

DFC STUDY

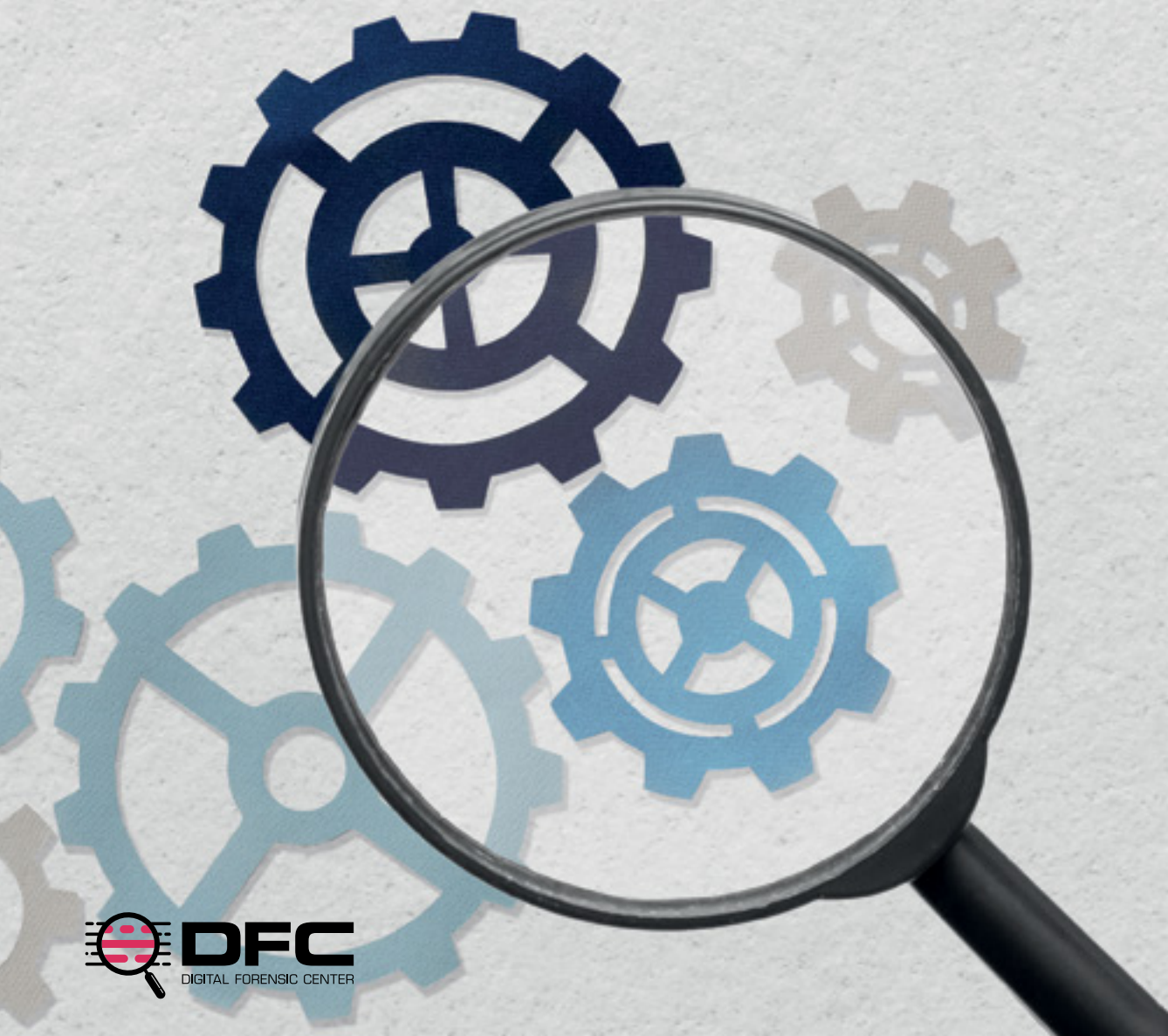
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# Mechanisms for Countering Disinformation

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COMPARATIVE STUDY

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**COMPARTIVE STUDY:**

# **Mechanisms for Countering Disinformation**

June 2024

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# Summary

Disinformation and malign foreign influences are among the most serious challenges facing modern society. In the digital age, disinformation and manipulative content spread rapidly, causing significant problems, particularly affecting political stability, democratic processes, and public opinion.

Foreign interference and information manipulation involve attempts by foreign actors to influence public opinion or socio-political processes in other countries. This includes the spread of disinformation, hacking and leaking information, and the misuse of social networks.

*Comparative Study: Mechanisms for Countering Disinformation* provides a detailed analysis of various mechanisms employed by the European Union, its member states, and Montenegro to counter disinformation and malign foreign influences. The aim is to identify best practices and propose specific measures that could help strengthen the resilience of Montenegrin society against these threats.



# Recommendations

- **Include provisions for countering disinformation in the Media Law.**
- **Develop strategies and establish state institutions to fight foreign interference and disinformation.**
- **Implement additional measures and restrict access to propaganda media that spread Russian disinformation narratives and war propaganda.**
- **Legally restrict access to websites that pose a threat to national security.**
- **Prevent access and specify sanctions and accountability for media, especially online portals, not registered in the Media Registry.**
- **Provide training for journalists to recognize disinformation.**
- **Align the Montenegrin Journalists' Code with online media, digital platforms, and the fight against disinformation.**
- **Grant the Agency for Electronic Media jurisdiction over internet publications (portals) and the authority to impose all sanctions.**
- **Legally mandate the establishment of self-regulation mechanisms for all registered media.**
- **Develop a strategy and opinions on foreign ownership of media in Montenegro.**
- **Align Montenegrin legislation with EU standards regarding social networks and artificial intelligence.**
- **Include media literacy as a mandatory subject in Montenegro's educational system. Simultaneously, it is necessary to establish an institution dedicated exclusively to the development of media literacy in Montenegrin society, coordinating necessary activities, and reporting on the levels of media literacy among citizens.**

# 2 Introduction

Disinformation and malign foreign influences represent, among other things, the most serious challenges of modern society. Due to the fact that in the digital age, disinformation and manipulative content spread rapidly, they cause serious problems, primarily affecting political stability, democratic processes, and public opinion.

Foreign interference and information manipulation involve attempts by foreign actors to control public opinion or socio-political processes in other countries. This includes spreading disinformation, hacking and leaking information and abusing social networks.

There are several key reasons why foreign interference and information manipulation are threats to democracy:

- 1. Undermining trust:** Disinformation and manipulative content can undermine public trust in electoral processes, the media, and institutions that are the foundations of a democratic society.
- 2. Polarization of society:** The spread of fake and manipulative information can increase socio-political polarization, making constructive public debate and compromise more difficult.
- 3. Impact on election outcomes:** Intensive disinformation campaigns can influence voters' perceptions of candidates or political party programs, potentially affecting election outcomes.
- 4. Legitimacy of government:** Successful foreign interference campaigns can lead to doubts about the credibility of election results, which can have long-term consequences for the stability and legitimacy of democratic governments.

Given all of the aforementioned, countering disinformation and safeguarding electoral and democratic processes from foreign interference has become one of the key priorities for many democracies worldwide.

The European Union (EU) has recognized the seriousness of the issue of disinformation and malign foreign influences and has developed a range of mechanisms to counter them. In 2015, the EU established the East StratCom Task Force, whose mission is to identify and expose disinformation campaigns originating from Russia and other countries.<sup>1</sup> Additionally, in 2018, the EU adopted an Action Plan on Disinformation, which includes four main pillars: enhancing the detection of disinformation, coordinating responses to disinformation campaigns, collaborating with online platforms, and strengthening media literacy among citizens.<sup>2</sup> In October 2022, the EU adopted the Digital Services Act (DSA) to prevent illegal and harmful content on information platforms that could have a negative impact on society.<sup>3</sup>

Individually, EU member states have also developed their own strategies and initiatives to address the growing threat. According to their needs, they have developed various legal mechanisms, and educational programs to enhance media and digital literacy, as well as institutions focused on countering malign foreign influences and disinformation.

The Western Balkans are particularly vulnerable to disinformation campaigns and foreign influence due to political instability, weak institutions, and ethnic tensions characterizing the region, as well as the lack of willingness from regional countries to confront foreign interference. These weaknesses are exploited by foreign actors to manipulate public opinion and destabilize political systems in the region. Russia plays a significant role, actively using disinformation campaigns to support its geopolitical objectives. These campaigns often involve spreading fake information about the EU and NATO, as well as backing pro-Russian political actors, all aimed at halting the Euro-Atlantic integration process in the Western Balkans.

Montenegro is especially exposed to disinformation campaigns and foreign influence, particularly those orchestrated by regimes in Russia and Serbia. The Kremlin employs various tactics to destabilize the political situation in Montenegro, including a developed network of proxy actors from the political, religious, and media spheres. These activities intensify during significant socio-political events in the country. The Serbian government is a key partner of Putin in the region. Through various channels of influence, narratives supporting Serbian and Russian nationalism are spread, destabilizing Montenegrin society. These campaigns include disinformation about ethnic and religious issues, further dividing society and hindering the process of democratic consolidation.

So far, Montenegro has not had an adequate response to these challenges. There has been a consistent lack of institutional response, while at the same time, malign foreign influence is often downplayed from the highest state levels. In order to preserve its Euro-Atlantic perspective and ensure stability and democratic development, Montenegro must establish adequate mechanisms to counter malign foreign influences.

The comparative study thoroughly analyzes various mechanisms used by the EU, its member states, and Montenegro in countering disinformation and malign foreign influences. The aim is to identify best practices and propose specific measures that would enhance the resilience of Montenegrin society against these threats.

# Mechanisms of the EU and member states

## The Digital Services Act (DSA) and disinformation

In February 2024, the European Union began implementing the Digital Services Act (DSA). The reason for its adoption is to prevent illegal and harmful content on information platforms that could have a negative impact on society. Entities providing internet services are categorized into four segments and, in accordance with the DSA, are responsible for the content they disseminate on their platforms. Two key categories covered by the Digital Services Act are Very Large Online Platforms (VLOP) and Very Large Online Search Engines (VLOSE), with a threshold for *entry* into both categories set at 45 million users.<sup>4</sup> The DSA represents a systemic solution by the EU to shape the European digital environment, ensuring a safer online space for all users. Very large internet platforms and browsers, such as Meta, Instagram, and Google, will need to review their policies regarding transparency, advertising, and content moderation. The *Coordinator* will play a key role in implementing the DSA at the national level—an independent body responsible for enforcing decisions and regulations from the DSA within each EU member state. Ultimately, the European Commission has the authority to impose fines of up to 6% of total annual revenue in the event of violations of rules related to VLOP and VLOSE services and content.<sup>5</sup>

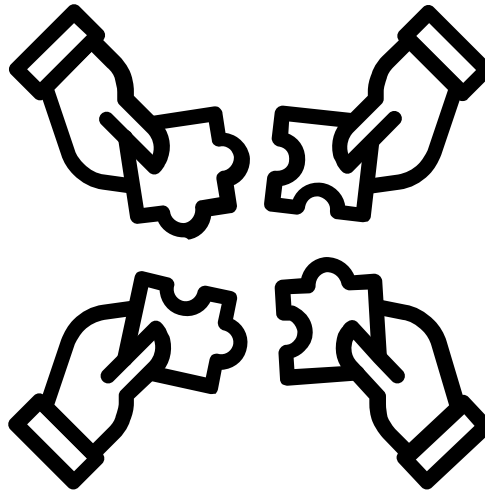
In the context of disinformation, the DSA builds upon the Code of Practice on Disinformation<sup>6</sup> from 2018, as well as an enhanced version from 2022. This Act is the first overarching document with which major platforms, civil society organizations, and advertisers have agreed on self-regulatory standards to counter disinformation.<sup>7</sup> While the Code is not legally binding, with the adoption of the DSA, all online platforms must implement rules to remove illegal content and services. Upon Elon Musk's appointment as the head of company X, the platform withdrew its participation from the Code, but the legal provisions of the DSA still apply to that company.

