

INFORMATION INTEGRITY COALITION:
RECOMMENDATIONS TO IMPLEMENT THE
FIRST STEP OF THE EUROPEAN UNION TO
**FIGHT AGAINST DISINFORMATION,
FOREIGN INFORMATION MANIPULATION
AND INTERFERENCE AGAINST THE EU AND
ITS VALUES**



On November 8, 2023, the European Commission presented its annual communication on EU enlargement policy. The president of the commission, Ursula von der Leyen, said that the European Commission recommends granting Georgia the status of a candidate country for EU membership on the understanding that a number of steps will be taken. Among the new 9 steps, the first involves fighting disinformation, foreign information manipulation and interference against the EU and its values.

According to the 2023 Communication on EU Enlargement Policy, „following the decision to recognise a European perspective to Ukraine, Moldova and Georgia as well as to grant candidate status to Moldova and Ukraine, these three countries have been the target of a new wave of FIMI campaigns, mainly aiming to discredit aspirations to join the EU¹ and blame the West for the current situation in the region. In Georgia, a specific strand of disinformation attempted to imply that the West seeks to open a ‘second front’ against Russia from Georgia. More active debunking by the authorities would be opportune.“

¹ It should be noted that the 2022 report of the State Security Service of Georgia emphasizes that the main goal of disinformation and propaganda campaigns against the country's interests was to influence Georgia's foreign policy and Euro-Atlantic aspirations. The report also notes that in 2022, the country was challenged by the intelligence activities of special services of foreign countries and the so-called attempts to intervene in the public and political processes of Georgia using the instruments of hybrid warfare. Available here: https://info.parliament.ge/file/1/BillPackageContent/38924?fbclid=IwAR3ej6qj3CqjGbV9ArYmyomOvtArffQFm6Bcg4fy4-CmP9OV3pHE1Kdq_t0

Information Integrity Coalition believes that the following steps should be taken to fulfill the first point defined by the European Commission:

General recommendations

- Taking into account the [report](#) of the European Commission, it is necessary for the authorities to distance themselves from and confront the disinformation according to which the West is trying to open a „second front“ against Russia in Georgia. In addition, the government should conduct a proactive campaign about the European Union and its values.
- It is important that the government of Georgia creates an environment conducive to cooperation with those civil society organizations² that have been working for years on fighting anti-Western and pro-Russian disinformation and propaganda. In this regard, it is necessary to stop aggressive rhetoric directed against civil society organizations, groundless investigation³ and the spread of false information regarding the so-called “foreign agents” draft law initiated in March 2023, as if it served democracy and transparency. According to the European Commission’s [report](#) on Georgia: „the enabling environment has increasingly come under attack through hostile rhetoric by political leaders and radical groups and, intermittently, through draft legislation that would have labelled CSOs who receive foreign funding as ‘foreign agents’ and subjected them to possible penalties for non-compliance, including criminal prosecution.”
- Key decisions on countering disinformation should be made through consensus. This is important, among other considerations, taking into account the 9th step⁴ defined by the European Commission. Therefore, it is important to ensure the involvement of civil society organizations and professional groups, both in the process of policy development and its implementation against anti-Western disinformation at the executive and legislative levels. In addition, it is vital to steer clear of introducing such legislative regulation that, under the pretext of fulfilling the first step, will endanger the freedom of speech and expression in the country.

2 It should be noted that the “Information Integrity Coalition” is ready to cooperate with all parties in order to fulfill the recommendation of the European Commission. Available at: <https://infointegrity.ge/ka/koalitsia-informatsiis-sandoobistvis-saqartvelostvis-kandidatis-statusis-minichebis-rekomendatsiasa-da-dezinformatsiis-mimartulebit-akhal-datqmas-ekhmaureba>

3 In the report, the UN Special Rapporteur noted: the investigation case against human rights defenders indicates “deliberate attempts by the SSSG to criminalise the human rights defenders involved and delegitimise the exercise of fundamental rights, and particularly young people and students exercising their right to peaceful protests.” Available at: https://georgia.un.org/sites/default/files/2023-11/Statement_Geo.pdf?fbclid=IwAR2TXzNQ64443P0z7rzqxFfugwy2LVumxbxVZjyK43JJKG-yHmDJV7jKAg

4 In the 9th step of the European Commission, it is mentioned that civil society organizations should be involved in the policy development process and they should have the opportunity to work freely: “consult and engage with civil society, allowing for their meaningful involvement in legislative and policymaking processes and ensure they can operate freely.”. Available: [here](#).

