Available at: <https://bit.ly/3Dtv95U>. Accessed on: 9 December 2024

- There is a need for greater transparency and accountability in the process of removing illegal online content, including mechanisms to hold online platforms responsible for failing to address harmful material.

**Comparative Analysis:** Montenegro's legal frameworks are compared with EU directives and international standards. Notable differences include:

- The EU's General Data Protection Regulation (GDPR) offers robust protections for digital privacy, indirectly curbing disinformation by limiting data misuse.
- EU member states have adopted coordinated strategies under the European Democracy Action Plan, focusing on platform accountability and transparency, which Montenegro lacks.
- International standards, such as those by UNESCO, advocate for media literacy and ethical journalism, areas where Montenegro shows minimal progress.



## 1.3 Legal Reforms Needed

Based on the evaluation, the following legislative reforms can contribute in the enhancement of Montenegro's capacity to combat disinformation while safeguarding democratic principles:



### Stricter Penalties for Deliberate Disinformation Campaigns

- Amend Articles 398 and 399 of the Criminal Code to introduce specific penalties for individuals and organizations that deliberately create or disseminate disinformation with intent to harm public order, national security, or democratic processes.
- Establish a tiered penalty system to differentiate between minor infractions and large-scale campaigns.



### Safeguards Against Abuse of Anti-Disinformation Laws

- Incorporate provisions into the Law on Media to prevent misuse of anti-disinformation laws for political purposes or to suppress legitimate dissent.
- Mandate judicial review for cases involving alleged disinformation under the Criminal Code to ensure impartiality and adherence to free speech standards.



### Enhanced Provisions for Digital Platforms' Accountability

- Amend the Law on Electronic Communications to require digital platforms to adopt transparency measures, such as labeling content from automated accounts.
- Enforce cooperation between platforms and regulatory bodies, such as the AEM, to track and mitigate disinformation.
- Introduce obligations for platforms under the Law on Media to provide regular reports on disinformation mitigation efforts, including statistics on removed or flagged content.

By aligning Montenegro's legal framework with EU directives and international best practices, these reforms aim to strike a balance between combating disinformation and protecting fundamental freedoms.

## CHAPTER 2: Institutional Capacity

In order to address issues of disinformation, robust institutional frameworks are critical to ensuring a coordinated, effective, and sustainable response. This chapter examines Montenegro's current institutional landscape, focusing on the regulatory, operational, and collaborative mechanisms in place to combat disinformation.

The analysis will not only uncover institutional strengths and weaknesses but also explore external opportunities for collaboration and innovation, as well as potential threats posed by rapidly evolving disinformation tactics. This structured approach aims to equip policymakers, regulators, and stakeholders with actionable insights, ensuring Montenegro's institutional frameworks are both resilient and adaptable to future challenges.

### 2.1 Analysis of Institutional Frameworks

This section examines Montenegro's institutional frameworks tasked with regulating and mitigating disinformation, including regulatory bodies, enforcement agencies, and their operational capacity. The primary institutions under review include:

#### 01 The Media Council for Self-Regulation

Established under Montenegro's Law on Media (2020), the Media Council oversees ethical standards in journalism and the media industry. While its mandate includes fostering transparency and upholding journalistic integrity, its effectiveness is limited by resource constraints and a lack of authority to enforce penalties for breaches.

#### 02 Agency for Electronic Media (AEM)

Under the Law on Electronic Media (2010), the AEM regulates electronic communications, including broadcast media. It has some authority to monitor and sanction broadcasters disseminating false or harmful content. However, its jurisdiction does not extend to digital platforms or social media, which are the main vectors for disinformation today.

#### 03 Digital Enforcement Agencies

These agencies, under the Law on Information Security (2014), are responsible for cyber regulation, including threats related to misinformation. However, the law lacks provisions for specific monitoring and penalization of digital disinformation campaigns.

## 04 Ministry of Public Administration, Digital Society and Media

These agencies, under the Law on Information Security (2014), are responsible for cyber regulation, including threats related to misinformation. However, the law lacks provisions for specific monitoring and penalization of digital disinformation campaigns.

## 05 OSCE Mission to Montenegro

This mission supports media self-regulation and works against discriminatory speech. It has helped increase knowledge on media and digital literacy and combat hate speech.

## 06 Computer Incident Response Team (CIRT)

CIRT coordinates the prevention and protection against computer security incidents and other information system security risks on the internet

### Strengths:

The regulatory bodies possess foundational legal frameworks (e.g., the Law on Media and the Law on

Institutions like AEM have demonstrated capacity in regulating traditional media content and responding to

### Weaknesses:

**Limited Digital Jurisdiction:** Institutions lack legal authority and technical infrastructure to monitor and penalize disinformation on social media platforms.

**Fragmentation:** The lack of inter-agency coordination results in inefficiencies, with regulatory bodies operating in silos.

**Resource Constraints:** Regulatory bodies like the Media Council and AEM face budgetary limitations that hinder their investigative capacity and operational efficiency.

- Resource Constraints: Regulatory bodies like the Media Council and AEM face budgetary limitations that hinder their investigative capacity and operational efficiency.

## 2.2 Capacity Building

To address the weaknesses in institutional frameworks, capacity-building strategies are essential for improving Montenegro's regulatory efficacy. This includes:

### Resource Allocation Strategies

- Increase budgetary support for the Media Council and AEM to improve staffing, training, and monitoring tools.
- Invest in modern digital forensics and AI-based tools to track and analyze disinformation on digital platforms.

### Training Programs for Officials and Regulators

- Develop specialized training programs in collaboration with international organizations (e.g., UNESCO, Council of Europe) to enhance media literacy, fact-checking, and investigative journalism skills.
- Introduce digital literacy training for enforcement officers to better understand emerging technologies, such as social media analytics and data manipulation techniques.

### Creation of Inter-Agency Collaboration Protocols

- Establish formal communication frameworks between AEM, the Media Council, and digital enforcement agencies to streamline information sharing and enforcement.
- Introduce regular joint task force meetings to address cross-platform disinformation campaigns.
- Mandate the creation of an inter-agency body under the Law on Information Security to oversee coordinated responses to digital disinformation.

## 2.3 Penal Provision Monitoring

Effective enforcement of penal provisions related to disinformation remains a critical challenge. Montenegro's Criminal Code (Articles 398 and 399) and the Law on Media provide legal grounds for prosecution; however, procedural delays and evidence-gathering inefficiencies hinder their implementation. Key issues include:

### Procedural Delays

- Judicial backlogs lead to delays in adjudicating cases of disinformation, undermining public trust in enforcement mechanisms.
- Limited awareness among judiciary personnel regarding the nuances of digital disinformation slows down proceedings.

## Evidence-Gathering Inefficiencies

- Lack of advanced forensic tools prevents regulators and enforcement agencies from effectively collecting evidence on digital platforms.
- Difficulty in accessing cooperation from private digital platforms, particularly international corporations, hampers evidence validation.

## Recommendations for Streamlining the Adjudication Process:

- Amend the Law on Criminal Procedure to prioritize disinformation cases during periods of heightened public risk, such as elections or public crises.
- Require digital platforms to comply with evidence-sharing requests under amended provisions in the Law on Electronic Communications.
- Implement specialized judicial training programs to equip courts with skills to adjudicate digital disinformation cases effectively.

# CHAPTER 3: Cooperation with Media and Social Networks

In order to address disinformation there is a need for a strong collaboration between governments, media organizations, and social network platforms. Media outlets play a critical role in providing verified and credible information, while social media platforms serve as a primary arena where disinformation spreads. Developing cooperative frameworks between these stakeholders is essential to ensuring both timely intervention and the promotion of trustworthy content.

This chapter examines strategies for fostering effective cooperation with traditional media and digital platforms. It highlights the importance of developing Memoranda of Understanding (MOUs), implementing accountability mechanisms for platforms, and incentivizing transparency in algorithmic processes. Additionally, the chapter emphasizes the role of multi-stakeholder partnerships, task forces, and forums in aligning national goals with platform operations to counter disinformation effectively. By improving collaboration, Montenegro can enhance its resilience against disinformation while protecting freedom of speech and fostering public trust in information ecosystems.

## 3.1 Government-Media Collaboration

Successful partnerships between governments and media organizations are critical for addressing disinformation. Collaborative efforts can foster trust, enhance media literacy, and improve the dissemination of verified information. While the Montenegrin government recognizes the threat of disinformation, particularly from foreign sources, its cooperation with media and social networks to combat this issue appears limited and faces challenges.

**Limited Collaboration:** Although the government acknowledges the role of media freedom and literacy in countering disinformation<sup>14</sup>, there's no evidence of a systematic effort to collaborate with media outlets on this issue. The focus primarily remains on traditional media, with less attention given to the role of social networks in spreading disinformation<sup>15</sup>.

**Challenges with Social Networks:** While there's a recognition of the need to cooperate with global internet companies and social media networks<sup>1</sup>, concrete actions and strategies in this

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<sup>14</sup> COUNTERING DISINFORMATION WHILE PROTECTING FREEDOM OF EXPRESSION - Center for democratic transition, accessed December 15, 2024, [https://en.cdtmn.org/wp-content/uploads/2024/05/ENG-Policy\\_Borba-protiv-dezinformacija-i-sloboda-izrazavanja.pdf](https://en.cdtmn.org/wp-content/uploads/2024/05/ENG-Policy_Borba-protiv-dezinformacija-i-sloboda-izrazavanja.pdf)

<sup>15</sup> MONTENEGRO - IREX, accessed December 15, 2024, <https://www.irex.org/files/vibrant-information-barometer-2023-montenegro.pdf>

area appear to be lacking. This is partly due to the challenges in ensuring journalistic independence and mitigating the influence of political and foreign actors on media content<sup>16</sup>.

**Media Influence and Independence:** Concerns exist about the influence of political and foreign actors on media content, potentially hindering objective reporting and effective cooperation<sup>17</sup>. This influence can create an environment where disinformation can flourish and make it difficult for the government to collaborate effectively with media outlets.

**Lack of Clear Strategy:** Montenegro still needs a comprehensive national strategy to combat disinformation, including specific plans for collaborating with media and social media platforms<sup>18</sup>. This strategy should outline clear objectives, responsibilities, and resources dedicated to fostering cooperation and achieving tangible results.

Overall, while the government acknowledges the importance of media and social networks in addressing disinformation, more concrete actions and strategies are needed to foster effective cooperation and achieve tangible results. A comprehensive national strategy, coupled with efforts to ensure media independence and address the challenges posed by foreign influence, will be crucial in effectively combating disinformation in Montenegro. Below examples of respective cooperation approaches, that could provide a framework for Montenegro, are presented:

### Germany's Government-Press Partnership

- The German government collaborates with public broadcasters such as ARD and ZDF to provide fact-checked information during election periods.
- Regular press briefings and media workshops ensure alignment in messaging and prevent the spread of false narratives.