The cumulative effects of the Digital Services Act (DSA) and the Code of Practice are recognized in areas that receive the greatest attention and are concerning in terms of disinformation. These areas include countering disinformation in advertising and promotion, demonetizing disinformation, empowering users, and promoting media literacy.

**Advertising in the online space** poses a significant challenge in the fight against disinformation. Within the frameworks of the DSA and the Code of Practice, regulations have been proposed to prevent malign actors from exploiting the advertising system.

## DIGITAL SERVICES ACT CODE OF PRACTICE ON DISINFORMATION

Countering  
disinformation  
in advertising  
and promotion



Empowering  
users

Demonetizing  
disinformation

Promoting  
media literacy

According to the DSA, advertisers must possess databases where they store information about the content and payment methods of advertisements, as well as the entities on whose behalf payments are made. Additionally, the DSA mandates that these databases be publicly accessible for one year. Such regulations enable researchers to better identify disinformation trends, and most importantly, enable regulators to identify advertisers disseminating deceptive content.

**Demonetizing disinformation** – interrupting the advertising chain through which disinformation proxies are financed – is one of the key tasks of the DSA and the Code of Practice. The EU aims to prevent disinformation by having signatories of the Code commit to strengthening measures preventing the placement of disinformation alongside advertising content, as well as preventing the spread of advertisements containing disinformation.<sup>8</sup>

The significance of the Code also lies in **promoting fact-checking organizations** that independently verify content on online platforms. These organizations, through the development of tools, particularly in the field of artificial intelligence, will contribute to enhancing users' critical awareness of the dangers of malign and disinformation content.

The European Union has recognized the impact of disinformation on electoral processes. In accordance with the DSA, on March 26, 2024, the European Commission issued six recommendations to reduce systemic risk on the Internet during elections. One of the essential recommendations concerns foreign interference and manipulation of information (FIMI). This measure highlights the obligation of EU member states, independent experts, and civil society to cooperate and exchange information before, during, and after elections. Additionally, the European Commission recommends the adoption of crisis management mechanisms to ensure that disinformation or cyber threats do not affect voter turnout or the final outcome of elections.<sup>9</sup>

# Latvia

***For years, Latvia has been developing mechanisms to protect itself from malign foreign influences. In the past decade, civil society in Latvia has been strengthened by the formation of independent institutions and organizations working on building critical awareness and raising the level of media literacy among citizens.***

The Baltic states found themselves under the impact of Russian hybrid activities in the period following the annexation of Crimea. Russia exploited all possibilities of hybrid actions towards the Baltics during the past decade. Latvia, in particular, was at the center of these activities, primarily because 30% of its population consists of a Russian-speaking minority.<sup>10</sup> Key disinformation in Latvia came from pro-Kremlin media, focusing on undermining NATO and the EU. Disinformation narratives from Russian media portrayed Latvia as a state that glorifies or rehabilitates Nazism. Russia continuously conducted influence operations through channels like Zvezda.ru and Sputnik, linking Latvian society to Nazi Germany. An example of such influence is a disinformation campaign by the Russian TV channel Zvezda in 2018, claiming that Latvian citizens read Adolf Hitler's *Mein Kampf* more than *Harry Potter*. This narrative was picked up by Sputnik, creating a fabrication that depicts Latvians as sympathizers of Nazis and Latvia as a Nazi state.<sup>11</sup> The narrative of Latvia glorifying Nazism is a constant in Russian hybrid activities.



Russia utilized its full repertoire of hybrid activities in Latvia during the referendum on amending the Constitution in 2012, deciding whether Russian would become the second official language in the country. The proposal did not receive the necessary majority in the referendum, as only 24.8% of Latvia's citizens voted in favor. However, disinformation narratives, pamphlets, and media campaigns influenced the general polarization of society. Russia channeled a narrative through proxy media that Latvia was conducting a continuous campaign of suppressing the Russian-speaking community. Multi-channel propaganda utilized narratives about dismissing people who speak Russian from their jobs and claimed that voting rights in the referendum were only granted to Latvian citizens. After the ban on Sputnik and other Russian propaganda media in 2020, media constructs reappeared regarding the suppression of free speech and segregation of the Russian-speaking community. The narrative is based on a law that denies citizenship to Latvian residents who did not apply for citizenship after the collapse of the Soviet Union and continued to live in Latvia. The Kremlin exploits the Russian population living in Latvia to spread disinformation about human rights violations and generates media fabrications about linguistic genocide against Russians.<sup>12</sup>

However, for years, Latvia has been developing mechanisms to protect itself from malign foreign influences. In the past decade, civil society in Latvia has been strengthened by the formation of independent institutions and organizations working on building critical awareness and raising the level of media literacy among citizens. Since 2012, all segments of hybrid activities in the information and digital space in Latvia have been closely monitored by experts. Research organizations such as the Baltic Center and the Digital Forensic Research Lab focus on disinformation, malign narratives, and manipulative techniques used by third parties to undermine democratic processes. Additionally, in 2022, Latvia established the Department for Strategic Communication Coordination, located within the Prime Minister's Office. Their goal is to develop an intersectoral structure to provide training and tools to public servants in the field of disinformation. The National Electronic Mass Media Council (NEPLP) is an organization that plays a crucial role during election processes and crises. NEPLP ensures that accurate and priority information is disseminated during important events, as well as provides citizens with credible information during crises.<sup>13</sup>

Latvia is the only one of the three Baltic states that addresses the spread of fake news and disinformation through legal regulations. Article 231 of Latvia's Criminal Law classifies the dissemination of misleading content and information that disrupts public peace, institutions, or companies as hooliganism. This provision of the law is not used to restrict freedom of speech but solely in situations that could significantly disrupt public order and peace. Article 13, paragraph 5 of the Electronic Media Law allows NEPLP to restrict access to websites that pose a threat to national security. Following this law, Latvia banned 80 Russian media outlets perceived as a threat to national security in 2022. NEPLP has imposed fines on multiple occasions for spreading fake news and disinformation narratives. The TV channel TV Rain had its broadcasting license revoked in 2022 for portraying Crimea as part of Russia.<sup>14</sup>

# Estonia



***Estonia perceives disinformation as a threat to national security and addresses it accordingly. The concept of national security from 2017 emphasizes the principle of strategic communication, highlighting that improving social cohesion and psychological defense will ensure that citizens are informed about harmful information tactics.***

The Russian-speaking community, which makes up 24% of the total population, is the primary target of disinformation and malign narratives in Estonia. Pro-Kremlin propaganda and disinformation aim to alienate this population from liberal values and the strategic course of the state. Estonian security services found in 2023 that disinformation was inciting conflict between war refugees and the pro-Russian population in the country.<sup>15</sup> Ethnic Russians living in Estonia are often exposed to disinformation, with their ethnic background used as a point of entry for narratives that glorify Estonia's Soviet past or undermine the country's Western orientation. After Russia's aggression in Ukraine, Estonia received 5% of the total number of Ukrainian refugees. Russian propaganda seized on this fact to spread fake news, creating divisions between the native population and refugees, and portraying Ukrainian refugees as criminals prone to criminal activities.<sup>16</sup> Studies show that linguistic differences have created separate information spheres in Estonia, with Russian-speaking migrants in Estonia during the Soviet era primarily following Soviet media propagating the idea of pan-Slavism. Although Estonia adopted liberal media principles after regaining independence in 1991, separate information groups and areas persist. This represents a critical zone for the penetration of malign influences and disinformation narratives by third parties.<sup>17</sup> During 2021, support for COVID-19 vaccination in Estonia was lowest among the Russian population, which predominantly relies on information from pro-Russian media.

In the Ida-Viru region, with a predominantly Russian-speaking community, 33.3% believed that the official number of COVID-19 cases reported by state authorities was lower than actual. This percentage was the highest compared to other regions in Estonia.<sup>18</sup>

Estonia perceives disinformation as a threat to national security and addresses it accordingly. The concept of national security from 2017 emphasizes the principle of strategic communication, highlighting that improving social cohesion and psychological defense will ensure that citizens are informed about harmful information tactics. Since then, the concept has been regularly updated to enable Estonian society to better confront new challenges. Additionally, the Estonian government established the Computer Emergency Response Team (CERT) in 2013, to tackle security incidents,<sup>19</sup> in response to growing tensions with Russia and intensifying disinformation campaigns, especially in the context of the situation in Ukraine.

Estonia does not have specific legislation directly addressing disinformation or fake news, but it addresses these issues through various legal frameworks and strategies. The Estonian Penal Code includes provisions against defamation, hate speech, and incitement to violence, which can cover certain forms of disinformation and fake information. The Estonian media landscape is regulated to ensure journalistic integrity and transparency, with the Estonian Public Broadcasting Act regulating public media, and promoting accountability. Since the start of Russia's aggression in Ukraine, Estonia's Consumer Protection and Technical Surveillance Authority has ordered companies providing communication services to block media and online channels disseminating Russian war propaganda. Additionally, in line with EU sanctions against Russia, a total of 51 TV channels and around 200 websites have been blocked in Estonia.<sup>20</sup>

Estonia has stood out on the international stage for its strong focus on media literacy education as a key component of its strategy to counter disinformation.<sup>21</sup> Media literacy is integrated at all levels of education, from elementary schools to universities. In elementary schools, it is integrated into the main subjects, while in high schools, all students must attend a course called Media and Influence. Universities offer media literacy courses, especially as optional subjects. This comprehensive approach has resulted in Estonia having one of the highest levels of media literacy in Europe.<sup>22</sup>

In 2014, Estonia, along with several other countries, established the NATO Strategic Communications Centre of Excellence in neighboring Latvia, recognizing the importance of international cooperation in countering disinformation campaigns. The Estonian Digital Research Center and the Prime Minister's Office launched a free online test with 20 questions to assess skills in detecting disinformation. The test is based on software from an Estonian cybersecurity company.<sup>23</sup> The limitation of this system is that the course on media manipulation is not mandatory in Russian schools in Estonia. Nonetheless, Estonia is making efforts to make the media manipulation course mandatory in all high schools, including Russian ones. The Estonian government is also trying to reach older citizens through advertisements, public announcements, open discussions, and an annual *Media Literacy Week* to increase awareness of information manipulation across the country.

# Finland

***Finland has focused more on education as a key tool for curbing the spread of fake information rather than enacting special laws. This innovative approach is reflected in various measures adopted to ensure that citizens, especially the young, develop critical thinking and media literacy from an early age.***

Due to its geographical proximity and historical ties, Finland is constantly exposed to strong disinformation campaigns originating from Russia. However, the country has shown resilience and successfully manages foreign interference.<sup>24</sup> Disinformation campaigns related to Finland's NATO accession are the most evident examples of the malign influence of the Russian regime. The Kremlin has consistently propagated narratives claiming that NATO membership would threaten Finland's security and that the US forced Finland to apply for membership despite extensive domestic opposition. NATO membership has been negatively portrayed as a loss of independence and national sovereignty, especially considering Finland's tradition of neutrality.

