



**Organization for Security and Co-operation in Europe
Office of the Representative on Freedom of the Media**

“Disinformation and media self-regulation”

**Brief Paper for the Expert Meeting organized by the Office of the OSCE Representative on
Freedom of the Media on 25 June 2021**

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I. INTRODUCTION

1. On 25 June 2021, the Office of the OSCE Representative on Freedom of the Media (RFoM) organizes an expert meeting to discuss the interplay between disinformation and media self-regulation in the context of freedom of the media. Its aim is to serve as food-for-thought and to inspire further discussions on the matter within and among all OSCE participating States.
2. The current media environment and the widespread proliferation of propaganda-driven disinformation confront professional traditional media entities with numerous new challenges, and place a heavier burden on journalists and standards of journalism. By blurring the lines between false and true, disinformation undermines public trust in quality journalism and its role in a democratic society.
3. Furthermore, the prevalence of online and offline disinformation can threaten international peace, and undermine States' sovereignty, political independence, territorial integrity and the safety of citizens.
4. Historically, international debate has proven that the remedy for disinformation is not to be provided by governments, while there is a need to enable the media to strive for fair reporting and the public to appreciate media efforts to meet higher professional standards.
5. This Brief Paper assesses the current approach of journalists' associations towards the use of media for disinformation purposes, examines the interplay between politics and the state of media accountability in the OSCE region, notes the role of media literacy to ensure accountability, and presents research on the arguments of media self-regulation bodies in cross-border disinformation cases.
6. This Brief Paper addresses the following overarching question: how might the outcomes of media accountability and media literacy initiatives help to counteract disinformation in the media? To answer this question one might follow these sub-questions: (1) what are the current goals of the professional media community in relation to the pursuit of truth? (2) How can these goals be implemented in self-regulatory activities? (3) How can these goals and activities be understood by the public through media literacy initiatives? (4) How, and in what ways, might intergovernmental institutions and media associations share concerns and resources? (5) How can these insights be used to strengthen public trust in the media?

7. The RFoM has been particularly concerned by the matter of disinformation and media self-regulation, and engaged in many discussions and initiatives on the topic with various stakeholders in the OSCE region. In offering its services, the RFoM emphasizes its continued readiness to engage in further assistance to the interested OSCE participating States on these issues.

II. PROFESSIONAL CODES

8. The international right to seek, receive and impart information and ideas ‘of all kinds’ by definition includes the right to any information, true or false. At the same time, the search for truth remains the main value of journalism as a profession.
9. The major global association of media workers, the International Federation of Journalists (IFJ), has proclaimed a set of principles – recently updated – setting out the professional conduct of journalists ‘in the research, editing, transmission, dissemination and commentary of news and information, and in the description of events, in any media whatsoever.’¹ The very first standard reads as follows: ‘[r]espect for the facts and for the right of the public to truth is the first duty of the journalist.’ In the pursuit of the truth, according to the IFJ Global Charter of Ethics, a journalist shall, at all times, deem it his or her duty to faithfully ‘defend the principles of freedom in the honest collection and publication of news, and of the right of fair comment and criticism.’ The journalist is called to ‘report only in accordance with facts of which he/she knows the origin.’ The IFJ further pledges that journalists shall not suppress essential information or falsify documents. If any published information is still found to be inaccurate, the journalist shall do the utmost to rectify it.
10. These principles are unsurprisingly shared by national associations of journalists in the OSCE region that are members of the IFJ, as well as followed by the grounding documents of the national self-regulation bodies that present a form of media accountability. For example, the Code of Ethics of Journalists in North Macedonia, in its preamble states that the ‘main duty of the journalist is to respect the truth and right of the public to be informed.’²

¹ International Federation of Journalists (2019), ‘Global Charter of Ethics for Journalists’, Adopted at the 30th IFJ World Congress in Tunis on 12 June 2019, <https://tinyurl.com/zplxtsu>

² Association of Journalists of Macedonia (2001), ‘Code of ethics of journalists’, Association of Journalists of Macedonia, 14 November, preamble, <https://znm.org.mk/kodeks-na-novinarite-na-makedonija/>.