At the executive level

- The strategic communications departments of both the government administration and other agencies should work to fulfill the stated goal, which was determined in 2018, by the decision of the Georgian government, when they were created - „Reducing the impact of anti-Western propaganda and increasing the awareness of the public⁵ about the country's European and Euro-Atlantic integration“. According to the action plan⁶ of the Government Commission of European Integration of Georgia, for the implementation of the first step, among other things, it is planned to „strengthen the information center on NATO and EU with both financial and human resources“.
- It is important that strategic communications departments within the government administration and ministries, regularly and proactively provide information to the public about their action plans and their implementation.
- It is important that these agencies, in cooperation with professional groups and civil society organizations working on disinformation issues, determine the challenges of anti-Western and pro-Russian disinformation and, with their involvement, plan effective countermeasures (which may include measures aimed at exposing anti-Western disinformation groups, their messages, and tactics)⁷.
- It is important that in order to increase societal resilience against anti-Western disinformation, the information center on NATO and EU proactively speaks and exposes (using the so-called „naming and shaming“ tactics and pre-bunking tools) those groups, messages and the tactics by which Russia's hostile information campaigns and interference efforts are carried out in Georgia. Also, for this purpose, the State Security Service⁸ should name groups connected with Russia, whose main goal of disinformation and propaganda campaigns against the interests of the country, according to the annual report of the State Security Service, is to influence Georgia's foreign policy and Euro-Atlantic aspirations. Also, the State Security Service should inform the public about the foreign interference attempts in the socio-political processes of Georgia carried out with the instruments of hybrid warfare⁹.
- It is important that government and civil society organizations cooperate and increase coordination to create and/or refine media/digital literacy materials for different groups of society and disseminate them effectively both online and offline.

5 Government of Georgia, 2018, „By the decision of the government, structural units of strategic communications will be created in all ministries“. Available at https://www.gov.ge/index.php?lang_id=-&sec_id=491&info_id=68608

6 The Action Plan of the Government of Georgia, „Measures for the Implementation of the Steps Defined for Georgia in the Communication of the European Commission's 2023 Enlargement Policy“, was made public on December 25, 2023. Available: [here](#).

7 At the [meeting](#) of the Government of Georgia held on December 11, 2023, the communication strategy of the Government for the years 2024-2027 was approved, one of the priority areas of which is the fight against disinformation. The mentioned document was published on 12 January, 2024. The strategy was not developed in a transparent and inclusive manner. Available: [here](#).

8 In this context, it is important to note that the State Security Service should not be used as a tool for political retribution or persecution of critical representatives of civil society. The UN Special Rapporteur on the situation of human rights defenders published recommendations and a preliminary conclusion in November 2023, in which a separate chapter was devoted to the tactics of declaring human rights defenders as enemies by state agencies and high-ranking officials of the ruling political party. In the report, the UN Special Rapporteur noted: the investigation case against human rights defenders indicates „deliberate attempts by the SSSG to criminalise the human rights defenders involved and delegitimise the exercise of fundamental rights, and particularly young people and students exercising their right to peaceful protests.“ Available at: https://georgia.un.org/sites/default/files/2023-11/Statement_Geo.pdf?fbclid=IwAR2TxzNQ64443P0z7rzqxFfugwy2LVumxbxVZjyK43JJKG-yHmDJV7jKAg

9 The enlargement report prepared by the European Commission on Georgia notes that although there is a well-defined legislative framework for oversight, civilian oversight of security and intelligence services is limited in practice. Available on page 17: https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_697%20Georgia%20report.pdf

