D5.1

MedDMO report on monitoring Meta, TikTok, and Google's practices to combat disinformation and supporting national authorities 2024 in Cyprus, Greece, and Malta

2nd Report of platform practices and national authorities support 2024 Part B

Project Title	MedDMO
Project Number	101083756
Thematic Priority	DIGITAL-2021-TRUST-01-EDMO
Start of Project	1 December 2022
Duration	30 months

Deliverable title	2nd Report of platform practices and national authorities support –2024
Deliverable number	D5.1.
Deliverable version	V1.0
Contractual Date of delivery	n/a
Actual Date of delivery	n/a
Nature of deliverable	Report
Dissemination level	Public
Partner Responsible	CUT
Author(s)	Pantelitsa Leonidou, Nikos Salamanos, Theodoros Christophides, Andreas Phylactou, Socratis Ioakim, Iacovos Mylona, Neophytos Lophitis, Athanasios Sitista, Loukia Taxitari, Kostantinos Papadamou, Pashalia Spyridou, Michael Sirivianos
Reviewer(s)	CERTH, UCY
EC Project Officer	Mark Vella Muskat

Abstract	This is the MedDMO annual report detailing the results of monitoring the online platform practices in support of the national authorities of Cyprus, Greece and Malta in combating active disinformation campaigns. In addition, the report highlights progress in the implementation of the Code of Practice on Disinformation by online platforms.
Keywords	Code of Practice on disinformation, Social media, disinformation campaign, fact-checking

MedDMO is a Digital Europe SME Support Action project co-financed by the EC under Grant Agreement with project ID: 101083756. The content of this document is © the author(s).
For further information, visit www.meddmo.eu

Copyright

© Copyright 2022 MedDMO Consortium

This document may not be copied, reproduced, or modified in whole or in part for any purpose without written permission from the MedDMO Consortium. In addition to such written permission to copy, reproduce, or modify this document in whole or part, an acknowledgement of the authors of the document and all applicable portions of the copyright notice must be clearly referenced.
All rights reserved.

Revision History

Version	Date	Modified By	Comments
V0.1	01/10/2024	CUT	First Draft Table of Content
V0.2	01/12/2024	CUT	Final Table of Content
V0.3	01/02/2025	CUT	First Draft
V0.4	20/05/2025	CUT	Second Draft
V0.5	10/06/2025	CUT	Final Second Draft
V0.6	15/06/2025	CUT	Final Second Draft Review
V0.7	23/06/2025	CUT	Review
V1.0	25/06/2025	CUT	Final Document

Glossary

Abbreviation	Meaning
CoP	Code of Practice on Disinformation
VLOPs	Very Large Online Platforms
IFCN	International Fact Checking Network
AFP	Agence France-Presse
EH	Ellinika Hoaxes
QREs	Qualitative Reporting Elements
SLIs	Service Level Indicators
DSA	Digital Service Act
ICPSR	Inter-university Consortium for Political and Social Research
CIB	Coordinated Inauthentic Behaviour
3PFC	Third Party Fact-Checking Program
EFCSN	European Fact-Checking Standards Network
IIB	Independent Intermediary Body
CASD	Centre D'Accès Sécurisé Aux Données
WHO	World Health Organisation
EMIF	European Media and Information Fund
VCE	Virtual Compute Environment
CRTA	Cyprus Radio Television Authority
MBA	Broadcasting Authority of Malta
NCRTV	National Council for Radio and Television
DSC	Digital Service Coordinator
MCA	Malta Communications Authority
EETT	Hellenic Telecommunications and Post Commission

Table of Contents

Index of Figures

Index of Tables

Executive Summary

This report presents a qualitative evaluation of the practices of online platforms in Cyprus, Greece, and Malta, with a focus on the implementation of the signed Code of Practice on Disinformation by three very large online platforms (VLOPs): Meta, Google, and TikTok for the period of 1st of January to 30th of June 2024 (based on their CoP reports No.4. of September 2024). The report also outlines broader activities supporting the national authorities in the three countries.

The global challenge of disinformation has become increasingly pervasive, impacting societies, political landscapes, and public discourse worldwide. Cyprus, Greece, and Malta each face unique challenges within their disinformation landscapes. In Cyprus, disinformation proliferates through social media channels and websites, particularly during election periods and amidst significant news events such as the war in Ukraine. Greece experiences disinformation crises during natural disasters and in the context of political decisions, with actors ranging from government mechanisms to far-right movements disseminating false information. In Malta, state-sanctioned trolls contribute to a complex disinformation environment, exacerbated by the aftermath of the assassination of investigative journalist Daphne Caruana Galizia.

This study focuses on monitoring the actions of three prominent online platforms: Meta, Google, and TikTok, which are widely used in the three countries. Meta holds a central role in shaping public discourse, Google influences online content visibility, and TikTok provides a unique arena for user-generated content.

The objective is to investigate the policies, practices, and tools implemented by these platforms to combat disinformation within the digital ecosystems of Cyprus, Greece, and Malta. The report assesses the efficiency of these measures and evaluates their accessibility to diverse audiences, aiming to provide a comprehensive understanding of how effectively the strategies address the challenges posed by disinformation.

This analysis marks the initial step in comprehensively examining platform practices in combating disinformation across different digital spaces in Cyprus, Greece, and Malta. Through this exploration, prevalent trends, challenges, and potential strategies for mitigating the impact of disinformation within these online landscapes are identified.

1 Introduction

The global challenge of disinformation remains highly prevalent, significantly affecting societies, politics, and public discourse worldwide. Between January and June 2024, the ongoing advancement of digital platforms and social media intensified the spread of false or misleading information, posing serious threats to information integrity, shaping public opinion, eroding trust in democratic institutions, and influencing political outcomes.

During the first half of 2024, both Greece and Cyprus faced similar disinformation challenges, prominently featuring disinformation related to COVID-19 vaccines, including unfounded health claims and conspiracy theories about vaccine safety. Politically motivated disinformation was widespread, employing manipulated or misrepresented visuals falsely linked to recent events such as natural disasters and geopolitical conflicts. Additionally, the Israel-Hamas conflict became a frequent subject of misleading narratives, increasing polarization and exacerbating social tensions in both countries. Often, identical false claims circulated simultaneously in Cyprus and Greece. Cyprus specifically encountered intensified disinformation during electoral periods and critical geopolitical developments, including the ongoing impact of the war in Ukraine. Misleading narratives proliferated on Cypriot social media platforms, news websites, and traditional media, often involving anonymous online accounts, politically aligned groups, or foreign entities aiming to influence public perception and destabilize trust in Cypriot institutions.

In Malta, the first half of 2024 witnessed significant disinformation around allegations of financial corruption, economic mismanagement, and misuse of public funds. There was notable usage of deepfake technology to spread falsehoods targeting political figures. Environmental disinformation also circulated widely, influencing public perception of urban planning and environmental policy. Furthermore, Malta faced extensive migration-related disinformation, with exaggerated reports of migrant numbers and impacts fuelling societal tensions. Online scams were also prevalent, exploiting public trust and causing economic vulnerabilities.

This report is the second part of MedDMO's monitoring of platform practices in Cyprus, Greece, and Malta for the first half of 2024. It presents a qualitative assessment of how Meta, Google, and TikTok implemented the Code of Practice on Disinformation—specifically focusing on the commitments under Empowering Users, Empowering the Research Community, and Empowering the Fact-Checking Community—as outlined in their CoP Signatory Report No. 4 (January–June 2024).

The analysis builds on findings from the first part of the monitoring round **[Leonidou et al., 2025],** which mapped the appearance and handling of false claims across platforms and media based on the MedDMO Fact-Checks archive. Results and findings further complement this after applying the EDMO methodology to assess the VLOPSEs September 2024 CoP Signatories report **[Botan et al., 2025]**.

While Greece, Cyprus, and Malta face distinct yet overlapping disinformation challenges, this study underscores the importance of tailored, country-specific strategies to improve digital literacy, strengthen fact-checking efforts, and enhance democratic resilience. As part of the MedDMO project, our aim is not only to share the findings of our monitoring work with the broader public, but also to inform and support other MedDMO activities—such as collaboration with national broadcasting authorities in the three countries. To that end, the report concludes by highlighting our ongoing initiatives related to disinformation, in partnership with the Cyprus

Radio Television Authority, the Greek National Council for Radio and Television, and the Broadcasting Authority of Malta.

The report is structured as follows: Section 2 presents the methodology used to evaluate platform practices, drawing from the Code of Practice Signatory reports. Section 3 begins with a summary of key findings for Meta (Facebook and Instagram), Google (Search and YouTube), and TikTok, followed by recommendations for how platforms and media experts can collaborate more effectively to combat disinformation in Cyprus, Greece, and Malta. It then provides a detailed analysis of the reported information under the commitments assessed within each of the three pillars: Pillar V (Empowering Users), Pillar VI (Empowering the Research Community), and Pillar VII (Empowering the Fact-Checking Community). Section 4 outlines platforms' fact-checking partnerships involving MedDMO partners such as Agence France-Presse and Ellinika Hoaxes. Finally, Section 5 highlights key MedDMO activities supporting the national authorities in the three countries in their efforts to tackle disinformation.

2 Methodology for Monitoring the Platforms' Practices

Code of Practice on Disinformation: The EU Code of Practice on Disinformation (CoP) **[European Commission, 2022]** is a voluntary, self-regulatory framework through which major online platforms pledge to curb the spread of false or misleading content. Its core objectives are to empower users with clear labelling and context, boost the visibility of authoritative sources, remove or demote harmful disinformation, and ensure greater transparency and collaboration with independent fact-checkers. Signatory platforms are required to submit periodic self-assessment reports outlining the policies, mechanisms, and partnerships in place to tackle disinformation, ranging from labelling systems and removal workflows to demotion algorithms and information panels. These reports also include quantitative metrics such as the number of labelled or removed posts, content demoted in feeds, or instances where users were exposed to contextual information. These metrics allow stakeholders to assess the platforms' implementation effectiveness across different regions and time periods. As of 13 February 2025, the European Commission and the European Board for Digital Services formally endorsed the integration of the Code of Practice into the Digital Services Act (DSA), marking its transition from a voluntary code to a co-regulatory instrument for VLOPs and VLOSEs (Code of Conduct). This transition, which takes effect in July 2025[1], reinforces the need for structured and transparent monitoring practices to ensure compliance and assess effectiveness.

In this report, we monitor the practices of online platforms in addressing disinformation by evaluating their self-reported actions submitted as part of the Code of Practice on Disinformation (CoP) Signatories Reports. Specifically, we examine the qualitative and quantitative data disclosed by Meta, Google, and TikTok under the September 2024 CoP reporting cycle, focusing on how these platforms claim to implement their commitments in Cyprus, Greece, and Malta. By systematically reviewing the official submissions made under the CoP framework, we aim to assess the clarity, completeness, and country-specific applicability of their policies, tools, partnerships, and interventions related to disinformation.

In the framework of the MedDMO project, we adopt the EU's original 2018 Code of Practice **definition of "Disinformation"** as "**Verifiably false or misleading information which, cumulatively, (a) is created, presented and disseminated for economic gain or to intentionally deceive the public; and (b) may cause public harm, intended as threats to democratic political and policymaking processes as well as public goods such as the protection of EU citizens' health, the environment or security"** **[European Commission, 2018]**.

This report is part of the second round of the Code of Practice (CoP) report analysis within the MedDMO project. The first report, available on the MedDMO website **[Leonidou et al., 2023]**, covered platform practices from January 1st to June 30th, 2023. In this second round, we build on our earlier monitoring efforts **[Leonidou et al., 2025]**, which used the MedDMO Fact-Check Archive[2] to assess platform responses to debunked disinformation claims across Cyprus, Greece, and Malta from January 1st to June 30th, 2024. That analysis examined whether platforms applied moderation actions such as labelling, removal, or contextual warnings to flagged content.

[1] https://digital-strategy.ec.europa.eu/en/library/code-conduct-disinformation
[2] https://meddmo.eu/fact-checking/archives/

The current report shifts focus to evaluate how Meta (Facebook and Instagram), Google (Search and YouTube), and TikTok implemented their CoP commitments during the same period. Our assessment draws primarily from the CoP Signatories' Reports submitted in September 2024, complemented by our own investigations. It concentrates on three key pillars: empowering users, supporting the research community, and strengthening the fact-checking ecosystem (see the specific CoP Commitments we covered, outlined in Table 1). We assess both qualitative reporting elements (QREs) and quantitative and implementation data (SLIs) specific to Cyprus, Greece, and Malta. The evaluation also considers the transparency of platform actions and the accessibility of tools and processes for users, researchers, and fact-checkers.

Our assessment is aligned with the methodology proposed by **the EDMO Subgroup on CoP Report Analysis in September 2024** **[Botan et al., 2025].** More specifically, three reviewers/researchers reviewed the Signatories' reports and responded to the questions of the proposed methodology (Sections A and B). Afterwards, platforms' reported actions are evaluated using a structured scale (see Table 2), considering their coherence, transparency, and specificity in relation to each country's context.

In terms of context, Cyprus, Greece, and Malta share similar challenges related to disinformation but also present distinct media and political environments requiring tailored responses. The 2023 Media & News Survey **[European Commission, 2023]** showed that social media platforms dominate news consumption in all three countries. In Cyprus, 70% of respondents use social media for news, with Facebook, Instagram, YouTube, and WhatsApp being the top platforms. In Greece, 55% of the population uses social media, and 57% rely on online news sites, with Facebook and YouTube again ranking highest. Malta follows a similar pattern, with 70% of the population using social media, particularly Facebook and WhatsApp. Across all three countries, influencer-generated content also plays a growing role in how users engage with news—69% in Cyprus, 63% in Greece, and 61% in Malta use social media for news, with substantial portions preferring content from influencers.

While TikTok was not explicitly cited in the survey, it has gained relevance through increasing engagement levels, particularly among younger users. During the 2024 Romanian presidential election, TikTok disclosed the existence of 27,000 fake accounts involved in a coordinated disinformation campaign promoting a far-right candidate **[BBC News, 2025a]**. In Germany, a Global Witness investigation **[Global Witness 2025]** ahead of the federal election revealed that TikTok's recommendation system disproportionately promoted far-right AfD content to politically neutral new users. These examples underline the importance of rigorous monitoring and greater transparency from platforms, especially in how their algorithms surface political content.

Through this report, we aim to assess how well Meta, Google, and TikTok are addressing disinformation in Cyprus, Greece, and Malta. We explore their existing tools, their integration with local contexts and languages, their support for researchers and fact-checkers, and the extent to which their measures are transparent and effective. Ultimately, our goal is to support ongoing efforts in enhancing media literacy, platform accountability, and democratic resilience across the three countries.

Table 1: CoP Commitments covered by this analysis

CoP Pillars	CoP Commitment	Issue covered by the measure
V Empowering Users	Commitment 17	Media Literacy
	Commitment 21	Better equipping users to identify disinformation
VI Empowering the Research Community	Commitment 26	The provided access to platforms' data for researchers
	Commitment 27	The provided access to data necessary to vetted researchers to undertake research on Disinformation
	Commitment 28	Support good faith research into Disinformation
VII Empowering the Fact-Check Community	Commitment 30	Cooperation with EU fact-checking community
	Commitment 31	Integration of Fact-checkers' work in platforms
	Commitment 32	The provided access to information for fact-checkers

Table 2: CoP Commitment-level assessment scaling system

1 to 5 Rating Scale Guidelines	
Score	**Interpretation**
1	**Very Poor:** The tools, activities, or partnerships had little to no impact, were poorly implemented, or had significant issues that prevented them from achieving their objectives.
2	**Poor:** The tools, activities or partnerships had limited impact, with several deficiencies in implementation or design that reduced their effectiveness.
3	**Fair:** The tools, activities or partnerships had a moderate impact, achieving some of their objectives but with noticeable areas for improvement.
4	**Good:** The tools, activities or partnerships were effective, achieving most of their intended outcomes, with only minor areas that could be enhanced.
5	**Excellent:** The tools, activities or partnerships were highly effective, fully achieving their objectives and demonstrating best practices with no significant shortcomings.
n/a	**Not Applicable:** If a signatory claims a measure they subscribed to is not relevant to their services, and we believe this assessment to be correct, e.g., the measure relates to displaying information alongside political advertising and the signatory's product does not allow political advertising.

In **Section 3**, we present a summary of our evaluation results. The summarised results are followed by a detailed analysis per platform. For each platform and commitment, we present the assigned scores (general, Cyprus, Greece, and Malta), followed by a summary of the reported actions pertaining to the commitment, the reported SLIs, and evaluators' comments on the platforms' practices based on their responses and actual implementation.

3 CoP Signatories Reports Assessment Results

3.1 Summary of Results

In this section, we present the overall findings of the analysis. The evaluation of the CoP reports of the Signatories is based on the reported information by each signatory, looking at the completeness and clarity of the reported elements. In cases where it is feasible, we investigate the reported elements, looking for evidence of the reported data, specifically:

1. We evaluate the reported platform's practices and policies (QREs - Qualitative Reporting Elements);
2. We evaluate the reported quantitative data together with the related implementation by the platforms, namely, the quality and verifiability of Service Level Indicators (SLIs), as well as the overall implementation of the reported policies and practices (QREs) by the platforms across the three countries.

A detailed presentation of the evaluation scores—broken down by platform and commitment—along with a table indicating whether relevant SLIs were reported in the Signatories report, is provided in Annex I: CoP Signatories Reports Assessment Scores and Missing SLIs.

CoP Signatories Reports Assessment Scores and Key Findings per pillar:

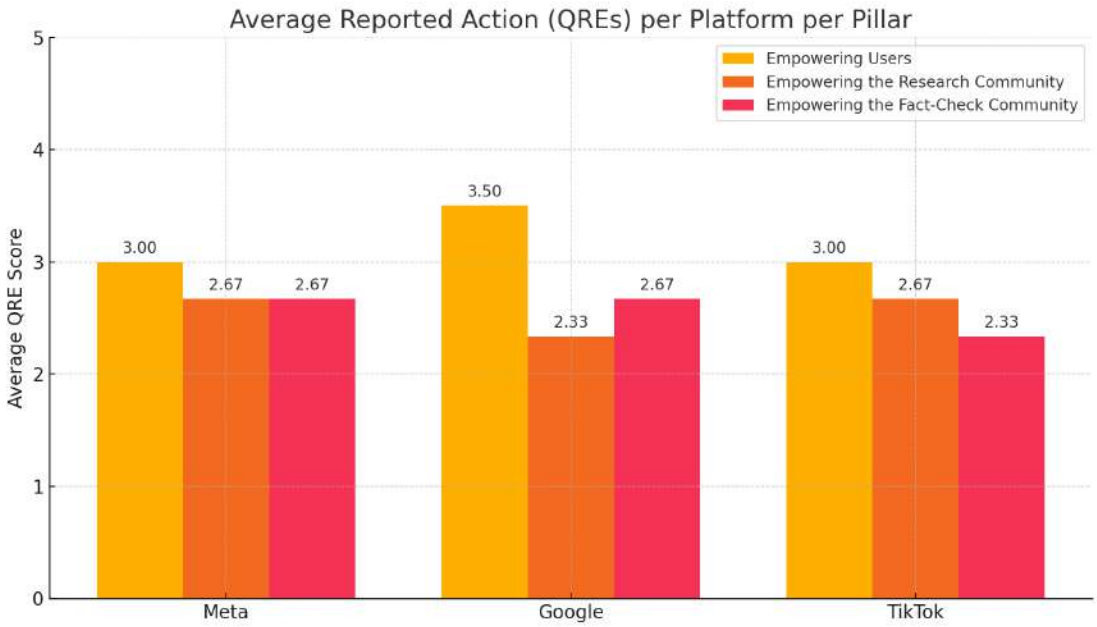


Figure 1: Average scores for each CoP pillar and each platform

Figure 1 illustrates the average scores for each Code of Practice (CoP) pillar for each platform. Among the three assessed pillars, "Empowering the Users" received the highest average scores, ranging from 3 to 3.5 out of 5, across Meta, Google, and TikTok. This suggests that platforms were generally more precise and more complete

in reporting their tools, activities, and partnerships aimed at empowering users with media literacy and verification capabilities.

In contrast, the "Empowering the Research Community" and "Empowering the Fact-Checking Community" pillars received lower scores. These lower ratings primarily stem from insufficient or vague responses in the qualitative reporting elements (QREs). Platforms often repeated the same information across different QREs or failed to provide concrete, detailed descriptions of their activities.

TikTok's report stood out for its clarity and structure, including illustrative screenshots of tools and features, which helped evaluators navigate the submission more easily. However, this clarity in presentation should not be interpreted as indicating a higher overall level of action or effectiveness in addressing disinformation compared to Meta and Google.

Empowering the Users

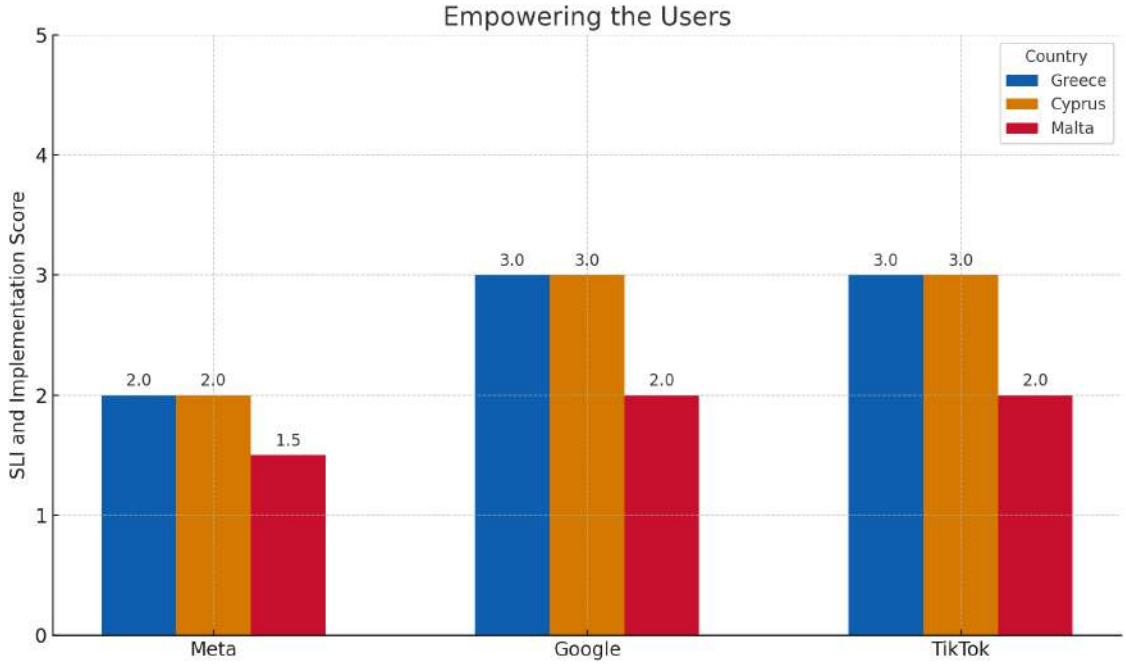


Figure 2: Average scores for each platform under Empowering users pillar

Figure 2 illustrates the assessment scores of the efforts of Meta, Google, and TikTok towards empowering users to identify disinformation across Greece, Cyprus, and Malta. More specifically:

Lower Scores for Meta - Limited Efforts and Inconsistent Labelling: Meta received the lowest score among the three platforms for empowering users. The platform reported fewer relevant efforts during the evaluation period and showed weak engagement in localized media literacy initiatives. Our analysis of debunked Facebook content [Leonidou et al., 2025] revealed inconsistent application of false information labels. Even when posts featured identical text or images related to the same false claim, some were labelled while others were not. This inconsistency suggests that Meta's automated labelling system may not reliably flag misleading content, limiting users' ability to make informed decisions.