Finland does not have specific laws directly aimed at countering disinformation. Instead, it focuses on protecting individual rights and maintaining the integrity of information through existing laws. For instance, illegal information must be removed from news platforms and websites, hate speech can be penalized under laws against

ethnic agitation and whistleblower rights are protected by laws supporting freedom of speech and journalism.<sup>25</sup> However, Finnish institutions recognize the threat posed by foreign interference and information manipulation. The Finnish Security Intelligence Service (SUPO) has requested the criminalization of disinformation as part of foreign interference.<sup>26</sup>

Nevertheless, in its fight against disinformation, Finland has focused more on education as a key tool for curbing the spread of fake information rather than enacting special laws. This innovative approach is reflected in various measures adopted to ensure that citizens, especially the young, develop critical thinking and media literacy from an early age. Finnish students are involved in media literacy programs from the age of six, enabling them to develop critical thinking skills. This approach has resulted in Finland consistently ranking high in terms of media literacy within society. It is also recognized as a country with a high-quality education system, media freedom, and a high level of mutual trust in society.<sup>27</sup>

Finland's strategy against disinformation encompasses a combination of media self-regulation and reliable news delivery practices. This includes the engagement of the state-owned radio service YLE. YLE's primary mission is to strengthen democracy and provide independent and neutral information in its reporting. Thanks to the public resources it receives, as it is funded by taxes, YLE has special obligations regarding media coordination in response to hybrid and information warfare.

Based on the preliminary report of the National Emergency Supply Agency in 2021, it was decided to launch a pilot project – the Information Resilience Center, which aims to address deficiencies in information resilience. During this project, the development of operational models and tools for preventing information manipulation, as well as monitoring deliberate and harmful campaigns targeting society, is planned.<sup>28</sup>

# Sweden

***In response to disinformation campaigns, the Swedish government established the Psychological Defense Agency in 2022. It is responsible for monitoring the development of disinformation and strengthening Sweden's resilience in confronting these threats.***

Disinformation campaigns in Sweden are primarily directed towards Muslim communities and, to some extent, the Russian community in the country. Campaigns orchestrated by the Russian regime aim to polarize Swedish society and influence the country's geopolitical orientations. As with Finland, this was most visible as Sweden approached NATO membership.

The constructed narrative portrays Sweden as a racist and anti-Muslim country, claiming that the state forcibly separates Muslim children from their families through social services to convert them to Christianity. Since the end of June 2023, the Swedish Psychological Defense Agency has identified around one million posts related to Sweden and Quran burning, many of which falsely claim that Sweden approves of such acts. Disinformation campaigns also involve actors supported by Russia who spread false claims that the Swedish government supports the desecration of holy books to further polarize and weaken Sweden internationally. These disinformation efforts serve Russian interests in undermining NATO and its allies.

Sweden does not have specific laws targeting disinformation, but existing laws against defamation, incitement to ethnic hatred, agitation, and rebellion can be applied to counter certain types of disinformation.

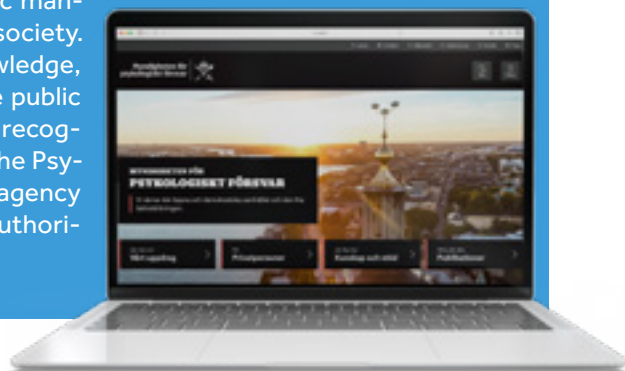
In response to disinformation campaigns, the Swedish government established the Psychological Defense Agency in 2022. It is responsible for monitoring the development of disinformation and strengthening Sweden's resilience in confronting these threats.

The promotion of Media and Information Literacy (MIL) is entrusted to the Swedish Media Council (MIK - Sveriges kunskapsbank), which aims to improve national collaboration in this area. The initiative includes a formal network of 25 actors from various sectors, known as MIL Sweden, consolidating cross-sector expertise in countering disinformation. The Swedish Internet Foundation (Stiftelsen för Internetinfrastruktur) also plays a significant role by offering training and guides on safe internet use for adults and children. Media literacy and internet safety education are fundamental elements of both formal and informal education systems in Sweden, aimed at empowering citizens to critically navigate the internet. The Swedish Media Council leads these efforts, focusing on the media use of children and youth, and providing valuable resources such as the online *MIL for Me* training, part of the European Commission's Safer Internet project.

## Psychological Defence Agency

The Swedish Psychological Defense Agency (Myndigheten för psykologiskt försvar) is a government agency managed by the government.<sup>29</sup> The agency operates under the Ministry of Defence, Ministry of Justice, Ministry of Culture, Ministry of Education, and Ministry of Foreign Affairs. The Ministry of Defence provides strategic guidelines, operational support, and resources, and integrates psychological defence into national defence policies. The Ministry of Culture promotes media literacy, supports public awareness campaigns, collaborates with media houses, and oversees cultural programs that enhance societal resilience. The Ministry of Justice ensures the legal framework, the Ministry of Foreign Affairs aligns the agency's strategies with foreign policy objectives, and the Ministry of Education promotes educational programs. The Psychological Defense Agency also collaborates with other state institutions such as the Swedish Security Service, the Swedish Armed Forces, the Swedish Media Agency, the Swedish Agency for Cultural Policy Analysis, the National Board of Health and Welfare, and the Swedish National Council for Crime Prevention.

The Psychological Defense Agency is primarily defensive. Its first task is to analyze and counter foreign malignant informational influence that uses any type of information in a deceptive antagonistic manner to have a negative effect on Swedish society. Its second task is to disseminate knowledge, contribute to preparedness, and increase public awareness to support the population in recognizing threats and social vulnerabilities. The Psychological Defense Agency is not only an agency for building resilience but also has broad authority that aligns with democratic values.





# France



***France has taken several measures, including legal ones, to counter this challenge. One of the key initiatives for a successful fight is the adoption of the Law on Information Manipulation, which came into effect in 2018. The aim of the Law is a legal battle against the spread of fake news during election periods, i.e., better protection of democracy from fake news that could undermine the integrity of voting. The Law gives French authorities the power to remove or block content on social networks deemed fake, especially during election campaigns.***

France, like other European countries, has been targeted by disinformation campaigns and narratives related to the COVID-19 pandemic, the war in Ukraine, and climate change. It has been observed that actors spreading disinformation easily shift from one topic to another depending on what is current and how a particular crisis develops. France has legal regulations aimed at curbing the problem of disinformation. Additionally, there are numerous organizations and civil society initiatives engaged in fact-checking and promoting media literacy.

During the COVID-19 pandemic, disinformation and alternative narratives were noticeable and widespread in French society. Key narratives included anti-vaccine stances and conspiracy theories, including the underreporting of COVID-19 death tolls. Conspiracy theories circulated in France, suggesting that the coronavirus was created to sell vaccines, a pattern seen in other countries. Another conspiracy theory that circulated in France and Italy claimed that the coronavirus was being used to cover up NATO military exercises. Interestingly, media figures from the Yellow Vest movement actively spread disinformation during the COVID-19 pandemic.

Since the beginning of the Russian aggression against Ukraine, numerous disinformation and propaganda narratives have been uncovered in France. Accusations of Nazism against Ukrainians, denial of war crimes, and questioning the veracity, scale, or per-



petrators of events are some elements of Russian propaganda. In France, fake media headlines about the war in Ukraine, presented as reports from German, Spanish, or American media, have been circulated. Connecting the economic and energy crisis to the conflict in Ukraine has become part of the disinformation strategy. The main narrative is that sanctions against Russia (imposed after Russia's aggression against Ukraine) have led to an economic and energy crisis. The Russian propaganda machine also tries to diminish French support for Ukraine by spreading disinformation about the apparent prosperity of the Russian economy compared to Western countries. Additionally, narratives about poor governance in France, highlighting inflation and social inequality, are spread to foster distrust in institutions and the system.<sup>30</sup> In February 2024, French government agencies countering foreign online threats announced that they had uncovered a disinformation network comprising 193 Russian websites. These sites were designed to spread pro-Kremlin propaganda and influence public opinion in Western countries, especially those supporting Ukraine. The main goal of spreading false and misleading narratives was to justify Russia's invasion of Ukraine, discredit the Ukrainian military, break Western support for Ukraine, and slow or stop the delivery of weapons to Ukraine. These narratives were most commonly spread via the social network X and sites like Sputnik.<sup>31</sup>

Disinformation and public manipulation trends are also evident during electoral processes in France. This was demonstrated during the 2022 elections, in which Emmanuel Macron was re-elected as president, and new parliamentary elections were held. Fact-checking organizations dedicated significant resources to verifying political actors' claims during election campaigns. It was observed that distorted or exaggerated statements by political competitors dominated, rather than completely false information. Conspiracy theories under the slogan "stop the steal" aimed to reduce trust in the electoral process, although they were present only in a smaller part of the political spectrum.<sup>32</sup> Six main French fact-checking organizations (part of the International Fact-Checking Network) identified a total of 169 disinformation related to the 2022 French presidential elections. Among the main disinformation narratives aimed at spreading electoral distrust were: claims that the 2020 law deprived 22,500 Yellow Vest members of voting rights, and the alleged sudden disappearance of two million votes for Marine Le Pen. Other claims included Emmanuel Macron receiving the most votes on 100% of electronic voting devices and speculation that the QR code printed on new ballots was supposedly for tracking voters and rigging results. However, none of these manipulations reached a scale that could affect the integrity of the voting process or jeopardize its outcome.<sup>33</sup>

The fight against information manipulation in France has become even more significant in the digital age, where disinformation is ubiquitous and can have a strong impact on public opinion and political processes. France has taken several measures, including legal ones, to counter this challenge. One of the key initiatives for a successful fight is the adoption of the Law on Information Manipulation, which came into effect in 2018. The aim of the Law is a legal battle against the spread of fake news during election periods, i.e., better protection of democracy from fake news that could undermine the integrity of voting. The Law gives French authorities the power to remove or block content on social networks deemed fake, especially during election campaigns.

## Information Manipulation

Information manipulation is defined by law as an inaccurate or misleading statement of fact that could alter the credibility of an upcoming vote, intentionally, artificially, or massively disseminated to an online audience through communication services. For the competent authorities to respond, the false news must be evident, massively and artificially spread, and capable of disturbing public order or the integrity of elections. The interim measures judge has 48 hours to decide on the nature of the information and potentially order its removal.

### THE LAW IS BASED ON FIVE PILLARS:

**THE FIRST PILLAR** stipulates that digital platforms are obligated to cooperate in the fight against disinformation.

According to **THE SECOND PILLAR**, operators of digital platforms are required to increase transparency concerning sponsored informational content during the election process.

**THE THIRD PILLAR** creates a new legal procedure: the possibility of referring the case to the president of the court to counter disinformation during the election process to stop the spread of inaccurate or misleading allegations and statements.