### United Kingdom's Trusted News Initiative (TNI)

- The TNI brings together major media organizations and the UK government to combat disinformation.
- Through shared databases and collaborative fact-checking, the TNI has reduced the spread of coordinated disinformation campaigns.

### The Greek Task Force

In July 2022, the Greek government established the Task Force on Ensuring the Protection, Safety and Empowerment of Journalists and other Media Professionals to help implement the EU Recommendation and the Council of Europe Recommendation on the safety of journalists and the various UN resolutions on this issue. The Task Force is the result of a Memorandum of

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<sup>16</sup> MONTENEGRO - IREX, accessed December 15, 2024, <https://www.irex.org/files/vibrant-information-barometer-2023-montenegro.pdf>

<sup>17</sup> MONTENEGRO - IREX, accessed December 15, 2024, <https://www.irex.org/files/vibrant-information-barometer-2023-montenegro.pdf>

<sup>18</sup> COUNTERING DISINFORMATION WHILE PROTECTING FREEDOM OF EXPRESSION - Center for democratic transition, accessed December 15, 2024, [https://en.cdtmn.org/wp-content/uploads/2024/05/ENG-Policy\\_Borba-protiv-dezinformacija-i-sloboda-izrazavanja.pdf](https://en.cdtmn.org/wp-content/uploads/2024/05/ENG-Policy_Borba-protiv-dezinformacija-i-sloboda-izrazavanja.pdf)

Understanding (MoU) signed between six Greek ministries in May 2022 (General Secretariat for Communication and Information, the Presidency of the Government; General Secretariat for Justice and Human Rights, the Ministry of Justice; General Secretariat for Public Order, the Ministry of Citizen Protection; General Secretariat for Demographic and Family Policy and Gender Equality, the Ministry of Labour and Social Affairs; General Secretariat for Telecommunications and Post, the Ministry of Digital Governance; and General Secretariat, the Ministry of Foreign Affairs), and representatives of journalist unions and associations, universities, public service media, news agencies, and other relevant stakeholders<sup>2</sup>. The Task Force aims to pursue the objectives of the MoU, that have been developed in line with Commission Recommendation (EU) 2021/1534 on ensuring the protection, safety and empowerment of journalists and other media professionals in the European Union.

Hence, the main goals of the Task Force, as described in the MoU, can be summarised as follows:

- Monitor the situation on the safety of journalists in the country;
- Promote legislation, public policies and other actions, such as training, to promote the safety of journalists, with a special focus on women, youth, local and digital media, and take into account the recommendations proposed by the Task Force's members to address the main challenges;
- Promote multi-stakeholder coordination and collaboration.

### Proposals for MOUs with Social Media Platforms:

- Montenegro should develop formal agreements with platforms like Facebook, Twitter, and YouTube to:

- Ensure Data Access: Platforms must provide government agencies with timely access to data related to disinformation trends.

- Enhance Content Moderation: Collaborative frameworks can enforce stricter content moderation policies for false information.

- Facilitate Transparency Reports: Platforms should publish regular reports outlining actions taken against disinformation in Montenegro.

## 3.2 Social Network Accountability

To incentivize platform transparency and enhance accountability, Montenegro can adopt the following strategies:

### 1. Transparency Incentives

- Introduce legal obligations for platforms to disclose algorithms that amplify content.
- Encourage platforms to label automated accounts and provide users with tools to identify AI-generated content.



## 2. Tools for Monitoring Disinformation Trends

- Invest in AI-based software tools that monitor disinformation trends across social networks.
- Collaborate with private companies to develop dashboards for real-time tracking of disinformation campaigns.

## 3.3 Collaborative Frameworks

A collaborative approach is essential to align government, media, and private sector efforts to combat disinformation. Proposed initiatives include:

### 1. National Task Force

- Establish a national task force comprising representatives from the government, media regulators, social media platforms, and civil society organizations.
- Responsibilities include monitoring disinformation trends, sharing data, and recommending policy interventions.

### 2. Regular Forums for Stakeholder Alignment

- Host biannual forums to bring together stakeholders to discuss emerging threats, share best practices, and evaluate ongoing initiatives.
- Invite international experts to provide insights into global trends and solutions for tackling digital misinformation.

## Chapter Conclusion

Strengthening cooperation between the government, media, and social networks is a key pillar in combating disinformation. By fostering collaborative frameworks, establishing accountability for platforms, and developing formal agreements, Montenegro can create a more resilient information ecosystem. Aligning these efforts with international models such as the Trusted News Initiative, Germany's partnerships, and Greece's task force will further enhance the country's capacity to address digital misinformation.

# CHAPTER 4: Media Literacy and Public Awareness

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Media literacy is an essential skill in today's world, enabling individuals to critically analyze and evaluate information from various sources. This is especially crucial in the digital age, where the abundance of information and the rise of misinformation require individuals to possess strong critical thinking and information verification skills<sup>19</sup>. In Montenegro, under a developing media landscape<sup>20</sup>, media literacy initiatives play a crucial role in fostering informed citizenry and promoting democratic values. This section examines the current state of media literacy initiatives in Montenegro, exploring government and non-governmental efforts, specific programs, impact, and challenges.

## 4.1 Current Media Literacy Initiatives

### Government Initiatives on Media Literacy in Montenegro

The Montenegrin government recognizes the importance of media literacy, particularly in combating disinformation and promoting informed public discourse. The Ministry of Culture and Media has been instrumental in drafting the Media Strategy<sup>21</sup>, and the 2023–2027 Media Strategy of Montenegro lists "improved quality of information for citizens and enhanced media literacy" as one of its strategic goals. The government is actively working to create a system for effectively combating hate speech, online harassment, and disinformation. Programs under the Ministry of Education incorporate basic elements of digital literacy, but there is a lack of systematic integration of critical thinking and media awareness modules across all educational levels.

Despite these efforts, challenges remain. The European Commission and Parliament have called on Montenegro to step up efforts to counter foreign interference and information manipulation. The current legal framework does not explicitly address disinformation. There is also a need for a multi-sector approach to media literacy and greater government attention to the issue.

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<sup>19</sup> Media literacy for every child | UNICEF, accessed December 15, 2024, <https://www.unicef.org/montenegro/en/stories/media-literacy-every-child>

<sup>20</sup> Mass media in Montenegro - Wikipedia, accessed December 15, 2024, [https://en.wikipedia.org/wiki/Mass\\_media\\_in\\_Montenegro](https://en.wikipedia.org/wiki/Mass_media_in_Montenegro)

<sup>21</sup> Media Literacy for primary schools in Montenegro | UNESCO, accessed December 15, 2024, <https://www.unesco.org/en/articles/media-literacy-primary-schools-montenegro>

## Non-Governmental and International Organizations

Non-governmental organizations (NGOs) and international organizations play a vital role in promoting media literacy in Montenegro. These organizations conduct research, implement programs, and advocate for policies that support media literacy education.

### Non-Governmental Organizations

Several NGOs are actively involved in media literacy initiatives in Montenegro. These include:

**Mladiinfo Montenegro:** This NGO organizes workshops and conferences on media literacy, focusing on the importance of critical thinking and responsible media consumption<sup>22</sup>.

**Juventas:** Juventas implements projects aimed at improving media literacy, particularly among young people. They focus on addressing youth in engaging ways and providing them with the skills to navigate the media landscape effectively<sup>23</sup>.

**Center for Civic Education (CCE):** CCE organizes projects and conferences to promote media literacy and advocate for wider and more systematic efforts to make Montenegro a media-literate society<sup>24</sup>.

**Montenegro Media Institute (MMI):** MMI conducts research, develops educational materials, and implements programs to enhance media literacy among various target groups, including journalists, educators, and the general public<sup>25</sup>.

**Digital Forensic Center (DFC):** The DFC plays a crucial role in highlighting and debunking specific cases of disinformation for the Montenegrin public, increasing awareness of disinformation tactics and improving media literacy skills.

### International Organizations

International organizations, such as UNESCO, UNICEF, and OSCE, provide support and expertise to media literacy initiatives in Montenegro.

**UNESCO:** UNESCO supports the development of media literacy curricula and teacher training programs. They have funded projects to introduce media literacy in primary schools and provide guidelines for teachers<sup>26</sup>.

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<sup>22</sup> . NGO “Mladiinfo Montenegro” organizes the workshop “Literate ...”, accessed December 15, 2024, <https://www.medijskapismenost.me/en/ngo-mladiinfo-montenegro-organizes-the-workshop-literate-creative/>

<sup>23</sup> Wider and more systematic efforts are needed to make Montenegro a media literacy society, accessed December 15, 2024, <https://cgo-cce.org/en/2022/06/10/wider-and-more-systematic-efforts-are-needed-to-make-montenegro-a-media-literacy-society/>

<sup>24</sup> Wider and more systematic efforts are needed to make Montenegro a media literacy society, accessed December 15, 2024, <https://cgo-cce.org/en/2022/06/10/wider-and-more-systematic-efforts-are-needed-to-make-montenegro-a-media-literacy-society/>

<sup>25</sup> Montenegro - SeeMIL, accessed December 15, 2024, <https://seemil.org/montenegro/>

<sup>26</sup> Media Literacy for primary schools in Montenegro | UNESCO, accessed December 15, 2024, <https://www.unesco.org/en/articles/media-literacy-primary-schools-montenegro>

**UNICEF:** UNICEF collaborates with the Agency for Electronic Media to promote media literacy among parents and children. They have implemented campaigns to encourage critical media consumption and raise awareness about the impact of media on children<sup>27</sup>.

**OSCE:** The OSCE Mission to Montenegro works with various stakeholders to increase knowledge on media and digital literacy. They support media self-regulation and conduct research on media literacy levels in the country<sup>28</sup>.

### Specific Media Literacy Programs and Projects

Several specific media literacy programs and projects are being implemented in Montenegro. These programs target different audiences and employ various approaches to promote media literacy skills.

Program/Project	Target Audience	Goals	Activities	Funding Sources
Let's Choose What We Watch <sup>29</sup>	Parents and children	Raise awareness about the importance of media literacy and encourage critical media consumption	Workshops, public campaigns, and resources for parents	Agency for Audiovisual Media Services of Montenegro
SMART <sup>30</sup>	High school students	Develop media literacy skills among high school students	Conferences, research, and educational activities	Ministry of Education
Media Literacy Guidelines <sup>31</sup>	Primary school teachers	Provide teachers with guidelines and resources to teach media literacy	Development of teaching materials, workshops, and training	UNESCO
Our Media <sup>32</sup>	Civil society organizations (CSOs), media professionals, young activists	Strengthen capacities of CSOs, media professionals, and young activists to generate media literacy, counter polarization, and promote dialogue	Capacity building workshops, training programs, and resource development	

These programs aim to equip individuals with the knowledge and skills to navigate the media landscape effectively, critically analyze information, and make informed decisions.