Higher Scores for Google and TikTok - More Documented Tools and Local Language Support: In contrast, Google and TikTok received higher scores for reporting more tools, campaigns, and events aimed at empowering users. Both platforms made some of their resources available in the Greek language, which contributed to improved accessibility for users in Greece and Cyprus. However, the level of detail and localization of these efforts varied, with generic campaigns being more prominent than country-specific ones.

Absence of Local Media Literacy Events Across All Platforms: None of the three platforms reported organizing localized media literacy events specifically tailored to Greece, Cyprus, or Malta. This gap highlights a broader issue: a lack of structured collaboration with national media literacy experts and institutions. While global initiatives like Google's HitPause Campaign are technically accessible, they are not adapted to the unique media environments of these countries, reducing their potential impact.

Language Barriers in Malta: Lack of Maltese Language Integration: A significant challenge identified in Malta is the limited support for the Maltese language in media literacy tools and campaigns. The platforms primarily rely on English-language materials, which may limit accessibility for Maltese users. Additionally, none of the platforms engaged in fact-checking or media literacy activities specifically in Malta, which may have contributed to Malta's lower scores.

Limited Collaborations with Local Experts and Fact-Checkers: Across all three countries, platform partnerships with local experts i.e., journalists, educators, and fact-checkers are either minimal or absent. This hinders the design and adaptation of tools or campaigns to address national disinformation challenges. Malta is particularly affected, as the lack of engagement with fact-checking bodies prevents the development of user-focused features.

TikTok Shortcomings: Inconsistent Tags and Limited Search Functionality: Although TikTok scored well in clarity and structure of reporting, it has notable limitations in implementation. Our review found that TikTok's Video Notice Tags were not consistently applied, and its search interventions were unreliable, especially for Greek language queries or those with minor typographical errors. Furthermore, TikTok's "Unverified Content" label does not apply to Maltese content, as there is no local fact-checking partner for the country.

YouTube Information Panels: Greek Support Available, but Consistency Concerns Remain: YouTube's Information Panels are available in Greek, which is beneficial for users in Greece and Cyprus. However, the Maltese language is not supported. Users in Malta receive these panels in English by default. During testing, we identified a case where an information panel failed to appear when the interface language was set to Greek but did appear when set to English (UK) (see Figure 14). This inconsistency raises concerns about the reliability of the panels and whether language settings may hinder access to credible contextual information, particularly for non-English-speaking users.

Meta and TikTok Lack Fact-Checking Partnerships in Malta: Neither Meta nor TikTok has established fact-checking collaborations in Malta. As a result, disinformation circulating locally is unlikely to be flagged or labelled by platform mechanisms. This further reduces user awareness and weakens the platforms' ability to empower users in the region effectively.

Empowering the Research Community

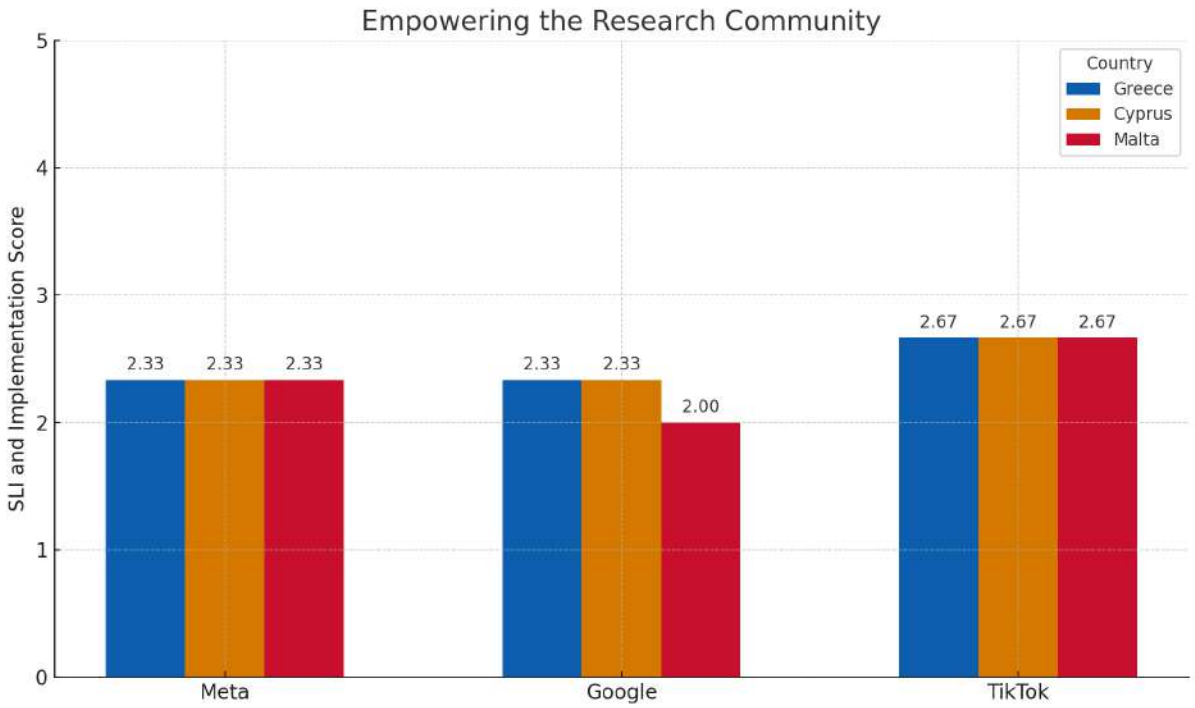


Figure 3: Average scores for each platform under Empowering the Research Community pillar

Figure 3 illustrates the assessment of the efforts of Meta, Google, and TikTok in empowering researchers to combat disinformation across Greece, Cyprus, and Malta. More specifically:

Consistent but Modest Platform Performance in Supporting Researchers: All three platforms—Meta, Google, and TikTok—received similar, moderate scores for their efforts to empower the research community across Cyprus, Greece, and Malta. While each platform reports the existence of publicly accessible tools and APIs for disinformation-related research, the actual usage or engagement from these countries is extremely limited, and no meaningful metrics were provided to assess their effectiveness.

Limited Google Research Tools Functionality for Malta: Google received a slightly lower score compared to Meta and TikTok, primarily due to limited tool functionality for Malta. For instance, Google's Fact Check Explorer does not index fact-check articles relevant to Malta, and Google Trends lacks country-specific features, such as omitting Malta from the "Trending Now" location filter. These limitations reduce research visibility into Maltese disinformation trends.

Promoting the Tools to Researchers: Although platforms did fulfil their obligation to list data access tools and repositories for researchers, these tools appear to be under-promoted and underutilized. To improve impact, platforms must actively promote, localize, and provide guidance on how to use these tools within each country's academic and research communities.

Disinformation Labels from APIs: Crucially, researchers also need access to deeper layers of platform data, such as whether content has been labelled, modified, or removed under disinformation policies. Improved

transparency and access to such data via APIs is essential to enable high-quality, independent research on disinformation dynamics within and across the three countries.

Table 3 lists several resources (tools and data repositories) available to researchers as mentioned in their CoP reports No.4.

Table 3: Available resources for Researchers found in the Platforms Reports

Tool / Data Repositories for researchers	**Description**
Meta	
Meta Content Library and API	Enables researchers to access public content from Facebook and Instagram. Researchers can apply through the Inter-university Consortium for Political and Social Research (ICPSR). Includes search, filtering, and download functions with access thresholds.
Meta Ads Library	Publicly searchable database of all active ads across Meta platforms, including issue, electoral, and political ads. Offers ad creative, spend, targeting data, and impressions.
Ad Targeting Dataset	Political and social issue ad targeting data since August 2020.
URL Shares Dataset	Aggregated engagement data for links.
Influence Operations Research Archive	Data on Coordinated Inauthentic Behaviour (CIB) networks.
Data for Good	Dashboards with aggregated insights.
Google	
Google Researcher Program	Grants are available to EU researchers (including vetted non-academics) for limited metadata access across Search and YouTube to study public data. A dedicated team reviews applications; successful applicants receive API credentials and usage guidance.

YouTube Researcher Program	Provides qualifying academic/non-profit researchers worldwide with expanded access to anonymized, global YouTube video metadata (titles, descriptions, views, likes, comments, channel information, and search results) via a Data API. Includes formal application and support.
Google Trends	Publicly accessible tool showing aggregated, anonymized search-interest data over time and by geography. Researchers can analyze search trends for keywords, topics, and regions to study information demand and potential disinformation spikes.
Fact Check Explorer	Index of ClaimReview-tagged fact-checked articles from certified publishers worldwide. Researchers can search by keyword, URL, or date to retrieve verified claims and metadata (claim origin, publisher, verdict).
Claim Search API	Programmable interface allowing researchers to retrieve ClaimReview fact-check results in JSON format. Useful for bulk analysis of claim metadata, publisher details, and review dates.
Google Ads	A publicly accessible database that provides transparency into political and issue-based advertising across Google platforms. It includes detailed information about ad content, spend, impressions, advertiser identity, geographic targeting, and more. Researchers and the public can search and explore ads to better understand how different topics are promoted and targeted across regions.
Search Researcher Result API	Beta API that returns anonymized, aggregated search results (SERP snippets, ranking signals) to approved researchers. Enables analysis of how certain queries produce different result types, without exposing individual user data.
Lumen Database (Harvard Berkman)	Independent repository of legal takedown and content-removal notices voluntarily shared by companies (including Google). Researchers can query millions of notices to study patterns in online content availability and removal requests.
AMMeBa Dataset	Publicly released dataset of 135,838 ClaimReview fact-checks annotated for media modality (image, video, AI-generated, etc.). Enables researchers to study historical and evolving trends in media-based disinformation from 1995 onward.

TikTok	
Research API	Programmatic access to *public* TikTok content and account metadata—including comments, captions, subtitles, counts (views/shares/likes), and follower/following lists—available to qualified non-profit academic researchers in major regions.
Virtual Compute Environment	Secure, sandboxed environment for non-academic, not-for-profit EU researchers to query and analyse TikTok's public data under strict privacy and security controls.
Commercial Content API	API providing detailed advertising data—creative assets, run dates, targeting criteria, impressions, spend ranges, and disapprovals—for ads served in the EU; access via approved TikTok for Developers accounts.
Commercial Content Library	Publicly searchable repository of all paid ads (and tagged commercial-nature posts) run in the EEA, UK, and Switzerland, with creatives, metadata (targeting parameters, impressions), and one-year retention after last view.
TikTok Transparency Centre	Houses TikTok's core moderation and policy reports for EU audiences: COPD (biannual), Community Guidelines Enforcement (quarterly), and DSA (biannual) reporting with downloadable aggregated data.

Empowering the Fact-Checking Community

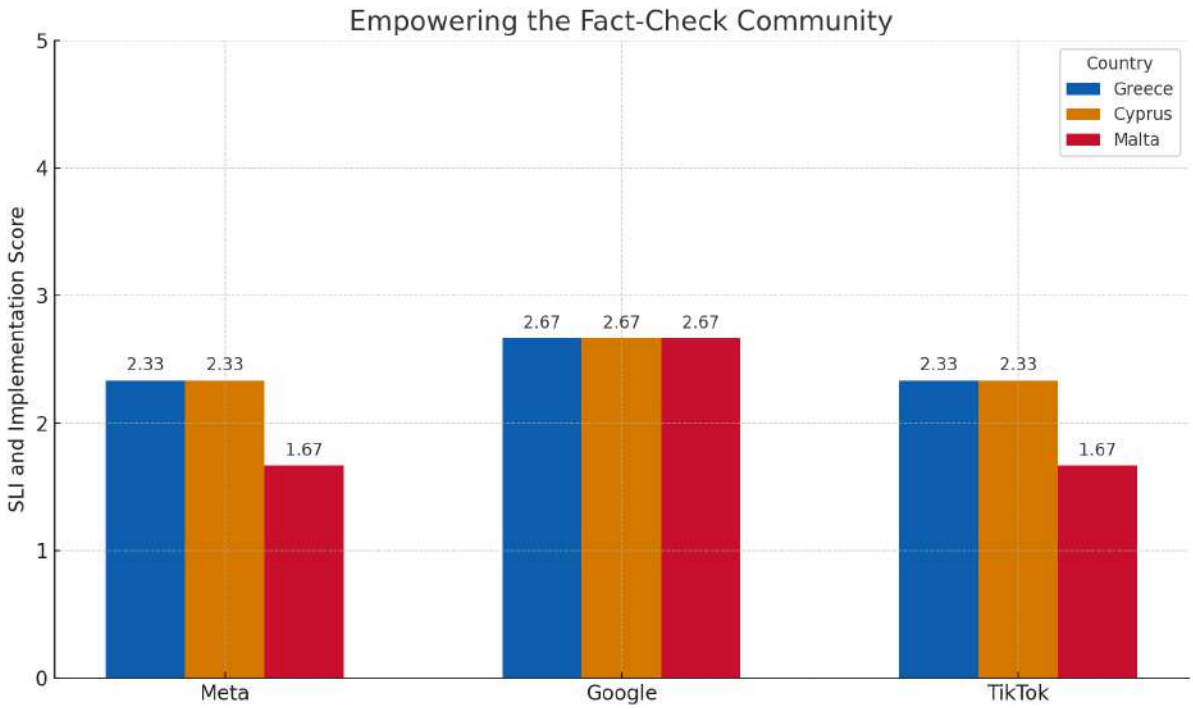


Figure 4: Average scores of each platform under Empowering the Fact-Checking Community pillar

Figure 4 illustrates the assessment scores of the reported efforts of Meta, Google, and TikTok in empowering the fact-checking community across Greece, Cyprus, and Malta. The scores reflect platform practices in terms of operational partnerships, transparency of tools, integration of fact-checks, and regional funding distribution. Key observations include:

Uneven Integration and Coverage Gaps: Meta, Google, and TikTok exhibit moderate engagement in Greece and Cyprus, but a significantly weaker presence in Malta. The absence of partnerships with Maltese fact-checkers, combined with limited or no support for the Maltese language, has resulted in serious coverage gaps that reduce the platforms' ability to address disinformation effectively at the national level.

Differences in Fact-Checking Integration Mechanisms: Each platform adopts a different model for integrating fact-check outcomes. Meta uses fact-checkers' ratings to label content as "false information" and links to the relevant fact-check articles directly. TikTok does not apply fact-check labels directly; instead, it routes fact-checkers' assessments to internal moderators, who then decide whether to remove or demote the content—making the integration less direct and opaque. In contrast, Google does not label content as true or false. Instead, it integrates fact-checking outcomes by surfacing fact-checking articles in its search results through the ClaimReview markup and by displaying information panels alongside content to provide contextual information.

Lack of Methodological and Impact Transparency: All three platforms report ongoing collaboration with fact-checking partners (primarily through IFCN), yet none of them provide clear methodologies or performance assessments for evaluating the effectiveness of fact-checking integrations. TikTok and Meta do not disclose usage metrics for their fact-checking dashboards or internal tools. Google also lacks follow-up metrics for its

ClaimReview markup and does not provide post-placement impact data (e.g., click-throughs, or engagement resulting from fact-check appearances).

Minimal Country-Specific Disaggregation of Impact Data: TikTok shares country-level data on videos assessed and removed due to fact-checker input. However, the numbers are very low. Meta reports the number of articles used to support content ratings and shares cancelled after users saw false information warnings. Google provides fact-checking impression metrics and article counts by language and country in its Fact Check Explorer. Yet, across all three platforms, this data lacks sufficient granularity or context to meaningfully assess impact at the national level.

Generic or Inaccessible Fact-Checker Tools: Google promotes general tools such as Search Console and YouTube Studio, which fact-checkers can use to assess site traffic and video performance. However, these tools are not tailored for fact-checking workflows and are available to all users. Google's only tool explicitly designed for fact-checking—the ClaimReview markup—also lacks a feedback mechanism. Meta and TikTok reference internal dashboards, but do not offer public details on their structure, usage, or effectiveness.

Funding Gaps and Opaque Support Structures: Google indirectly supports fact-checkers through funding bodies such as IFCN, EFCSN, and EMIF. In 2024, only fact-checking projects in Cyprus and Greece received limited grants. Malta received no support under the most recent IFCN funding phases. Meta does not disclose country-level funding details or outline how resource allocation reflects local disinformation risks or fact-checking capacity.

In summary, while the platforms maintain some form of collaboration with fact-checkers and promote select tools, they fall short in offering country-specific impact data, tool transparency, and effective integration frameworks—particularly in Malta. Clearer data on tool performance, regional investment, and integration outcomes is essential to ensure that fact-checking communities across all three countries are fully empowered in accordance with the Code of Practice on Disinformation.

Table 4 lists several tools available to support fact-checking organizations in their efforts. Only Google reported such tools, while Meta and TikTok only mentioned the dashboards available for fact-checking organizations they partner with.

Table 4: Available resources for Fact-Checkers found in the Platforms Report

Tool for fact - checkers	**Description**
Google Search Console	Monitors a site's presence in Google Search, reporting on impressions, clicks, queries, and country-specific views so fact-checkers can track their web performance.
YouTube Studio	Central dashboard for channel management and analytics, showing fact-check video views, watch time, traffic sources, and search terms that lead viewers to content.
ClaimReview HTML Markup	A schema.org format that fact-checkers embed in their articles; allows Google to index and display structured fact-check metadata in Search and YouTube.
YouTube Create	A mobile app for rapid video production—offering templates, filters, music, and editing controls—so organizations (including fact-checkers) can quickly create and publish short-form debunk videos.

3.2 Recommendations for Platforms and National Experts in Cyprus, Malta, and Greece to Strengthen the Fight Against Disinformation

In this section, we present our recommendations to enhance the coverage and effectiveness of platform practices—both existing and future—in addressing disinformation in Cyprus, Greece, and Malta. The suggestions are organized according to the three pillars of the Code of Practice: Empowering Users, Empowering the Research Community, and Empowering the Fact-Checking Community. This structure allows for targeted, actionable insights tailored to each area of intervention.

Empowering Users

Develop Localized Tools and Language-Specific Resources: Platforms should ensure that all media literacy tools—such as disinformation warnings, fact-check labels, context panels, and in-app educational features—are available in the national and regional languages used in Cyprus, Greece, and Malta. This includes full support for Greek, Cypriot Greek, and Maltese. Localized content should also reflect context-specific disinformation narratives, such as those tied to regional elections, migration, or public health debates. Without language and cultural adaptation, such tools risk being underused or misunderstood by local users.

Improve Visibility and Discoverability of Media Literacy Tools: Many users remain unaware that platforms offer tools such as fact-check notices, reverse image search guidance, or credibility signals. **Platforms should integrate clear prompts, banners, and tutorials** directly into the user interface, especially around high-risk events like elections. These features should be visible in news feeds, search results, and trending topics. Additionally, **periodic awareness campaigns**—using pop-ups or short explainer videos in local languages—can enhance user familiarity with available verification tools.

Encourage Stakeholder Feedback and Co-Design of MIL Tools: Platforms should actively engage national experts in media literacy (e.g., educators, journalists, NGOs, university researchers) from Cyprus, Greece, and Malta in the design, testing, and refinement of their media literacy and fact-checking features. This can be achieved through local focus groups, usability studies, or consultative forums. Tools co-designed with local stakeholders are more likely to address cultural norms, digital habits, and the specific vulnerabilities of each country's information environment.

Ensure Consistent Labelling of False Content Across Languages and Regions: One of the critical issues observed is the uneven application of fact-check labels, particularly for Greek-language posts across different platforms and regions. Platforms must implement cross-regional consistency so that if a claim has been debunked (e.g., by a Greek fact-checker), identical posts in Cyprus or in Cypriot Greek also trigger the same label. This consistency ensures that all users are not confused and that all audiences receive timely and accurate correction notices.

Provide Local-Language Context Panels and Correction Prompts: When disinformation is flagged, platforms should not only label it but also display short summaries of why the content is misleading, link to relevant fact-checks, and do so in the local language. These context panels should appear prominently (e.g., above the post or in the comment feed), helping users understand the basis of the correction rather than simply seeing a warning badge. This enhances user trust and increases the likelihood of behaviour change.

Broaden Community-Driven Annotation Programs: Platforms that use systems like Community Notes (on X/Twitter) should expand them to support local languages and regional contributors. This includes recruiting Greek- and Maltese-speaking users to participate in community-based verification and incentivizing diverse participation. Expanding community moderation gives local users a greater sense of agency in combating disinformation and can help flag emerging false narratives before they scale.

Implement Safe Design Features to Limit Spread of Disinformation: Platforms should adopt "friction" features—such as pop-up warnings before resharing flagged content, slowing down virality of unverified posts, or hiding likes on content that has been debunked. These interventions reduce impulse-sharing of falsehoods while preserving transparency. Platforms should also down-rank content that has been fact-checked as false, so it appears less frequently in feeds and recommendation systems, especially during periods of heightened risk (e.g., elections or health crises).