**THE FOURTH PILLAR** provides that the law strengthens the power of the independent body regulating television and radio to counter any attempt at destabilization or disinformation campaigns by television stations controlled or influenced by a foreign state.

**THE FIFTH AND FINAL PILLAR** highlights the need to support and strengthen media literacy in schools, with a particular focus on content disseminated online.<sup>34</sup>

The implementation of this law has significantly contributed to the creation of institutional capacities in France in terms of countering online information manipulation. This has resulted in the development and consolidation of operational skills regarding the monitoring of measures applied by online platforms to combat abuse in the online information space.<sup>35</sup>

In France, fake news is also addressed by the Press Freedom Law of 1881, which defines the rights and responsibilities of the media in the country. Article 27 of the law provides penalties for the production or dissemination (in bad faith) of false information that inherently disturbs public order and peace.<sup>36</sup> However, this article is rarely applied due to concerns about interfering with freedom of expression. The Criminal Code primarily addresses false news related to stock market laws and the integrity of voting.

In France, in addition to laws regulating information manipulation, there are also organizations that fight against the phenomenon of disinformation and promote media



literacy. Fact-checking organizations are dedicated to verifying the accuracy of information disseminated to the public, especially during election campaigns and other significant socio-political events. Some well-known fact-checking actors in France include: AFP FACTUEL (the digital investigation unit of Agence France-Presse), ARKOM (the Regulatory Authority for Audiovisual and Digital Communication - an independent public institution formed by the merger of the Audiovisual Council and the High Authority for the Distribution of Works and the Protection of Rights on the Internet), the Council for Journalistic Ethics and Mediation (CDJM), and the Association for Information and Media Literacy (Entre les lignes).

In addition to legislative measures, France has also made efforts to raise public awareness of the problem of disinformation and promote media literacy. Various educational campaigns and initiatives have been launched in France to equip and encourage citizens to recognize fake news and think critically about the information they receive.

The legislative framework for the reform of the Republic School in France, dated July 8, 2013, defines media education in the first chapter as transversal school training that develops the knowledge, skills, and culture necessary for citizenship in modern society. In 2015, the French Ministry of Education introduced Media and Information Literacy training into the mandatory school curriculum to equip students to analyze and critique media and its content. Since January 2022, the program has been expanded to all grades. It envisages the creation of web radio stations in every high school in partnership with national, regional, or local newspapers, supported by the Center for Media and Information Education (CLEMI). The center organizes a press and media week to help students, from kindergarten to high school, understand the media system, develop critical thinking, and build a civic identity. Broadly speaking, the goal of media and information literacy is to prepare students for current events and the world, to discover media diversity and pluralism, to educate them to process and decode information, and to familiarize them with the process of creating their own media.<sup>37</sup>

# Germany

***Another legal instrument addressing hate speech, threats, and disinformation is the German Criminal Code. Due to the rising trend of far-right extremism, the propaganda it spreads, and the way right-wing groups use internet platforms for recruitment and organization, Germany is using laws to reduce this activity.***

The tradition of alternative medicine and a special relationship with Russia have created fertile ground for the dissemination and spread of disinformation in Germany during the COVID-19 pandemic and Russia's aggression against Ukraine.

During the COVID-19 pandemic, disinformation and narratives about the virus, vaccines, and preventive measures spread through the media and social networks, aiming to cause confusion and erode public trust in health institutions. Groups that were already promoting narratives to foster distrust in institutions intensified their activities after the pandemic outbreak in Germany. Messages denying and downplaying the coronavirus merged with conspiracy theories, leading to protests by the Querdenker movement, which later supported anti-vaccination stances.<sup>38</sup> Querdenker unites pandemic skeptics, anti-vaxxers, and protesters against preventive measures. They claim that federal and regional laws aimed at stopping the virus's spread violate citizens' freedoms. Although they present themselves as a peace movement, their protests often included far-right actors and frequently ended in violence.<sup>39</sup> Regarding conspiracy

theories, unverified sources in Germany mainly spread claims that the coronavirus is a hoax used to control the world, and they opposed all kinds of measures and restrictions during the pandemic.

Analyses of disinformation, conspiracy theories, and narratives during the pandemic also showed that German unverified sources spread narratives identified in Russian disinformation campaigns that criticize the European Union.<sup>40</sup> Germany's tradition of belief in alternative medicine and frequently disseminated disinformation that the European Union approved harmful vaccines contributed to the growth of the anti-vaccination movement. The real and effective impact of this disinformation is evidenced by Germany's vaccination rate, which was lower than in other European countries. Germany's populist, far-right party, Alternative for Germany (AfD), often downplayed the dangers of the COVID-19 virus and spread disinformation regarding vaccines.<sup>41</sup>

Since the beginning of Russia's aggression against Ukraine, there has been a noticeable increase in disinformation coming from media controlled by the Russian government, pro-Russian websites, and through official diplomatic and pro-Kremlin accounts on the social network X (formerly Twitter). To curb the spread of this disinformation, the Federal Government imposed sanctions to limit the reach and influence of pro-government Russian media. However, since the sanctions came into effect, pro-Russian disinformation and propaganda have increasingly spread through social networks. The Russian government's goal is to control how its aggression against Ukraine is perceived by spreading false claims to justify the military invasion, conceal civilian casualties, and reinforce its narrative of an anti-Russian West.<sup>42</sup> Germany has previously been a primary western target of Russian propaganda, and its propaganda activities intensified with its aggression against Ukraine. Narratives that significantly influenced public opinion in Germany included relativizing Russian aggression due to NATO's eastward expansion, alleged attacks on Russian nationals in Ukraine, and depicting Ukraine as a Nazi state. Narratives aimed at glorifying Russia and its success in the war were also disseminated. Actors spreading these narratives attempted to position German society against supporting Ukraine and sanctioning Russia, provoking public fear of economic consequences.<sup>43</sup> Russia combines subtlety and persuasiveness in its messages, one of the most striking being revealed on the social network X, where more than 50,000 fake accounts posted up to 200,000 posts daily. They sought to convince Germans that their government's aid to Ukraine undermines German prosperity and risks a nuclear war. These claims were presented as opinions conveyed from reputable and relevant media.<sup>44</sup>

Germany combats information manipulation in several ways, one of which involves legislation to mitigate harm and ensure public access to reliable and truthful information.

In Germany, there is no law that directly criminalizes disinformation as such. However, one of the key laws addressing the issue of fake news and disinformation is the Network Enforcement Act (NetzDG), adopted in 2017. The law aims to combat the spread of false information, hate speech, and other illegal content on the internet, especially on social networks and other online platforms. NetzDG allows for criminal penalties for malicious slander, defamation, public incitement to crime, incitement to hatred, the spread of violent imagery, and threats of criminal acts. Under this law, large so-

cial media platforms such as Facebook, X (formerly Twitter), or YouTube must remove illegal content like hate speech and fake news within 24 hours after users report them. Failure to do so can result in significant fines, up to 50 million euros. Platforms are also required to regularly publish reports on how they handle complaints and remove contentious content.

Since 2021, German authorities have applied NetzDG provisions to the Telegram platform, which frequently disseminates fake information and tolerates right-wing extremist content.<sup>45</sup> In June 2021, an amendment to the NetzDG came into effect, aiming to increase the informational content and comparability of transparency reports from social media providers and improve user accessibility to channels for reporting contentious content. The same amendment introduces a procedure for appealing measures taken by platforms and, due to requirements under the European Union's Audiovisual Media Services Directive, video-sharing platform services are now within the scope of the NetzDG.<sup>46</sup>

Another legal instrument addressing hate speech, threats, and disinformation is the German Criminal Code. Due to the rising trend of far-right extremism, the propaganda it spreads, and the way right-wing groups use internet platforms for recruitment and organization, Germany is using laws to reduce this activity. The Criminal Code prohibits the public denial of the Holocaust and the dissemination of Nazi propaganda both offline and online. This includes sharing images such as the swastika, wearing SS uniforms, and making statements in support of Hitler. Strict rules are also in place regarding how social media companies must moderate and report hate speech and threats. Section 130 of the Criminal Code criminalizes certain types of hate speech, defining offenses related to inciting and provoking hatred against various groups based on their race, nationality, religion, or ethnicity.<sup>47</sup>

Numerous organizations play a significant role in fighting disinformation and propaganda, working in various ways to curb the spread of false information and promote media literacy among German citizens. One of the leading organizations is Correctiv, which combines uncovering disinformation with investigative journalism. ARD – Faktenfinder is part of the German public broadcaster ARD, focusing on fact-checking. BR24 #Faktenfuchs also works on debunking disinformation and fact-checking within the Bavarian public broadcaster. In addition to media actors fighting against disinformation, there are other non-profit organizations like the Center for Monitoring, Analysis, and Strategy and the Institute for Strategic Dialogue.

Media education and literacy are the responsibility of the federal states, resulting in varying degrees of integration of media literacy into school curricula across different regions. Media education is often addressed as an interdisciplinary subject alongside other subjects in German schools. For example, in some areas of Germany, media education is studied within the subjects of Language and Ethics, while in other parts, media education is included as an optional IT course.<sup>48</sup> In March 2012, the Standing Conference of Ministers of Education and Cultural Affairs adopted the Declaration on Media Education in Schools. It was designed to provide schools and teachers with

guidelines on media education and envisages making media education an integral part of the mandatory school curriculum. In 2016, a basic media education course was introduced in the fifth grade in Baden-Württemberg grammar schools, teaching how to use and consume media independently and responsibly. The Federal Ministry of Education and Research launched a program from 2014 to 2020 to promote digital media in vocational education/training. The goal was to promote media literacy and media education among employees in companies. The sectors covered by the program include industry, commerce, crafts, and others. Projects within this program aimed to establish media literacy as a solid element within vocational education in companies.<sup>49</sup>

# Slovenia

***Despite the underdeveloped legislation, there are initiatives and projects in Slovenia that strive to combat disinformation and limit its negative impact. The two most active fact-checking platforms in Slovenia are Razkrinkavanje.si and Ne/Ja – Razbijalka mitov, managed by the Slovenian Press Agency.***

The European Digital Media Observatory (EDMO), in its 2022 report on major trends and legal developments at the national level regarding disinformation and national policies during electoral campaigns/policies to combat disinformation in EU member states, notes that disinformation narratives in Slovenia can originate from or have close ties to the government, which reduces the chances of successfully addressing this problem.<sup>50</sup> The disinformation industry in Slovenia is a public-private partnership project that uses digital tools to produce, disseminate, and reinforce politically tinted disinformation and misinformation that misdirects public attention and creates public distrust in independent institutions.<sup>51</sup>

In Slovenia, conspiracy theories were not so frequently and explicitly researched and studied until the outbreak of the coronavirus. Pandemic-related conspiracy theories stemmed from already established narratives and conspiracies about a great and imminent threat to the health and freedom of humanity believed to have been created



by conspiratorial evil forces. After the epidemic was declared in Slovenia, two diametrically opposed narratives were present in society. According to one, Covid-19 is just the flu, while the other claims this new disease heralds an apocalypse and the ultimate transformation of the world. These two paradigms influenced the development of various types and subtypes of Covid-19 conspiracy theories. The first conspiracy theories that immediately started circulating in Slovenia and were transmitted through conversations, media, social networks, and emails claimed that the virus came from a laboratory and that American soldiers brought it to China, being responsible for its further spread. Simultaneously, rumors spread that China created the virus in a laboratory and used it as a biological weapon, that the United States created the virus intending to destroy the Chinese economy, that the government wanted to restrict human rights and destroy small businesses, and that it was implementing a dictatorship. Ultimately, it was said that the virus was spread for urgent artificial selection to reduce the number of elderly people and that vaccines would contain surveillance chips that governments would use to control humanity.<sup>52</sup>