<sup>27</sup> Media literacy (launched in 2018) - Unicef, accessed December 15, 2024, <https://www.unicef.org/montenegro/en/node/851>

<sup>28</sup> Media literacy among citizens of Montenegro can improve, education is key, shows OSCE-supported survey, accessed December 15, 2024, <https://www.osce.org/mission-to-montenegro/564898>

<sup>29</sup> NGO "Mladiinfo Montenegro" organizes the workshop "Literate ...", accessed December 15, 2024, <https://www.medijskapismenost.me/en/ngo-mladiinfo-montenegro-organizes-the-workshop-literate-creative/>

<sup>30</sup> Wider and more systematic efforts are needed to make Montenegro a media literacy society, accessed December 15, 2024, <https://cgo-ccc.org/en/2022/06/10/wider-and-more-systematic-efforts-are-needed-to-make-montenegro-a-media-literacy-society/>

<sup>31</sup> Media Literacy for primary schools in Montenegro | UNESCO, accessed December 15, 2024, <https://www.unesco.org/en/articles/media-literacy-primary-schools-montenegro>

<sup>32</sup> Media literacy - MONTENEGRO MEDIA INSTITUTE (MMI), accessed December 15, 2024, <https://www.mminstitute.org/en/front-page-eng/what-we-do/media-literacy/>

## 4.2 Impact of Media Literacy Initiatives

Media literacy initiatives in Montenegro have shown positive results in raising awareness and promoting critical media consumption.

**Increased awareness of disinformation:** Citizens are becoming more aware of the prevalence of disinformation and the need to verify information. This is particularly important given that a significant number of adults in Montenegro do not verify suspicious information they encounter<sup>33</sup>.

**Changes in media consumption habits:** Parents are increasingly limiting their children's screen time and the content they consume<sup>34</sup>.

**Greater engagement in critical analysis:** More parents are stimulating critical analysis of media by talking to their children about the content they follow<sup>35</sup>.

**Increased interest in media literacy education:** The number of students choosing media literacy as an elective course has increased<sup>36</sup>.

**Strengthening public trust in traditional media:** Media literacy initiatives aim to strengthen public trust in traditional media by promoting quality media programs and reducing the impact of unprofessional content<sup>37</sup>.

**Low media literacy index:** Despite some progress, Montenegro still has a low media literacy index, highlighting the need for continued efforts to improve media literacy skills among the population<sup>38</sup>.

### Challenges and Opportunities

Media literacy initiatives in Montenegro face several challenges:

**Funding:** Securing adequate funding for media literacy programs and projects remains a challenge<sup>39</sup>.

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<sup>33</sup> Media literacy for every child | UNICEF, accessed December 15, 2024, <https://www.unicef.org/montenegro/en/stories/media-literacy-every-child>

<sup>34</sup> Media literacy for every child | UNICEF, accessed December 15, 2024, <https://www.unicef.org/montenegro/en/stories/media-literacy-every-child>

<sup>35</sup> Media literacy for every child | UNICEF, accessed December 15, 2024, <https://www.unicef.org/montenegro/en/stories/media-literacy-every-child>

<sup>36</sup> Media Literacy for primary schools in Montenegro | UNESCO, accessed December 15, 2024, <https://www.unesco.org/en/articles/media-literacy-primary-schools-montenegro>

<sup>37</sup> Media literacy - MONTENEGRO MEDIA INSTITUTE (MMI), accessed December 15, 2024, <https://www.mminstitute.org/en/front-page-eng/what-we-do/media-literacy/>

<sup>38</sup> Media literacy among citizens of Montenegro can improve, education is key, shows OSCE-supported survey, accessed December 15, 2024, <https://www.osce.org/mission-to-montenegro/564898>

<sup>39</sup> Wider and more systematic efforts are needed to make Montenegro a media literacy society, accessed December 15, 2024, <https://cgo-cce.org/en/2022/06/10/wider-and-more-systematic-efforts-are-needed-to-make-montenegro-a-media-literacy-society/>

**Access to resources:** Access to quality educational materials and training resources for educators and the public is limited<sup>40</sup>.

**Political support:** While the government recognizes the importance of media literacy, consistent political support and prioritization are needed<sup>41</sup>.

**Evolving media landscape:** The rapid evolution of the media landscape, with the rise of social media and online platforms, presents new challenges in addressing misinformation and promoting media literacy. This includes the need to equip individuals with the skills to navigate online sources, identify misinformation and disinformation, and protect their privacy and digital well-being<sup>42</sup>.

**Challenges for journalists:** Journalists in Montenegro face significant hurdles, including information manipulation, political propaganda, and direct attacks, which can hinder their ability to report accurately and contribute to media literacy efforts<sup>43</sup>.

**Varying perceptions of challenges:** Different age groups have distinct perceptions of the challenges to media literacy, highlighting the need for tailored approaches to address the specific needs and concerns of various segments of the population<sup>44</sup>.

However, there are also opportunities to strengthen media literacy initiatives in Montenegro:

**Collaboration and partnerships:** Increased collaboration between government agencies, NGOs, international organizations, and media outlets can enhance the reach and impact of media literacy programs<sup>45</sup>.

**Integration into the education system:** Integrating media literacy into the formal education system, starting from primary school, can ensure that future generations are equipped with essential media literacy skills<sup>46</sup>.

<sup>40</sup> Improve media literacy in Montenegro, accessed December 15, 2024, <https://english.mladiinfo.me/improve-media-literacy-in-montenegro/>

<sup>41</sup> Strengthening Media Independence in the Western Balkans - U.S. Embassy in Montenegro, accessed December 15, 2024, <https://me.usembassy.gov/strengthening-media-independence-in-the-western-balkans/>

<sup>42</sup> Advancing Media Literacy and Fact-Checking Initiatives in Montenegro - Critide Youth Power, accessed December 15, 2024, <https://critide-youth-power.org/2023/10/23/advancing-media-literacy-and-fact-checking-initiatives-in-montenegro/>

<sup>43</sup> Strengthening Media Independence in the Western Balkans - U.S. Embassy in Montenegro, accessed December 15, 2024, <https://me.usembassy.gov/strengthening-media-independence-in-the-western-balkans/>

<sup>44</sup> MEDIA LITERACY IN MONTENEGRO - Public opinion research, accessed December 15, 2024, <https://www.osce.org/files/f/documents/0/a/564889.pdf>

<sup>45</sup> Advancing Media Literacy and Fact-Checking Initiatives in Montenegro - Critide Youth Power, accessed December 15, 2024, <https://critide-youth-power.org/2023/10/23/advancing-media-literacy-and-fact-checking-initiatives-in-montenegro/>

<sup>46</sup> Wider and more systematic efforts are needed to make Montenegro a media literacy society, accessed December 15, 2024, <https://cgo-cce.org/en/2022/06/10/wider-and-more-systematic-efforts-are-needed-to-make-montenegro-a-media-literacy-society/>

**Public awareness campaigns:** Targeted public awareness campaigns can raise awareness about the importance of media literacy and provide citizens with the tools to navigate the media landscape effectively<sup>13</sup>.

**Leveraging technology:** Utilizing technology and online platforms can enhance the accessibility and reach of media literacy programs<sup>47</sup>.

**International media presence:** The presence of international media organizations in Montenegro contributes to the diversity of viewpoints and provides an external perspective on local issues, which can enrich media literacy discussions.

**International cooperation:** Collaboration with international fact-checking organizations like FactCheckEU and the International Fact-Checking Network (IFCN) provides valuable resources and support for media literacy initiatives in Montenegro. Platforms like "raskrinkavanje.me" offer specific examples of fact-checking initiatives that can be promoted and utilized<sup>48</sup>.

**Advantages of a smaller media landscape:** The relatively smaller media landscape in Montenegro can be seen as an advantage, as it may limit the spread of misinformation and make it easier to validate information<sup>49</sup>.

### 4.3 Enhancing Media Literacy

To strengthen Montenegro's societal resilience, such opportunities should be exploited and media literacy must become a national priority. Recommended strategies include:

#### Integration of Critical Thinking Modules

Introduce mandatory critical thinking and media literacy modules into school curricula at all levels. These modules should focus on:

Identifying disinformation and verifying news sources.

Recognizing media manipulation techniques, such as deepfakes and AI-generated content.

Developing fact-checking skills using digital tools like Google Reverse Image Search, Media Bias/Fact Check, and national fact-checking platforms.

Collaborate with international organizations such as UNESCO to design curriculum frameworks aligned with global best practices.

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<sup>47</sup> Advancing Media Literacy and Fact-Checking Initiatives in Montenegro - Critide Youth Power, accessed December 15, 2024, <https://critide-youth-power.org/2023/10/23/advancing-media-literacy-and-fact-checking-initiatives-in-montenegro/>

<sup>48</sup> Advancing Media Literacy and Fact-Checking Initiatives in Montenegro - Critide Youth Power, accessed December 15, 2024, <https://critide-youth-power.org/2023/10/23/advancing-media-literacy-and-fact-checking-initiatives-in-montenegro/>

<sup>49</sup> MEDIA LITERACY IN MONTENEGRO - Public opinion research, accessed December 15, 2024, <https://www.osce.org/files/f/documents/0/a/564889.pdf>



## Nationwide Public Awareness Campaigns

Launch government-backed campaigns to educate the public on identifying and reporting disinformation. Components of the campaign should include:

- Interactive workshops for adults and youth.
- Partnerships with media organizations to broadcast awareness messages.
- Social media campaigns featuring verified influencers and educational content.
- Establish a centralized media literacy hub under the Ministry of Education to coordinate these efforts and provide resources to educators, journalists, and the public.

## 4.4 Good Practices

Montenegro can adopt proven practices from other countries to strengthen its media literacy ecosystem:

### Estonia's Emphasis on Digital Literacy in Schools

Estonia integrates digital and media literacy into its national school curriculum starting from primary education. Students are taught:

How to evaluate online sources and identify disinformation.

Ethical digital behavior, including privacy and responsible media consumption.

Teachers receive regular training in digital literacy education, ensuring consistent implementation across schools.

### The Netherlands' Public Awareness Initiatives

The Netherlands collaborates with media organizations, NGOs, and government agencies to implement large-scale public awareness initiatives, including:

- Media literacy weeks featuring workshops, panel discussions, and interactive activities.
- Partnerships with schools, libraries, and broadcasters to promote digital literacy.
- Metrics-based tools to monitor campaign effectiveness and audience engagement.