Boost Digital Literacy and Awareness Campaigns: To maximise reach, platforms should collaborate with schools, media outlets, and civil society organisations to co-develop media literacy campaigns tailored to Cyprus, Greece, and Malta. These could include educational videos, classroom toolkits, or influencer-led explainers promoting critical thinking and digital verification techniques. Platforms should fund or co-host such initiatives in both online and offline settings, especially targeting younger and first-time voters.

Empowering Researchers

Provide Access to Data for Independent Research: Enable vetted researchers and EDMO hubs (such as MedDMO) to access granular platform data relevant to disinformation in each country. This includes sharing anonymized data on content views, shares, takedowns, and labelling actions in Cyprus, Greece, and Malta. Such access is a precondition for effective monitoring of the local disinformation ecosystem, allowing researchers to identify trends and gaps in platform responses.

Include Small Languages in Transparency Reporting: In transparency reports and archives, break down information by country and language so that data from Malta and Cyprus is not hidden in aggregate. Platforms should report country-specific metrics – for instance, the number of fact-checked posts, false content removals, and user warnings issued in Greek and Maltese – to facilitate accountability. This granular transparency enables researchers and policymakers to gauge coverage and effectiveness of platform measures at the national level.

Improve Researcher API Tools and Support: Enhance existing APIs and data-sharing tools to ensure they cover content in local languages (Greek, Maltese) and are easy for research teams to use. Platforms should streamline data request processes under the Digital Services Act's researcher access provisions and provide documentation or liaisons for researchers in Cyprus, Greece, and Malta. By lowering technical barriers, platforms empower the research community to study disinformation dynamics and the impact of interventions in these markets.

Collaborate on Joint Studies and Risk Assessments: Work directly with academic institutions and observatories in the region to investigate platform-specific disinformation risks. For example, platforms can invite local researchers to co-design studies or share insights when performing risk assessments for upcoming elections in Greece or Cyprus. This cooperation ensures that platform policies are informed by on-the-ground expertise and evolving disinformation tactics in each country.

Empowering the Fact-Checking Community

Integrate Local Fact-Checkers into Platform Programs: Formally include credible national fact-checking organizations in Cyprus, Greece, and (especially) Malta into the platforms' third-party fact-checking partnerships or equivalent collaboration frameworks. In Malta (where no such partnerships exist yet), platforms should onboard local fact-checkers (e.g. Times of Malta, University of Malta team) so that their debunks feed into in-app warnings and reduced content reach. Likewise, any Greek or Cypriot fact-checking outlets not already in programs should be added. Bringing local fact-checkers into the fold **widens fact-checking coverage across the EU** and ensures even smaller communities are protected.

Increase Visibility of Local Fact-Check Results: Adjust algorithms and notification systems to boost the prominence of local fact-checks on the platforms. When local fact-checkers debunk a false story targeting Greek or Cypriot audiences, platforms should swiftly label the content and display the fact-check link or summary to all users who have seen or shared it. This practice amplifies trustworthy local sources and helps correct falsehoods before they spread further.

Support Capacity-Building for Fact-Checking Organizations: Provide direct support to strengthen fact-checking efforts in these countries. This could include offering training on platform policies and tools, providing grants or advertising credits for public-awareness campaigns by fact-checkers, and sharing relevant data or tools (like claim detection algorithms) with them. By investing in the local fact-checking community, platforms improve the **effectiveness** of moderation – verified false claims get addressed faster and more reliably.

Facilitate Cross-Border Fact-Checking Collaboration: Encourage collaboration between fact-checkers in Greece, Cyprus, and Malta as well as those in other EU countries. Platforms can host regular roundtables or an online portal for fact-checkers to exchange information on emerging disinformation themes (for instance, similar false narratives that appear in Greek and then in Maltese contexts). Such networks, supported by platform data where possible, ensure that fact-checking coverage is coordinated and no country is left behind when dealing with region-wide disinformation campaigns.

Next, we present a platform-by-platform analysis, highlighting key reported information and evaluating each platform's practices. Our assessment focuses on tools, activities, and partnerships that platforms report under their disinformation mitigation efforts. Where applicable, we illustrate these tools with examples and share findings from our own investigations—especially in cases where we observed strong performance or notable gaps.

The evaluation includes both general commentary on the quality and clarity of the reported elements, as well as specific insights into their relevance for the three countries under review: Cyprus, Greece, and Malta. For each commitment, we include an evaluation matrix that displays the scores assigned to the Qualitative Reporting Elements (QREs) and the per-country scores for Service Level Indicators (SLIs) and implementation. Each section concludes with a summary of the reported content we assessed, followed by a discussion of the key observations and shortcomings that influenced our scoring.

3.3 Meta (Facebook and Instagram)

Our analysis of Meta's practices is based on the information provided in Meta's Code of Practice Signatory Report No. 4, submitted in September 2024, covering the period from January 1st to June 30th, 2024 **[Meta, 2024]**. It is important to note that in January 2025, Meta announced a significant policy change: it would begin phasing out its collaboration with third-party fact-checking organisations—initially in the United States—who had been independently assessing the accuracy of claims to enable Meta to apply warning labels and demote misleading content. Instead, Meta plans to implement a Community Notes system, resembling the one used by X (formerly Twitter) **[Kaplan, 2025][BBC, 2025b].** The CoP report assessed in this study reflects the period prior to this announcement and does not include any information on Meta's new direction.

3.3.1 Meta: Empowering Users

Pillar-V: Empowering Users ***Commitment 17: Enhancing Media Literacy,*** *page 66-71*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 17	3	2	2	2

Meta Media Literacy Tools

Meta has reported several features aimed at improving user awareness and promoting media literacy across its platforms:

- **Warning Screens** on Facebook and Instagram for content containing sensitive material such as violent or graphic imagery, bullying or harassment, nudity, or references to suicide or suicide attempts.
- **Verified Badges** for public figures and notable accounts on Facebook and Instagram to help users identify authentic profiles and reduce impersonation and scams.
- **Notification Screens for Outdated Articles** on Facebook, which appear when users attempt to share news content that is over 90 days old. These notifications aim to provide users with contextual awareness. Notably, official health content from government agencies or recognized global organizations is exempt to avoid obstructing the flow of verified information.

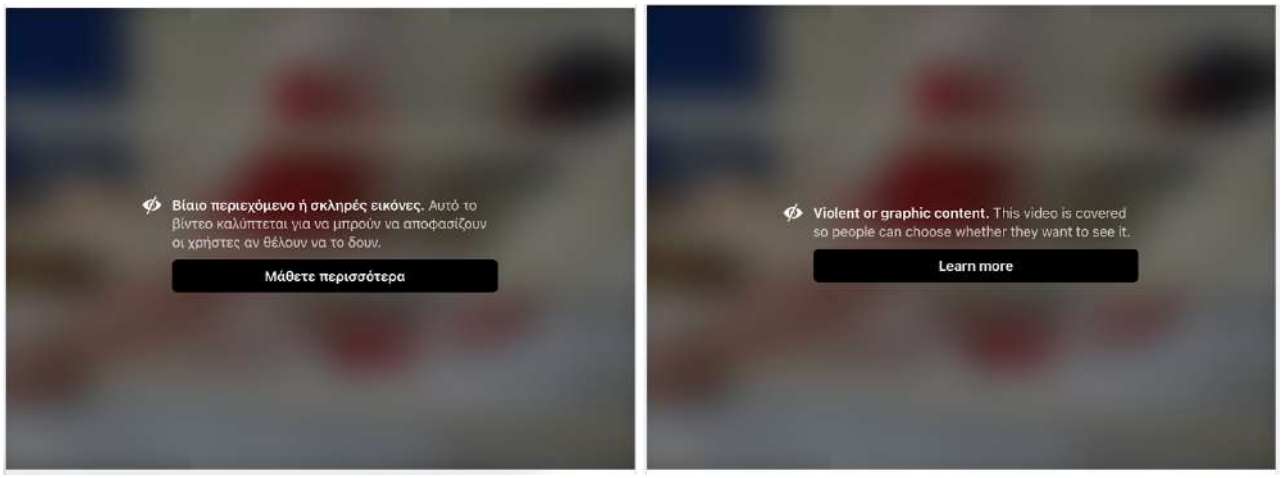


Figure 5: Facebook Warning Screens

Meta Media Literacy Activities

During the reporting period, Meta promoted a range of initiatives to support informed civic engagement and counter disinformation across Europe:

- European Parliament Elections 2024
  - Ran awareness campaigns in Germany, Poland, Slovakia, Lithuania, and Romania, promoting Facebook and Instagram tools related to electoral integrity.
  - Promoted the #BeElectionSmart website by EDMO and included it on Meta's dedicated election hub[3].
  - Provided ad credit support to ERGA (European Regulators Group for Audiovisual Media Services) for its anti-disinformation campaign.
- Country-Specific Efforts
  - Germany: Supported the Federal Returning Officer's "get-out-the-vote" campaign.
  - France: Partnered with AFP Fact Check and participated in the disinformation awareness campaign led by Génération Numérique. Meta also ran its own election awareness campaign in the country.
- Thematic and Regional Campaigns
  - EFCSN Collaboration: Supported workshops and educational efforts focused on AI-generated disinformation.
  - Youth Awareness Campaigns: Conducted campaigns in Spain, Ireland, and the Netherlands to promote well-being tools for young users.
  - European Disability Forum: Delivered a webinar focused on online campaigning techniques for disability rights organizations.
  - CEE Digital Awareness Day: Co-organized a regional event featuring media literacy experts from 17 Central and Eastern European countries.

[3] https://www.facebook.com/government-nonprofits/eu

Meta's Partnerships with Media Literacy Experts

Meta reported collaborations with NGOs, academics, and fact-checking organizations to enhance media literacy and combat disinformation, including:

- Ongoing work with **AFP Fact Check** and **Génération Numérique** in France.
- Training and capacity-building initiatives with the **European Fact-Checking Standards Network (EFCSN)**.
- Youth-centered campaigns and digital well-being initiatives in various EU member states.
- Participation in regionally coordinated events to address local disinformation narratives and improve digital resilience.

These activities were designed to reinforce the transparency and reliability of online information, particularly in politically sensitive periods such as elections.

Major Comments:

- Warning screens on sensitive content are translated into Greek but not Maltese when users set the platform language to Greek or Maltese, respectively (see
- Figure 5 in which on the left the language setting is in Greek and on the right it is in English). These screens are not applied to content containing disinformation, misinformation, or misleading claims.

- No data is provided on the number of accounts with verified badges at the member-state level. There is also no metric reported to assess how verified badges affect user interactions or trust.

- No quantitative information is reported under SLI17.1.1. This means there is no data available at either the national or EU level on the impact of Meta's media literacy tools—such as total impressions or user engagement —as recommended in the Code of Practice.

- Media literacy campaigns listed in Meta's report were not tailored to Cyprus, Greece, or Malta. There are no metrics on reach or engagement specific to these countries.

- Meta reported providing ad credit support to ERGA for an EU election awareness campaign but gave no implementation details. National broadcasting authorities in Cyprus and Greece confirmed the action, including that the campaign was translated into Greek.

- Meta's reporting on partnerships with experts is general and lacks granularity by member state. It is unclear whether any partnerships exist in Cyprus, Greece, or Malta.

Pillar-V: Empowering Users *Commitment 21: Better Equipping Users to Identify Disinformation,* *page 80-84*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 21	3	2	2	1

Meta Third Party Fact-Checking Program (3PFC):

Meta collaborates with over 45 independent third-party fact-checkers certified by the International Fact-Checking Network (IFCN) and the European Fact-Checking Standards Network (EFCSN) across Europe. In the EU, Meta works with 29 partners covering 23 languages in 26 countries. Their fact-checking efforts have a global impact, as false-rated posts receive demotions, warnings, and notifications worldwide.

Globally, Meta's 3PFC includes nearly 100 organizations working in over 60 languages to combat misinformation. Fact-checkers operate independently, reviewing content and assigning **ratings** such as **False, Altered, Partly False, Missing Context, Satire, and True**. Meta then labels, limits distribution, and sanctions repeat offenders based on these ratings. Meta also offers the link to the fact-checking article related to the fact-checking label on the post. If a user is about to share content that has received the fact-checking label, they receive a warning or reminder that the content contains false information, in order to prevent the spread of disinformation.

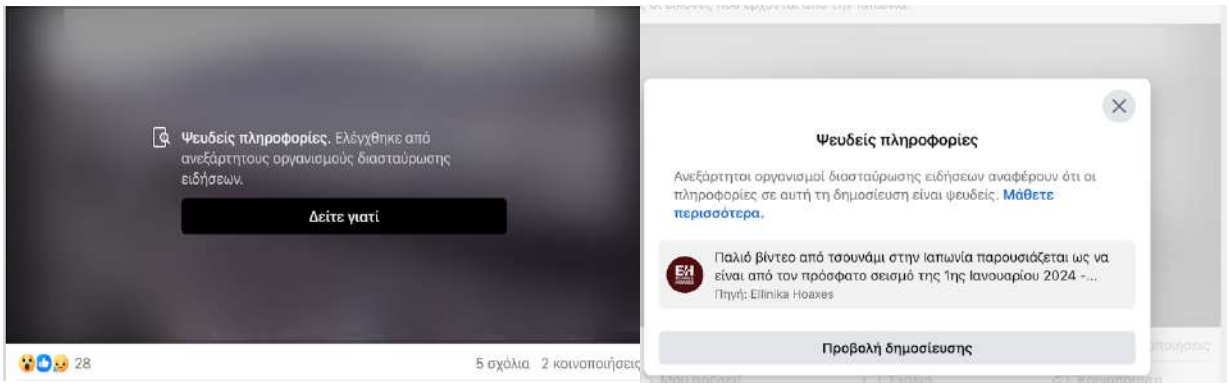


Figure 6: Fact-checking rating label in Greek on a Facebook post and dialog window with link to the fact-checking article.

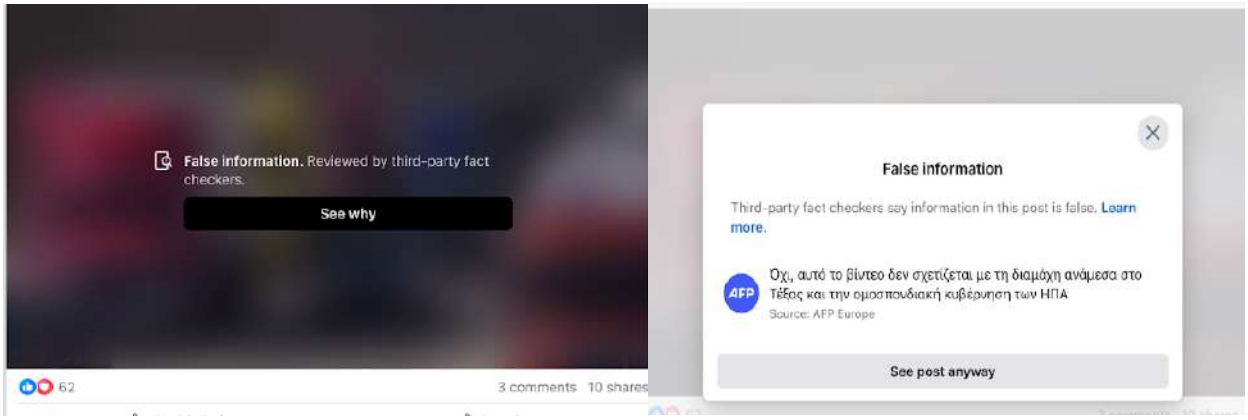


Figure 7: Fact checking rating label in English on a Facebook post and dialog window with link to the fact-checking article.

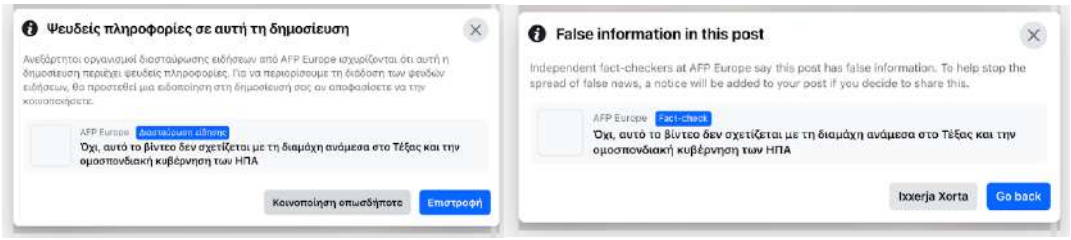


Figure 8: Warning message to prevent user from sharing the content in Greek and English.

Major Comments:

- Meta does not have partnerships with any fact-checking organizations covering Malta or the Maltese language. In contrast, Cyprus is covered by AFP, and Greece is covered by both AFP and Ellinika Hoaxes—both of which are partners in the MedDMO project and members of Meta's Third-Party Fact-Checking Program (3PFC).
- Fact-check rating labels are currently available in Greek (see Figure 6 and Figure 8) but not in Maltese (see Figure 7 andFigure 8). When users select Maltese as their language, Meta prompts them to add a secondary language to access features that are not supported.
- An analysis of the Greek MedDMO's fact-check archive and Facebook post searches related to false claims—specifically those verified by AFP and Ellinika Hoaxes—reveals inconsistencies in Meta's labelling system **[Leonidou et al., 2025].** While some posts receive fact-check labels, others presenting the same false claims remain unlabelled. This inconsistency suggests that Meta's algorithmic application of fact-check labels is not systematic, even when dealing with content reviewed by verified 3PFC partners. These gaps should be addressed to improve Meta's disinformation response.
- According to metrics reported under SLI21.1.2 (see table below), Facebook consistently displayed more fact-check articles and generated more treated content views than Instagram across all countries, suggesting either higher misinformation volumes or stronger enforcement on Facebook.

- Reshare prevention rates on Facebook were highest in Malta (57%), followed by Cyprus (49%) and Greece (47%). On Instagram, Greece led with 48%, followed by Cyprus (44%) and Malta (40%).
- Meta does not provide a ratio comparing fact-check impressions to the original reach of the false content, making it difficult to evaluate how many users saw corrective information.
- The platform also does not disclose how many users were penalized as repeat misinformation offenders or provide a breakdown of fact-check labels by category (e.g., False, Altered, Partly False, Missing Context, Satire, True), limiting transparency around enforcement practices.
- Global metrics under SLI21.1.2, which were included in previous reports, were not reported by Meta in this reporting round.
- Meta did not report any internal studies or evaluations assessing the effectiveness or accuracy of its labelling and rating systems.

Table 5: Meta's reported quantitative information for SLI 21.1.2, page 82.

SLI 21.1.2	Number of Articles written by third party fact checkers to justify rating		Content viewed on Facebook and treated with fact checks, due to a falsity assessment by third party fact		% of reshares attempted that were not completed on treated content	
	Instagram	Facebook	Instagram	Facebook	Instagram	Facebook
Cyprus	over 8,000	over 30,000	over 35,000	over 260,000	44%	49%
Greece	over 12,000	over 46,000	over 96,000	over 1,200,000	48%	47%
Malta	over 5,100	over 23,000	over 15,000	over 110,000	40%	57%
Total EU	over 39,000	over 150,000	over 990,000	over 30,000,000	43%	46%

3.3.2 Meta: Empowering the Research Community

Pillar-VI: Empowering the Research Community, *Commitment 26: Empowering the Research Community,* *pages 96 - 100*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 26	3	2	2	2

Meta's tools and processes to provide access to data for research purposes:

Meta Content Library and API[4]:

- Rolled out in June 2023.
- Includes data: for Instagram– accounts, posts and comments, for Facebook – Pages, posts, comments, profiles, groups and events.
- Enables searching, exploration, and filtering through a graphical user interface or a programmatic API.
- **Content Library API features:**
  - Searching and filtering with sorting options.
  - Multimedia exploration for photos, videos, and reels.
  - Customizable producer lists for refining search results.
  - API code generation in Python or R.
  - Designed for computational researchers familiar with R or Python.
  - Developer Documentation and technical guides are available, and a specific **help centre[5]** to support the API users
  - **Eligibility and Application:**
    - Open to researchers from qualified academic and research institutions.
    - Applicants focused on scientific or public interest research topics.
    - **Apply for access[6]** through partners with expertise in secure data sharing, such as the University of Michigan's Inter-university Consortium for Political and Social Research.

Ad Library[7] Tools:

- Dedicated Ad Library website and API.
- Enables searching through all currently active ads across Meta technologies.
- Provides comprehensive information on ad content, start date, advertiser details.

[4] https://developers.facebook.com/docs/content-library-and-api
[5] https://developers.facebook.com/docs/content-library-api/get-help
[6] https://developers.facebook.com/docs/content-library-api/get-access
[7] https://transparency.meta.com/researchtools/ad-library-tools

- Additional transparency for EU ads active within the past year.
- Displays spend, reach, and funding entity information for social issues, elections, or political ads in the last seven years.
- Ad library is open to public
- All Facebook users can access the Ad Library API

Major Comments:

- Meta's Content Library and API are well-documented and accessible to researchers in the EU through the SOMAR platform[8].
- Meta reports global usage metrics for the Meta Content Library, it does not provide country-level uptake data, leaving a gap in understanding local research engagement.
- Meta states its commitment to improving the Content Library and has introduced new data fields, including access to comments and account profile information.
- However, the Content Library and API still lacks key data fields that would be especially valuable for disinformation research—such as endpoints related to fact-checking ratings, links to fact-checking articles, or labelling decisions.
- The Meta Content Library limits access to public posts on Facebook and Instagram based on follower and page size thresholds[9]—specifically, only pages with more than 15,000 followers, and personal or creator accounts with over 25,000 followers are included in the downloadable subset. While public content from accounts with at least 1,000 followers is available for viewing, these higher thresholds for data export significantly restrict researchers' ability to analyse disinformation dynamics in smaller countries like Cyprus and Malta, where such large-scale accounts are comparatively rare.

[8] https://icpsr.atlassian.net/servicedesk/customer/portal/53
[9] https://developers.facebook.com/docs/content-library-and-api/appendix/data-dictionary

Pillar-VI: Empowering the Research Community, ***Commitment 27: Governance Structure for Access to Data for Research Purposes Requiring Additional Scrutiny,*** *pages 100 - 103*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 27	3	3	3	3

Data Sharing Programs:

Meta has been engaged in the EDMO working group on Platform-to-Researcher data sharing since 2019. They participated in a pilot program with EDMO researchers, testing the platform-to-researcher data sharing process. Meta's reported information highlights its active participation in the EDMO working group and support for the creation of an **Independent Intermediary Body (IIB)**[10]. As part of this pilot, they shared data with vetted researchers via Centre D'Accès Sécurisé Aux Données (CASD), a France-based third-party secure data access center, ensuring a privacy-preserving approach.