At the legislative level

- According to the report of the Parliament of Georgia¹⁰, „Strengthening Georgian State Policy on Anti-Western Disinformation and Propaganda“, „it is significant for the Parliament to be a non-partisan forum to discuss issues pertaining to hybrid threats, and host periodical thematic deliberations involving state and non-state actors. At times, such discussions can go deeper in nature and grow into an investigation commission, depending on a scale and relevance of an issue.“ Considering the above, the Parliament of Georgia should create an investigative commission, which will study the issue of coordinated and inauthentic network related to the strategic communications department of the Georgian government administration as found by the company Meta, and issue recommendations to the relevant executive bodies¹¹.
- From 2020, the Defense and Security Committee of the Parliament of Georgia is the committee responsible for addressing the issues of Russian disinformation and anti-Western propaganda. Accordingly, it is important for the committee to ensure, on the one hand, the review and update of the above-mentioned report developed as a result of the thematic inquiry process in the Parliament of Georgia, and, on the other hand, to execute oversight of the relevant bodies at the executive level responsible for counter disinformation actions. For this purpose, the committee should ensure the organization of regular public hearings of bodies responsible for disinformation countermeasures (Stratcoms, State Security Service, National Communications Commission, Ministry of Education, etc.) in the Parliament.
- Also, the committee should ensure the organization of regular committee hearings and discussions on the issues of countering anti-Western disinformation. Also, a discussion should be held on how to increase the accountability of social media platforms in the Georgian market, first of all, taking into account the spirit of the Code of Practice of Disinformation of the European Union¹². These may include social media platforms's efforts to increase the transparency of political advertising, empower users, enhance cooperation with fact-checkers, etc.

In the same context, it is worth considering starting consultations with both EU institutions and local professional groups on the issue of the possibility of expanding the „Digital Services Act“ (DSA)¹³ and the above-mentioned code on the Georgian market.

10 The report “Strengthening of Georgia’s state policy against anti-Western disinformation and propaganda in the country” was developed as a result of a thematic inquiry on disinformation and propaganda issues that was created by the Foreign Relations Committee on February 11, 2019 . The report is available at: <https://parliament.leavingstone.club/storage/files/shares/tematuri-mokvleva/sagareo/dezinformacia/angarishi-27.01-2020-geo.pdf>

11 On May 4, 2023, Information Integrity Coalition published a statement, calling on the Parliament of Georgia to use the oversight mechanisms at its disposal to study the disinformation schemes mentioned in the report, including creating a temporary investigative commission and/or contacting the State Audit Service. Available at: <https://infointegrity.ge/ka/koaliciis-gancxadeba-metaze>

12 The Code of Practice on Disinformation is a first-of-its kind tool through which relevant players in the industry agreed - for the first time in 2018 - on self-regulatory standards to fight disinformation. The code was [revised](#) in 2022 and is [signed](#) by 34 signatories, including social media platforms, fact-checkers, representatives of advertising industry, etc. Signatories commit to take action in several domains, such as; demonetising the dissemination of disinformation; ensuring the transparency of political advertising; empowering users; enhancing the cooperation with fact-checkers; and providing researchers with better access to data.

13 The consideration of any of these regulations is contingent upon the assurance that the political independence of the authority responsible for its implementation is guaranteed.

DEFENDING 2024 PARLIAMENTARY ELECTIONS

In the context of the 2024 parliamentary elections, state institutions must defend the elections from malign foreign (Russian) interference and also local information manipulations.

► In the context of foreign (Russian) malign interference:

It is important that the Security Council and the State Security Service present a threat assessment on possible foreign (Russian) malign interference in the 2024 elections and determine the state's response, reactive and preventive actions (indicating the responsible agencies and actions).

Also, the Security Service of Georgia and relevant institutions (the Ministry of Internal Affairs, the Prosecutor's Office of Georgia, the Audit Service, the Anti-Corruption Bureau, the Central Election Commission, etc.) should work in a coordinated manner in order to prevent Russia from interfering in elections, including tactics such as the use of financial resources for funding of separate political parties, organizing campaigns against them, etc¹⁴. This should include the identification of groups with possible, including financial, connections with Russia and proactive study of their activities and income, investigation, and informing the public about this.

In order to protect the elections from foreign (Russian) interference, it is also necessary to establish communication channels¹⁵ between relevant state institutions and civil society (media, civil society organizations working on disinformation, fact-checkers) in order to exchange information in a timely manner and, if possible, in advance, to expose anti-Western and pro-Russian disinformation, aimed at projecting malign influence on the citizens of Georgia during the elections.

Taking into account the recommendation¹⁶ of the European Commission and the report¹⁷ of the US State Department, it is necessary to investigate the violence against media professionals on July 5, 2021, in which there is an alleged crime of those groups that, at the same time, are spreading anti-Western and pro-Russian disinformation¹⁸.