Russian propaganda, especially since its aggression against Ukraine, has been present in Slovenia. An April 2022 survey by the Institute for Research of Opinion and Marketing in France and Abroad (IFOP) showed that 39% of Slovenians believe that Russia is not responsible for the war.<sup>53</sup> In Slovenia, as in Western Balkan states, pro-Russian narratives spread that the West was to blame for the war and failed negotiations, and that all Western services' efforts were aimed at escalating the conflict and violently changing power in Russia through a coup. Pro-Kremlin messages about the Ukrainian military were also circulated, claiming their alleged combat ineptitude and low morale indicated the army was exhausted and unable to conduct offensive actions, while narratives claimed the Ukrainian army posed a threat to the civilian population. Alongside disparaging the Ukrainian defense, the Russian propaganda network propagated narratives extolling the achievements and advantages of the Russian army.<sup>54</sup> EDMO's research showed that between March 20 and 26, 2024, the Portal Kombat network, discovered by French agencies, aimed at spreading pro-Russian informational manipulation and propaganda, was activated in Slovenia among other countries in the run-up to the EU elections.<sup>55</sup>

Slovenian President Nataša Pirc Musar, during her speech at the United Nations in September 2023, listed the traps of the digital age—social media and artificial intelligence—as one of the four main problems affecting the complex and changing world and society. She emphasized that disinformation is the main threat of our time, pointing to increasingly complex opposing narratives.<sup>56</sup> However, the Slovenian legislative framework does not include specific laws regarding disinformation; related issues are addressed through the Media Act and the Journalists' Code of Ethics. There is consensus among media workers and the civil sector in Slovenia about the need for new media regulation to address the spread of fake news, as there is no media policy and regulation to prevent such abuses of media space. The existing Slovenian Media Act allows only for the correction of published media content, not addressing what is now considered a broader societal problem, the rise of fake news on the internet.<sup>57</sup> Due to these and many other issues, and following appeals from journalists and media experts, media legislation reform has begun. The draft law envisages numerous changes

and innovations, one of which particularly stands out concerning artificial intelligence. If such a law is adopted, Slovenia will become one of the first countries to regulate the use of artificial intelligence in the media. It will require that content created using generative artificial intelligence be appropriately labeled. It would also require media outlets to inform the public about how they use artificial intelligence. The use of deep fake technology would be explicitly banned, except with clear labeling in humorous, satirical, and/or educational programs for young people, if their purpose is to enhance media literacy.<sup>58</sup>

Despite the underdeveloped legislation, there are initiatives and projects in Slovenia that strive to combat disinformation and limit its negative impact. The two most active fact-checking platforms in Slovenia are Razkrinkavanje.si and Ne/Ja – Razbijalka mitov, managed by the Slovenian Press Agency.<sup>59</sup>

In Slovenia, media education is currently limited to primary schools, where students have the option to choose it as a separate subject. At the same time, media education is included in other subjects in primary and secondary schools (Slovenian language, Local and Civic Education and Ethics, and Sociology). Slovenia does not have a coherent document or strategy for youth regarding media literacy and the safe use of new media.<sup>60</sup>

The initial media development strategy until 2024 (Strategy for the Development of Media in the Republic of Slovenia until 2024) includes a section called Media Literacy, stating that media and digital literacy are part of mandatory curricula. According to this strategy, media education and digital literacy should become mandatory subjects, no longer just elective subjects. The strategy also envisages establishing a system to ensure media literacy for adult users. Due to the wide presence of media or websites that convey various information and video content, it is necessary to ensure that users acquire the appropriate knowledge and skills for critically accepting information, evaluating it, and actively shaping their attitudes toward the world, society, and themselves according to their developmental levels.<sup>61</sup>



# Montenegro



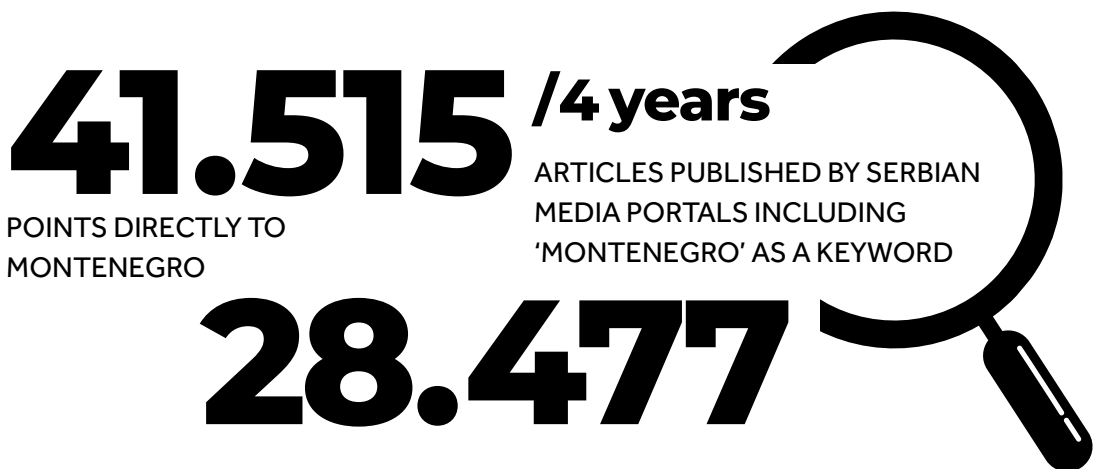
Montenegro, like the rest of the world, has faced a rise in hate speech, propaganda, and disinformation due to technological advancements, mainly in digital media and social networks. Democratic deficits, distrust in institutional systems, political instability, and a divided media community have made Montenegro particularly vulnerable to foreign interference and information manipulation. Additionally, research shows that Montenegro, along with neighboring Balkan countries, ranks low in Europe regarding media literacy.<sup>62</sup>

The Montenegrin media landscape is characterized by the presence of various media outlets whose content and editorial policies are shaped by the political and ideological preferences of their owners, who are predominantly foreign actors. While media pluralism is desirable in developed democratic societies, media diversity in Montenegro contributes to further societal polarization. The operation of media in synergy with political entities, activists, and analysts is reflected in strong campaigns during significant socio-political events in Montenegro. A public opinion survey conducted by the Digital Forensic Center in 2024 revealed that 47.5% of respondents believe the media works in the interest of political structures, 36.8% in the interest of media owners, and only 11.3% in the interest of citizens. Foreign malign influence through media poses a serious challenge to Montenegro's sovereignty, social stability, and democratic processes. Media manipulations and the infiltration of foreign actors into this sphere can significantly impact the integrity of the Montenegrin media environment, creating confusion among the public and undermining their trust in key information channels.

In response to Russian aggression against Ukraine, the European Union (EU) imposed sanctions on the Russian Federation, including suspending the broadcasting and licenses of several Kremlin propaganda media outlets.<sup>63</sup> Consequently, Montene-

gro, an EU candidate country, aligned its actions by suspending the broadcasting of Russia Today and Sputnik.<sup>64</sup> However, this did not reduce the scope or success of Russian disinformation campaigns in the country. The sanctions did not cover key Kremlin propaganda channels in the region, such as the local branches of Sputnik Serbia and RT Balkan, nor other media that continually spread pro-Russian narratives and disinformation.

Serbia has a significant influence on Montenegro's media space through ownership stakes. The interests of Serbian companies buying Montenegrin media are not financial but aim to achieve certain influence. Foreign entities, predominantly Serbian, influence editorial policies by purchasing media in Montenegro, thereby controlling the information distributed. Montenegrin media are also significantly influenced by domestic political structures and actors who use them to shape public opinion in line with their political agendas and narrow party interests. Public opinion research shows differing perceptions regarding the motives behind Serbian companies buying media in Montenegro. Most citizens (44.1%) believe the main motive is to expand political influence, while a smaller percentage (22.2%) think the motives are profit opportunities in Montenegro. This confirms the thesis that Serbian companies have a political context in media purchases, while profit is of lesser importance.



An additional challenge is the fact that Montenegro's information space is not defined by state borders, but extends across the region due to the absence of a language barrier. Such a situation poses a serious threat to the sustainability of Montenegrin media, with a significant number recognized as major sources of disinformation in Montenegro. The list of media leading in spreading disinformation and hate speech is dominated by tabloids and television stations from Serbia. Supporting this claim, data from the DFC research indicate that over four years of monitoring the most-read Serbian media in Montenegro, 41,178 articles about Montenegro were published, most often of questionable quality.

Besides Serbian media, the soft power of Serbia and Russia is also evident through aggressive propaganda via media that are not originally Serbian or Russian but follow their agenda. These media in Montenegro disseminate disinformation and fake news, as well as narratives as subtler forms of manipulation that are much more dangerous because they are not easily recognizable. Additionally, local political elites use disinformation and narratives to strengthen their position and/or eliminate political opponents.

## Key Narratives

A narrative is defined as a series of stories, events, and ideas grounded in values and beliefs, tailored to a target audience or the way media convey information about a particular event.

In Montenegro, as in other countries, the presence of emotional narratives has become increasingly noticeable in politics, media, and society in general. Issues of identity, political divisions, and social tensions often provide fertile ground for manipulative narratives that stir emotions and exacerbate polarization.

The targets of narratives in Montenegrin media include various ethnic or religious groups, political and ideological opponents, civil activists, human rights defenders, and international actors such as the EU, NATO, and the USA. The dissemination of such content intensifies during election periods and when significant political decisions are made or divisive issues arise, such as Montenegro's accession to NATO or the adoption of the Law on Freedom of Religion.

Manipulations through narratives can suppress critical thinking among citizens, leading to the limitation of freedom of expression for those who disagree with prevailing narratives. This can result in self-censorship and the stifling of opinion pluralism. Additionally, if narratives are used to undermine trust in institutions, democratic processes, and individuals, serious consequences for democracy and the rule of law in Montenegro can ensue.

### Key Narratives:



**Endangerment of Serbian identity:** The narrative of the endangerment of Serbian identity has been exploited for 30 years as a basis for Serbia's direct interference in the internal affairs of neighboring countries. Narratives are propagated that the Serbian people and the Serbian Orthodox Church in Montenegro are discriminated against and that Serbs in Montenegro are deprived of their rights.



**Return to tradition, traditional Montenegro:** The Russo-Serbian narrative on preserving tradition is used to distance Montenegro from the West and Western values. Serbia and Russia are presented as alternatives to lead Montenegro on the right path. This narrative essentially denies Montenegro's separate identity, *emphasizing the traditional spirituality of Montenegrin society and undermining the allegedly historical Serbian character of Montenegro.*



**Montenegro as an *ambassadoristan*:** This narrative posits that Montenegro is not a sovereign country, but rather that Western embassies and foreign power centers dictate Montenegro's internal and foreign policy. This is one of the key Russian and Serbian disinformation narratives.