### Relevance for Montenegro:

Montenegro can replicate Estonia's school-based media literacy program by mandating the integration of digital literacy from an early age.

A national awareness week, modeled on the Netherlands' initiative, could engage media organizations, educators, and the public in promoting awareness.

Introducing **metric tools** to assess media awareness levels will help evaluate the impact of campaigns and identify areas for improvement. Tools such as pre- and post-campaign surveys, audience analysis software, and engagement trackers can be employed to ensure measurable outcomes.



Enhancing media literacy and public awareness is essential for strengthening Montenegro's societal resilience against disinformation. By integrating critical thinking into education, launching nationwide campaigns, and adopting international best practices from Estonia and the Netherlands, Montenegro can create an informed and media-literate society. The inclusion of metric tools to evaluate awareness and engagement will ensure that these initiatives produce measurable and sustainable results.

## Chapter Conclusion

Media literacy initiatives in Montenegro are gaining momentum, with government agencies, NGOs, and international organizations working to promote critical thinking and responsible media consumption. While challenges remain in terms of funding, access to resources, and the evolving media landscape, there are also opportunities to strengthen these initiatives through collaboration, integration into the education system, and public awareness campaigns.

A key challenge is the need to address the low media literacy index in Montenegro and ensure that media literacy initiatives reach all segments of the population, including those most vulnerable to misinformation. This requires a multi-faceted approach that includes:

**Prioritizing the integration of media literacy into the formal education system:** This will ensure that future generations are equipped with the critical thinking skills necessary to navigate the complex media landscape.

**Advocating for increased funding for media literacy initiatives:** Adequate funding is crucial to support the development and implementation of effective programs and resources.

**Promoting collaboration and partnerships:** Fostering collaboration between government agencies, NGOs, international organizations, and media outlets can maximize the reach and impact of media literacy efforts.

**Tailoring programs to address the specific needs and concerns of different age groups:** Recognizing the varying perceptions of media literacy challenges among different age groups is essential to develop effective and targeted programs.

By fostering media literacy skills among its citizens, Montenegro can contribute to a more informed, engaged, and resilient society.

# CHAPTER 5: International Context and Best Practices

## 5.1 Global Approaches to Disinformation

Addressing disinformation effectively requires understanding successful international strategies that incorporate regulatory frameworks, technological innovations, and public awareness campaigns. The following brief presentation of case studies highlight best practices from the European Union, the United States, and international organizations:

### European Union (EU)

The EU's strategy to combat disinformation is anchored in its Digital Services Act (DSA) and the Code of Practice on Disinformation, which establish regulatory standards and encourage platform accountability. Key features include:

**Platform Accountability:** Platforms like Facebook and Twitter are required to implement stricter content moderation policies and remove harmful content swiftly.

**Algorithmic Transparency:** Platforms must disclose content-promotion algorithms and their methods of identifying and combating disinformation.

**Fact-Checking Collaborations:** The EU supports cross-border fact-checking networks such as the European Digital Media Observatory (EDMO), which unites researchers, journalists, and policymakers to address disinformation collaboratively.

**Public Awareness Initiatives:** Programs to improve media literacy and public awareness are integrated into national educational systems.

The EU's multi-stakeholder approach combines legal mandates, funding for media literacy, and partnerships with technology companies to achieve comprehensive solutions.

### United States

The United States employs a multi-agency approach, combining government initiatives, platform regulations, and private-sector collaboration:

**Government-Led Initiatives:** Agencies such as CISA (Cybersecurity and Infrastructure Security Agency) monitor disinformation trends, particularly during elections and public crises, issuing alerts and verified updates to the public.

**Platform Cooperation:** Collaboration with technology companies and independent fact-checking organizations ensures harmful content is swiftly identified and removed.

**Public-Private Partnerships:** Programs like the Global Engagement Center coordinate efforts between federal institutions, private platforms, and international partners to combat foreign influence campaigns.

**Media Literacy Programs:** Federally funded initiatives focus on improving digital and media literacy among citizens to bolster societal resilience.

## UNESCO and United Nations Initiatives

International organizations emphasize education, awareness, and cooperation as tools to fight disinformation:

**UNESCO's Media and Information Literacy (MIL) Framework:** This global framework promotes critical thinking, responsible media use, and fact-checking skills, particularly among youth and educators.

**The United Nations Verified Initiative:** Designed to counter misinformation during crises (e.g., COVID-19), this initiative distributes fact-based, verified content through partnerships with media organizations and influencers.

**International Collaboration:** UNESCO fosters collaboration among governments, civil society, and digital platforms to ensure ethical journalism and promote global media literacy standards.

## 5.2 Detailed overview of best practices

Additionally, a more detailed analysis of disinformation combat strategies, policies and initiatives from other countries and international organisations, is presented below, seeking practices that could be relevant to the Montenegro's specific needs and requirements. In this context an overview of EU's best practices will be presented, as well as specific case studies, of respective national policies and initiatives, of France, Estonia, Lithuania and Greece.

### EU level

The European Commission defines "disinformation" as the "*creation, presentation and dissemination of verifiably false or misleading information for the purposes of economic gain or intentionally deceiving the public, which may cause public harm*"<sup>50</sup>. Such public harm includes threats to democratic political and policy making processes as well as to the protection of EU citizens' health, the environment or security. The Commission's definition of disinformation excludes misleading advertising, reporting errors, satire, and parody, or clearly identified partisan news and commentary. Unlike hate speech or terrorist material, false or misleading information is not illegal on its own.

More specifically, the European Commission has established a distinction between different phenomena that are commonly referred to as disinformation, namely:

**Misinformation:** false or misleading content shared without harmful intent,

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<sup>50</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee of the Regions, "*Tackling online disinformation: a European Approach*", 2018 Retrieved from [[eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018DC0236&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018DC0236&from=EN)]

**Disinformation:** false or misleading content that is spread with an intention to deceive or secure economic or political gain and which can cause public harm,

**Information influence operation:** coordinated efforts by either domestic or foreign actors to influence a target audience using a range of deceptive means, and

Foreign interference in the information space: often carried out as part of a broader hybrid operation can be understood as coercive and deceptive efforts to disrupt the free formation and expression of individuals' political will by a foreign state actor or its agents.

Depending on the actor, channel and impact of each incident, appropriate policy responses are designed, such as a strong and well-coordinated response involving the European External Action Service (EEAS) when it comes to foreign interference and information manipulation, or measures related to media literacy when it comes to misinformation without the intention to deceive, cause public harm or gain economically.

Based on the above disinformation conceptualization, EU efforts to combat disinformation incidents initiated in March 2015, when the need for the development of an action plan on strategic communication to address Russia's ongoing disinformation campaigns was identified<sup>51</sup>. This acknowledgement led to the launch of several organisational and strategic structures which set up multiple mechanisms, networks, and tools in order to (a) improve the detection, analysis and exposure of disinformation, (b) support and promote a stronger cooperation and joint responses to arising incidents, (c) mobilize the private sector to tackle disinformation and (d) raise awareness and improve societal resilience across Europe (*4 pillars of tackling disinformation*).

The Strategic Communications Division ("StratCom") and its Task Forces within the EEAS stand out as one of the most important European interventions in the field, with a mandate to counter disinformation originating outside the EU (especially Russia) and design and disseminate positive strategic communications in:

the EU's eastern neighborhood – known as the East Strategic Communications Task Force,

the southern neighborhood, and

the Western Balkans.

The Commission's "Communication on tackling online disinformation: a European approach" (April 2018), which was based on the recommendations of the High-level expert group on fake news and online disinformation (HLEG) set up by the Commission, was also of utmost importance for the enhancement of the joint framework on countering hybrid threats, as it placed tools to tackle the spread of disinformation and ensure the protection of EU values. Moreover, it paved the way for the "Communication on securing free and fair European

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<sup>51</sup> EUvsDisinfo, "To Challenge Russia's Ongoing Disinformation Campaigns: Eight Years of EUvsDisinfo", 2023 Retrieved from [[To Challenge Russia's Ongoing Disinformation Campaigns': Eight Years of EUvsDisinfo - EUvsDisinfo](#)]

elections” (September 2018)<sup>52</sup>. Both initiatives outlined key overarching principles and objectives to guide action to raise public awareness about disinformation, as well as specific measures for the accomplishment of the ultimate purpose of defeating disinformation at all levels.

With the aim of achieving the objectives set out by the Commission's Communication, the 2018 Code of Practice on Disinformation (“the 2018 Code”) was published by the Commission and adopted by leading social networks, online platforms, and advertisers, with which the signatories committed to employing best practices against disinformation, taking down fake accounts, and reporting on their actions. This was the first time worldwide that major industry players have agreed on a voluntary basis, to act together and set self-regulatory standards to fight disinformation. However, the Code’s self-regulatory nature and the lack of appropriate monitoring mechanisms, such as key performance indicators, contradicted its sufficiency, according to the 2020 Commission’s First Implementation and led to the proposal of new solutions. In June 2022, the Strengthened Code of Practice on Disinformation was launched (“the 2022 Code”)<sup>53</sup>, with the aim of bringing together a wide range of players to commit to a broad set of voluntary commitments to counter disinformation<sup>54</sup>.

Another milestone was the publishment of the EU action plan against disinformation (“EU action plan”) in December 2018 by the Commission, with specific proposals for a coordinated EU response to the challenge of disinformation, including appropriate mandates<sup>55</sup>. The EU action plan set out ten (10) specific actions, based on the above-mentioned four priority areas or ‘pillars’ that established, targeting society as a whole. Each of the EU action plan’s four pillars is under the responsibility of a different Commission DG or the EEAS. The EU action plan became the foundation for the establishment of the Rapid Alert System in 2019, as well as for the start-up of numerous other initiatives, such as the European Democracy Action Plan and the Digital Services Act in 2020 which aimed to strengthening democratic resilience and the EU’s regulatory toolbox and policy framework of digital governance by taking a broad view of digital regulatory policy and proposing the introduction of legally binding tools, in particular regarding the accountability and transparency of digital platforms in response to the emerging risks<sup>56</sup>.