Meta also mentions engaging with ICPSR (Inter-university Consortium for Political and Social Research) as another third-party organization involved in vetting researchers and hosting access to datasets. Specifically, ICPSR is currently vetting researchers and providing access to datasets related to:

- **The US 2020 election**[11]
- T**he Meta Content Library and API**.

They have also expanded their Influence Operations (IO) Archive dataset since 2021, which provides access to over 100 removed networks related to Coordinated Inauthentic Behavior (CIB[12]), allowing researchers to conduct both qualitative and quantitative analyses.

[10] An Independent Intermediary Body (IIB) is a third-party organization designed to facilitate the sharing of data between digital platforms and vetted researchers while ensuring compliance with privacy laws, such as the GDPR. The IIB acts as a neutral intermediary to oversee and secure the data-sharing process, ensuring that personal data is handled appropriately and that the research conducted aligns with legal and ethical standards. It helps build trust and transparency between platforms, researchers, and the public.

[11] https://www.icpsr.umich.edu/web/about/cms/5024

[12] https://about.fb.com/news/tag/coordinated-inauthentic-behavior/

Major Comments:

- There is no clear disclosure of funding for the Independent Intermediary Body, and while Meta references ongoing engagement, the timeline for establishing this third-party entity lacks the specificity expected under Measure 27.1. Providing more concrete details would strengthen the credibility of the report.
- Meta's response would also benefit from additional clarity regarding the number of research teams participating in the pilot programs, along with any preliminary findings or insights. It remains unclear whether these pilots include access to content that has been removed from the platform, as stipulated in Measure 27.4.
- Overall, the reported information is overly generic and difficult to evaluate. To our knowledge, no research institutes in Cyprus, Malta, or Greece have been granted access to platform data as vetted researchers under these pilot initiatives.

Pillar-VI: Empowering the Research Community, *Commitment 28: Cooperation with Researchers,* *pages 103 - 105*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 28	2	2	2	2

META Research Support & Engagement:

Meta has a dedicated team to facilitate research and engage with the research community. Information on available research tools is provided through the Transparency Center[13].

Meta provides access (only to researchers) to the following datasets:

1. Meta Content Library & API – Public posts, pages, groups, and events.
2. Ad Targeting Dataset – Political and social issue ad targeting data since August 2020.
3. URL Shares Dataset – Aggregated engagement data for links.
4. Influence Operations Research Archive – Data on Coordinated Inauthentic Behavior (CIB) networks.
5. Data for Good – Dashboards with aggregated insights.

[13] https://transparency.meta.com/researchtools/

Major Comments:

- META outlines the available research tools but does not specify how they engage with researchers beyond providing tools.
- Meta does **not** disclose specific financial allocations for disinformation research under its cooperation with the European research community.
- There is no information to assess the reported information at a member-state level.

3.3.3 Meta: Empowering the fact-checking community

Pillar-VII: Empowering the fact-checking community ***Commitment 30: Cooperation with the fact-checking community,*** *page 108-113*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 30	3	2	2	1

As previously mentioned in Commitment 21, Meta has agreements with independent fact-checking organizations that follow the International Fact-Checking Network (IFCN) Code of Principles. From 2024, fact-checkers certified by the European Fact-Checking Standards Network (EFCSN) may also be onboarded.

The list of fact-checking partners covering specific countries or languages during the particular period is available in Meta's Report No. 4, on pages 111-112 **[Meta, 2024]**.

Meta reported that they have a team dedicated to working with fact-checkers, gathering feedback, and improving processes. Regular reviews and consultations are mentioned, but without details on frequency or impact.

Meta engages with EDMO regional hubs but does not outline specific collaboration outcomes.

Major Comments:

- META does not fully provide details on expected outcomes and the impact of fact-checking.
- META lacks transparency regarding per-country funding and the effectiveness of fact-checking.
- Meta mentions regular review and feedback of the fact-checking process and the cooperation with the fact-checking organizations, but there are no results or findings of these reviews and feedback.
- Meta lists the fact-checking organizations covering EU countries and languages; however, the lack of disclosed funding details and the number of fact-checkers per organization involved in Meta's rating makes it unclear how the funding and agreements effectively meet the needs of each country.
- The Meta 3PFC program covers Cyprus and Greece (Greek language) through their collaboration with AFP and Ellinika Hoaxes, but not Malta (Maltese language)

Pillar-VII: Empowering the fact-checking community ***Commitment 31: Use and integration of fact-checking*** *page 114-119*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 31	3	3	3	2

Meta's actions towards Commitment 31 focus on integrating independent fact-checkers, labeling misinformation, and assessing the impact of fact-checking efforts across its platforms:

Meta's collaboration with fact-checkers leads to labelling content as "false", "altered", or "missing context", reducing visibility and issuing warnings before users share it, along with links to fact-check articles.

In January–June 2024, Meta (in the EU) labelled more than 30 million Facebook posts and more than 990,000 Instagram posts, relying on more than 150,000 fact-checking articles. Additionally, 46% of Facebook and 43% of Instagram users cancel reshares after seeing these warnings.

Meta funds fact-checking initiatives but does not detail contributions to a centralized fact-check repository or shared technological solutions.

Major Comments:

- Meta incorporates fact-checkers' ratings by labelling content and linking to relevant fact-checking articles, demonstrating a degree of integration of fact-check outcomes into its services. However, no fact-checking organizations currently cover Malta or the Maltese language, limiting the effectiveness of these efforts for Maltese users.
- Despite referencing ongoing research, Meta has not provided a transparent methodology for evaluating the effectiveness of its fact-checking integration. The platform reports general figures, such as average monthly active users across the EU (see Table 6), but these do not offer meaningful insight into the actual impact of fact-checking measures.
- Additionally, Meta has not disclosed any information regarding the development or existence of a dedicated fact-checks repository, further limiting transparency and evaluation of its approach.

Table 6: Meta's reported quantitative information for SLI 31.1.3

SLI 31.1.3	Facebook	Instagram
	Average of monthly active users on Facebook in the European Union between 1/01/2024 and 30/06/2024	Average of monthly active users on Instagram in the European Union between 1/01/2023 and 30/06/2023
Total Global	260.7 million	264.3 million

Pillar-VII: Empowering the fact-checking community *Commitment 32: Fact-checkers access to relevant information* *page 119-121*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 32	2	2	2	2

Meta's third-party fact-checking partners have access to a **dashboard** Meta built in 2016. According to Meta, this dashboard surfaces potential misinformation for fact-checkers and provides "data points" to help them prioritize which content to review.

Meta reported using feedback from the fact-checking community and similarity-detection signals to highlight likely misinformation for fact-checkers. They may also send content to fact-checkers if Meta "becomes aware" content may be false.

Meta indicates it will continue to work with EDMO (European Digital Media Observatory) and with an "elected body representative of independent European fact-checking organisations," as referenced in Commitment 32. They also claim to be "constantly working to further strengthen" relationships with fact-checkers.

In preparation for the **2024 European Parliamentary Elections**, Meta launched a refresher training series for fact-checking partners. This included training on:

- Reviewing generative AI content.
- Understanding the different labels for misinformation.
- Using the "Newswhip" dashboard to track trending topics.

Major Comments:

- Meta refers to ongoing improvements to its fact-checking dashboard and "constant work" to enhance collaboration with fact-checkers. Still, it does not provide specific timelines, implementation milestones, or a roadmap outlining when new tools or functionalities will be introduced.
- Although fact-checker feedback is acknowledged, Meta does not explain how this input is collected, processed, or integrated into its systems for iterative improvement.
- While all fact-checking organizations participating in the 3PFC reportedly have access to the dashboard, Meta provides no data on actual usage, such as how frequently it is accessed, the volume of content reviewed, or metrics indicating success in identifying or addressing misinformation.
- Meta also mentions plans to collaborate with EDMO but offers no concrete details on how or when it intends to align with any future joint frameworks for data access by fact-checkers, only a general indication that such alignment is intended.

3.4 Google (Search, YouTube)

Our analysis on Google's practices is based on the information provided in **Google's Code of Practice Report, delivered in September 2024, No.4** [Google, 2024], covering the period 1st of January 2024 to 30th June 2024.

3.4.1 Google: Empowering Users

Pillar-V: Empowering Users *Commitment 17:* ***Enhancing Media Literacy,*** *page 123-136*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 17	4	3	3	2

Media Literacy Tools:

Google Search has deployed the **"About This Result"** feature that appears as three vertical dots next to a search result on Google (whether on desktop or mobile), an information panel appears providing useful context about the result. This panel includes a brief description of the source—typically from Wikipedia or the site itself—to help users understand who is behind the content. It also explains how the result was generated, such as through keyword matches, links from other websites, or relevance to the user's region. Additionally, it indicates whether the website uses a secure HTTPS connection and offers feedback options allowing users to report results they find unhelpful or misleading. Additionally, there's a "More about this page" button that links to a dedicated page with deeper insights into the source's web presence, publication history, and content credibility, further supporting users in making informed decisions.

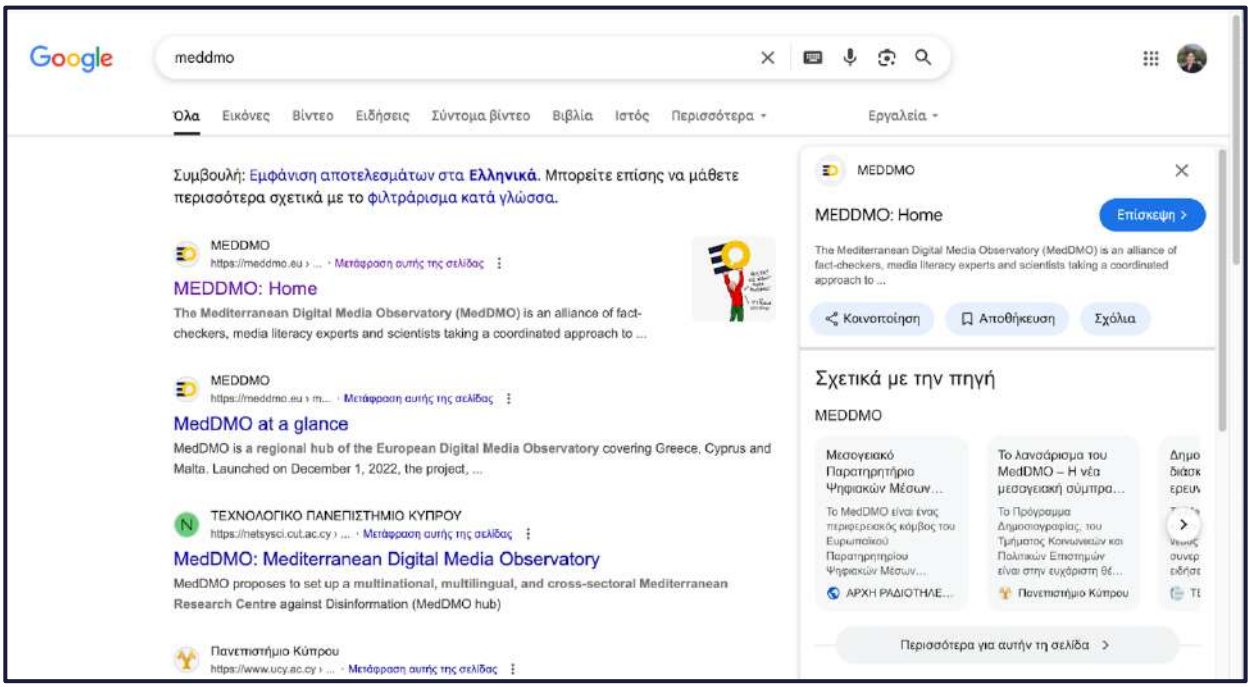


Figure 9: Google Search "About This Result" Feature (Greek)

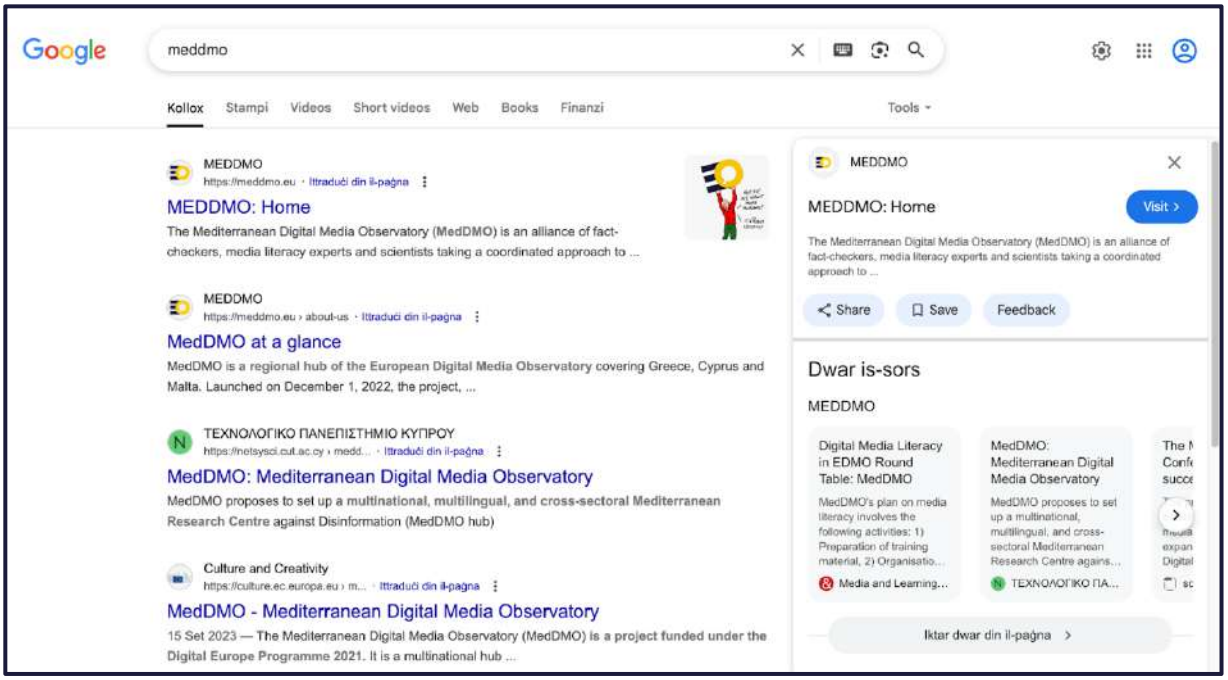


Figure 10: Google Search "About This Result" Feature (Maltese)

Google has expanded its **"About This Image"** tool to 40 additional languages, helping users evaluate online images more easily. "About this image" feature appears as a small clickable section next to or below the image in the info panel. It gives the image context like 1) When the image was first indexed, 2) Where it has appeared online, and 3) Whether it was used in fact-checking articles.

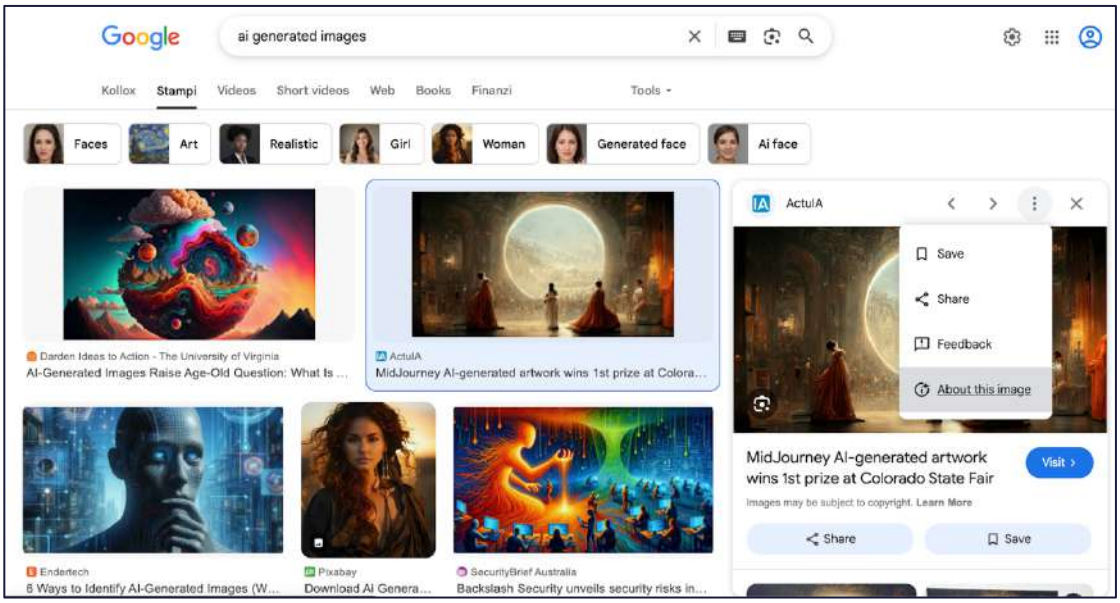


Figure 11: Google Search "About this image" feature

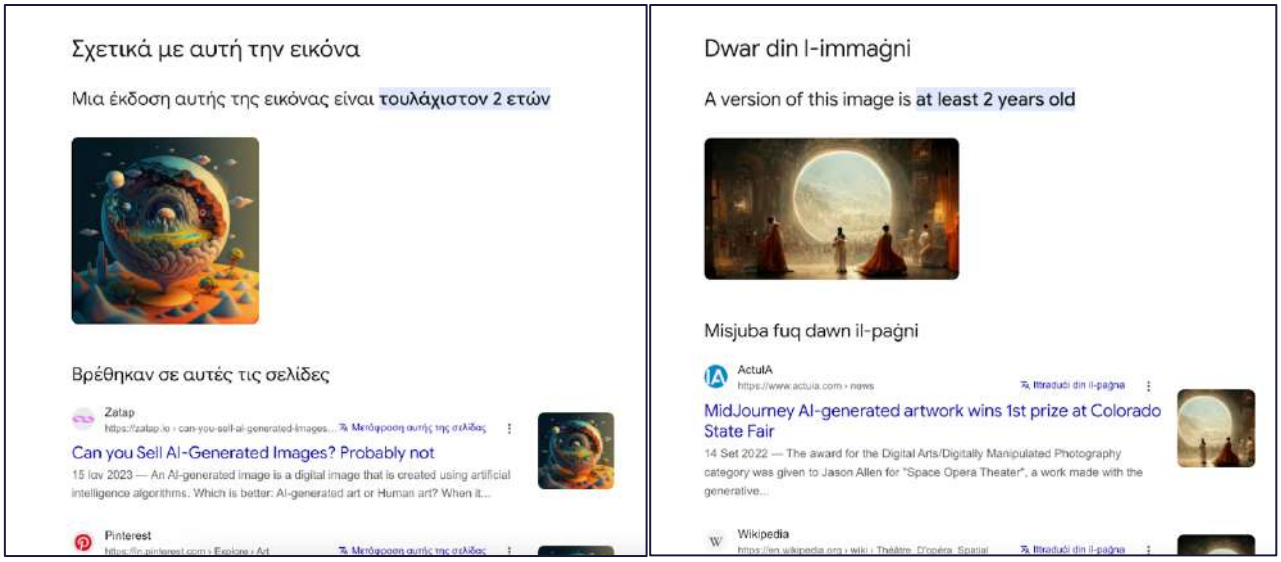


Figure 12: Google Search "About this image" feature (left: Greek and right: Maltese)

Google introduced **SynthID text watermarking** as part of its Responsible Generative AI Toolkit. If an AI-generated image created with Google tools contains the SynthID text watermark, the "About This Image" section will include a new field to indicate this, with a text "Made with Google AI". In that way, users will know if an image is authentic or AI-generated.

Google Search's **Content Advisory Notices**[14] are designed to alert users when reliable information is limited or when people are searching for a topic faster than accurate information is available.YouTube uses **Information Panels** to provide viewers with additional context on topics prone to misinformation, such as COVID-19, climate change, and elections. These panels appear alongside videos and in search results, offering concise information sourced from authoritative third-party organizations like the World Health Organization (WHO), Wikipedia, and Encyclopedia Britannica. The aim is to help users make informed decisions by presenting reliable information directly within the YouTube platform.

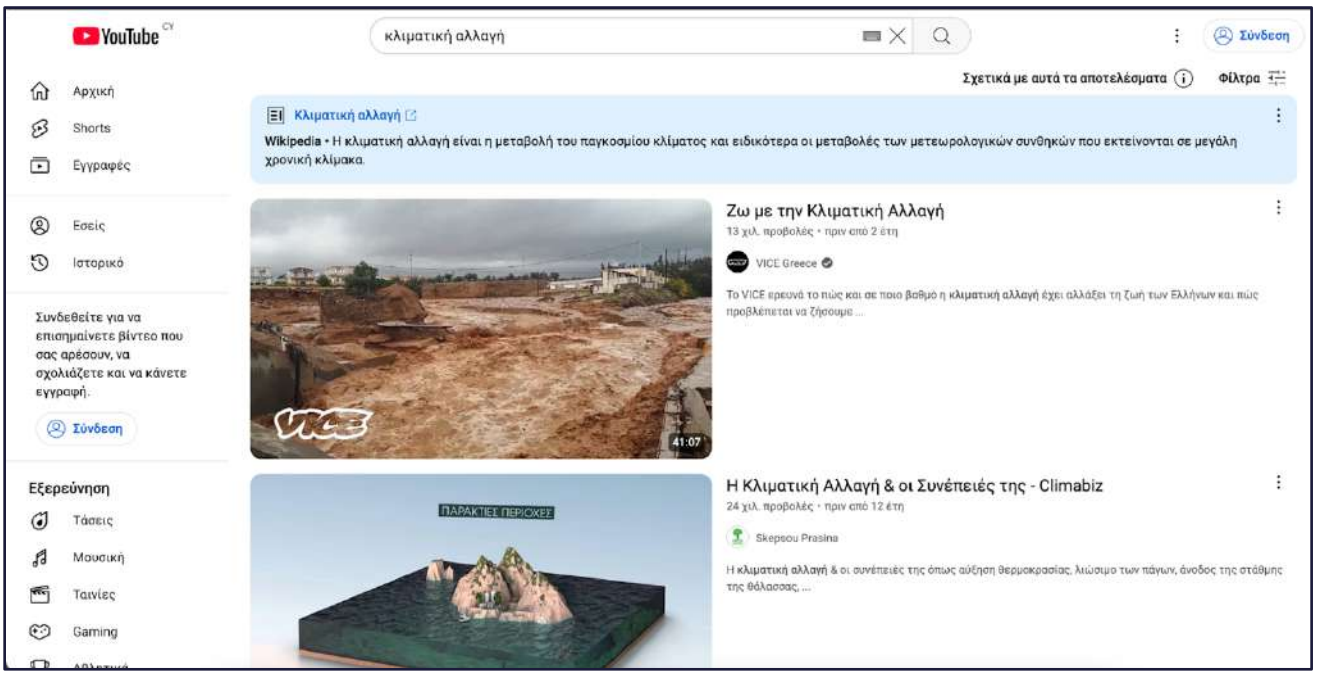


Figure 13: YouTube's Climate Change Information Panel example when language is set to Greek.