11. The very beginning of the German Press Code proclaims: ‘[r]espect for the truth, preservation of human dignity and accurate informing of the public are the overriding principles of the Press. In this way, every person active in the Press preserves the standing and credibility of the media.’³
12. The Code of Professional Ethics of the Russian Journalist – the approval, acceptance and following of which is an absolute condition for one’s membership in the national Union of Journalists – contains the following provisions in paragraph 3:

The journalist disseminates and comments only information of whose reliability he is convinced and the source of which is known well to him. He will do his utmost to avoid damage to any party due to its incompleteness or inaccuracy, deliberate concealment of socially meaningful information or through dissemination of knowingly false information. [...]

The journalist considers malicious distortion of facts, slander, and receipt – under any conditions – of payment for the dissemination of false or for concealment of truthful information as grave professional misdeeds.⁴
13. Members of the National Union of Journalists (United Kingdom and Ireland) are expected to abide by the professional principle to ensure that information disseminated is honestly conveyed, accurate and fair, and to do her/his utmost to correct harmful inaccuracies.⁵ Additionally, in Ireland, the self-regulatory body for on-demand audio-visual services has developed and introduced a code that includes requirements for news and current affairs. Specifically, this includes an obligation that, where content is purported to be news or current affairs, the concepts of fairness, objectivity and impartiality should apply.⁶
14. In Finland, the Guidelines for Journalists, a document used for self-regulation purposes, provides the following canons regarding dissemination of information in the media:

³ German Press Council (1973), German Press Code, Drawn up by the Deutscher Presserat (German Press Council) in collaboration with the Press associations and presented to Federal President Gustav W. Heinemann on 12 December 1973 in Bonn, version of 22 March 2017, section 1, <https://www.presserat.de/pressekodex.html>.

⁴ Code of Professional Ethics of the Russian Journalist (1994), Adopted by a Congress of Russian journalists on 23 June, <https://presscouncil.ru/teoriya-i-praktika/dokumenty/633-kodeks-professionalnoj-etiki-rossijskogo-zhurnalista>

⁵ National Union of Journalists (2013), ‘Code of conduct’, National Union of Journalists, 5 February, paras 2 and 3, <https://tinyurl.com/y9kjldb6>.

⁶ Donde, M., Rokša-Zubčević, A. and Machet, E. (2017), ‘Role of regulators implementing accuracy, objectivity and impartiality in practice’, Comparative Background Document. 46th EPRA Meeting, EPRA/2017/09, EPRA and KommAustria, Vienna, 12–13 October, p.10. <https://tinyurl.com/y8rkxg3p>.

‘The journalist must aim to provide truthful information. [...] The public must be able to distinguish facts from opinions and fictitious material. Similarly, photographic and sound material must not be used in a misleading manner.’⁷

III. APPROACH OF REGIONAL INSTITUTIONS TO MEDIA ACCOUNTABILITY

15. The issue of self-regulation in the context of challenges and accountability to online media and journalism is the focus of attention for European political institutions. It was a subject of Resolution 2143 (2017) of the Parliamentary Assembly of the Council of Europe (PACE) ‘Online media and journalism: challenges and accountability’. The Resolution recommended that the European Federation of Journalists and the Association of European Journalists call on their members to ensure that legacy news media uphold their editorial standards in their internet presence. This should include their own media content, advertising, third-party content, as well as user-generated content such as feedback or comments by users. Users of online media are to be informed about the same possibilities to address complaints as those of offline media, including to relevant journalists, their media outlet or their professional association.⁸
16. There is a strong wish of the Council of Europe parliamentarians to impose upon the editors and the media outlets accountability for ‘all third-party content posted on the websites of professional media’.⁹ This provision was probably influenced by the controversial judgement of the European Court of Human Rights (ECtHR) in the case of *Delfi AS v. Estonia*, in which a commercially run Internet news portal was found liable for the offensive online comments of its readers.¹⁰ It seems to be a wrong conclusion as the ECtHR itself rightfully claims that it does not set in the Delfi case

⁷ Council for Mass Media (2014), ‘Guidelines for journalists in Finland’, Council for Mass Media (CMM), Adopted at the meeting of the CMM Management Group, 4 November 2013, paras 8 and 11, operative from 1 January 2014, <https://bit.ly/2K8Eepc>.

⁸ Parliamentary Assembly of the Council of Europe (2017), ‘Resolution 2143 (2017) Online media and journalism: Challenges and accountability’, 25 January, par. 12.2, <https://tinyurl.com/ydxzsc8k>.