In early 2020, after the COVID-19 outbreak, an unprecedented wave of misinformation, disinformation and digital hoaxes which appeared on the internet and described as an “infodemic” led to the publishment of a Communication by the European Commission and the High Representative entitled “Tackling COVID-19 disinformation - Getting the facts right”,

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<sup>52</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee of the Regions, “*Securing free and fair European elections - Contribution to the Leaders’ meeting*”, 2018 Retrieved from [<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52018DC0637>]

<sup>53</sup> [2022 new strengthened code of practice on disinformation - Publications Office of the EU \(europa.eu\)](https://ec.europa.eu/communication/2022/new-strengthened-code-of-practice-on-disinformation)

<sup>54</sup> [2022 Strengthened Code of Practice on Disinformation | Shaping Europe’s digital future \(europa.eu\)](https://ec.europa.eu/communication/2022/strengthened-code-of-practice-on-disinformation)

<sup>55</sup> [Factsheet: Action Plan against Disinformation | Shaping Europe’s digital future \(europa.eu\)](https://ec.europa.eu/communication/2022/factsheet-action-plan-against-disinformation)

<sup>56</sup> European Parliament’s Policy Department for External Relations, Directorate General for External Policies of the Union, “*The impact of disinformation on democratic processes and human rights in the world*”, 2021 Retrieved from [[The impact of disinformation on democratic processes and human rights in the world \(europa.eu\)](https://ec.europa.eu/communication/2022/the-impact-of-disinformation-on-democratic-processes-and-human-rights-in-the-world)]

which looked at the steps already taken and concrete actions to follow against disinformation regarding COVID-19. In addition, the COVID-19 disinformation monitoring program, carried out by signatories of the Code of Practice, acted as a transparency measure to ensure online platforms' accountability in tackling disinformation.

Another notable initiative was the creation of the European Digital Media Observatory (EDMO) in 2020, as an independent observatory bringing together fact-checkers and academic researchers with expertise in the field of online disinformation, social media platforms, journalist driven media and media literacy practitioners. Its operational function includes a repository of fact-checking or open-source intelligence activities, as well as hubs-networks of active organisations in one or several countries in order to provide specific knowledge of information environments, strengthen the detection and analysis of disinformation campaigns, improve public awareness, and design effective responses for national audiences, while also contributing to assessing the implementation of the Code of Practice on Disinformation.

The EU-supported Social Observatory for Disinformation and Social Media Analysis (SOMA), a digital platform bringing together European fact-checking organisations and researchers with the aim of forming the basis for a European network of fact-checkers to fight against disinformation, as well as the Media Literacy Expert Group, the Media and Audiovisual Action Plan (MAAP) and the InVID project, stand for "*In video veritas*" or "*In video, there is truth*". It is partly funded by the EU and aims to tackle the problem of fake videos on social media, which spread conspiracy theories and other falsehoods, by allowing users of the platform to carry out a reverse image search of videos to detect whether the images have been used in a different context and/or manipulated.

### ***Looking ahead***

Building on the 2020 European Democracy Action Plan, the 2022 Strategic Compass<sup>57</sup> called for the EEAS to create an EU Hybrid Toolbox that brings together different instruments to detect and respond to a broad range of hybrid threats and campaigns and, in this context, to develop an EU Foreign Information Manipulation and Interference (FIMI) toolbox and include this in the Common Security and Defense Policy (CSDP) missions and operations. In July 2022, the Council welcomed the FIMI toolbox<sup>58</sup>, which covers the entire scope of potential action against disinformation, from situational awareness to resilience and capacity building, and from disruption's individual regulation up to diplomatic responses and measures of the Common Foreign and Security Policy (CFSP). The Toolbox strengthens the EU's ability to detect, analyse and respond to threats, by imposing costs on perpetrators and by leveraging the full range of available tools, i.e., the Rapid Alert System, the Single Intelligence Analysis

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<sup>57</sup> European External Action Service (EEAS), "*A Strategic Compass for Security and Defense*", 2022 Retrieved from [[https://www.eeas.europa.eu/sites/default/files/documents/strategic\\_compass\\_en3\\_web.pdf](https://www.eeas.europa.eu/sites/default/files/documents/strategic_compass_en3_web.pdf)]

<sup>58</sup> Council of the European Union, "*Council conclusions on Foreign Information Manipulation and Interference (FIMI)*", 2022 Retrieved from [<https://data.consilium.europa.eu/doc/document/ST-11429-2022-INIT/en/pdf>]



Capacity, in particular its Hybrid Fusion Cell, the Information Sharing and Analysis Centre (FIMI ISAC) etc.

The Commission funds the Radicalisation Awareness Network (RAN) – an umbrella network for practitioners working on preventing radicalisation and violent extremism across Europe. RAN facilitates the exchange of ideas, knowledge and experience among field experts, social workers, teachers, NGOs, civil society organisations, victims' groups, local authorities, law enforcement authorities and academics. Within RAN, a special Communication and Narratives Working Group (C/ & N) focuses on online and offline communication that counters extremist propaganda and/or challenges extremist ideas.

In the context of its 2020 European Democracy Action Plan, the Commission announced its intention to complement the rules on online advertising included in the Digital Services Act through a legislative proposal on sponsored political advertising. The proposal was presented in November 2021 and draws on previous EU initiatives to ensure greater transparency in political advertising.

The Commission communicated a proposal for a new Artificial Intelligence (AI) Act in April 2021, aiming to enshrine in EU law a technology-neutral definition of AI systems. In June 2023, the Commission called on online platforms that are part of its 2022 strengthened Code of Practice to identify and label AI-generated content to tackle disinformation, to make it easier for people to spot manipulated information.

Therefore, the EU initiatives against disinformation campaigns are ongoing, targeting a stronger cooperation of multiple organisations and mechanisms active in this field<sup>59</sup>. The launch of a wide scope of instruments within the EU to counter foreign information manipulation and interference reflects the need to address this ever-evolving threat through a holistic and collective approach involving governments, private businesses and civil society.

### Overview of best practices in EU Member States

While many EU Member States have encountered problems related to disinformation, especially in the context of national elections, only a few M/S have established specific/targeted framework to guide their responses.

Among the 27 Member-States, France, Estonia, and Lithuania are the countries that have developed the most considerable progress in this area, by taking policy measures which engage the whole government, the civil society and NGOs in a collective effort to combat disinformation, preserve their citizens' fundamental right to correct information, which affects their decisions, and enhance the democratic foundation of the EU joint venture.

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<sup>59</sup> European Parliamentary Research Service, “*Future Shocks 2023: Defending the EU’s democratic information sphere [Policy podcast]*”, 2023 Retrieved from [<https://epthinktank.eu/2023/08/24/future-shocks-2023-defending-the-eus-democratic-information-sphere/>]

### *Case Study I – France*

In the past decade, the manipulation of publicly available information on online platforms and social media was highly increased in Europe and beyond especially during pre-election periods. France was among many European countries that experienced the effect of such incidents.

After a hack-and-leak operation that targeted a candidate in its 2017 presidential election (leak of over 20,000 emails and false documents related to this candidate) and a social media campaign against its exports in 2020, and with another national election approaching in April 2022, France's government decided in 2018 to take steps to protect its politics from foreign digital interference.

More specifically, in order to ensure the effective address of potential similar incidents in the future, the government created the Committee for Fighting Information Manipulation (2018), which brought together representatives from the ministries of Culture, Education, Armed Forces, Interior, Justice, and Foreign Affairs as well as the government's information service. The Secretariat General for National Defense and Security led the Committee, with the goals of building a shared understanding of the threat and combining their monitoring efforts. In addition, the government set up a Commission called 'The Enlightenment in the digital era' ("Les Lumières à l'ère numérique") to assess the state of disinformation. The group's report (2021) looked at cognitive bias, the role of algorithms and the monetisation of disinformation.

Based on the outcomes and findings of the above-mentioned initiatives, France proceeded to the development of an innovative technology-based mechanism under the responsibility of the French Ministry for Europe and Foreign Affairs (*analysis provided below*) in order to defend its policies from disinformation attacks. Moreover, France decided to implement a whole-of-government approach to fight disinformation with the creation of an interagency unit, under the authority of the Prime Minister, responsible for the detection and monitoring of foreign online information and manipulation.

At the same time, the Government Information Office (Service d'Information du Gouvernement or SIG) is responsible for stimulating, coordinating, and implementing communication initiatives. The Office designs and carries out inter-ministerial campaigns, coordinates communication activities by the ministries and the main public institutions and oversees and benchmarks communication initiatives and trends.

#### Illustration of Best Practices

##### 1. The Disinfo Toolbox (Open-source toolbox to fight disinformation) of the French Ministry for Europe and Foreign Affairs

In order to counter the spread of disinformation and equip citizens and companies with tools to detect it, the French Ministry for Europe and Foreign Affairs along with the team of the French Ambassador for Digital Affairs<sup>60</sup>, which falls under it, developed the Disinfo toolbox in 2019. This toolbox of open-source software and open resources to fight disinformation facilitated the capability of Internet users to access software to detect fake Twitter accounts, assess the legality

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<sup>60</sup> [Reducing vulnerabilities to information manipulation. \(quaidorsay.fr\)](https://quaidorsay.fr)



of political advertisement on Facebook, and use multiple further resources on good practices to counter disinformation, while further work is ongoing to develop and deploy additional online resources.

The Disinfo toolbox marked the beginning of the open-source response to disinformation in an effort to foster transparency and reusability ahead of the European elections of 2019 and the national elections of 2022<sup>61</sup>.

Available on GitHub, the toolbox includes different pieces of software and online resources published under an EUPL 1.2 or a Creative Commons license.

## 2. Viginum Agency

With the aim of defeating information manipulation and empowering the monitoring of disinformation operations targeted to French political priorities, policies, and electoral campaigns, in January 2021, the French President decided to launch a permanent unit within the Secretariat-General for National Defense and Security that could detect and monitor foreign online information manipulation. This initiative aimed to protect the country from foreign digital interference, while preserving freedom of speech, by creating a network of different cooperating agencies and by separating the responsibility for identification of attacks from the responsibility for framing and executing a response among them.

Viginum<sup>62</sup>, the new “National Service in Charge of Vigilance and Protection against Foreign Digital Interference” was created under the responsibility of the Prime Minister with the responsibility of detecting and analysing the propagation of hostile content on digital platforms. More specifically, it is responsible for identifying and characterizing, through the analysis of publicly available online content, foreign information manipulation campaigns which intend to spread inexact or deceptive content that could “harm the nation’s fundamental interests” by using artificial or automated systems. Viginum is also responsible to inform election authorities about foreign disinformation operations during electoral periods and to help coordinate interministerial work on protection against foreign disinformation campaigns.

In the context of the operational function of the new interagency unit, in August 2021, the Secretariat-General defined a new interministerial governance model to fight foreign digital interference, by establishing a solid, consistent, and comprehensive framework of separate and clearly defined roles and responsibilities for each body.