[14] https://blog.google/products/search/google-search-new-fact-check-features-europe/

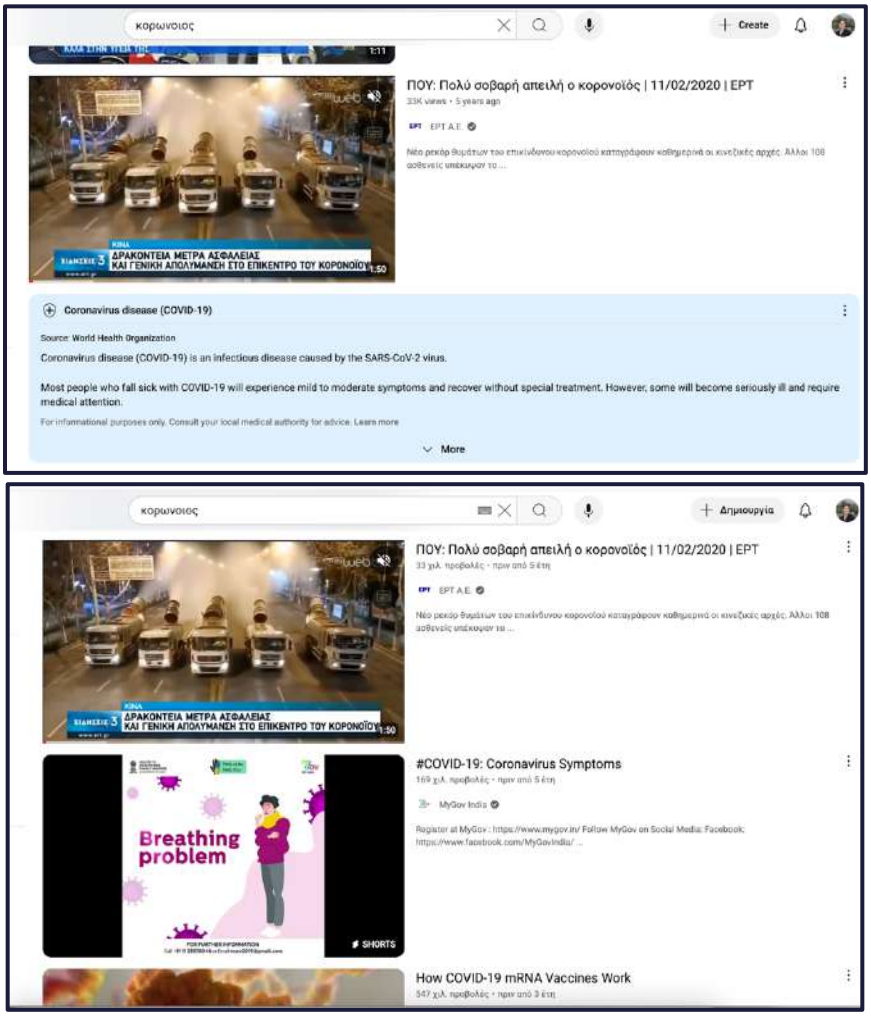


Figure 14: YouTube: Information Panels Inconsistency

Campaigns

Hit Pause Campaign[15] , a global media literacy initiative featuring a series of animated videos, was expanded to all EU Member States to teach critical thinking about misinformation. YouTube collaborated with the National Association for Media Literacy Education (NAMLE) to develop its "Hit Pause" campaign.

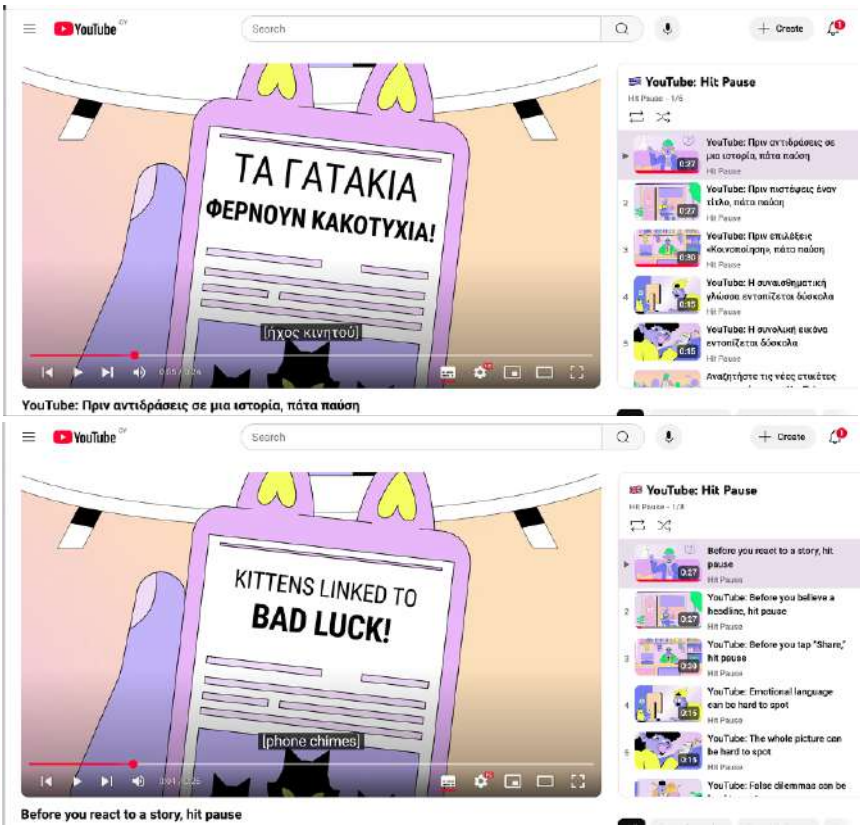


Figure 15: Hit Pause Campaign Screenshot in Greek and English

Research and Grants

Google through its Jigsaw unit, conducts research on information interventions and publishes its results regularly. In H1 2024, they published two research works relevant to misinformation:

- January 2024 – Research by Jigsaw and collaborators **[Maertens et al., 2025]** shows that inoculation interventions (text or video) can reduce misinformation susceptibility for up to a month, and their effectiveness can be extended with memory-based boosters.
- May 2024 – Ethnographic research with Jigsaw **[Hassoun et al., 2024]** reveals that GenAI enables everyday users to creatively remix and produce misinformation, calling for a shift in focus from passive consumers to active "bricoleurs."

[15] https://www.youtube.com/hitpause

Google granted funds to two organizations for media literacy activities in H1 2024:

- Barnardos ($1M) [16]
- ThinkYoung ($1M) [17]

Google partnered with Public Libraries 2030[18] to implement the "Super Searchers" training program. However, this program did not run in EU countries for first half of 2024.

Major Comments:

- Google has developed and deployed useful features to give more context to users about their search results.
- The **'About This Result'** feature is now available in the Greek (see Figure 9) and Maltese (see Figure 10) languages, following its expansion to 40 new languages in December 2023. This feature enables users to access information about the source and other contextual details of the search results information. Google reported that the "Source" section of this feature was viewed 291,106 times in Cyprus, 2,779,146 times in Greece, and 184,810 in Malta, the "Your Search and these results" was viewed 1,111,636 times in Cyprus, 11,819,482 times in Greece, and 662,658 in Malta, and the "Personalization" section was viewed 1,104,946 times in Cyprus, 11,769,060 times in Greece, and 657,346 in Malta.
- The **'About This Image'** feature is available in the Greek language and partially available in the Maltese language (see Figure 12). English is used to complement the text or feature that is not supported by Google in the Maltese language. This is a helpful tool, that provides context for users regarding images. Google reported that this feature was viewed 101,432 times in Cyprus, 639,346 times in Greece, and 57,930 times in Malta.
- Although we were unable to confirm whether the **Content Advisory Notices** feature is fully available in the Greek and Maltese languages, Google's reported data indicates that users in Cyprus, Greece, and Malta were exposed to these notices during H1 2024. Specifically, the impression proportions for low relevance results were relatively similar across the three countries (Cyprus: 0.183%, Greece: 0.168%, Malta: 0.173%), suggesting that users in all three regions encountered searches with limited high-quality information at comparable rates. In contrast, the impression proportions for rapidly changing results and potentially unreliable sets of results were significantly lower (Cyprus: 0.0006% and 0.0001088%, Greece: 0.00009% and 0.0000109%, Malta:

[16] https://www.barnardos.ie/google-org-extends-support-to-barnardos-to-help-make-the-internet-safer-for-children/
[17] https://blog.google/around-the-globe/google-europe/fighting-misinformation-online-elections/
[18] https://publiclibraries2030.eu/who-we-are/

0% and 0.0000238%), which may indicate either fewer trending or emerging topics in search or a more limited deployment of this specific advisory category in these regions.

- **YouTube Information Panels** are also available in the Greek language, while the Maltese language is not supported. Users in Malta receive the information panels in English by default. We detected an instance where the information panel is not displayed when the language is set to Greek (see Figure 14 on the bottom) but it is displayed when the language is set to English (UK) (see Figure 14 on the top). This instance indicates that the method to display information panels to users is unclear and inconsistent. Google reported the number of impressions of information panels (excluding fact-checks panels, crisis resource panels and non-COVID medical panels). The information panels were viewed 5,389,481 times in Cyprus, 42,428,213 times in Greece, and 2,653,667 times in Malta.

- YouTube's **"Hit Pause" campaign.** Greece had 6,663,804 received impressions from this campaign; Cyprus had 353,502 impressions and Malta had 182,871 impressions. These numbers indicate that the campaign has reached users in the three target countries. The campaign is also translated into the Greek language, while we did not find it translated into Maltese. Maltese users can find the campaign in English language.

- There is no mention of localized events, training sessions, or campaigns specifically targeting Greek, Cypriot, or Maltese audiences.

- There are no known Google partnerships with Media Literacy Experts in the three countries.

Pillar-V: Empowering Users *Commitment 21:* ***Better Equipping Users to Identify Disinformation,*** *page 155-165*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 21	3	3	3	2

Google does not directly label or flag content in Search or YouTube using disinformation tags based on ratings from third-party fact-checking organisations, as Meta does, nor does it explicitly collaborate with fact-checkers to apply such labels.

However, Google does incorporate fact-checks into Search through features such as **Fact Check Rich Snippets**, which rely on the ClaimReview markup implemented by publishers. In the first half of 2024, Google Search displayed **298,382 fact-checked articles globally** using these rich snippets.

Figure 16: Fact Check Rich Snippet in Google Search Results (Greek).

Figure 17: Fact Check Rich Snippet in Google Search Results (Maltese).

Figure 18: Fact Check Rich Snippet in Google Search Results (English).

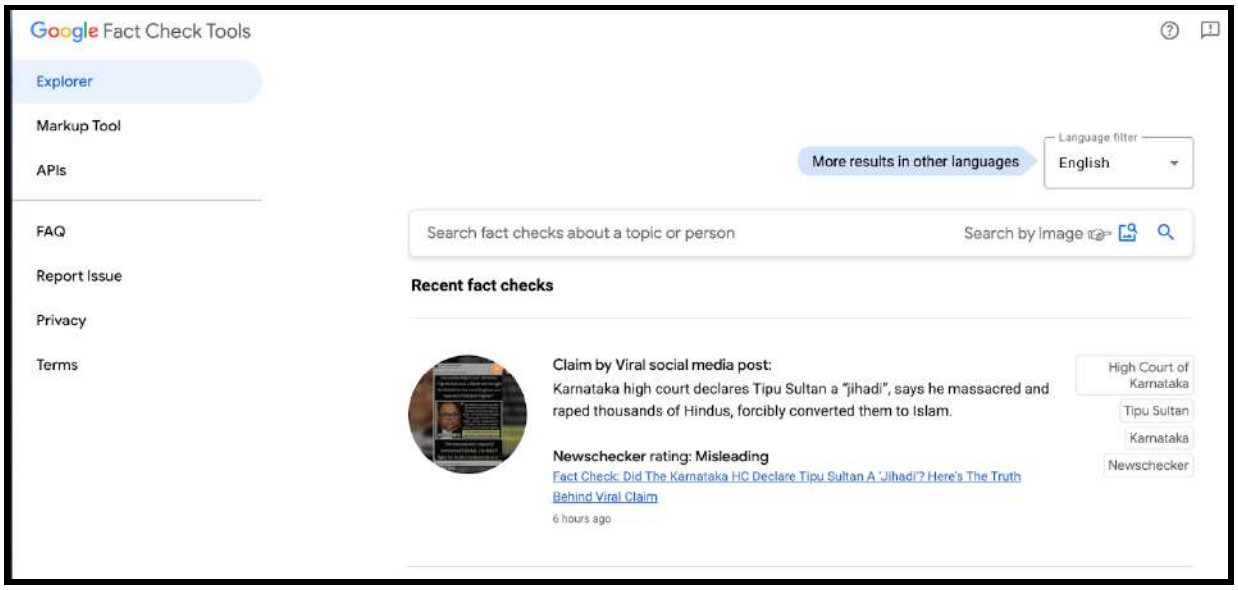


Figure 19: Google's Fact-Check Explorer

The Google Fact Check Explorer (see Figure 19) and the Claim Search API allow users and journalists to explore verified claims and images.

Regarding Fact-Checking Tools, Google highlighted two tools (in beta testing at the time of reporting):

1) **Image Search in Fact Check Explorer** (see Figure 20): Users can search for existing fact-checks by image. Deployed during the EU elections through the **Elections24Check** platform.

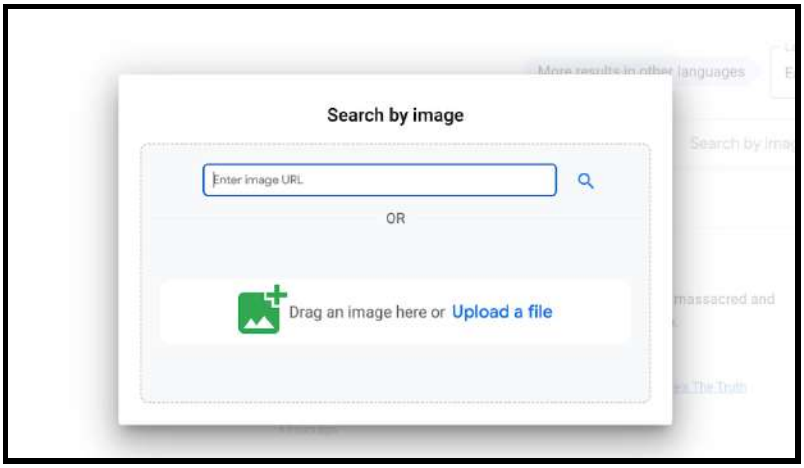


Figure 20: Search by Image Feature in Fact Check Explorer

2) **Image Timeline Tool**: Provides contextual timelines for images.

YouTube Information Panels were expanded to include fact-check articles in video searches relying on the ClaimReview tagging system. YouTube's algorithm elevates authoritative sources and content using ClaimReview tagging.

Fact-checking organizations are supported in developing **short- and long-form video content on YouTube**. **YouTube Studio** analytics and **Creator Support** help fact-checkers grow their reach.

Research and Data Contributions

Google Research, in collaboration with four fact-checking organizations—Maldita (Spain), Full Fact (UK), Duke Reporters Lab (USA), and Factly (India)—conducted a two-year study **[Dufour et al., 2024]** analysing online media-based misinformation using human raters and a large sample of 135,838 fact-checks tagged with ClaimReview metadata. The study, which spans fact-checks dating back to 1995, found that around 80% of recent misinformation claims involve media content. Historically, images were the most common format associated with misinformation, but by 2022, videos had become the dominant medium, accounting for over 60% of fact-checked media claims. Furthermore, AI-generated content, which was virtually absent before 2023, saw a significant rise in fact-checks from the spring of that year onward. As part of this research, Google released the **Annotated Misinformation, Media-Based (AMMeBa)**[19] to support further study and evaluation of misinformation mitigation methods, marking the first large-scale dataset of its kind to track the types and modalities of online misinformation.

Major Comments:

- The integration of Fact Check Rich Snippets into Search results is available in the Greek and English languages. When the browser language is set to Maltese, the feature is not available, not even with a fallback language (see
- Figure 17). However, the label design does not capture the user's attention. The results with the fact-check label are almost indistinguishable from the other results. This is something that Google should try to improve. The impression number there cannot be assumed to mean that the users saw the fact-check label or that it was just there in the search results; the user may not have even seen it.
- In the first half of 2024, Google reported the usage of fact-check labelled results in Google Search across Cyprus, Greece, and Malta, demonstrating the visibility and reach of its disinformation countermeasures in these countries. According to the data, users in Greece were shown fact-check rich snippets 2,488,609 times, in Cyprus, the number of impressions reached 267,880, while in Malta, the figure was 125,929.

- Regarding the Fact Check Explorer tool, which indexes articles reviewed by fact-checking organizations using structured metadata, the data shows a modest but consistent increase in Greek-language fact-checking activity during the first half of 2024. Specifically, the number of Greek-language fact-checked articles rose from 1,772 at the beginning of the period to 1,898 by the end, reflecting ongoing contributions from Greek-speaking fact-checkers to the global

[19] https://www.kaggle.com/datasets/googleai/in-the-wild-misinformation-media

verification ecosystem. In contrast, Maltese-language content was not listed, pointing to the limited visibility or integration of fact-checking in Malta within Google's tools.

- This absence is likely due to several factors. Fact-checking activity in Malta is still relatively recent, and the organizations involved are not currently certified by the International Fact-Checking Network (IFCN) or the European Fact-Checking Standards Network (EFCSN)—both of which are widely recognized by platforms like Google. Furthermore, fact-checks produced in Malta are primarily published in English, rather than Maltese, and may not use the ClaimReview markup required for inclusion in tools like Fact Check Explorer and for generating rich snippets in Search. As a result, while some fact-checking work is taking place in Malta, it may not yet be technically or institutionally connected to Google's structured fact-checking ecosystem, highlighting a gap in localized, language-specific disinformation resources for Maltese users. The same applies to the fact-checks published by the Fact-Check Cyprus.
- We could not verify if the information panels with links to fact-checking articles are available in Greek or Maltese. YouTube did not provide SLIs for the impressions of the information panels with third-party fact checking information (neither at the EU level nor at the Member State level).
- There is no research or evaluation of mechanisms in place targeting the audience in Cyprus, Greece and Malta to assess the effectiveness of these tools. Google reported a research study published, but it was not specifically an evaluation study of the developed features to equip users to identify disinformation.

3.4.2 Google: Empowering the Research Community

Pillar-VI: Empowering the Research Community, *Commitment 26: Empowering the Research Community* *pages 184 - 195*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 26	4	4	4	3

Google provides the following tools to researchers:

1. **Google Trends**[20] – Offers access to anonymized and aggregated search request data from Google Search and YouTube. It allows researchers to track interest in topics globally or at a more localized level. Google Trends is publicly available, and it does not have an API integration.
2. **Google Fact Check Explorer**[21] – A tool that enables researchers to explore fact-checked articles. It is integrated with the **Fact Check Claim Search API**[22], which allows developers to query verified fact-checking data.
3. **Google Researcher Program**[23] – Grants eligible EU researchers access to publicly available data from Google Search and YouTube. Researchers receive limited metadata scraping permissions to analyse publicly available data.
4. **YouTube Researcher Program**[24] – Provides expanded access to global video metadata from YouTube via a Data API[25]. Eligible academic researchers affiliated with accredited institutions can access data including video titles, descriptions, view counts, likes, comments, and channel metadata.

The Google and YouTube Researcher Program have a three-step application process to review the applicants' eligibility to access the data. The application for Google is available here, and for YouTube here.

Major Comments:

- Google offers several tools that are useful for disinformation research. Google Trends helps detect trending search topics in specific locations. Fact Check Explorer can support the labelling of data and analysis of disinformation themes over time. Publicly available data from Google Search and YouTube can assist in studies on false claims detection, user interactions, and the broader spread of misleading content.
- However, Google Trends does not offer an API, which limits its use for large-scale research. It does allow users to download search results as CSV files. Notably, the "Trending Now" tab excludes Malta from the location filter, with only Greece and Cyprus available. The "Explore" tab is accessible for all three countries. Since Google Trends only provides a sample of actual queries, there is no information on whether this sample is representative of search behaviour in Greece, Cyprus, or Malta. Google reported 13,353 users in Cyprus, 36,501 users in Greece, and 6,011 users in Malta used Google Trends researching Google Search. Additionally, Google reported 667 users in Cyprus, 1,184 users in Greece, and 6 users in Malta used Google Trends researching YouTube. While these figures suggest some level of engagement, it is unclear whether the usage was for research purposes.

[20] https://trends.google.com/trends/
[21] https://toolbox.google.com/factcheck/about#fce
[22] https://toolbox.google.com/factcheck/apis
[23] https://transparency.google/tools-programs/researchers/
[24] https://research.youtube/
[25] https://developers.google.com/youtube/v3/docs/search/list#videoPaidProductPlacement

- Google Fact Check Explorer is available to researchers in all three countries. However, fact-checks from Malta and Cyprus are not indexed in the repository. Google reported 93 users in Cyprus, 446 users in Greece, and 58 users in Malta accessed the tool during the reporting period. These numbers indicate relatively low engagement. Fact-Check Explorer can also be accessed via the Google FactCheck Claim Search API, but Google did not provide user metrics by Member State for this API.
- During the reporting period, no researchers from Cyprus, Greece, or Malta applied for or were granted access to the YouTube Research Program. Similarly, Google did not report the number of applications or granted accesses to the broader Google Research Program.