**Two nationalisms in Montenegro:** The narrative of Montenegrin nationalism is used to relativize Serbian nationalism in the country, to combat political opponents, and to promote certain political structures that present themselves to the public as the center between two ethnonational extremes.



**Relativization of malign foreign influence:** A major problem in Montenegro is the dissemination of narratives that attempt to relativize the issue of foreign influence. Those who relativize malign influence try to equate concerns about external interference with nationalism and extremism.

## CORRESPONDENCE WITH RUSSIAN DISINFORMATION NARRATIVES

Pro-Russian and pro-Serbian propaganda use identical subtexts for disseminating disinformation narratives. Russian propaganda portrays the Baltic states and Ukraine as *entities rehabilitating Nazism*. Through selective reinterpretation of historical events from World War II, Russian state media depicted the entire population of the Baltics as Nazi collaborators, rather than as victims of Nazi occupation. Key narratives from Sputnik consisted of portraying Latvia and Estonia as Nazi states that were only free under the Soviet Union.

In Montenegro, pro-Serbian proxy media and analysts associate Montenegrins and the Montenegrin idea of independence and statehood restoration with the Ustasha Croatia, that is, with the Nazi past. Continuously, Serbian proxies have demonized the idea of Montenegrin independence, Montenegrin symbols, and the anthem through a narrative that connects them with fascist ideology. Serbian historian and ethno-nationalist ideologue Aleksandar Raković wrote and published the book *Montenegrin Separatism*, in which he claims<sup>65</sup> that Montenegrin distinctiveness is tied to the idea of the Independent State of Croatia (NDH). In 2020, during church processions, Serbian Deputy Prime Minister Aleksandar Vulin stated<sup>66</sup> that Đukanović was doing what the Ustasha once did. This narrative was adopted by pro-Serbian portals IN4S<sup>67</sup> and Borba and used in forming disinformation narratives about *Montenegrin Ustashism*.

Disinformation narratives from Russia towards the Baltic States and from Serbia towards Montenegro exploit the issue of the Russian or Serbian language. The target of Russian propaganda in Latvia is the Russian-speaking community, which makes up 30% of Latvia's total population. The key narrative that Russian proxy media exploit is that the Russian-speaking community is being oppressed or that linguistic genocide is being carried out against Russians. For years, pro-Serbian proxy actors, politicians, and media in Montenegro have channeled the narrative about the endangered<sup>68</sup> Serbian language and the banning<sup>69</sup> of the Serbian language and Cyrillic script.

## The success of Russian Disinformation

Russia's hybrid activities and its interference in the internal affairs of other countries are most pronounced through information manipulation. The intensity of Russian disinformation, as well as its malign influence on democratic processes, has significantly intensified since the beginning of Russia's aggression against Ukraine. Although there is room for optimism regarding joint efforts to counter Russian disinformation, there are many indications that the Kremlin's influence on Western societies, including Montenegro's, significantly shapes public discourse and citizens' perceptions.

Montenegro has been consistently exposed to Russian propaganda and manipulation spread through various channels, including political parties, local and regional media, religious organizations, and far-right groups. The goal of Russian disinformation campaigns in the Western Balkans region, including Montenegro, is to undermine institutions, deepen social polarization, and halt European integration.

During Montenegro's accession process to NATO, Montenegrin society was constantly exposed to Russian propaganda aimed at halting the accession process to the Alliance. Disinformation campaigns continued even after Montenegro's entry into NATO. Russian authorities have an identical attitude regarding Montenegro's EU integration. This was unequivocally confirmed by the Ambassador of the Russian Federation to Montenegro, Vladislav Maslenikov, who stated that the expansion of the *EU into the Balkans means dragging the countries of the region into confrontation with Russia*.<sup>70</sup>

## Indicators of Success

The Hybrid Excellence Center from Helsinki has identified three key indicators for assessing the impact of contemporary Kremlin disinformation campaigns:

- repetition of narratives,
- their influence on public behavior,
- and insights gained from public opinion polls.<sup>71</sup>

Narratives and disinformation repeated by various social leaders or media outlets serve as a useful indicator of the influence of Kremlin information campaigns. This is especially true for the dissemination of narratives beyond sources directly from the Kremlin, as they are then perceived as credible and legitimate.

The psychological principle known as the *illusory truth effect* suggests that by consistently repeating certain narratives through different communication channels, they can gradually gain credibility and be accepted by the target audience.<sup>72</sup> Scientific research suggests that this phenomenon occurs because people tend to associate familiar narratives with truth. By gradually spreading through social discourse, Kremlin narratives can reshape perception, generate consensus, and manipulate opinions.

The repetition of disinformation in the statements of influential public figures suggests that they have successfully penetrated the information space. If influential individuals support or promote such narratives, it can be seen as an indication that broader audiences perceive them as legitimate and credible. When they repeat Kremlin narratives, it



enhances the reach and credibility of disinformation, as their words carry weight and are often accepted within target groups.

The repetition of pro-Kremlin disinformation in the statements of political actors is a common occurrence in the United States. Congresswoman Marjorie Taylor Greene from Georgia, with 3.1 million followers on the X platform, repeated some of the key Kremlin disinformation. One of the claims is *that NATO supplies neo-Nazis in Ukraine with powerful weapons and extensive training on how to use them*.<sup>73</sup> Additionally, former White House trade advisor in the Donald Trump administration, Peter Navarro, appeared on a conservative talk show claiming that *Ukraine is not really a state*.<sup>74</sup> Apart from politicians, several American media personalities belonging to the far right have spread pro-Russian disinformation. Among them, Tucker Carlson stood out in regularly promoting Kremlin perspectives on the war in Ukraine.

There are numerous examples of Russian disinformation narratives being spread by political leaders in Europe. Hungarian Prime Minister Viktor Orban has questioned Ukraine's sovereignty. German politician Stefan Kotre from the far-right Alternative for Germany (AfD) party called for a parliamentary inquiry into alleged biological weapons in Ukraine during 2022.<sup>75</sup>

Even in Montenegro, there are political leaders who directly spread Russian narratives. Current President of the Parliament, Andrija Mandić, referred to Russian aggression on Ukraine as a special military operation in July 2022.<sup>76</sup> Mandić's party colleagues and coalition partners, who are part of the current ruling majority in Parliament, often spread Russian disinformation narratives. The abuse of the Kosovo issue to relativize Russian aggression on Ukraine, the narrative of the unprofitability of imposing sanctions on Russia, and the thesis that Montenegro is *an ambassadoristan*, meaning it is not a sovereign country, are all narratives continuously used by the Russian propaganda machinery in the Western Balkans.

Repetition of narratives through the media is also a clear indicator of the influence of disinformation. The Kremlin has developed a wide network of propaganda channels in the Western Balkans. In addition to two state media outlets, Sputnik Serbia and RT Balkan, Russian propaganda is also spread by Belgrade tabloids controlled by the authorities in Serbia (which have a significant readership in Montenegro) as well as some local media outlets in Montenegro. Among them, IN4S, Borba, and Aloo.me stand out for consistently adopting and spreading Russian disinformation narratives.

The recycling of Kremlin narratives through media not directly connected to Moscow is a clear indicator of influence, as disinformation narratives are accepted as sufficiently legitimate or credible to be reproduced in those media. Research has shown that Western media sources sometimes repeat narratives propagated by the Kremlin by recycling content from other media sources without proper fact-checking. Such journalistic practices have become common in an increasingly fast-paced media environment, where journalists struggle to deal with a huge flow of information.

An illustrative example of such activity is Radio Television of Montenegro (RTCG), which has repeatedly spread pro-Russian narratives and disinformation. The RTCG portal uncritically adopts information from Russian media sources. Disinformation that was part of Russian propaganda before the aggression on Ukraine was published on the Public

Service portal. For example, in January 2022, the portal reported that Ukrainians attacked the Lugansk Republic, legitimizing the secession of the pro-Russian self-proclaimed Lugansk People's Republic in the text.<sup>77</sup> The editor of the foreign-policy desk of Radio Montenegro, Slaviša Đorđević, assessed the conflict in Ukraine as *a proxy intermediary war between two great empires, Russia and the United States, which spills over into the European space*. Journalist Sanjin Vešović from Radio Montenegro raised questions about the resolution passed in the Montenegrin Parliament condemning Russia's attack on Ukraine, emphasizing the economic impracticality of imposing sanctions on Russia.<sup>78</sup>

Since the beginning of the war in Ukraine, one of the key narratives Russia has used in the Balkans is the question of Kosovo's independence. Manipulations related to the NATO bombing of the Federal Republic of Yugoslavia in 1999 have also been highlighted, indicating a comprehensive anti-Western and anti-NATO campaign. The twenty-fifth anniversary of the NATO intervention in the FR Yugoslavia was the occasion for intensifying a comprehensive anti-Western and anti-NATO campaign. Key manipulations within this campaign related to the name of the operation and the number of victims of the NATO intervention. For example, on March 24, 2024, in the RTCG News program, on the occasion of the anniversary of the NATO intervention, it was announced that *there were thousands of victims of the bombing*. On the same day, in the *People and Events (Ljudi i događaji)* program on RTCG, misinformation was disseminated that the NATO campaign was named *Merciful Angel* and that *more than 1,000 people were killed in air strikes, with several thousand wounded*.<sup>79</sup> The official name of the NATO air operation is *Operation Allied Force*. The author of the phrase *Merciful Angel* remains unknown, but it is assumed to have been created in Serbia to facilitate mobilization for the fight against NATO. The only exact data available to the public are those determined and published by the Humanitarian Law Center in Belgrade and the Humanitarian Law Center in Kosovo. They show that from March 24 to June 10, 1999, 756 people lost their lives, including 452 civilians and 304 soldiers or police officers.

**RTCG** VJEŠTI EUROPEA SPORT HRONIKA KULTURA MAGAZIN KOLUMNJE TV RADIO ŠHOIP

**AMBASADOR RUSIJE U BEOGRADU**  
Bocan Harčenko očekuje da sutra ipak bude održana sjednica UN o bombardovanju SR Jugoslavije

**AMBASADORICA POZIVA**  
"Ambasadorica SAD-a da se konačno izvine zbog NATO bombardovanja"

**KRIKALJ**  
Rusija spremna na prekid vatre, Ukrajina nije

**KOVAČ**  
U NATO bombardovanju sila prava zamijenjena je pravom sile

**PROGLASIO PORAZU**  
Putin: Niko nije uspio da nas uplaši, Rusija će postati jača

**UPUTILI NOTU**  
Rusija zatražila od Njemačke da zvanično prizna opsadu Lenjingrada kao čin genocida

**KREMLJ**  
Peskov: Nema potrebe bojati se Putina

**HEZVEDIJE PREDLOŽIO HROVNI PLAN**  
"Kijev da prizna poraz i ujedini se sa Rusijom"

**LAVROV**  
EU je postala vojno-ekonomski dodatak NATO

**UPUTILI NOTU**  
Rusija zatražila od Njemačke da zvanično prizna opsadu Lenjingrada kao čin genocida

**MOSKVA TVRIH**  
"SAD planira da se umiješa u ruske izbore i smanji izlaznost"

**"NATO bombardovanje Jugoslavije ogromna tragedija"**  
Ruski predsjednik Vladimir Putin opet je rekao da je NATO bombardovanje 1999. ogromna tragedija i da je NATO mogao samo osuđiti, a da su triputice u međuvremenu drugacijem načinu obogađje u Jugoslaviji, sa našom drugacijem shodim u Moskvi - bezobzira.