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<sup>61</sup> <https://joinup.ec.europa.eu/collection/open-source-observatory-osor/news/disinfo-open-toolbox-fight-disinformation>

<sup>62</sup> Princeton University, Innovations for Successful Societies, “*Defending the vote: France Acts to combat Foreign Disinformation, 2021 – 2022*”, 2023 Retrieved from [[France\\_AB\\_Viginum\\_.pdf \(princeton.edu\)](#)]

### Key Success Factors

Adoption of a holistic (a whole-of-government) approach to combat disinformation through the creation of an interagency unit, within an interministerial body, that facilitates the active and coordinated cooperation of all government bodies/agencies.

Establishment of a solid, consistent, and comprehensive framework with clearly defined roles and responsibilities for each governmental body/agency, enabling the effective implementation of the interministerial governance model created to fight foreign digital interference.

Establishment of appropriate processes to safeguard fundamental rights and liberties during the operation of the respective unit, building public trust to its lawfulness.

Enablement of innovative, customized, and technology-based tools (software, algorithms etc.) that are specialised in the detection of disinformation incidents.

### Case Study II – Estonia

Disinformation in Estonia primarily originates from Russia and targets the country's sizable Russian-speaking minority<sup>63</sup>. The Russian-speaking communities often exist in isolation from the Estonian-speaking segment of society. To address this division, Estonian authorities implemented several initiatives, which focus on fostering connections between communities and facilitating the exchange of accurate information<sup>64</sup>.

In 2016, Estonia's State Electoral Office took specific measures to respond proactively to disinformation narratives and fake news impacting democratic processes. Faced with the influence of false messaging, it established an interagency task force within the electoral management body to combat dissemination of misinformation. The task force engaged diverse partners, including government agencies, intergovernmental organisations, civil society entities, social media companies, and the press. Its primary objective was to monitor, identify, and counter disinformation, drawing on collaborative efforts and expertise from multiple sectors.

Moreover, recognising the urgency to fortify societal resilience against disinformation, the State Electoral Office developed educational programs for high school students to enhance media literacy and critical thinking skills and judgement between factual information and falsehoods. Despite challenges related to balancing free speech and potential censorship concerns, this initiative illustrated how a resource-constrained electoral management body proactively addressed the broader societal impact of disinformation within Estonia's democratic framework.

Empowered by the office authority and with tacit approval from government officials, a unified government response was initiated. Recognising the need for a coordinated approach, the “Election Communications Task Force”, an ad hoc interagency working group, emerged to

<sup>63</sup> European Digital Media Observatory V.D.D., “Report on main trends and legal developments at national level on disinformation and national policies during the electoral campaigns / Policies to tackle disinformation in EU member states – part 2”, 2020, Retrieved from [<https://edmo.eu/wp-content/uploads/2022/07/Policies-to-tackle-disinformation-in-EU-member-states-%E2%80%93-Part-II.pdf>]

<sup>64</sup> Ibid

oversee election-related messaging, including outreach to Estonian voters abroad, focusing on combatting the spread of disinformation during electoral proceedings<sup>65</sup>.

### Illustration of Best Practices

According to *Innovations for Successful Societies (2020)*, in April 2017, six months before the local vote, the Election Communications Task Force formulated the 5 primary steps essential for countering disinformation<sup>66</sup>:

**Identifying the nature of the threat:** Recognising the multifaceted information influence challenge facing Estonia's electoral processes, which involved recognising the absence of a comprehensive risk analysis and expanding the scope beyond technical cybersecurity risks. Efforts led by the Information System Authority's chief research officer for cybersecurity, expanded risk analysis to strategic communications, information operations, and cybersecurity threats, particularly focusing on exploiting ethnic divisions between the Russian minority and Estonian majority. Past's comprehensive threat analysis uncovered the exploitation of media channels, which had the potential to disseminate election disinformation directly to the Russian-speaking minority in Estonia.

**Monitoring the information sphere:** Media monitoring across traditional and social media platforms, including Facebook, Twitter, VKontakte, and Odnoklassniki. Collaboration with different agencies, including the Information System Authority's analysts and Government Office's social media watchers, enabled the identification and flagging of potential disinformation. These efforts aimed to counter misleading narratives, particularly those targeting Estonia's electoral processes, seeking to reshape official responses and public messaging strategies.

**Establishing partnerships with social media companies:** Recognising the limitations on direct censorship due to free-speech protections, the task force sought to collaborate with social media platforms like Facebook, Twitter, and Google to counter disinformation. Through direct communication channels, "hotlines" or "red phones," established by the Government Office, efforts were made to address and report instances of suspected disinformation resulting in the removal of deceptive Facebook accounts and groups.

**Engaging international organisations and other countries:** Recognising the need for collaboration beyond borders to counter information threats, the task force shared data, experiences, and strategies with other countries. Collaborating with the European Union's East StratCom Task Force, Estonia participated in initiatives such as the Rapid Alert System to

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<sup>65</sup> *Innovations for Successful Societies, "Defending the Vote: Estonia Creates a Network to Combat Disinformation, 2016–2020."*, 2020, Retrieved from [\[https://successfulsocieties.princeton.edu/sites/g/files/toruqf5601/files/TM\\_Estonia\\_Election\\_FINAL%20edited\\_JG.pdf\]](https://successfulsocieties.princeton.edu/sites/g/files/toruqf5601/files/TM_Estonia_Election_FINAL%20edited_JG.pdf)

<sup>66</sup> *Ibid*

coordinate responses across member states. These alliances emphasized the importance of international cooperation in addressing cross-border information influence operations.

**Investing in education and media literacy:** Prioritizing public education and media literacy as essential tools in countering disinformation, the task force created educational resources accessible to both public and private sectors, including handbooks and training sessions for public servants and journalists. Initiatives like Media Literacy Week organised by the Ministry of Education and Research in collaboration with the European Commission, and the introduction of a compulsory course on Media and Manipulation for high school students, exemplified Estonia's proactive approach in nurturing critical thinking skills and media literacy.

### Key Success Factors

**Unified Government Response:** Active engagement from various government agencies and departments capitalizing on the government's willingness to apply agile principles and delegate new responsibilities.

**Contextual Understanding and Adaptation:** Estonia's task force succeeded by contextualizing its disinformation countermeasures within the country's historical and geopolitical context. This involved the application of existing knowledge of informational influence and showcased adaptability and awareness of Estonia's specific circumstances to safeguard election integrity.

**Effective Networking Model:** Estonia's model of collaboration, featuring several small, focused groups instead of a single task force, proved highly effective. This decentralized approach facilitated greater agility and effectiveness in countering disinformation threats during elections, as highlighted by the International Institute for Democracy and Electoral Assistance (IDEA).

**Thorough Media Landscape Understanding:** A comprehensive understanding of Estonia's media and information landscape was deemed crucial. Establishing robust media monitoring systems and gaining situational awareness played a pivotal role in preparing against information attacks, emphasizing the importance of continuous monitoring and data-driven insights.

**Partnerships with Social Media Platforms:** Establishing proactive and strong partnerships with social media platforms emerged as a key success factor. Developing these relations well in advance of elections enabled more effective communication and response mechanisms, enhancing the task force's capabilities to combat disinformation.

**Public Trust and Transparency:** Estonia's commitment to maintaining public trust through institutional impartiality, transparency, and openness across various sectors, not just during elections, was fundamental. This dedication to radical transparency and trust-building bolstered the country's defense against disinformation campaigns.

### *Case Study III – Lithuania*

Lithuania established counter-disinformation tools due to concerns about false narratives originated by various sources, especially Russia. The aim was to address the challenge of misleading information affecting public opinion. Recognising historical instances of misinformation campaigns, Lithuania sought robust defenses against such tactics. These initiatives aimed to verify information accuracy and counter attempts to distort facts, ensuring citizens had access to reliable information. Collaborations with EU partners focused on

enhancing media literacy and critical thinking skills to combat the impact of disinformation. The overarching objective was to strengthen resilience against attempts to manipulate information and protect Lithuania's information integrity without attributing it to any specific political entity.

### Illustration of Best Practices

The two main mechanisms that Lithuania uses to counter disinformation are: (a) Delfi Lie Detector and (b) Debunk Disinformation analysis center. Both were established by DELFI web portal, which is a news website in Estonia, Latvia, and Lithuania providing daily news, ranging from gardening to politics and ranks as one of the most popular websites among Baltic users.

#### **Delfi Lie Detector (DELFI Melo Detektorius)**

Delfi Lie Detector<sup>67</sup> was established in 2018 as an independent and open fact-checking unit of DELFI, the largest internet news portal in Lithuania, and operates in Lithuanian, Russian, Polish, and other languages. It was nominated as one of the best fact-checking success stories in Europe, as it has exposed several disinformation cases, including a disinformation network originated from Russia, through which false narratives and trolls about the Baltic States and the West were disseminated in a coordinated manner. Delfi Lie Detector's network has a significant number of followers and subscribers that coordinate to spread disinformation, propaganda, and false facts about Baltic countries and the West. As part of the International Fact-Checking Network (IFCN), it is also connected to EDMO and European Fact-Checking Standards Network (EFCSN). Its methodology consists of selecting facts through meetings, following public comments, press conferences, and using special fact-checking tools. However, there is no check on subjective editorial pieces or speculation of future events. After collecting all the necessary, traceable information and evidence about the fact being investigated, an assessment is made to assign the case to a category: "lie," "partial lie," "partial truth," "truth," or "manipulation."

#### **Debunk Disinformation analysis center (Debunk.org)**

Debunk.org<sup>68</sup> is an independent technology think tank and non-governmental organisation based in Vilnius, Lithuania. Founded in 2018, the organisation was developed to counter online disinformation and state-sponsored internet propaganda. It researches and analyses disinformation within the Baltic states, Poland, Georgia, Montenegro, North Macedonia, and the United States<sup>69</sup>. It also aims to improve societal resilience to disinformation through educational courses and media literacy campaigns.

Demaskuok, meaning "debunk" in Lithuanian, was established by DELFI. It represented a collaboration between media outlets, technology experts, strategic communication departments within government institutions, and an army of volunteers known as "elves." The project sought

<sup>67</sup> <https://www.delfi.lt/en/business/delfi-s-lie-detector-the-best-fact-checking-success-story-in-europe-to-be-introduced-at-international-facebook-event-86237847>

<sup>68</sup> <https://www.debunk.org/>

<sup>69</sup> EU Disinfo Lab, "Disinformation Landscape in Lithuania", 2023, Retrieved from [<https://www.disinfo.eu/publications/disinformation-landscape-in-lithuania/>]

to analyse thousands of articles per day, searching for Russian disinformation targeting the Baltic states. Debunk.org's research and analysis publications are the product of a team analysis and a consulting group of researchers who collaborate with the organisation's core team. They publish around 10 research reports per month. The topics of the reports include disinformation trends, NATO-related disinformation, political crises, and elections monitoring, as well as other issues.