Pillar-VI: Empowering the Research Community, ***Commitment 27: Governance Structure for Access to Data for Research Purposes Requiring Additional Scrutiny,*** *pages 195 - 198*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 27	1	1	1	1

Regarding the development of an independent third-party intermediary body for data access, as envisioned in Commitment 27, Google confirms its participation in the European Digital Media Observatory (EDMO) Working Group, which is focused on shaping the body's governance, functions, staffing, and budget. Despite this involvement, the intermediary body has not yet been established.

For Search, Google reports that it is exploring options for pilot programs aimed at sharing data with vetted researchers to support investigations into misinformation and disinformation. However, no specific details have been disclosed regarding participating teams, the scope of research topics, or concrete progress on these pilot efforts.

In the case of YouTube, Google maintains the existing YouTube Researcher Program that offers expanded access to global video metadata through a Data API. Google did not report any new pilot initiatives or expansions during the current reporting period.

Major Comments:

- The qualitative information submitted by Google is described as limited and largely repetitive of earlier disclosures. While it confirms ongoing engagement with EU institutions and researchers, it does not present substantive new insights or progress updates, and thus only partially fulfils the transparency objectives of Commitment 27.
- Google has not provided verifiable milestones or tangible evidence of progress beyond affirming its continued support and collaboration with the EDMO process.
- In summary, while Google remains formally engaged with relevant initiatives and institutions, its reporting under Commitment 27 reflects ongoing intentions rather than demonstrable new actions or outcomes.

Pillar-VI: Empowering the Research Community, *Commitment 28: Cooperation with Researchers,* *pages 198 - 202*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 28	2	2	2	2

Google Support for Research Programmes:

Google Researcher Programme

Google reports that there are dedicated teams for the Google Researcher Programme. These teams manage access applications for researchers and evaluate updates and developments for the Programme. Information to support researchers is available in the Help Center Support of the Search Researcher Result API[26] guidelines and the Google Transparency Center[27].

YouTube Researcher Programme

[26] https://support.google.com/websearch/answer/13856826?visit_id=638332129583125760-4204336310&p=searchresearcher&rd=1
[27] https://transparency.google/

YouTube's program staff manage access applications, provide technical support to grantees, and solicit researcher feedback to shape future platform enhancements. Researchers accepted into the program can reach out to a dedicated e-mail alias and access YouTube API code samples on GitHub[28]. Additionally, researchers can access the API documentation[29] to review the data they can access. Moreover, YouTube's Product and Policy teams maintain ongoing dialogues with independent researchers who seek to understand platform mechanics or receive input on research design.

Workshops for researchers:

Google hosted two workshops for researchers throughout H1 2024:

- January 1st to June 30th, 2024: Google hosted 25 researchers, experts in Trust & Safety-related research areas. Bringing together scholars working on misinformation, child safety, violent extremism, privacy, and at-risk user issues. These gatherings aimed to foster interdisciplinary collaboration and share insights across siloed research fields.
- A workshop with 30 attendees, including academics at the Trust & Safety Forum in France, on the topic of Trust & Safety by Design frameworks and implementation designs, including misinformation.

Partnerships:

Google has a partnership with Lumen[30], an independent research project managed by the Berkman Klein Centre for Internet & Society at Harvard Law School. The Lumen database holds online content takedowns after a report or complaint. Reports or complaints on Google products are shared with Lumen for publication. The Lumen repository can support researchers from academia or industry in the topic of online content availability.

Research Grants:

Google also maintained its **Trust & Safety Research Awards[31]**, offering grants to researchers investigating priority topics such as scams, generative AI, and misinformation. In June 2024, Google launched its **Academic Research Awards[32] (GARA) program**, which solicits proposals across a broad range of computing and technology subjects, including those relevant to Trust & Safety.

In 2021, Google contributed €25 million to the **European Media and Information Fund** (EMIF), which is administered by the European University Institute and Calouste Gulbenkian Foundation and supports media literacy, fact-checking, and disinformation research across Europe. Although EDMO advises EMIF's grant-making process, Google explicitly states it does not participate in selecting or evaluating individual EMIF applications.

[28] https://github.com/youtube/api-samples
[29] https://developers.google.com/youtube/v3/getting-started/?target=_blank
[30] https://lumendatabase.org/
[31] https://research.google/programs-and-events/trust-safety-research/
[32] https://research.google/programs-and-events/google-academic-research-awards/

Major Comments:

- Google reported its programs, resources, and partnerships to support researchers. They provide some participation figures (e.g., workshop attendees, application volumes).
- However, more information is missing on the dedicated teams supporting researchers, i.e., the number of Google employees responsible for supporting the research programs.
- At the same time, there is room for improvement in quantifying program outputs, publishing grant budgets and selection criteria. Addressing these gaps would enhance both the completeness and verifiability of Google's commitment to empowering the European research community in the fight against disinformation.
- Based on the reported information, it is not clear if researchers from the three countries were benefiting from Google's researchers support measures.

3.4.3 Google: Empowering the fact-checking community

Pillar-VII: Empowering the fact-checking community ***Commitment 30: Cooperation with the fact-checking community,*** *page 207-217*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 30	3	3	3	3

Google supports fact-checking professionals through the following fundings/partnerships:

- **International Fact-Checking Network (IFCN) Global Fact Check Fund ($13.2 M USD total):** Grants to support 135 + fact-checking organizations worldwide. In early 2024, Phase 3 (Engage) awarded $100 K each to six EEA teams (Croatia, France, Italy, Poland, Spain), and Phase 4 (Build) awarded $25 K each to eight EEA teams (including Cyprus and Greece).
- **European Fact-Checking Standards Network (EFCSN) / Elections24Check (€1.5 M EUR):** Funds a coalition of 40 + news and fact-checking organizations across 36 countries to verify European Parliamentary election claims, publish an open disinformation database, and provide beta Fact Check Explorer features (e.g., image search, provenance tools).
- **European Media and Information Fund (EMIF, €25 M EUR 2021–26):** Awards grants to at least 87 media literacy, misinformation, and fact-checking projects in 25 countries. EDMO serves as a scientific advisor; Google does not select grantees.

Google resources/tools to support fact-checking organizations:

- **Google News Initiative Training:** Delivers digital verification workshops to journalists; since 2015, 145 000+ European journalists trained and 400,000+ visits to free online curricula.
- **YouTube Partner Program (YPP)[33]:** The YPP lets eligible creators—such as certified fact-checking organizations—earn ad revenue from their videos. To join, a channel must have 1,000 subscribers, 4,000 watch hours in the past year, and must follow YouTube's guidelines. Once accepted, creators gain access to ad monetization, advanced analytics, and direct support from YouTube's Creator Support team. They also benefit from features like longer upload limits and improved visibility in search and recommendations, helping trusted fact-checkers reach a wider audience. YPP enables 11 EU-based,

[33] https://support.google.com/youtube/answer/72851?hl

IFCN-certified fact-checkers (Belgium, France, Germany, Italy, Portugal, Spain) to monetize fact-check videos, receive Creator Support, and access guidance on best practices.

- **ClaimReview Markup (schema.org):** A structured data format that fact-checkers embed in their articles. When implemented, Google can automatically index, and display verified fact-checks in Search and YouTube.

Major Comments:

- Google does not directly fund fact-checking organizations to label content on their platforms. However, Google grants funds to organizations such as IFCN, EFCN, and EMIL that are responsible for deciding on how to distribute funds to fact-checking organizations. Fact-checking organizations receive fundings from IFCN and EFCN. Google highlights that the decision to grant funds to organizations by reviewing applications is not their responsibility.
- Under IFCN's Global Fact Check Fund (supported by Google's $13.2 M commitment), Fact Check Cyprus (Cyprus)[34] and Greece Fact Check (Greece)[35] selected in Phase 4 (Build) for a $25K funding. Greece Fact Check received also a $5K
- No fact-checking organization in Malta received IFCN funding in either Phase 3 or Phase 4.
- In IFCN Phase 3 (Engage), no grantees came from Cyprus, Greece, or Malta.
- EMIL funded 5 research projects[36] in Greece in 2024. No research projects in Cyprus and Malta received funding from EMIL in 2024.
- We are not aware of fact-checking organizations in Cyprus, Greece and Malta that use the YouTube Partner Program (YPP). However, for recently established fact-checking organizations the metrics that make a channel eligible for YPP may be too hard to reach.
- The report notes regular meetings with IFCN and EFCSN, as well as collaboration with EU-based fact-checking organisations. However, it does not specify details regarding the exact meeting schedules or the impact of this collaboration on Google's mechanism to combat disinformation or support fact-checking organisations.

[34] https://factcheckcyprus.org/%cf%87%cf%81%ce%b7%ce%bc%ce%b1%cf%84%ce%bf%ce%b4%cf%8c%cf%84%ce%b7%cf%83%ce%b7-%ce%ba%ce%b1%ce%b9-%ce%b1%ce%bd%ce%b5%ce%be%ce%b1%cf%81%cf%84%ce%b7%cf%83%ce%af%ce%b1/

[35] https://www.factchecker.gr/xrimatodotisi-anexartisia/

[36] https://gulbenkian.pt/emifund/projects/?filter%5Btax%5D%5Bfcg_proj_priority%5D%5B%5D=&filter%5Btax%5D%5Bfcg_project_funding%5D%5B%5D=&filter%5Btax%5D%5Bfcg_project_year%5D%5B%5D=67&filter%5Btax%5D%5Bfcg_proj_country%5D%5B%5D=85&filter%5Btax%5D%5Bfcg_project_size%5D%5B%5D=&filter%5Btax%5D%5Bfcg_project_status%5D%5B%5D=

Pillar-VII: Empowering the fact-checking community *Commitment 31: use and integration of fact-checking* *page 218-221*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 31	3	3	3	3

Integration of fact-checking work on Google platforms:

Google does not take any action to label content on their platform as false information. Google released the **ClaimReview HTML markup,** which enables fact-checkers to tag their content for better discoverability. The markup is used in the Search Results and Information Panels to help users with giving context.

YouTube encourages fact-checking organizations to produce fact-checks in a video format, allowing them to promote more fact-checking content on their platforms. They offer the **YouTube Create**[37] mobile app, which helps users edit videos on their mobile devices, simplifying the process of producing high-quality videos. This tool is available only in specific countries in EU[38].

Major Comments:

- Google has made efforts to support fact-checkers and incorporate their work into its services. However, it falls short in providing detailed quantitative data or conducting impact assessments. The platform's reporting lacks disaggregated metrics by country and platform, limiting the evaluation of its effectiveness in specific contexts.
- YouTube's initiative to encourage fact-checkers to create video-based content is timely and appropriate, especially given the popularity of short-form videos across age groups. However, the YouTube Create app—intended to support such content creation—is not currently available in Cyprus, Greece, or Malta.
- Google does not offer dedicated tools for fact-checkers beyond the ClaimReview Markup tool. Fact-checkers lack streamlined access to content metadata or additional contextual information that would aid in verifying claims and improving the efficiency of the fact-checking process.

[37] https://support.google.com/youtube/thread/235901340/
[38] https://support.google.com/youtube/answer/13952912

Pillar-VII: Empowering the fact-checking community *Commitment 32: fact-checkers access to relevant information* *page 221-226*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 32	2	2	2	2

Google Tools for fact checkers to quantify the impact of their work:

Search Console[39]: a free toolkit that helps website owners, including fact-checking organizations, to track and improve their visibility in Google Search. Its key feature—the Search Performance report—reveals how often your pages appear (impressions), which queries trigger them, click-through rates, and country-specific views across the EU. By using these insights, fact-checkers can see which claims attract the most attention, identify search terms to target, and spot any dips in performance to troubleshoot issues, ensuring their corrections reach users effectively.

YouTube Studio offers to YouTube creators, including fact-checking organizations, a centralized dashboard to manage and grow their channels while monitoring video performance. Using the Channel Analytics panel, teams can track key metrics—total views, watch time, traffic sources, and the specific search terms that drive viewers to their fact-check videos—enabling them to understand which topics resonate and where to focus outreach. Additionally, YouTube's Help Center documents "information panels," text-based overlays that can provide viewers with context or source links during playback. Together, these tools enable fact-checkers to fine-tune their content strategy, engage their audience more effectively, and ensure accurate information reaches the widest possible audience.

Google Communication channels with the fact-checking community:

- Google reports that they are in regular contact with the International Fact-Checking Network (IFCN) and the European Fact-Checking Standards Network (EFCSN) to discuss collaborations and directions to support the fact-checking community.
- Fact-checking organizations that participated in the Elections24Check[40] have access to new beta features in Fact-Checker Explorer.
- Representatives from Google and YouTube participated and hosted events related to misinformation.
- YouTube, through its Creator Support teams, is available to support the fact-checking organizations that participate in the YouTube Partner Program (YPP).

[39] https://support.google.com/webmasters/answer/9128668?hl=en&ref_topic=9128571
[40] https://elections24.efcsn.com/

Major Comments:

- Google offers generic tools such as Search Console for websites and YouTube Studio for video channels, which fact-checking organizations can use to monitor metrics like impressions, clicks, watch time, traffic sources, and search queries. While these tools provide general visibility into content performance, they are not specifically designed to support fact-checking workflows.

- Despite the availability of these dashboards, Google does not report any usage statistics or engagement metrics specific to fact-checkers using Search Console. Since access to the tool is available to all webmasters without requiring identification as a fact-checking entity, it is impossible for organizations to evaluate how their fact-check pages perform relative to other types of content.

- A similar limitation exists for YouTube Studio. Although fact-checkers can monitor analytics such as views, watch time, and referral sources, Google's reporting does not include data on the extent of usage by fact-checking channels or the effectiveness of these features in promoting viewer engagement with fact-check content.

- While Google supports the use of the ClaimReview markup to make fact-checks visible in Search and YouTube, it provides no follow-up reporting or performance feedback. This absence of a feedback loop means fact-checking organizations have no visibility into whether applying ClaimReview markup improves content visibility or user engagement.

- Google claims that fact-checking content appears in search results and recommendation systems but does not provide granular data on how often this occurs, which queries trigger fact-check panels, or what user actions follow these exposures. Without such metrics, it is difficult to assess the actual impact of fact-check integration.

- Finally, although the report references ongoing collaboration with the fact-checking community—including through partnerships with IFCN and EFCSN—it lacks information on the frequency, scale, or effectiveness of these engagements. There are no details about the number of trainings, workshops, or meetings held, nor their outcomes, making it challenging to evaluate the true reach and value of Google's fact-checking support efforts.

3.5 TikTok

Our analysis on TikTok's practices is based on the information provided in **TikTok's Code of Practice Report, delivered in September 2024, No.4** [TikTok, 2024] covering the period 1st of January 2024 to 30th June 2024.

3.5.1 TikTok: Empowering the users

Pillar-V: Empowering Users ***Commitment 17: Enhancing Media Literacy,*** *page 101-150*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 17	3	3	3	2

TikTok employs a multi-faceted approach to enhance media literacy and counter misinformation. Their efforts can be categorised into three main areas: tools, activities, and partnerships.

Tools:

- TikTok implemented **in-app intervention tools** that flag content related to specific topics (e.g., Holocaust, Israel-Hamas conflict, climate change, and EU Parliament elections) and redirect users to reliable sources.
- **Video notice tags** (see
- Figure 25) provide educational prompts for specific hashtags, directing users to in-app guides or third-party information.
- TikTok applies a **state-controlled media label**[41] to content created by accounts that is subject to control or influence by government. The user can see more information on why they see the label in an **in-app page**[42]. They strengthened policies regarding state-affiliated media, prohibiting such accounts from targeting audiences outside their home countries. In the EU, Iceland, and Liechtenstein, TikTok reported that it restricted access from accounts i.e., RT- Russia Today UK-Germany-France-Spanish, Sputnik,Rossiya RTR / RTR Planeta, etc. See the full list in **[TikTok, 2024],** pages 108-109**.**
- A new **AI-generated content label** encourages creators to disclose content that is either fully or significantly AI-generated.

[41] https://www.tiktok.com/transparency/en-us/state-affiliated-media/
[42] https://www.tiktok.com/tns-inapp/pages/state-affiliated-media

- TikTok applies an "**Unverified content" label** to content that fact-checking partners have assessed but cannot verify as accurate to encourage users not to share this content. If users continue to share this content, it becomes ineligible for the TikTok recommendation algorithm. Additionally, the creator of the content is notified and provided with information on why the content receive the unverified label.
- TikTok offers a range of **dedicated information resources**—both online and within its app—to help users access accurate, up-to-date content from trusted authorities. Depending on the topic and country, users may be directed to external sites (for example, a national electoral commission), an in-app information center (such as for the Ukraine war), or specialized pages in TikTok's Safety Center or Transparency Center.
- The **Safety Center**[43] explains TikTok's **policies on harmful misinformation**[44] (including COVID-19[45] and election integrity[46]), online challenges[47], and guidelines for sharing content related to tragic events[48], while its **"safety partners" page**[49] highlights collaborations with experts and NGOs in the context of building a safer platform.
- **TikTok Transparency Center**[50] available in a number of EU languages, hosts transparency reports and information on TikTok commitments to ensure the integrity of the platform.
- **TikTok Newsroom**[51] is available for users to be up-to-date with the latest TikTok updates and efforts. Users can select their country to get the most relevant information. The country selection list includes also EU as an option.

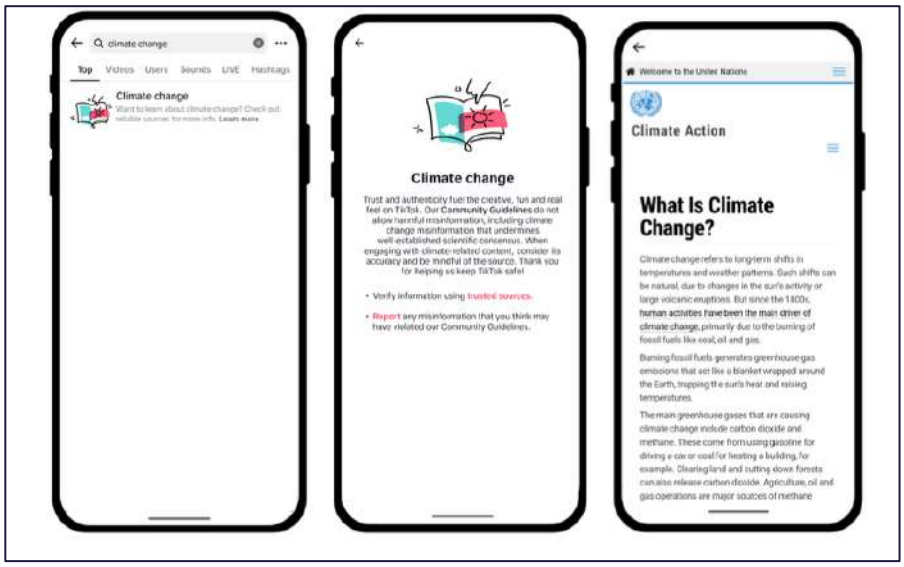


Figure 21: TikTok Climate Change Search Intervention [TikTok, 2024]

[43] https://www.tiktok.com/safety/el-gr/
[44] https://www.tiktok.com/safety/en-gb/harmful-misinformation-guide
[45] https://www.tiktok.com/safety/en/covid-19/
[46] https://www.tiktok.com/safety/en/election-integrity/
[47] https://www.tiktok.com/safety/en-us/online-challenges
[48] https://www.tiktok.com/safety/en/tragic-events-support/
[49] https://www.tiktok.com/safety/en-us/safety-partners/
[50] https://www.tiktok.com/transparency/en-us/
[51] https://newsroom.tiktok.com/en-gb

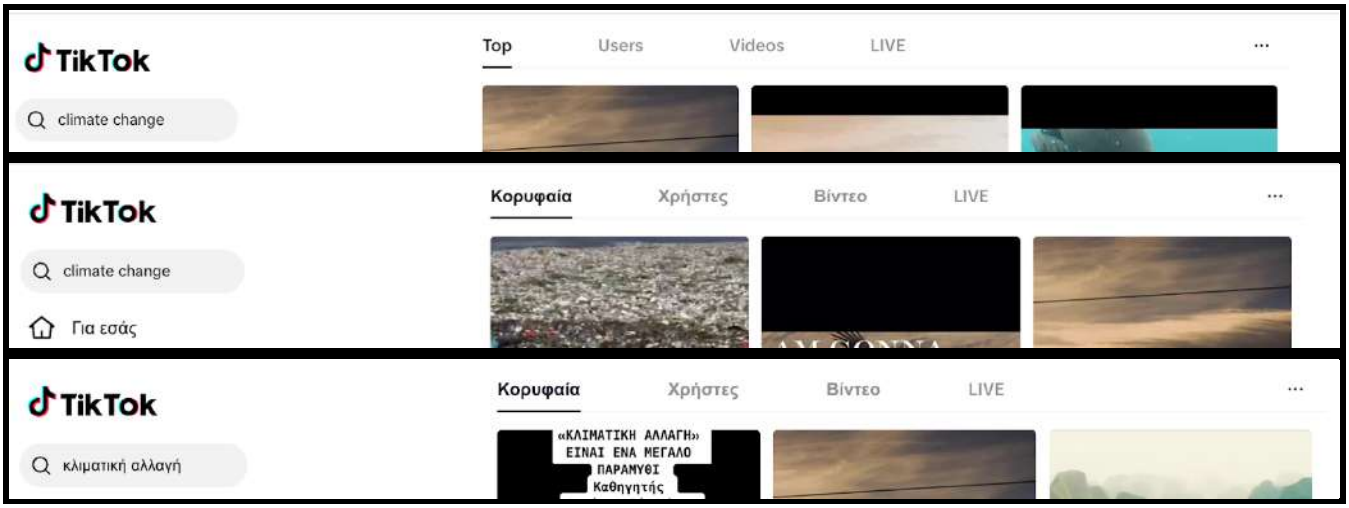


Figure 22: Climate Change Intervention unavailable.