**Articles from RTCG portal**

## EU sanctions circumvention

Despite Montenegro joining EU sanctions against Russia in May 2022 and the Agency for Electronic Media (AEM) banning the broadcasting of Russia Today and Sputnik, Russian propaganda and malign narratives continue to persist in the information space.

On May 25, 2024, the guest on City TV was the Russian Federation Ambassador to Montenegro, Vladislav Maslenikov. He used his appearance on the *Diplomatic Story* show (*Diplomatska priča*) to promote anti-Western and anti-NATO views, employing emotional manipulations related to the NATO intervention in FR Yugoslavia in 1999. Paradoxically, Maslenikov spoke about Montenegro's EU integration, suggesting that the United States does not genuinely support its European path but rather, since Brexit, Washington has lost its most important mechanism for interfering in European affairs. Following the change of government in the capital city in 2023 and the arrival of pro-Serbian proxies in power, the advisory board of RTV City was also changed. With the appointment of acting CEO Vladimir Otašević, the editorial policy was altered.

On May 27, 2024, Maslenikov was given space in the daily newspaper Dan. On the occasion of the anniversary of the assassination of the chief editor of Dan, Duško Jovanović, he emphasized in a video statement that it was a sad day for freedom of speech and media freedom in Montenegro. It is indicative that the Russian embassy deals with media freedom considering that since Vladimir Putin came to power in Russia, 19 journalists who dealt with human rights and freedoms issues have been killed, and none of the murders have been solved.

In April 2023, appearing on TV Adria, Maslenikov stated that Russia was facing a hybrid and information war, promoting a narrative of a pre-prepared scenario for war. After Russia's aggression against Ukraine, TV Adria propagated the disinformation narrative that Donbas was being defended through a special military operation.

Despite Russian state media being under EU sanctions and Russian Federation ambassadors in diplomatic isolation, Vladislav Maslenikov consistently receives space in Montenegrin media through which he disseminates malign narratives and manipulates emotions. By allowing the Russian ambassador to appear, media outlets under the guise of media freedom portray Russia not as an aggressor in Ukraine but rather as one side in the conflict.

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## TV Happy – A Unique Case in Europe

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An egregious example of spreading pro-Kremlin and warmongering propaganda is the Serbian television channel Happy, which is available in Montenegro. After the start of the Russian aggression against Ukraine in 2022, this television station began daily broadcasting the program *Aktuelnosti*, which glorifies Russian military campaigns in Ukraine. Commentators and guests of the show glorify Russian weaponry, depict Ukrainians as Nazis, and frame the aggression against Ukraine as a liberation war. A frequent guest on the show from Montenegro is the war correspondent of the pro-Russian propaganda portal IN4S, Igor Damjanović. In 2020, the Council of the for Electronic Media (AEM) limited the airing of Happy TV shows – *Dobro jutro Srbijo*, *Ćirilica*, and *Posle ručka* – to three months due to hate speech, intolerance, and discrimination against Montenegrins.

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## Public Opinion Poll

Data from public opinion polls can be one of the clearest and most accessible ways to assess the impact of contemporary Kremlin disinformation campaigns, providing straightforward, readily available information and quantifications of the prevalence of different beliefs among the population. Support for false Kremlin narratives in European countries has reached high levels.

European-wide studies have shown that in Greece, 43%, in Hungary, 28%, and in Italy, 26% of respondents believe in false Kremlin narratives justifying the Russian invasion of Ukraine.<sup>80</sup>

A study by the French Institute for Public Opinion showed that 28% of French respondents believed that *the Russian military intervention in Ukraine was supported by Russian-speaking Ukrainians who wanted to liberate themselves from persecution by the Ukrainian authorities*.<sup>81</sup>

Serbia is another country where evidence of the influence of Kremlin disinformation is particularly visible in survey data. In a survey conducted by the Belgrade-based research center CRTA during the fall of 2022, 64% of respondents stated that they believe Western actors are primarily responsible for the war in Ukraine, while only 15% of respondents attributed that responsibility to Russia.<sup>82</sup>

Regarding Montenegro, a survey published in January 2024 showed that 42.7% of citizens believe that Russia is fighting against Nazism in Ukraine, and about a quarter (27.6%) do not know whether this is true or false. Although 80% of Montenegrin citizens support Montenegro's membership in the EU, at the same time, 53.8% believe that the EU and Western countries actively promote changes in traditional values and impose deviant behavior.<sup>83</sup>

### **NEGATIVE** influence in Montenegro



### **SECURITY THREATS** to Montenegro



A DeFacto survey covering only young people in Montenegro showed that 33.6% of young people believe that the United States is responsible for the war in Ukraine, while 27.1% blame Russia. It was noted that 16.8% of respondents see Ukraine as responsible for the war.

The report by NATO Secretary-General from March 2024 indicates that 44% of Montenegrin citizens would vote to leave the Alliance, which is 12% higher compared to data from last year's report.<sup>84</sup>

A DFC public opinion survey addressing foreign influences in Montenegro showed that 53% of respondents believe that the Alliance has mostly or very negative influence in Montenegro. Also, the majority, 58.2%, believe that the United States has a negative influence. The research showed that over 30% of citizens consider NATO and the United States as security threats to Montenegro, while 25% said that Russia is a security threat to Montenegro.

## Social Behavior

A definitive way to illustrate the degree of influence of Kremlin disinformation is by analyzing citizens' behavior, or events and incidents that demonstrate the significant impact of Kremlin narratives on the public.

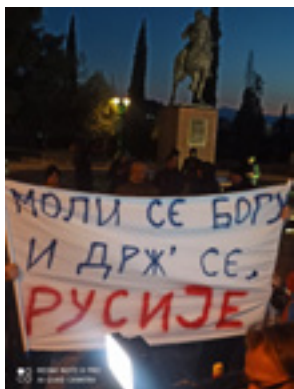
Following the Russian aggression in Ukraine, several rallies supporting the Russian Federation with Serbian, Russian, and Chetnik flags were organized in Montenegro, accompanied by messages portraying Russia as *a just warrior in the war in Ukraine and blaming the West as the main culprit for the conflict*. Members of local branches of the Night Wolves, Ravna Gora Movement, as well as members of Orthodox brotherhoods, attended these rallies. By chanting slogans in support of Russia and Putin and singing songs about Serbian Kosovo, members of far-right Serbian-Russian nationalist organizations expressed their support for Russia in the war against Ukraine.

Apart from events on the Montenegrin political scene, regional developments are often a trigger for the activation and actions of far-right organizations and individuals. The events in Kosovo in May and October 2023 confirmed this. After an incident in Zvečan (in May of that year), a series of protests in support of the Serbian people in Kosovo were held in Montenegro and Serbia, which largely had an anti-NATO and anti-EU character. Traditionally, in Montenegro, such gatherings are held with the blessing of the Serbian Orthodox Church and the active participation of priests, pro-Russian, and pro-Serbian political parties, and media.

On June 2, 2023, the Miholjski zbor in Tivat organized a rally in support of Serbs in Kosovo. The protest had an international character and simultaneously took place in Belgrade and the Italian city of Verona. In addition to *supporting Serbs in Kosovo*, the protests had a clear anti-NATO and anti-EU connotation. The protest in Verona was organized by Serbs from Italy and the organization *Verona per la libertà*. At the end of the protest in Verona, a NATO flag was torn and burned.

*Verona per la libertà* is an organization whose activities are based on anti-globalism,



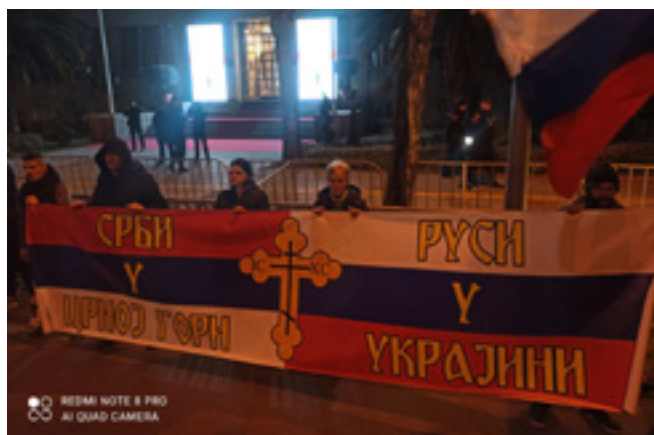
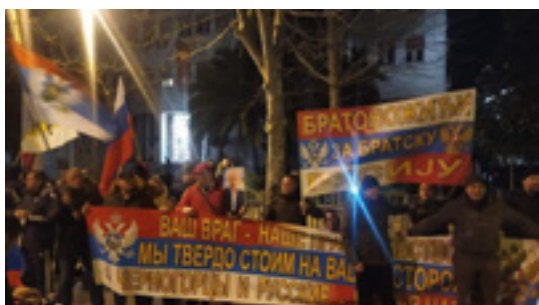


**KOSOVO CUORE DELLA  
SERBIA E DELL'EUROPA**  
Basta violenze sul Popolo Serbo!  
**VERONA 2 GIUGNO**  
**ORE 19 PIAZZA BRA**  
Insieme agli amici Serbi in Italia con  
collegamenti da Belgrado e altre città

**КОСОВО ЈЕ СРЦЕ  
СРБИЈЕ И ЕВРОПЕ**  
Стоп насиљу над српским народом!  
**ВЕРОНА 2. ЈУНА**  
**19.00Ч ТРГ БРА**  
Заједно са српским пријатељима из  
Италије и директним укључењем са  
скупова из Београда и осталих градова

**ORE 20 VERONA P.ZZA BRA**

Interranno:  
IRINA SOKOLOVA ass. cult. Toscana Russia,  
ELISEO BERTOLASI stampa estera e reporter,  
GAIA FUSAI avvocato, PIETRO MINUTE  
studente, VIDOSLAV CETOJEVIC ass. Korenli.



conspiracy theories about vaccines, and the 5G network. Additionally, its protests often feature messages that align entirely with Kremlin propaganda. Verona per la libertà, in cooperation with Russian organizations in Italy, organized several protests in support of Russian aggression.<sup>85</sup>

Photos from the commemoration of the NATO bombing of FR Yugoslavia in Tivat and Belgrade were posted on the organization's Facebook page.<sup>86</sup> The commemoration in Tivat on March 24, 2023, was attended by Bishop Metodije of the Budimlja-Nikšić Diocese, secretary of the diocese Mijajlo Backović, Mayor of Tivat Željko Komnenović, President of the Miholjski zbor Zdravko Nišavić, and Russian Ambassador to Montenegro Vladislav Maslenikov.<sup>87</sup>

Seven days later, a new anti-NATO and anti-EU protest was held in three cities: Verona-Tivat-Belgrade. The key messages from the protest were that NATO and the EU are criminal organizations that caused the conflict in Ukraine, and that the goal of the instructed regime in Ukraine is to exterminate the Orthodox people. Symbolically, NATO and EU flags were torn at the end of the protest.<sup>88</sup>

It is indicative that Russia uses every form of dissatisfaction or instability across Europe to sow disinformation and propaganda in the context of the war in Ukraine. NATO bombing and events in Kosovo are the most suitable examples. Russia, with the help of religious organizations and far-right groups, seeks to influence the perception of citizens in countries that are already or aspire to be EU and NATO members.