⁹ *Ibid.*, par. 12.2.1.

¹⁰ European Court of Human Rights (2015), ‘Case of *Delfi AS v. Estonia* (Application No. 64569/09) Judgment’, 16 June, <http://hudoc.echr.coe.int/eng?i=001-155105>.

any new rules/requirements for other countries concerning the liability of Internet news portals for user-generated comments.¹¹

17. PACE Resolution 2143 recommended the European Internet Services Providers Association to call on its members who provide social media, search engines and news aggregators to develop ethical quality standards regarding their own transparency and the due diligence of their media services. All providers are expected to set up self-regulatory mechanisms for monitoring these standards and informing the public about their adherence to them. In particular, they were asked to empower their users to report false information to internet service providers (ISPs) and thus make it known publicly; and voluntarily correct false content or publish a reply in accordance with the right of reply or remove such false content. It requested that the ISPs set up alert mechanisms against individuals who regularly post insulting or inflammatory text ('trolls'), and which empower users to complain about these trolls, with a view to excluding them from their forums.¹²
18. The European Interactive Digital Advertising Alliance was also advised in the PACE Resolution to develop self-regulatory standards to ensure that advertisers and public relations companies identify their own internet presence and their contributions to the internet presence of others. They should in particular disclose to the public the person, organization or company by whom they are commissioned, while disguised advertising and lobbying were recommended to be barred by professional media on the internet, as well as by social media providers, under their terms of service.¹³
19. In 2016, the European Commission and four major social media platforms announced a Code of Conduct on Countering Illegal Online Hate Speech.¹⁴ It included a series of voluntary commitments by Facebook, Twitter, YouTube and Microsoft to have in place clear and effective processes to review notifications regarding illegal hate speech on their services so they can remove or disable access to such content in Europe.

¹¹ Press Unit of the European Court of Human Rights (2015), 'Q & A *Delfi AS v. Estonia*, Grand Chamber judgment', Press Unit of the European Court of Human Rights, Press release, 16 June, <https://tinyurl.com/ydbf9otu>.

¹² Parliamentary Assembly of the Council of Europe (2017), op.cit., par. 12.3.

¹³ Ibid., par. 12.4.

¹⁴ European Commission (2016), 'Directorate-general for justice and consumers', Code of Conduct on Countering Illegal Hate Speech Online, Factsheet, Brussels: European Commission Directorate-General for Justice and Consumers, December, <https://bit.ly/217qElo>.

20. An implementation evaluation carried out by NGOs and public bodies in European Union Member States, released in 2020, showed that these companies had made significant progress in following up on their commitments: 90 per cent of flagged content was assessed by the platforms within 24 hours, whereas it was only 40 per cent of content in 2016, 71 per cent of the content deemed to be illegal hate speech was removed in 2020, whereas only 28 per cent of content was removed in 2016. The average removal rate, similar to the one recorded in the previous evaluations, shows that platforms continue to respect freedom of expression and avoid removing content that may not qualify as illegal hate speech.¹⁵
21. Another initiative for a multi-stakeholder ‘Code of Practice’ came in 2018 from the High-level Group on “fake news” and online disinformation. A major, if not the core, proposal of the Group’s final report is the idea of a common code for relevant actors, such as online platforms, news media outlets, journalists, publishers, independent content creators, the advertising industry and fact-checkers to elaborate, on the basis of the 10 guiding principles provided by the Group and mostly related to the work of the social media platforms, search engines and news aggregators.¹⁶
22. Addressing the shortcomings identified in the 2020 Assessment of the Code of Practice, the European Commission published, on 26 May 2021, its guidance on how the Code of Practice on Disinformation should be strengthened to become a more effective tool for countering disinformation.¹⁷ The Guidance calls for reinforcing the Code by strengthening activities and: (a) bring larger participation with tailored commitments, (b) demonetise disinformation, (c) ensure the integrity of services (d) empower users to understand and flag disinformation, (e) increase the coverage of fact-checking and providing increased access to data to researchers, and (f) provide a robust monitoring framework.