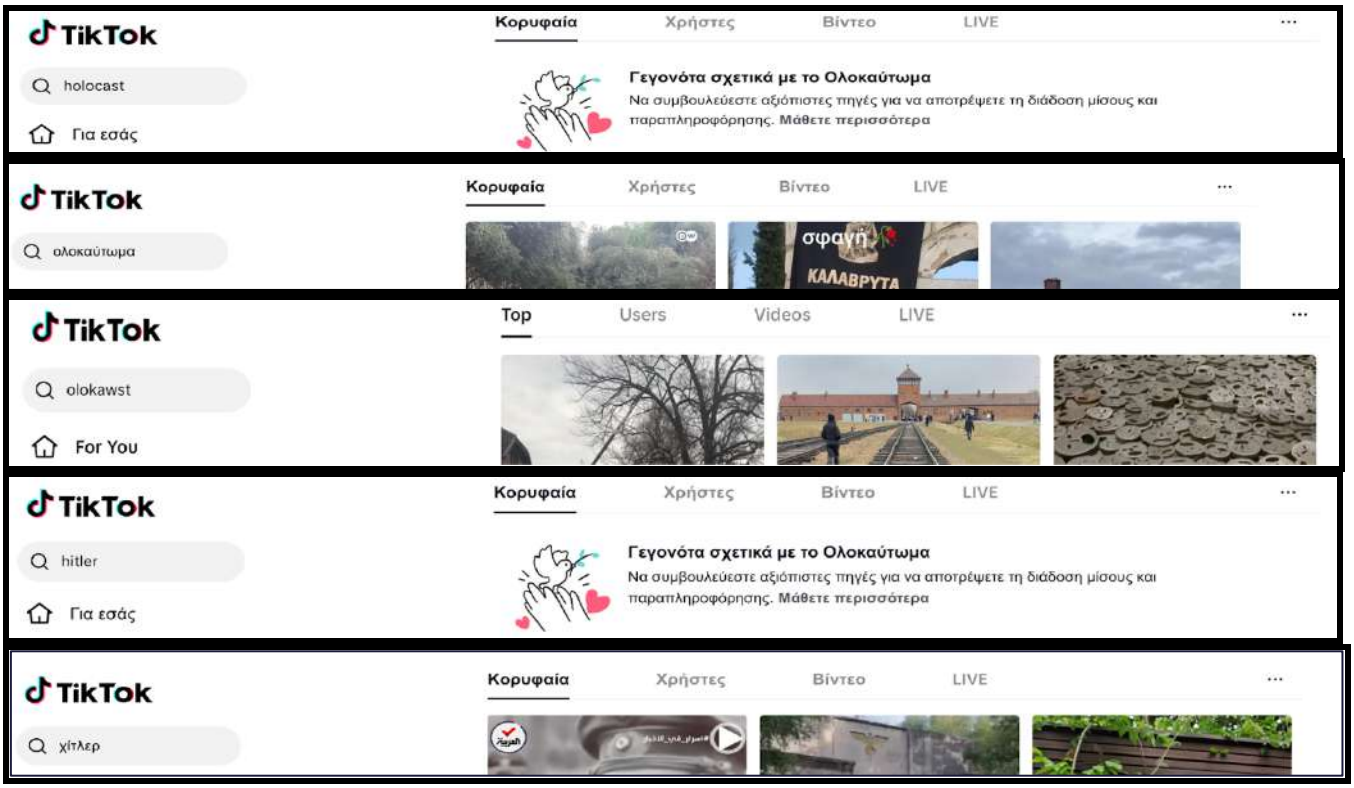


Figure 23: Holocaust Search Intervention Inconsistency.

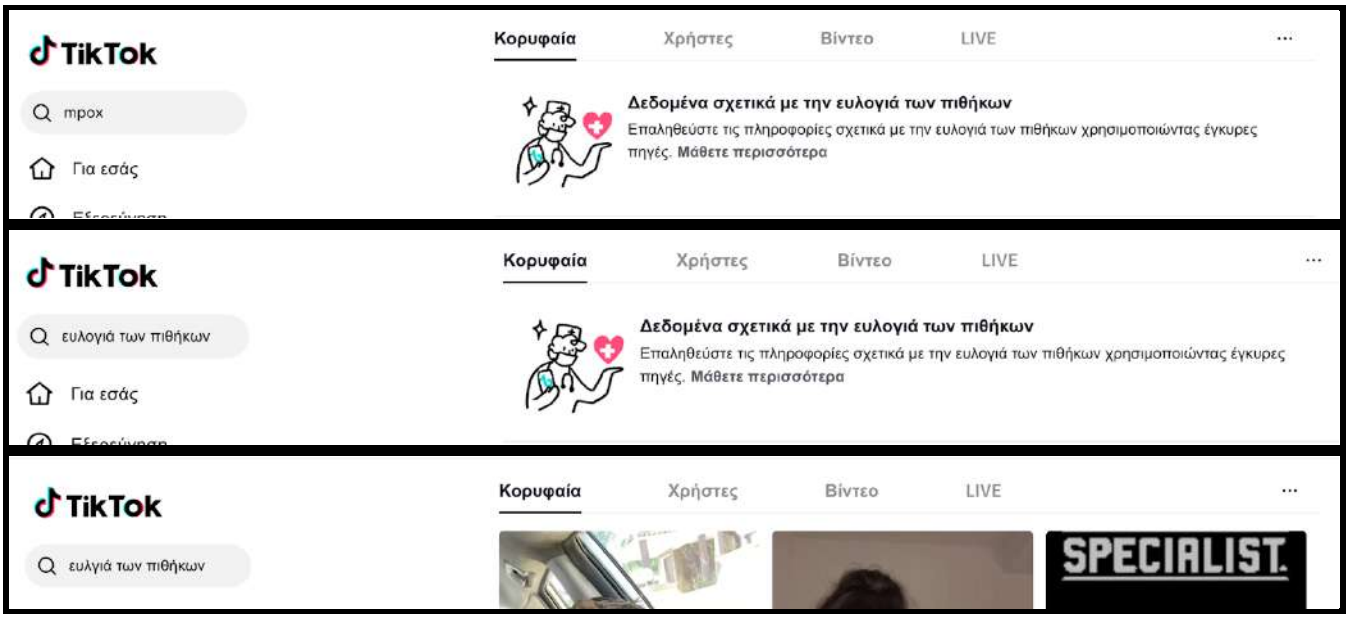


Figure 24: Monkeypox Search Intervention Availabilty and Inconsistency

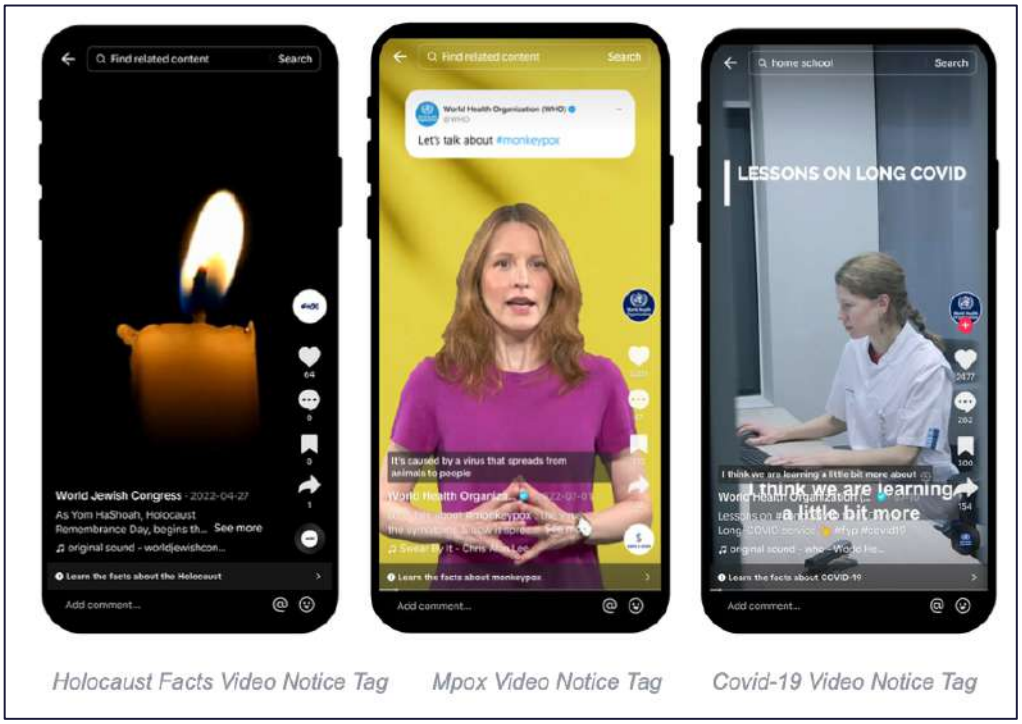


Figure 25: TikTok Video Notice Tags [TikTok, 2024]

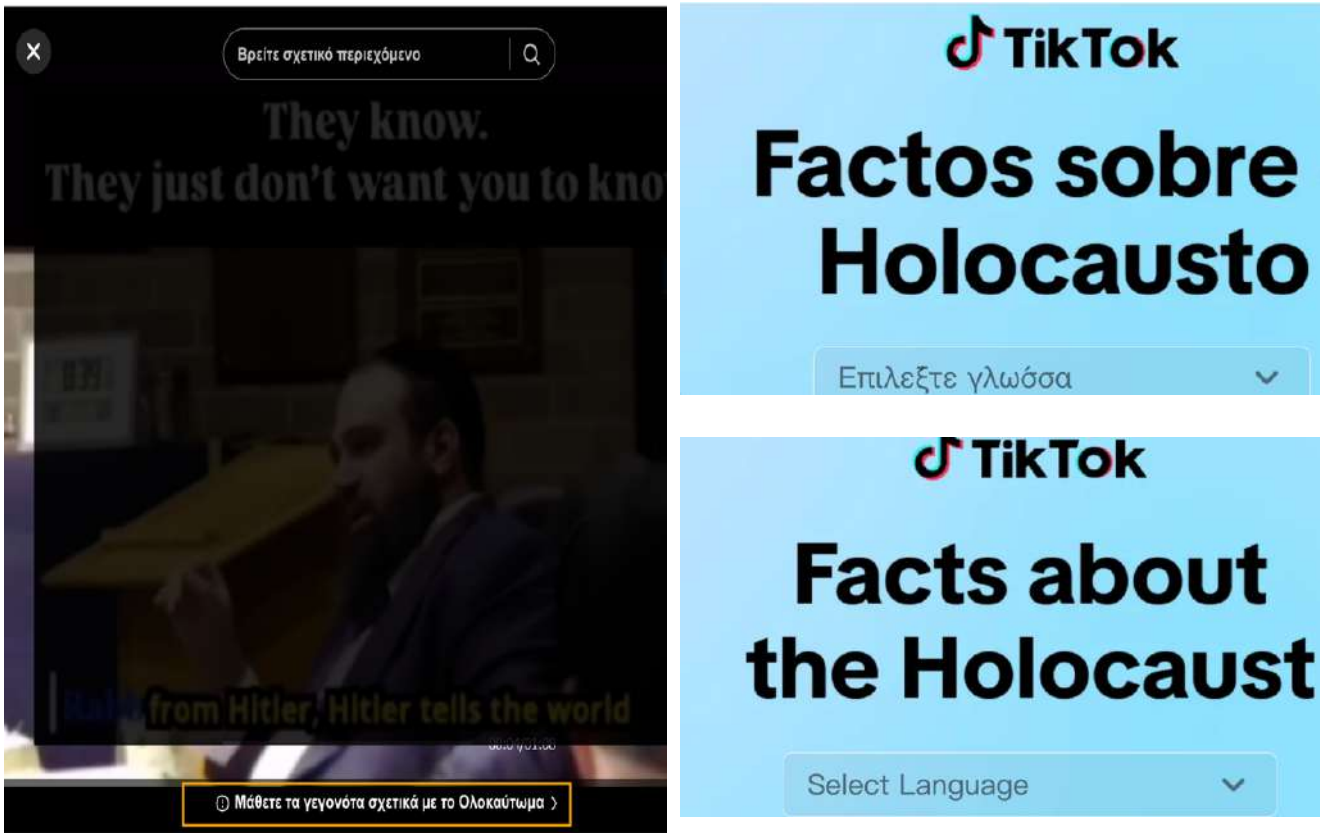


Figure 26: TikTok Video Notice Tag Language Issues with Redirecting Information Pages

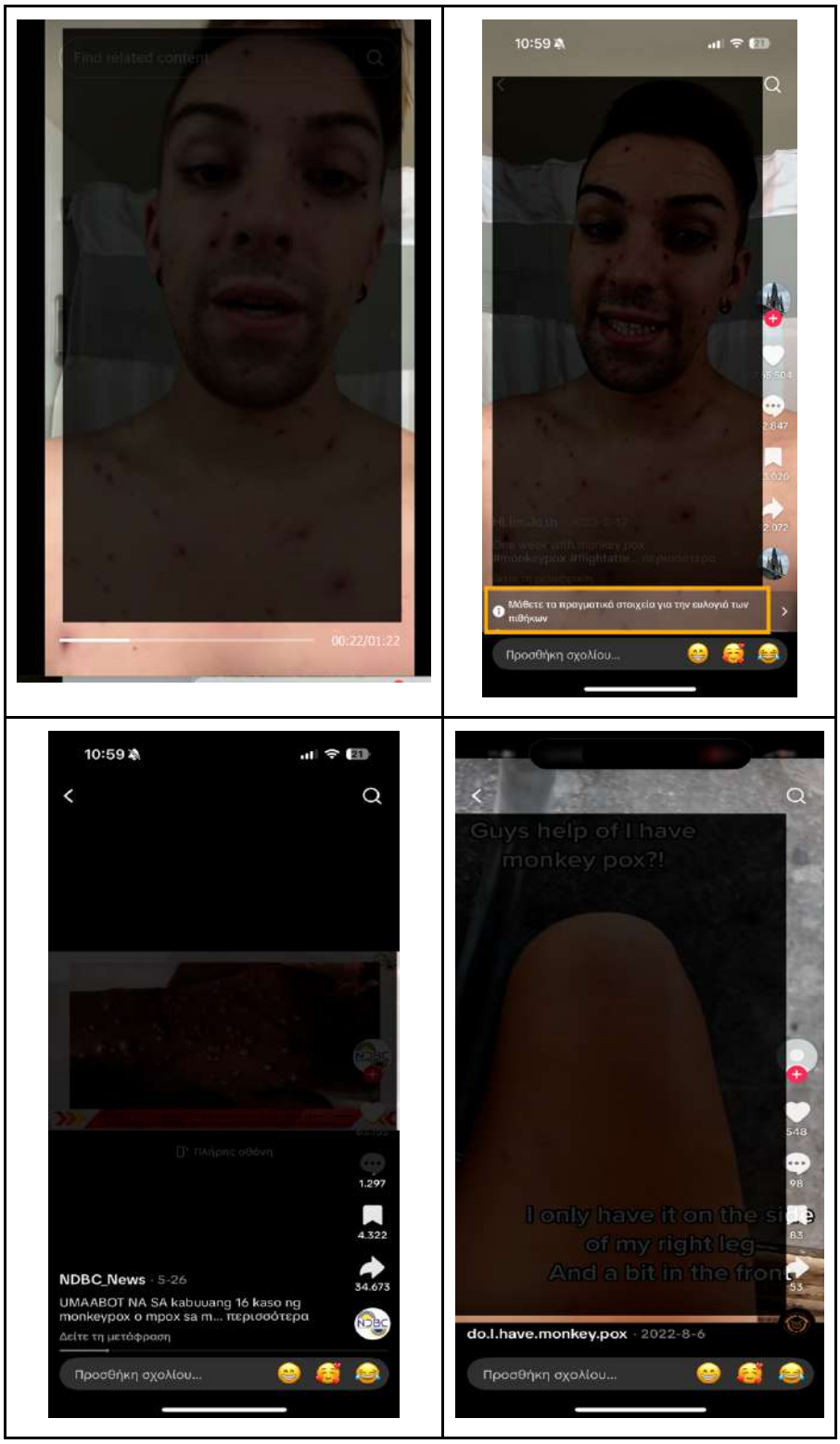


Figure 27: TikTok Video Notice Tag for Monkeypox Inconsistency

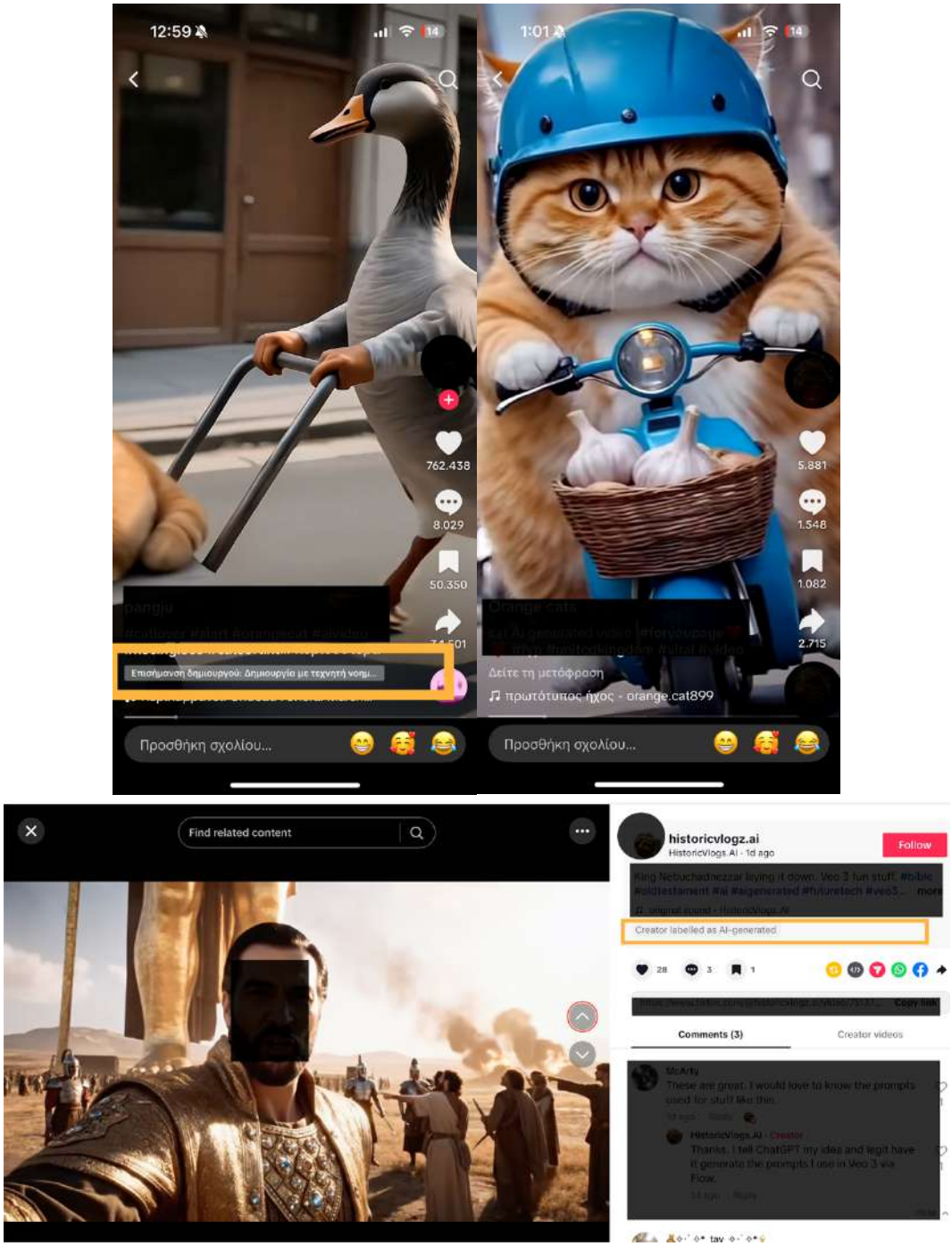


Figure 28: TikTok AI-generated content label availability

Activities:

- **Media literacy campaigns** were launched across all 27 EU member states, focusing on the 2024 EU Parliamentary election[52]. Within other country-specific campaigns, TikTok launched an Election Center[53] for the French Parliamentary Election 2024, providing users with up-to-date information relevant to the elections. There was a dedicated section for combating false information including videos created in partnership with the fact-checking organization Agence France-Presse (AFP).
- A **climate change search intervention tool** (see Figure 21) was introduced in 23 official EU languages, directing users to authoritative information on the subject.
- **Media Literacy campaigns** for **War in Ukraine** – available only for 14 countries: Austria, Bulgaria, Czech Republic, Croatia, Estonia, Germany, Hungary, Latvia, Lithuania, Poland, Romania, Slovakia, Slovenia, Ukraine. – and **Israel-Hamas conflict** through Search Interventions when users search for relevant keywords.
- **TikTok's Election Speaker Series** collaborated with external experts to promote election integrity, including a partnership with Agence France-Presse (AFP) for Greece and Cyprus.
- TikTok rolled out critical thinking skills campaigns in the Netherlands, and Denmark.

Partnerships:

- TikTok partner with external experts[54] around the world for a range of topics, including media literacy.
- TikTok reported their partnership with organisations (i.e., Agence France-Presse (AFP), Deutsche Presse-Agentur (dpa), Demagog.pl, Demagog.cz, Facta, Faktograf, Logically Facts, Newtral, Poligrafo, Delfi.lt, The Journal, Nieuwscheckers, Funky Citizens, DigiQ, Ostro.) with expertise in media literacy for promoting the election integrity on TikTok, including campaigns for the 2024 EU Parliamentary Election, and the Election Speaker Series.
- TikTok reported collaboration with media literacy experts in Austria, Germany, Slovakia, etc. for the War in Ukraine-related campaigns and with WHO Tech Taskforce, and other EU fact-checking organizations (including Agence France Presse) for Covid-19 related misinformation to improve the in-app intervention tools.

[52] https://newsroom.tiktok.com/en-eu/our-work-to-prepare-for-the-2024-european-elections
[53] https://activity-i18n.tiktok.com/magic/eco/runtime/release/666aaeaeb991e002dd1e6a59?isFromGCP=1&appType=muse&magic_page_no=1&lang=en®ion=Default&use_spark=1
[54] https://www.tiktok.com/safety/en-gb/safety-partners/

Major Comments:

- The Maltese language is generally not supported by TikTok.