## Legislative Framework

Montenegro lacks any strategic framework for combating foreign influence, but the issue of disinformation was first addressed in the Media Strategy 2023-2027.<sup>89</sup> While state institutions have shown passivity and lack of interest in the pervasive problem of foreign interference for years, citizens find it increasingly difficult to detect media manipulations and distinguish disinformation from true news.

Legal battles against disinformation raise concerns about media censorship and freedom of speech. Bans on disinformation and repression can at best be ineffective and at worst counterproductive. In countries undergoing democratization with weak institutions and a deficit of democracy, such as Montenegro, a legal framework enabling media control in the fight against disinformation can be easily abused.

Strengthening the legal framework to improve the transparency of the digital information ecosystem is essential for Montenegro. The long-awaited Media Law adopted in June 2024 has enhanced precisely that segment. The law stipulates that the founder of a media outlet or the authorized person must, within 30 days of founding the media, submit an application for media registration to the media registry. The registry is publicly available and contains an overview of data, including the media's headquarters, authorized person, governing bodies, name and surname of the editor-in-chief, and other information. The law also requires the media founder to publish information about the ownership structure in a simple, direct, and permanent manner. It also imposes fines on media outlets that do not comply with these provisions.

However, the law does not clearly define the consequences for media outlets that refuse to register, nor does it specify how responsibility for violations of the law will be determined. According to information obtained by DFC from relevant institutions, these details will be regulated by sub-legal acts, as well as amendments to the law planned for the fall of 2024. It is necessary to establish a precise norm in the law that prevents unregistered media outlets from operating.<sup>90</sup>

The 30-day period given to media outlets to register in the registry is problematic. Online publications, especially those created for targeted dissemination of disinformation during election campaigns, can operate unhindered for a month. Afterward, as often happens, they may be shut down without establishing responsibility for violating the law. DFC has recorded such examples during local elections in Nikšić. Therefore, it is necessary to precisely regulate the fight against disinformation in the Media Law.

The Media Directorate is responsible for monitoring the work of online portals, but it is questionable whether the Directorate has the capacity and resources to continuously and effectively monitor all portals in Montenegro. Therefore, it is necessary to transfer jurisdiction over portals to the Agency for Electronic Media because it has more tools and resources to engage in such activities.

The new Media Law has also improved the segment of media financing from public funds. Media outlets that are not registered, do not have a form of self-regulation, or do not comply with the law cannot count on financial support from public funds. This will prevent portals like IN4S from receiving funds from state-owned companies, as has been the case so far.

Better media self-regulation is certainly one of the key solutions as it provides mechanisms or tools to combat fake news while ensuring protection from censorship. With the new law, the state encourages media in Montenegro, regardless of format, to establish self-regulation mechanisms or join existing ones to ensure greater professionalism in reporting. At the same time, it is necessary to raise awareness among Montenegrin citizens and encourage them to report violations of the Code of Conduct through self-regulatory mechanisms.

The Media Law does not obligate media publishers registered in the media registry to have any form of self-regulation. However, the Law stipulates that media publishers who do not have established self-regulation mechanisms – internal or external – cannot receive funds from public sources. The current self-regulation of the media in Montenegro is based on the Code of Journalists of Montenegro, which all media outlets accept. However, new research shows that the Code *is outdated and does not guide the media on how to deal with challenges in the digital environment, such as content moderation and social media management, combating disinformation, fact-checking in advertising content, and many other issues.*<sup>91</sup>

Montenegro needs a strategy to combat foreign malign influence and disinformation, as well as a dedicated body, following the example of the Swedish Psychological Defense, to address these issues. The adopted media strategy envisages the establishment of a body to combat disinformation, hate speech, and violence on the internet



the – Network to Combat Disinformation whose members would be representatives of universities, media, non-governmental organizations, police, prosecution, courts, and the relevant ministry. This is a positive initiative that must be implemented as soon as possible.

It is necessary to incorporate into Montenegro's legal system all relevant European acts regulating the operation of social networks and other platforms for distributing digital content, although our country is not yet an EU member. The legal framework should consider the presence of media publications on platforms such as YouTube. Morning programs of Serbian television channels Pink and Happy were banned from broadcasting for three months due to continuous disinformation and hate speech against citizens of Montenegro.<sup>92</sup> Cable operators complied with the regulator's decision; however, both programs could still be accessed on social media and the YouTube channels of the television stations. This requires special attention, given that an increasing number of young people use online platforms as a means of information.

Another aspect of the problem that is insufficiently addressed is the development of artificial intelligence (AI). The quality of content that AI can produce is difficult to recognize and distinguish from productions resulting from human intelligence, especially when it comes to textual content. Solutions based on generative AI technologies already enable the production of a significant amount of audio, video, photo, and textual content that is very difficult to detect. Montenegro must act quickly and follow EU regulations in this area.

Finally, improving the level of media literacy in society is crucial for combating disinformation, as it plays a key role in this mission. Elementary school students in Montenegro studied media literacy as an optional subject in the 2023/2024 school year.<sup>93</sup> Previously, media literacy was offered as an elective subject only in secondary schools. It is necessary to incorporate the concept of media literacy (aligned with EU policy) into regulations/laws governing the media.

Effective combating of foreign influence and disinformation, while ensuring protection of freedom of expression, requires a comprehensive multidimensional approach that involves legal frameworks, public awareness, and cooperation among various stakeholders, but primarily political will and dedicated efforts of state institutions.

# Conclusion

The European Union is facing growing challenges of foreign influence and disinformation, which have become crucial issues for maintaining stability and democratic values within it. In recent years, the EU has recognized the need for a comprehensive approach to combat these threats, mostly originating from third countries attempting to destabilize the political order and influence public opinion. The EU has applied a holistic approach to combat disinformation, including technological, legal, and political instruments, as well as strong international cooperation.

Although the EU is largely committed to addressing issues of foreign interference and information manipulation, member states have developed their own mechanisms that adequately serve in the fight against disinformation and foreign influence, tailored to the socio-political situation within their countries.

Despite being constantly exposed to foreign influence and disinformation, especially from Russia, countries like Finland, Estonia, Latvia, and Sweden have shown a high level of resilience to threats. These countries stand out for establishing numerous mechanisms, including strong regulations, strategic communication, and a strong focus on media literacy. State institutions leading this fight play a crucial role. The implemented mechanisms, combined with transparent work of oversight bodies and active engagement of citizens, have enabled these countries to successfully reduce the impact of foreign disinformation campaigns.

The foundation of Russian disinformation narratives is identical in all regions of Europe, including the Western Balkans. However, the region has shown the lowest

level of resilience, as Putin's regime has been significantly obstructing the democratization of Western Balkan countries and their Euro-Atlantic integrations for years.

The success of Russian disinformation in Montenegro is quite evident. Although a NATO member and perceived as the next EU member, Montenegro has shown a low level of resilience to foreign interference, especially from Russia and Serbia. The main reason for this is primarily the lack of political will and institutional action to combat foreign interference. An additional challenge is the actions of political elites who consistently relativize or ignore the problem of foreign influence. Moreover, certain political structures in power in Montenegro are part of channels of influence of third parties.

Montenegro lacks a clear strategy and adequate legal framework to provide the basic conditions for successful combating of malign influences. Additionally, a stronger institutional approach and a broader format involving cross-sectoral cooperation of all societal actors striving for further democratization of Montenegrin society are needed.

However, all laws, strategies, measures, and recommendations are absurd without the political will to act in accordance with them. Without the implementation of laws, which has been the biggest problem in Montenegro, even a good legal framework would not contribute to the fight against foreign information manipulation and interference.

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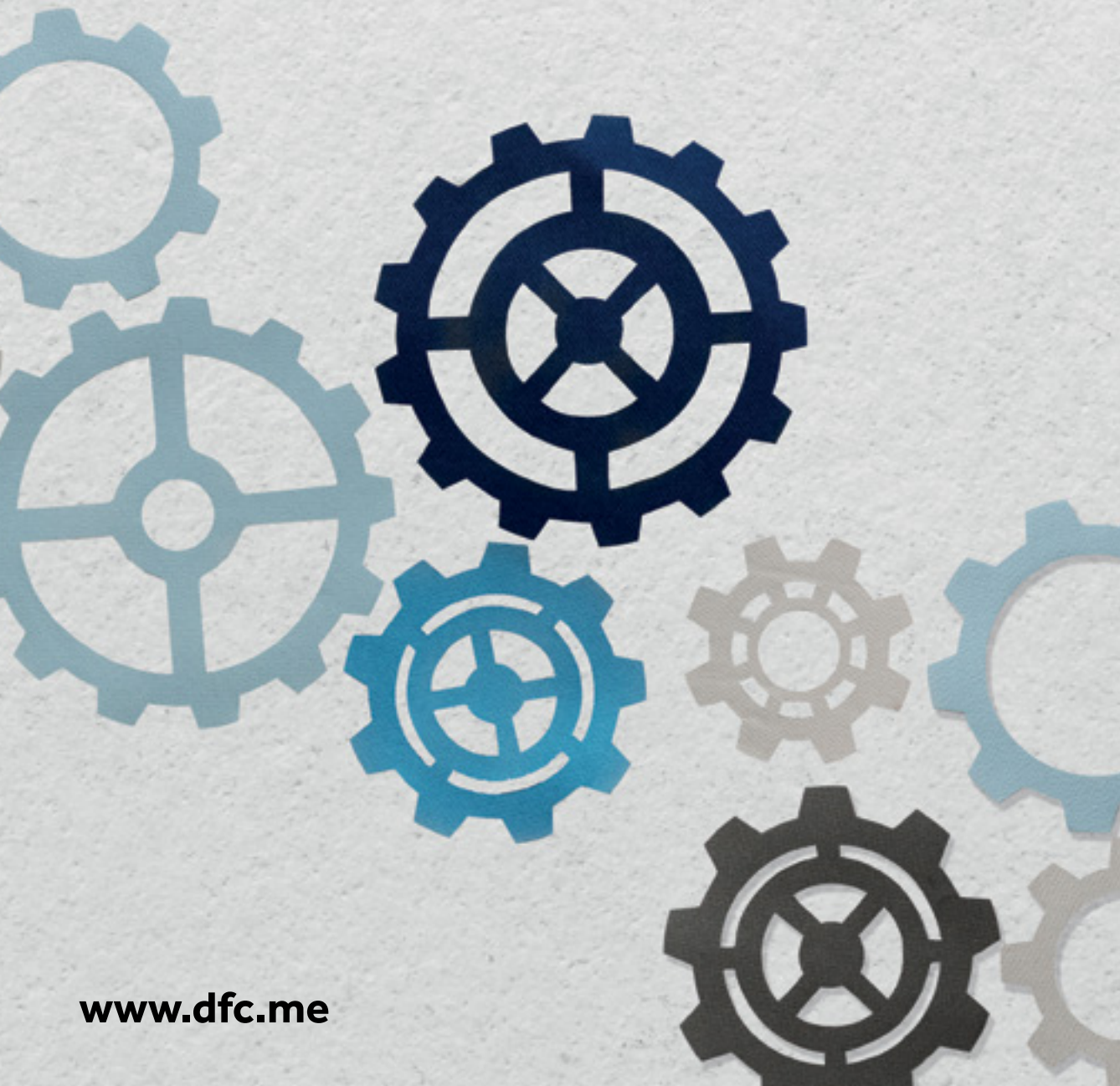
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