¹⁵ European Commission (2020), Commission publishes EU Code of Conduct on countering illegal hate speech online continues to deliver results, Press release, 22 June, https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1134

¹⁶ European Commission (2018), A Multi-Dimensional Approach to Disinformation: Report of the Independent High Level Group on Fake News and Online Disinformation, Brussels: European Commission Directorate-General for Communication Networks, Content and Technology, p. 32–33, <https://tinyurl.com/yc6fvmuf>.

¹⁷ European Commission (2021), Commission presents guidance to strengthen the Code of Practice on Disinformation, Press Release, 26 May, https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2585

IV. MEDIA COUNCILS

23. Regarding the good practice on self-regulation of disinformation in Europe, we find of particular interest to look at the experiment with the Advisory Commission on Countering the Propaganda (further on – Commission). The Commission was set up in 2016 by the Network of media councils of Armenia, Azerbaijan, Belarus, Georgia, Moldova, Russia and Ukraine.¹⁸ Each of them delegated a representative tasked with dealing with trans-border complaints in the region, mostly on propaganda-driven disinformation. These media councils entrusted the Commission with the recommendations that explain the current features of media propaganda. They include the following three characteristics of propaganda relevant to disinformation:

- 1) a targeted selection of facts that works for the tight ‘script’, an active use of misinformation, a manipulation with facts, statistics, opinions or a shift in emphasis where direct misinformation seems a ‘no-go’;
- 2) the use of means and methods that are mostly incompatible with values such as honesty and truthfulness;
- 3) the falsification of the appearances of reliability of information, including its sources.

24. In addition, the Network adopted an Appeal to journalists and editors of the region “Journalistic Accountability and Disinformation are Incompatible.”¹⁹ Its provisions refer to the Joint Declaration²⁰ and are based on complaints submitted to the Advisory Commission. The Network called to take all possible measures to raise trust in the news and exclude dissemination of disinformation “as a result of deliberate or insufficiently responsible editorial policy.”²¹

25. So far, the practice of the Advisory Commission, a *de facto* supranational press council in the region, consists of just a handful decisions (called ‘opinions’) dating

¹⁸ Bylaws of the Advisory Commission on Counteracting Propaganda (in Russian): https://ypc.am/wp-content/uploads/2014/06/Consultative-Commission_Reg_rus.pdf

¹⁹ ‘Journalistic Accountability and Disinformation are Incompatible,’ 14 December 2018, (in Russian) <https://presscouncil.ru/novosti/novosti-kollegii/5969-zhurnalistskij-dolg-i-dezinformatsiya-nesovmestimy-obrashchenie-soms-k-zhurnalistam-i-redktoram>.

²⁰ United Nations Special Rapporteur on Freedom of Opinion and Expression, the Organization for Security and Co-operation in Europe Representative on Freedom of the Media, the Organization of American States (OAS) Special Rapporteur on Freedom of Expression and the African Commission on Human and Peoples’ Rights Special Rapporteur on Freedom of Expression and Access to Information, Joint declaration on freedom of expression and “fake news”, disinformation and propaganda, 3 March 2017, <https://www.osce.org/fom/302796>.

²¹ “Journalistic Accountability and Disinformation are Incompatible,’ op.cit.

from 2017 and 2018. In all cases, this body referred to the above features of propaganda-driven disinformation. In one of the ‘opinions’, it found a story by Eynulla Fatullayev, a famous Azerbaijani journalist, published on the news website of his own NGO – unethical and unprofessional from an international standards viewpoint. The story had reported on the Azerbaijani opposition’s subversive activity in Tbilisi. In particular, the Advisory Commission considered it as ‘by nature unfair, provocative and manipulative pseudo-facts, presented as uncontested reality in the story, but actually having all features of post-truth, prohibitive for journalism.’²²

26. The opinion on another case – this time on the nature of the ‘journalist investigation’ report by the Russian CrimeaInform news agency – came to the conclusion that it had provided disinformation to readers with the aim of creating false scoops. The Advisory Commission criticized the media outlet for publication of a large number of unsubstantiated statements, as well as those not supported by facts, while purely alarmist, defamatory in nature and calculated, in particular, to cause feelings of suspicion, anxiety or even fear of ‘enemy press’ (in this case – Radio Liberty). It found incompatible with the ‘civilized idea of journalism and freedom of speech’ an uncontested opinion of the report’s ‘expert’ as to the nature of the activity of journalists working undercover for Radio Liberty as falling into the scope of the crime of State treason.²³
27. Standards of truth and accuracy are often quoted today by complainants to press councils all over the region as a reason of their dissatisfaction with journalists’ work. For example, in Ireland where they were cited in 140 out of a total of 347 complaints to the Press Council and Press Ombudsman in 2020.²⁴
28. To improve the climate of self-regulation, media councils and associations are assisted by a number of national regulatory agencies (NRAs) to better adhere to voluntarily accepted professional standards. According to a report provided in 2016 to