The core methodology adopted by Debunk.org is debunking, which also inspires the organisation's name. Debunking, or the exposing of falsehoods, is a widely accepted counter-disinformation and counter-propaganda method. The process often consists of fact-checking, to establish the elements of falsehood within a problematic narrative, and the dissemination of counternarratives, which involves presenting and explaining those falsehoods.

Debunk.org uses artificial intelligence algorithms to autonomously scan thousands of online news articles, flagging content which may represent the potential spread of disinformation. This approach was adopted by the organisation to increase the efficiency of countering disinformation and change the balance between "cheap disinformation" and "expensive debunking." The algorithms look for key words and more than 600 propaganda and disinformation narratives. According to internal data, Debunk.org monitors more than 2500 web domains, in 26 languages, which have been historically associated with instances of disinformation, from which it processes 30,000 articles per day. Examples of the domains which it tracks include Russian state outlets such as Sputnik and RT as well as lesser-known entities like news-front.info, which are sites operated on a "volunteer" basis. Over 15,000 content pieces are manually reviewed each month, including hundreds of public Facebook pages and groups. Articles are tracked based on the narratives that they disseminate, focusing not just on entirely false stories but also those which decontextualize information and publish misleading facts.

The organisation consists of over 50 volunteers, referred to as "elves," who contribute to its disinformation monitoring operations by manually rating the potential threat of the flagged content. The organisation claims that this combination of computer algorithms and manual coding has been capable of identifying and rebutting disinformation in as little as two hours. Debunk.org receives funding from Delfi. In addition, its research is supported by grants originated from the private sector (i.e., the Google Digital News Initiative), but also from government institutions and partner organisations, including the German Federal Government, the German Marshall Fund, the United Kingdom Foreign Office, and the Lithuanian MFA and Ministry of Defense.



### Key Success Factors

**Clear Mission and Purpose:** Both initiatives have a clear and focused mission, which is to counter online disinformation and state-sponsored internet propaganda. This clarity of purpose helps guide the organisation's efforts and activities, ensuring a concentrated and effective approach to combatting misinformation.

**Strategic Location:** Lithuania, like many Baltic states, has experienced several and different-type disinformation campaigns. Under these circumstances the developed mechanisms benefit from the country's expertise in this field, as well as from the unique insights and the heightened sense of urgency in addressing disinformation, caused by its geographical location.

**Independence and Non-Governmental Status:** As an independent think tank and NGO, Debunk.org operates with greater freedom from political constraints. This independence enhances credibility and allows for agile responses to emerging disinformation challenges.

**Expertise and Research:** Possessing a team of experts specialising in technology, communication, and information analysis, Debunk.org leverages crucial expertise in developing effective strategies and tools to counter disinformation. Continuous research and analysis of disinformation trends contribute to their success.

**Collaboration and Partnerships:** Collaboration with various stakeholders facilitates coordination of appropriate responses to disinformation campaigns, enhances the fast implementation of corrective measures and leads to more effective outcomes. Debunk.org's excels in forging partnerships with other organisations, governments, academia, and civil society. These partnerships broaden their reach, share resources, and exchange knowledge contributing to the development of comprehensive solutions.

### *Case Study IV – Greece*

Greece has drafted and implemented the Institutional Capacity to address disinformation (ICAD) project, funded by the EU Directorate General for Reform (DG REFORM) and with the support of the EU Directorate General for Communications (DG COMM), implemented by the Peace Journalism Lab of the Aristotle University of Thessaloniki. This has been a project aiming to provide technical assistance to the Greek Ministry of foreign affairs in tackling disinformation. The project conducted a needs assessment to identify the specific challenges and gaps in the Ministry's capacity to address disinformation. Based on the needs assessment, the project developed a technical assistance plan that included capacity building and training, technical expertise, and pilot projects to enhance the Ministry's capacity to tackle disinformation. As an outcome, a Task Force has been created within the Greek MFA. This new Task Force on Disinformation engages closely with the MFA policymakers to provide real-time analysis, strategic advice, and coordinate with other government bodies to safeguard Greece's political processes from external influence. Moreover, the MFA Task Force on Disinformation has built a robust academic partnership to enhance research, policy recommendations, and public awareness on the evolving threats of disinformation. Academia play a key role in providing data-driven insights, fostering public discourse, and collaborating on workshops, publications,

and joint projects with the MFA. Finally, the MFA's Task Force on Disinformation is fully committed to the EU's broader strategic framework on combatting disinformation and FIMI. By aligning national efforts with the EU's priorities, it enhances collaborative intelligence sharing, policy alignment, and coordinated actions at both the national and European level. The task force serves as a bridge for implementing joint initiatives, sharing best practices, and advancing the EU's resilience against hybrid threats.

### 5.3 Alignment with International Standards

To ensure Montenegro's strategies align with international best practices, the following recommendations are proposed:

#### 01 Policy Alignment with the EU Digital Services Act

Montenegro should incorporate principles from the Digital Services Act (DSA) to hold digital platforms accountable for combating disinformation. This includes:

- Mandating algorithmic transparency and accountability for content promotion
- Requiring periodic transparency reports from digital platforms, detailing their efforts to identify and mitigate disinformation.
- Establishing penalties for platforms that fail to comply with content moderation requirements.

#### 02 Adoption of UNESCO's Media and Information Literacy Framework

Montenegro should integrate UNESCO's MIL framework into its national education policy to promote media literacy. Key steps include:

- Introducing media literacy as part of the school curriculum at all levels.
- Providing training programs for educators to equip them with tools to teach critical thinking and media evaluation skills.
- Launching public awareness campaigns in partnership with civil society organizations to enhance digital resilience among citizens.

#### 03 Participation in European and International Initiatives

Montenegro should actively participate in regional and international initiatives that address disinformation, including:

- European Digital Media Observatory (EDMO): Joining EDMO would allow Montenegro to benefit from research, tools, and fact-checking expertise to combat disinformation.
- Global Fact-Checking Networks: Collaborating with fact-checking organizations such as the International Fact-Checking Network (IFCN) would strengthen Montenegro's ability to verify and respond to false information.
- United Nations Partnerships: Working with initiatives like the Verified Initiative will ensure Montenegro has access to verified and credible information during crises.



## 04 Securing International Funding

Montenegro should seek funding from international organizations, including the EU, UNESCO, and the United Nations, to implement advanced technologies, strengthen institutional capacities, and promote public awareness campaigns. Specific funding opportunities include:

- EU grants for digital transformation and media resilience.
- UNESCO support for media literacy programs and fact-checking initiatives.
- Bilateral partnerships with donor countries to access funding for AI-driven tools and regulatory solutions.

## 05 Regional Cooperation

Montenegro can enhance its resilience against disinformation through regional partnerships with neighboring countries. Establishing a Balkan Media Resilience Network can foster knowledge sharing, coordinated fact-checking efforts, and joint responses to cross-border disinformation campaigns.

## 06 Creation of a Task Force in the Ministry of Foreign Affairs

Montenegro should establish a dedicated Task Force on Disinformation within the Ministry of Foreign Affairs. This task force will:

- Coordinate with international partners, such as the EU and United Nations, to monitor and combat foreign disinformation campaigns targeting Montenegro.
- Act as a liaison between national agencies, technology platforms, and international institutions to ensure aligned responses.
- Leverage advanced technological tools and knowledge-sharing platforms from international agencies to detect and address cross-border disinformation.
- Provide diplomatic expertise to negotiate stronger cooperation agreements with global stakeholders, securing tools, resources, and technical assistance for Montenegro.

### Chapter Conclusion

Aligning Montenegro's disinformation strategies with international standards and best practices is essential for building a resilient and informed society. By adopting frameworks like the EU Digital Services Act and UNESCO's Media and Information Literacy Framework,

Montenegro can establish effective policies that promote platform accountability, enhance public awareness, and strengthen institutional capacities. Participation in regional and global initiatives, coupled with international funding opportunities, will further enable Montenegro to implement technological, educational, and regulatory solutions that combat disinformation effectively.

The creation of a Task Force on Disinformation within the Ministry of Foreign Affairs will strengthen Montenegro's international engagement, ensure alignment with global initiatives, and facilitate the adoption of cutting-edge tools to combat foreign and domestic disinformation. This task force will serve as a strategic hub for diplomatic, technological, and collaborative efforts, positioning Montenegro as a leader in the regional fight against digital misinformatio

# CHAPTER 6: Technological Solutions

The spread of disinformation, especially at a national level, poses a significant threat to public discourse and societal well-being. Fortunately, various technological tools and solutions can be employed to identify, monitor, and limit its dissemination. It's important to note that for many of the solutions outlined below, readily applicable commercial tools and services are available on the market, offering varying levels of sophistication and integration. Alternatively, organizations can choose to develop their own bespoke solutions, which offers greater customization but requires significant resources and expertise.

## 6.1 Identification of Disinformation

**A**

**Natural Language Processing (NLP):** NLP algorithms can analyze text to detect patterns indicative of disinformation, such as emotionally charged language, hyperbole, or inconsistencies. *Commercial NLP APIs and platforms are readily available from providers. Custom development is also an option.*

**B**

**Machine Learning (ML):** ML models can be trained on datasets of known disinformation to identify similar content. *Cloud-based ML platforms and pre-trained models are widely available, simplifying the development and deployment of disinformation detection systems. Custom models can also be trained.*

**C**

**Network Analysis:** Social network analysis can map the spread of information and identify influential accounts or bot networks spreading disinformation. *Commercial social listening and network analysis tools offer features for identifying influential spreaders and bot activity. Open-source network analysis libraries can be used for custom development.*

**D**

**Image and Video Analysis:** Tools can detect manipulated images or videos (deepfakes) used to spread false narratives. *Commercial deepfake detection tools and APIs are emerging, while open-source libraries offer building blocks for custom solutions.*

IDENTIFY

## Monitoring of Disinformation:

A

**Social Media Monitoring Tools:** These tools track trending topics and hashtags, identify potential disinformation campaigns, and measure their reach. *Numerous commercial social listening and media intelligence platforms offer comprehensive monitoring capabilities.*

B

**Fact-Checking Platforms:** These platforms employ human fact-checkers to verify information and debunk false claims. *While some fact-checking organizations develop their own tools, commercial solutions for content management and workflow are available.*

C

**Media Monitoring Tools:** These tools track news outlets and identify potential sources of disinformation. *Commercial media monitoring services provide comprehensive coverage of news sources across various formats.*

## 6.2 Limiting the Spread of Disinformation

### 01 Content Moderation

Social media platforms can use AI and human moderators to remove or flag disinformation. *Commercial content moderation platforms offer AI-powered tools and human moderation services.*

### 02 Algorithmic Ranking

Search engines and social media platforms can adjust their algorithms to prioritize credible sources and demote disinformation. *This is typically handled internally by platform providers, but APIs and tools for custom ranking adjustments may be available in some cases.*

### 03 Digital Literacy Programs

Educational initiatives can empower citizens to critically evaluate information and identify disinformation. *While not strictly technological tools, online learning platforms and resources can be leveraged for digital literacy training.*

### 04 Government Regulations

Government can enact laws to criminalize the creation and spread of certain types of disinformation. *This is a legal and policy area, but technology can be used to support enforcement.*

**Digital Literacy Programs:** Educational initiatives can empower citizens to critically evaluate information and identify disinformation. *While not strictly technological tools, online learning platforms and resources can be leveraged for digital literacy training.*

**Government Regulations:** Government can enact laws to criminalize the creation and spread of certain types of disinformation. *This is a legal and policy area, but technology can be used to support enforcement.*

## 6.3 Considerations

**Accuracy:** Tools must be accurate to avoid wrongly flagging legitimate content.

**Scalability:** Solutions must be able to handle the vast amount of information online.

**Bias:** Algorithms and human moderators must be free from bias.

**Transparency:** Methods used to identify and limit disinformation should be transparent.

**Collaboration:** Governments, tech companies, and civil society organizations must collaborate to address disinformation effectively.