14 Investigative journalistic platform "Dossie" released reports in 2020, exposing Russia's alleged interference attempt in Georgia's 2020 parliamentary elections. According to the report, administration of the president of Russian Federation was involved in coordinating "Alliance of Patriots of Georgia" election campaign, including through financial support. The Prosecutor's Office was [requested](#) to launch an investigation. According to the response of the Prosecutor's Office, the request was sent to the State Audit Office which according to the statement was the responsible body for investigating financial issues pertaining to political parties. The [Audit Office](#) launched inquiry, during which the office requested information on the income of 37 people from banks and the Revenue Service, interviewed 2 people. One person, in the opinion of the SAO, could not substantiate the origin of the donation and a protocol of administrative violations was drawn up against him, which was sent to the court. The court found no violation. SSSG and the Prosecutor's office have not launched investigation.

15 A good example of such cooperation is the WhatsApp group created during the coronavirus pandemic between fact-checkers and the Ministry of Health, Labour and Social Affairs of Georgia and the National Center for Disease Control and Public Health (NCDC). This facilitated swift information exchange, enabling fact-checkers to promptly address misinformation circulating on social networks and in partnership with Meta, preventing them from going viral.

16 9th step defined by the European Commission says: "Improve the protection of human rights including by implementing an ambitious human rights strategy and ensuring freedom of assembly and expression. Launch impartial, effective and timely investigations in cases of threats against safety of vulnerable groups, media professionals and civil society activists, and bring organisers and perpetrators of violence to justice." Available at: https://www.eeas.europa.eu/delegations/georgia/2023-communication-eu-enlargement-policy-extract-about-georgia_en

17 Country Reports on Terrorism 2022 on Georgia says: "Alt-Info is a far-right, pro-Russia group associated with violent extremism including with the organization of and the execution of violent attacks against dozens of journalists and activists during the July 5, 2021 Tbilisi Pride event and a July 6, 2021 protest against the July 5 violence. Alt-Info protestors demonstrated in a separate location during the event. No group leaders or organizers of the violence at the 2021 event, including Alt-Info and far-right networks associated with violent extremism, were held legally responsible in 2022. Alt-Info and its political party arm Conservative Movement also expanded its presence throughout the country." Available at: <https://www.state.gov/reports/country-reports-on-terrorism-2022/georgia>

18 On November 30, 2023, the Supreme Court of Russia made a decision to ban the "International LGBT Movement" and recognize it as extremist. Issues related to the LGBT community are an important part of Russian state propaganda, which manipulates public opinion both in the Russian Federation and through its proxies in various countries, including Georgia. Throughout the years, Russian propaganda in Georgia is trying to discredit European values and instill fears of losing identity in case of EU membership. Available at: <https://grass.org.ge/uploads/other/2021-03-26/888.pdf>

► **In the context of local information manipulations:**

Part of local information manipulations are sponsored, often anonymous and platform-policy-violating (including coordinated inauthentic behavior) discrediting campaigns on social networks that have a harmful impact on public attitudes. In this context, it is important that the relevant state institutions, political parties and representatives of civic organizations discuss the solutions. This could include developing a code of conduct that political groups would sign up to, pledging their commitment to refrain from employing disinformation, anti-Western propaganda, and unethical use of social media for campaign purposes.

Both in terms of foreign (Russia) malign interference in elections and local information manipulations, state and civil society organizations should strengthen their efforts to increase the accountability of social media platforms. These endeavors should also serve the objective of urging social media platforms to present their commitment to safeguarding the integrity of Georgia's 2024 parliamentary elections.

Taking the abovementioned steps will contribute to the adoption of the so-called „whole-of-society approach“¹⁹, which is considered the best European practice in the context of the fight against disinformation.

19 In the report prepared on Georgia, the European commission calls on Georgia continue efforts to increase hybrid/cyber resilience, through the adoption of a whole of society approach. pg 112. Available at https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_697%20Georgia%20report.pdf

► **Information Integrity Coalition:**

- Georgia's Reforms Association (GRASS)
- Institute for Development of Freedom of Information (IDFI)
- IFact
- The Georgian Charter of Journalistic Ethics
- Europe-Georgia Institute - EGI
- Democracy Research Institute - DRI
- Governance Monitoring Center – GMC
- Franklin Club
- Open Space Caucasus (COS)
- Democracy Defenders
- Center for Media, Information and Social Research (CMIS)
- International Society for Fair Elections and Democracy (ISFED)



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