²² Advisory Commission on Counteracting Propaganda (2017), ‘Opinion of the Advisory Commission on Counteracting Propaganda of the Network of Media Self-Regulation Bodies (NMSB) on the complaint of the Council of Charter of Journalists’ Ethics of Georgia as to the story published on website <https://haqqin.az>’, Advisory Commission on Counteracting Propaganda, 14 September, - par. 5, <https://tinyurl.com/y75axra8>.

²³ Advisory Commission on Counteracting Propaganda (2017), ‘Opinion of the Advisory Commission on Counteracting Propaganda of the Network of Media Self-Regulation Bodies (NMSB) on the complaint of the Commission on Journalist Ethics of Ukraine as to the publication of the CrimeaInform news agency’, Advisory Commission on Counteracting the Propaganda, 14 September, par. 6, <https://bit.ly/2sOGKLLk>.

²⁴ See: Press Council of Ireland and the Office of the Press Ombudsman, Annual Report 2020, http://www.presscouncil.ie/_fileupload/Statistics%202020.pdf.

the European Platform of Regulatory Agencies (EPRA), some NRAs, such as in Croatia, ‘have prepared guidelines to clarify legal provisions with examples offering best practice on how to deal with propaganda issues and maintain professional standards in reporting.’ In order to help broadcasters of Bosnia and Herzegovina solve a possible dilemma on what to do with propaganda, the national Communications Regulatory Agency developed ‘Guidelines on Implementation of the Code on Audiovisual and Radio Media Services’. In the United Kingdom, Ofcom and in France, the CSA, introduced guidance on the application of the impartiality and accuracy provisions.²⁵

29. A number of media councils regulate online publications, such as the United Kingdom’s Independent Press Standards Organisation, which oversees over 1,100 online publications that are subject to the Editors’ Code of Practice.

V. MEDIA LITERACY

30. Teaching media audiences to be sceptical may be an effective approach for combating disinformation. Today, media literacy is seen as a response of society to the challenges brought about by the abundance of information and the proliferation of new forms of communication. The concept of media literacy comprises three essential dimensions: ‘access and use, a critical understanding of the multiple facets of the media and the production of content and the participation in and through the communication media’.²⁶ A key element in this and other definitions of media literacy is the development of critical thinking by the media user.²⁷
31. Critical thinking, in this context, means an understanding of how the media industry works and how media messages are constructed; questioning the motivations of content producers in order to make informed choices about content selection and use; recognizing different types of media content and evaluating content for truthfulness, reliability and value for money; and recognizing and managing online security and

²⁵ Rokša-Zubčević, A. (2016), ‘The role of regulatory authorities: Background questionnaire report’, Final post-meeting version of 15 November, EPRA/2016/10, Yerevan: NCTR and EPRA, p. 10, <https://tinyurl.com/y8dfr9qy>.

²⁶ Pereira, S. and Moura, P. (2018), ‘Assessing media literacy competences: A study with Portuguese young people’, *European Journal of Communication*, 34:1, <https://doi.org/10.1177/0267323118784821>.

²⁷ European Commission (2016), Mandate of the Expert Group on Media Literacy, Press release, Brussels: Directorate-General for Communications Networks and Content and Technology, 6 July, <https://tinyurl.com/ybxfygae>.

safety risks. Media use skills related to the ability to search, find and navigate and use media content and services.²⁸ In this regard media literacy allows one to mitigate the harm caused by disinformation and presents the public with an instrument to assess and even push for more media accountability.