## 6.4 Proposals for Public-Private Partnerships to Develop Regulatory Tech Solutions

Collaboration between the government, private technology companies, and civil society can enhance Montenegro's ability to regulate and mitigate disinformation effectively.

### Establishing a Regulatory Sandbox

A sandbox model allows Montenegro to test new AI-driven tools and regulatory technologies in a controlled environment before full-scale implementation.

This framework enables innovation while ensuring compliance with local regulations.

### Partnerships with International Technology Firms

Collaborate with tech companies like Meta, Google, and Microsoft to develop tailored solutions for Montenegro's disinformation challenges.

Partner with platforms to share anonymized data and tools that allow real-time detection and intervention.

### Joint Research and Development (R&D) Initiatives

Engage universities, research institutions, and tech startups to develop cost-effective, localized AI tools for disinformation monitoring.

Funding for these initiatives can be secured through EU grants and international partnerships.

### **Creation of a National Task Force for Disinformation Technologies**

Establish a **National Task Force for Disinformation Technologies** within the Ministry of Foreign Affairs and the Ministry of Digital Transformation.

Responsibilities of the task force include:

Coordinating with digital platforms, fact-checkers, and technology partners.

Overseeing the implementation and evaluation of AI tools.

Facilitating knowledge sharing and capacity-building efforts among stakeholders.

### **Regional and International Partnerships**

Collaborate with regional alliances, such as the **Balkan Media Resilience Network**, to co-develop regulatory solutions and share technological resources.

Participate in global initiatives like the **European Digital Media Observatory (EDMO)** and **UNESCO's MIL Framework** to adopt best practices.

## **6.5 Chapter Conclusion**

The choice between using commercial tools and developing custom solutions depends on factors such as budget, technical expertise, and specific requirements. Commercial solutions offer faster deployment and often come with support and maintenance, while custom development allows for greater flexibility and control. By employing these technological tools and solutions thoughtfully and ethically, whether commercially available or custom-built, we can create a more informed and resilient society capable of withstanding the harmful effects of disinformation.

# CHAPTER 7: Stakeholder Engagement

## 7.1 Inclusive Consultation Process

Engaging diverse stakeholders is essential for building a coordinated and sustainable response to disinformation. Effective strategies must involve all relevant actors to ensure a multi-faceted approach that balances freedom of expression with the need to curb harmful narratives.

### Strategies for Engaging Diverse Stakeholders

#### Journalists and Media Professionals

- Conduct regular workshops to train journalists on recognizing, verifying, and reporting disinformation.
- Establish a journalist network that collaborates with regulators and fact-checking organizations.
- Involve media outlets in the development of awareness campaigns to educate the public on disinformation trends.

#### Civil Society Organizations (CSOs)

- Partner with CSOs to mobilize grassroots awareness campaigns on media literacy and critical thinking.
- Encourage CSOs to act as independent watchdogs, monitoring the spread of disinformation.
- Leverage the reach of CSOs to engage marginalized communities and address specific regional challenges.

#### Academic Experts

- Collaborate with universities and research institutions to study disinformation trends and develop technological solutions.
- Engage academics to provide evidence-based insights for policymaking and public awareness campaigns.
- Establish think tanks to evaluate the effectiveness of policies and tools deployed to counter disinformation.

## 7.2 Building Consensus

Building cooperation and trust among stakeholders is critical for ensuring the successful implementation of anti-disinformation strategies.

### Techniques for Fostering Cooperation and Trust

- Multi-Stakeholder Dialogues
- Organize regular roundtables and forums that bring together representatives from government, media, academia, and civil society to share insights and strategies.

- Establish working groups to address specific disinformation challenges and propose joint solutions.

### **Transparent Decision-Making**

- Ensure stakeholders have access to relevant data, research, and progress reports to foster trust and mutual accountability.
- Develop a shared framework for evaluating success, ensuring all parties remain aligned on objectives.
- Establishing a National Council on Combating Disinformation

### **Purpose and Structure**

Create a National Council on Combating Disinformation as an independent advisory body composed of representatives from:

- Government ministries (e.g., Foreign Affairs, Digital Transformation).
- Media organizations.
- CSOs.
- Academic institutions.
- Technology companies.

### **Roles and Responsibilities**

- Coordinate national efforts to combat disinformation.
- Develop policy recommendations based on evidence and stakeholder input.
- Monitor the implementation and effectiveness of anti-disinformation strategies.
- Foster international partnerships to align Montenegro's efforts with global best practices.

### **Long-Term Impact**

By fostering collaboration and building trust, the council can ensure a sustainable, unified approach to tackling disinformation while protecting democratic values and freedom of speech.

### **Chapter Conclusion**

Engaging stakeholders through inclusive consultation processes and consensus-building is critical to creating a resilient response to disinformation. Establishing a National Council on Combating Disinformation will serve as a central platform to coordinate efforts, build trust, and align Montenegro's strategies with global standards. By leveraging the expertise of journalists, civil society, and academics, Montenegro can create a sustainable, multi-stakeholder approach to combating disinformation.



# CONCLUSION AND RECOMMENDATIONS

Montenegro faces significant challenges with disinformation, impacting its democratic processes and EU accession efforts. The European Union has provided several recommendations to assist Montenegro in combating this issue.

## EU Recommendations and Assessments

- **Media Freedom and Literacy:** The EU emphasizes the importance of media freedom and independence in Montenegro. Improving media literacy is considered crucial for combating disinformation. The European Parliament has called for strengthening European cooperation with Montenegro to address disinformation and related cyber threats.
- **Legal Framework and Reforms:** The EU has noted the need for Montenegro to revise its legal framework to ensure consistency and alignment with EU standards. Sustained efforts are required to counter disinformation and mitigate online harassment and hate speech without disproportionately limiting freedom of expression.
- **Institutional Efforts:** The EU has recognized Montenegro's commitment to EU integration but has expressed concerns over political tensions and polarization delaying progress on EU-related reforms. The European Parliament has urged Montenegro to make significant efforts toward identifying and dismantling disinformation sources.

## Disinformation Challenges in Montenegro

- **Foreign Interference:** Disinformation campaigns, particularly from foreign actors, have been identified as exacerbating tensions within Montenegro. The European External Action Service (EEAS) reported that media outlets based in Serbia and Russian-owned platforms have disseminated false information, aiming to create divisions in Montenegro.
- **Domestic Response:** Analyses indicate that Montenegro has been slow in building mechanisms to combat disinformation that undermines democratic processes and fuels social discord. There is a need for more robust strategies to address these challenges effectively.

## EU Initiatives to Combat Disinformation

- **Code of Practice on Disinformation:** The EU has implemented a Code of Practice on Disinformation, providing a framework for structured dialogue between stakeholders to ensure greater transparency of platforms' policies against disinformation. While valuable, the self-regulatory nature of the Code has highlighted certain shortcomings.
- **Assessment and Monitoring:** The EU continues to assess the effectiveness of measures against disinformation, publishing platform reports and analyses to adapt strategies as needed. This ongoing evaluation aims to enhance the EU's capacity to

counter efforts by actors who spread disinformation to destabilize societies and democracies.

The fight against disinformation requires a multi-dimensional approach, combining legal reforms, technological solutions, and inclusive stakeholder engagement. Montenegro has the opportunity to implement globally recognized best practices while addressing its unique national challenges.

## Key Recommendations

### 01 Establish a National Task Force for Disinformation

Montenegro should create a dedicated task force, modeled after Greece's approach to Institutional Capacity Building, to coordinate and oversee efforts to counter disinformation. This task force would:

- Monitor and assess disinformation trends using AI-driven tools.
- Develop and implement national action plans.
- Facilitate inter-agency collaboration and ensure alignment with EU standards.

### 02 Institutional Capacity Building for Ministry of Foreign

- To support the structures of the Ministry of Foreign Affairs in developing a comprehensive and effective strategy to counter disinformation.
- Strengthening the capacity of Ministry of Foreign Affairs and diplomats to address disinformation.

### 03 Legal Reforms

- Update Montenegro's legal framework to align with the EU Digital Services Act, ensuring platform accountability and transparency.
- Introduce stricter penalties for deliberate disinformation campaigns while safeguarding freedom of expression.

### 04 Technological Solutions

- Adopt cost-effective AI-driven tools for monitoring disinformation.
- Create a National Task Force for Disinformation Technologies to oversee implementation and evaluation.

# RECOMMENDATIONS

## 05 Media Literacy and Public Awareness

- Integrate media literacy programs into school curricula, following the examples of Finland and Greece.
- Launch nationwide public awareness campaigns to educate citizens on identifying and reporting disinformation.

## 06 Stakeholder Collaboration

- Create a National Council on Combating Disinformation to facilitate multi-stakeholder engagement and policy alignment.
- Foster partnerships with civil society organizations, media professionals, and academia to implement sustainable anti-disinformation initiatives.

## 09 International Cooperation

- Collaborate with international organizations like UNESCO, and the United Nations Verified Initiative to access funding, tools, and expertise.

By implementing these recommendations, Montenegro can strengthen its resilience against disinformation and build a more informed, democratic society. The EU's support and guidance, coupled with robust national initiatives, provide a pathway for Montenegro to enhance trust in its institutions and accelerate its EU integration efforts. A multi-stakeholder approach, rooted in transparency, accountability, and public engagement, will be essential for sustainable success in this endeavor.