32. The threats of disinformation gave a boost to initiatives that would enable European citizens to access to media literacy tools and resources. Media literacy became a buzzword in the policy documents of the European institutions and organizations. For example, two out of four ‘overarching principles and objectives should guide action to tackle disinformation’, set forward by the European Commission, refer to media literacy.²⁹
33. Encouraged by political demand, universities in Slovakia and Hungary jointly developed the first online course on disinformation and media literacy. Throughout the course, students learn and discover basic terminology and concepts, but also, using concrete examples, understand the way disinformation impacts the lives of individuals and entire societies. The course provides practical tips on how to spot and stop the spread of online disinformation.³⁰
34. This and other educational initiatives made UNESCO provide a model curriculum ‘Journalism, “Fake News” and Disinformation’, an essential addition to teaching syllabi for journalism educators and practicing journalists throughout the world. UNESCO viewed it as part of its record of ‘encouraging optimum performance and self-regulation by journalists, as an alternative to the risks of having state intervention to deal with perceived problems in the freedom of expression realm’.³¹
35. A recent report prepared for the European Commission, based on the data compiled by a team of national experts, refers to as many as 547 media literacy projects implemented in EU member States since 2010. Media literacy skills linked to critical

²⁸ Chapman, M. (2016), Mapping of Media Literacy Practices and Actions in EU-28 (ed. M. Capello), Strasbourg: European Audiovisual Observatory, p. 41, <https://bit.ly/3grY8NR>.

²⁹ European Commission (2018), ‘Tackling online disinformation: A European approach’, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, COM/2018/236 final, 26 April, EUR-Lex, <https://bit.ly/2rz2WrW>.

³⁰ Media & Disinformation (2018), A Survival Guide to Your Everyday Life on the Internet, Slovakia: University of Matej Bel; Slovakia: GLOBSEC; Budapest: Central European University, <http://www.knowhoax.org/course?courseid=cto>.

³¹ Ireton, C. and Posetti, J. (eds) (2018), Journalism, “Fake News” & Disinformation: Handbook for Journalism Education and Training, Paris: United Nations Educational, Scientific and Cultural Organization, <https://bit.ly/2QmgNwM>.

thinking were addressed by 403 of those projects, while media use skills featured in 385 projects.³²

36. As was noted in a background report for EPRA, media literacy helps people to manage content and communications, and protect themselves and their families from the potential risks associated with using these services. In this context, the development of cognitive skills, or critical understanding, is a useful means by which children and adults can learn to identify the relative trustworthiness of different forms of content and information. In this regard, the report advised media regulatory authorities in Europe to embrace the promotion of media literacy.³³ Indeed, the Swiss NRA – the Federal Office of Communications – already endorses internet services that take over the role of ‘lighthouses of trust’ and offer content, ‘which has a certain “public service value” and respects the rules on accuracy, objectivity and impartiality,’³⁴ while the media regulator in Ukraine established a regular co-operation with the StopFake project to analyze possible disinformation materials in broadcasting.³⁵
37. Research suggests that media literacy programmes can be quite effective. For example, a 2020 audience survey held in Ukraine pointed out that, compared with previous years, the public started paying more attention to the source of news and the representation of different viewpoints. Consumers are less likely to trust their “favourite” media – the one they mostly prefer, while the number of people thinking that accuracy is the most important requirement increased considerably.³⁶
38. By gaining traction on the current counter-disinformation agenda of policy-makers in Europe, media literacy today becomes sort of a magic tool to make our societies more enlightened and better prepared to defend their own interests from manipulation in the media, including the social media. In a way, it aims at ‘rational censorship’, which enables one to judge news reports correctly and to understand what and why the media actually say or do not say certain things.

³² Chapman, M. (2016), *op.cit.* P. 28, 39.

³³ Rokša-Zubčević, A. (2016), *op.cit.*

³⁴ Donde, M., Rokša-Zubčević, A. and Machet, E. (2017), *op.cit.*, p. 10.

³⁵ National Council on Television and Radio (2020), National Council makes it public its memorandum on cooperation with the Centre on Media Reform (StopFake), 22 July, <https://bit.ly/3gmcX4l>.

³⁶ USAID-Internews (2020), Media Consumption Survey, August, p. 9, <https://bit.ly/3pIv7BQ>.

39. To sum up, there are a number of ideas among media professionals as to how to limit the effects of disinformation detrimental to trust in the media. The debate often points to governments' responsibility to facilitate development of media self-regulation, including media literacy and fact-checking mechanisms.