- The Search Intervention Tools and Video Notice Tags features are available in the Greek language as well. However, these features appear to be inconsistent in many ways:
    - Minor typos in search query results in the search intervention not to appear while still fetch related videos. For example,
    - Figure 24 shows that Monkeypox Search Intervention fails to display when there are minor typos in the search terms, even if relevant videos are returned. Similarly, the Israel–Hamas Search Intervention (in **Error! Reference source not found.**) is not activated for queries with minor typos are in the search terms—even when relevant videos are retrieved—highlighting a lack of linguistic and input flexibility.
    - Using keywords related to a topic again may not bring the search intervention section (see
    - Figure 22, and **Error! Reference source not found.**). For example, the Climate Change Intervention not available when searching in Greek and English, and the language is set to Greek and English respectively (see
    - Figure 22).
    - Using the Greek or Maltese language in search query may not display the search intervention feature. For example, the Holocaust Search Intervention (in
    - Figure 23) appears when the language settings are set to Greek and the search query is in English. However, it does not appear when the query is entered in Greek or Maltese, even if the language settings are set to Greek or English, respectively. Similarly, the Israel–Hamas Search Intervention (in **Error! Reference source not found.**) appears for English-language keywords when the language settings are set to either English or Greek. However, it does not activate for queries using Greek-language keywords.
    - The redirection page when clicking on the Video Notice Tag may not be available for some languages. For example, in Figure 26 there is a Video Notice Tag in Greek for Holocaust-related content. When the user clicks on the tag, they are redirected to the information page shown at the top right. However, when the interface language is set to Greek, the linked page is incorrectly displayed in Spanish, as Greek is not available in the language menu. The information page is accessible in multiple other languages, including English (bottom right).
    - Same videos on browser and in mobile app receive or not receive the video notice tag. In Figure 27, the Video Notice Tag for Monkeypox is visible when accessed via the TikTok mobile app (top right), and at the same the same video appears without the notice tag when viewed on a web browser (top left), indicating inconsistency in the display of the tag across devices.
    - Some videos receive the Video Notice Tag, while others on the same topic do not, even though the tag feature is available for the specific topic (i.e., monkeypox) (see Figure 27).

The tag is available in Greek, as shown in the top right of the figure. However, it is not consistently applied to all videos related to the topic (see examples at the bottom).

- The **Search intervention tool for the Ukraine War** is not available for the three countries. There is no reasoning behind who gets the tools and who does not.
- **The State-controlled media label** is now available in Cyprus, Greece, and Malta[55]. However, we did not manage to find accounts with the label in the three countries.
- We did not find examples of the **'Unverified Content Labels'** to examine if they are accessible to the audience of the three countries.
- The **AI-generated content label** is also available in Greek language. However, there is still AI-generated content that does not receive a label (see Figure 28). The label is available in the mobile application (top left of the figure) and on the browser view of TikTok as shown in the bottom of the figure. We found also examples of AI-generated content with no label (see top right of the figure). We assume those are the cases when the users do not self-label their content, and the TikTok detection mechanism fail to detect those videos and label them accordingly.
- Some of the **Safety Center** pages and the dedicated information on misinformation-related topics are also available in Greek, i.e., Harmful Misinformation[56], Online Challenges[57], Tragic Events[58].
- The **TikTok's Transparency Center** is not available in the Greek or Maltese languages.
- **The TikTok's Newsroom** offers Greece (in Greek) and EU (in English) as options in the country list to customize the view for the blogs' page. Cyprus and Malta are not options on the list.
- TikTok reported quantitative information for the reach and user engagement of their tools at a Member State level. See below the figures presenting the metrics for each tool in the three countries. The numbers show that the Video Notice Tag feature reaches more users, looking at the impressions and the number of clicks than the Search Intervention feature in most of the topics. This was expected as users mostly consume content on TikTok through their For You Feed rather than searching for specific content. For Video Notice Tags it would be beneficial to better understand the effectiveness of the number of users who interacted (i.e., share) with the content after receiving a tag. The report lacks quantitative information on the Unverified Content label and the AI-generated label. Additionally, TikTok could provide more engagement metrics for the

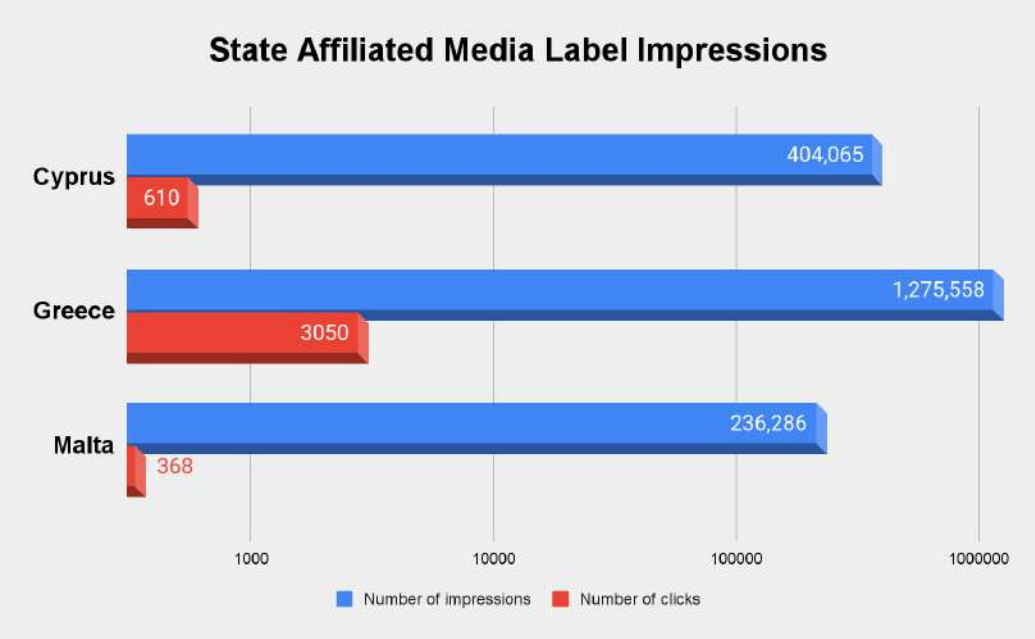
[55] https://www.tiktok.com/transparency/en-us/state-affiliated-media/
[56] https://www.tiktok.com/safety/el-gr/harmful-misinformation-guide
[57] https://www.tiktok.com/safety/el-gr/online-challenges
[58] https://www.tiktok.com/safety/el-gr/tragic-events-support

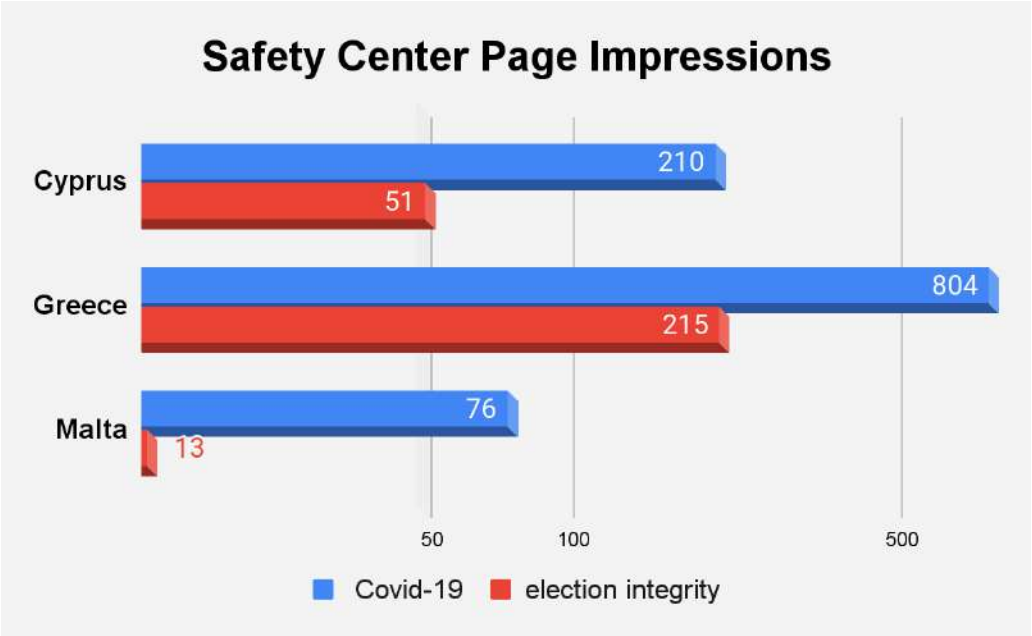
Transparency Page, misinformation related-specific Safety Pages, and Newsroom. No metrics are available for the search interventions for Israel-Hamas conflict or the War in Ukraine.

- Initiatives to enhance media literacy in Greece, Cyprus and Malta are limited (especially in Malta). Almost all activities and tools used in the three countries are part of broader initiatives undertaken by TikTok and concern major and often "controversial" topics (e.g. elections, climate crisis). Campaigns or programmes addressing the needs and challenges of the three countries individually were not materialised.

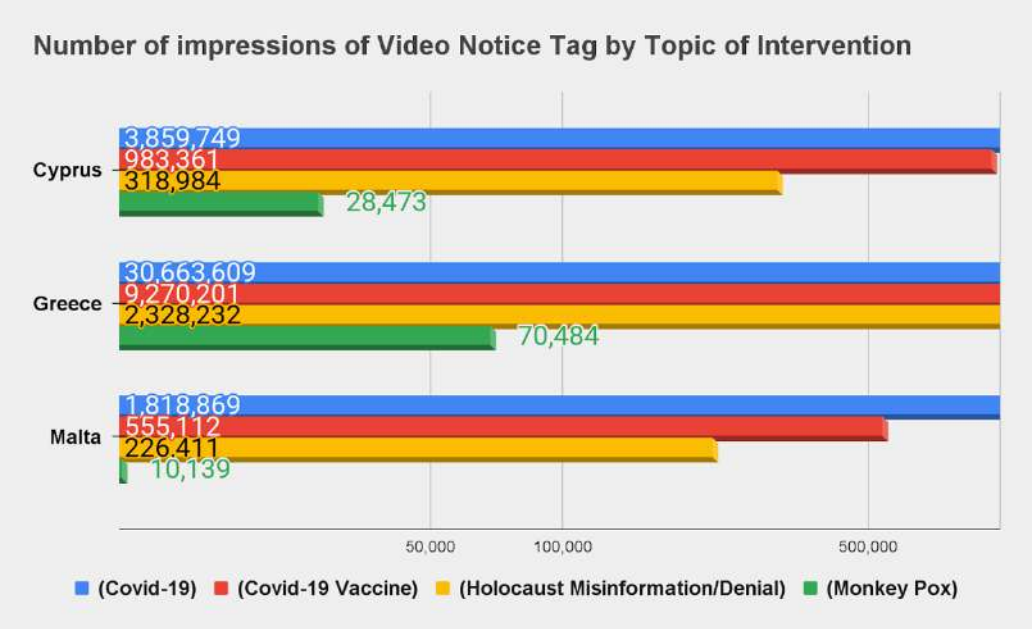
The TikTok reported information for SLI 17.1.1 can be found in the TikTok CoP 2024 report [TikTok, 2024], pages 112-137, next we present the reported numbers in figures:

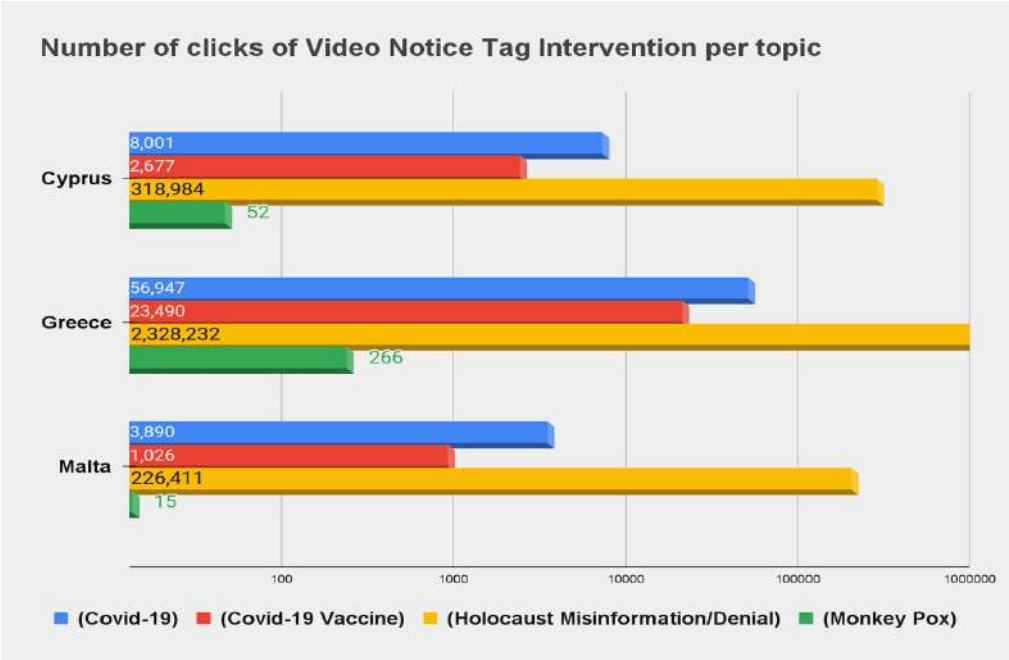
Table 7: TikTok's reported quantitative information for SLI 17.1.1

State Affiliated Media Label

Safety Centre Page Impressions

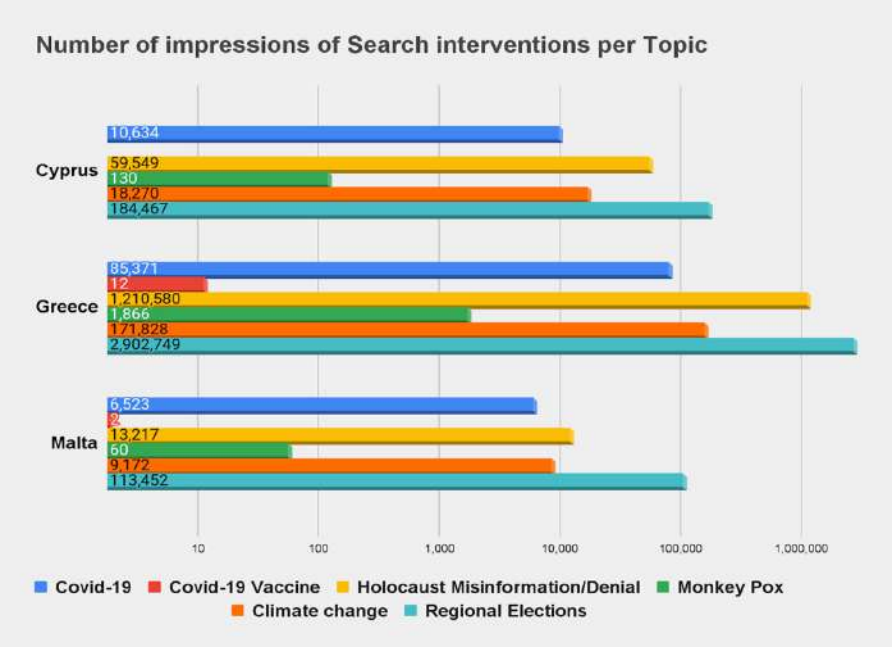


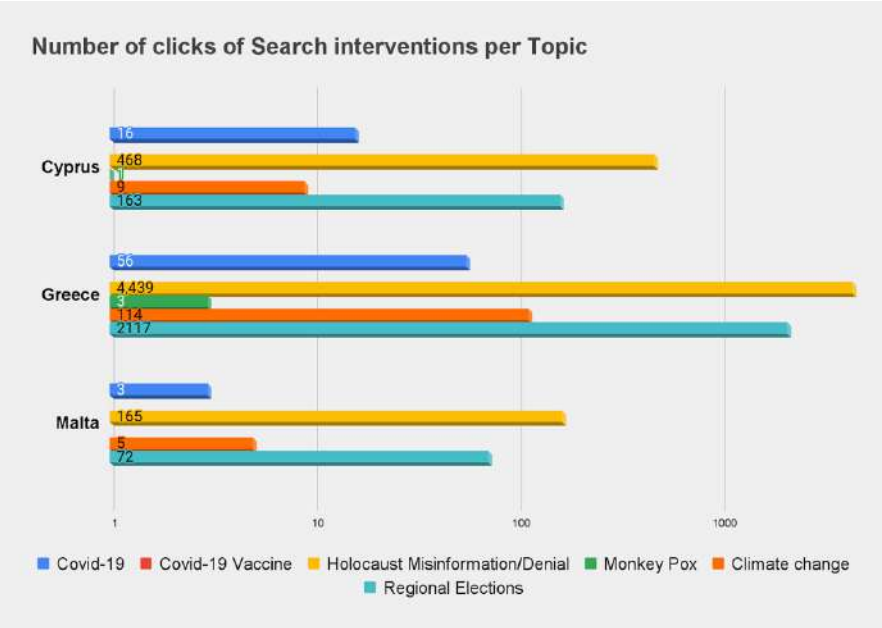
Video Notice tags intervention





Search Intervention




Number of clicks of Search interventions per Topic
Cyprus
16
468
1
9
163
Greece
56
4,439
3
114
2117
Malta
3
165
5
72
1
10
100
1000
Covid-19
Covid-19 Vaccine
Holocaust Misinformation/Denial
Monkey Pox
Climate change
Regional Elections

Pillar-V: Empowering Users *Commitment 21: Better Equipping Users to Identify Disinformation,* *page 174-187*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 21	3	3	3	3

TikTok has made some efforts to ensure transparency and combat misinformation, particularly by partnering with independent fact-checkers and using tools to notify users when content is flagged. Key aspects of their approach include:

- **Independent Fact-Checking**: Enforcement of misinformation policies through 12 IFCN accredited fact-checking partners in Europe who provide fact-checking coverage in 23 official EEA languages, including at least one official language of each EU Member States. Fact-checking organizations that collaborate with TikTok review and assess content, while TikTok's misinformation moderators determine on actions such as removing or demoting content that violates its guidelines. When the fact-checking of a claim is inconclusive then, labels such as "**unverified content**" may be applied. Non-violating but potentially harmful content has its visibility reduced on the For You feed. Users receive inbox notifications when action is taken on flagged content, and creators are also notified when their videos are marked as unsubstantiated

- **User awareness on fact-checking partnerships:** Users can learn about fact-checking partnerships and labels through the Safety Center & Transparency Center in more than 25 languages.

- **In-App Tools**: These tools provide information on specific topics like **COVID-19**, **election integrity**, and **climate change** to improve user awareness.

- **New AI-generated label:** Building on a new AI-generated label for creators to disclose content that is completely AI-generated or significantly edited by AI.

Partnerships with Researchers to design and evaluate TikTok Tools to empower users to identify misinformation:

- **Massachusetts Institute of Technology (MIT) & University of Regina:** Consulted on a study to measure how showing users accurate information after they'd seen a misinformation claim affects their behaviour.
- **Irrational Labs (behavioural scientists):**

  - Partnered in 2021 to design and test the "unverified content" prompts, which reduced shares of labelled videos by 24% and likes by 7% **[Irrational Labs, 2021].**
  - Worked on developing and user-testing the "state-controlled media" label (across English, Spanish, Arabic), finding "[country] state-controlled media" to be the clearest and most accurate phrasing.
- **IFCN-accredited fact-checkers (EU):** Help assess the accuracy of content; where fact-checks are inconclusive (e.g. during unfolding events), videos receive the "unverified content" label.
- **Media experts, political scientists, academics, and representatives from international organisations & civil society:** Consulted across North/South America, Africa, Europe, Middle East, Asia, and Australia to inform TikTok's state-affiliated media policy.
- **TikTok Safety Advisory Councils:** Engaged in advance of launching the AI-generated content label to advise on policy and user experience.
- **Industry experts, including Dr David G. Rand (MIT):** Drew on Dr Rand's research into how viewers perceive AI-disclosure labels to guide the design of TikTok's "AI-generated content" label.

Major Comments:

- TikTok's efforts represent a step toward improved media literacy and content moderation, but there are significant gaps in their reporting and data-sharing practices.
- TikTok listed their partnerships with experts on consultation to design or evaluate their tools. However, there is no detailed information on the partnerships and the findings of the studies TikTok used for their design or evaluation. Important to mention that there are no studies to evaluate the actual impact of these warnings and interventions.
- TikTok reported that the fact-checking organizations review content, but the decision is made by their content moderators. It is not clearly described how the moderators take the decisions to remove or demote content.
- TikTok provided quantitative data such as the share cancel rate for content that received the unverified content label, and the share of content removals under the misinformation policy, etc. (see Tables below).
- Malta sees the biggest effect, with 30.2% of users stopping a share when warned, followed closely by the EU average (29.7%). Cyprus trails at 25.0% and Greece at 27.0%, suggesting room to optimize the pop-up's impact there.
- Cyprus and Greece have roughly a 30% share of all removals under this policy, indicating a significant volume of flagged content. Malta's comparatively low 12.1% could reflect fewer overall

cases, different content patterns, or lower moderation coverage of content from Maltese creators.

- TikTok takes down proactively the vast majority of flagged misinformation before any user report- with average 97% in the EU. Proactive removals share in Malta and Cyprus exceeds 95%, while in Greece it is 87%.
- 63% (Cyprus), 64% (Greece) and 75% (Malta) of videos judged to violate policy are removed before garnering any views.
- Most removals happen within 24 hours of posting, with Cyprus leading at 84.5%, Greece at 80.8% and Malta at 75%.
- TikTok also reports the number of contents receiving the 'unverified label', ranging from 1 to 2K for the three countries.
- The data provided by TikTok shows that the unverified content labels have a significant impact on users sharing the content, and at the same time that the share of TikTok content removals under the misinformation policy holds a considerable share of the content removals, and they also do that timely before reaching the users. However, we are not able to independently assess these metrics.

Table 8: TikTok's reported quantitative information for SLI 21.1.1

TikTok					
SLI 21.1.1	**Methodology of data measurement:** The share of removals under our harmful misinformation policy, share of proactive removals, share of removals before any views and share of the removals within 24h are relative to the total removals of each policy. The share cancel rate (%) following the unverified content label share warning pop-up indicates the percentage of users who do not share a video after seeing the label pop up. This metric is based on the approximate location of the users that engaged with these tools.				
	Share cancel rate (%) following the unverified content label share warning pop-up (users who do not share the video after seeing the pop up)	Share of removals under harmful misinformation policy	Share of proactive removals under misinformation policy	Share of video removals before any views under misinformation policy	Share of video removals within 24h by misinformation policy
Cyprus	25%	31.9%	95.7%	62.9%	84.5%
Greece	27%	29.5%	87.1%	64%	80.8%
Malta	30.2%	12.1%	98.6%	75%	75%
Total EU	29.7%	26.6%	97.2%	80%	83.7

Table 9: TikTok's reported quantitative information for SLI 21.1.2

TikTok		
SLI 21.1.2	**Methodology of data measurement:** The number of videos tagged with the unverified content label is based on the country in which the video was posted. The share cancel rate (%) following the unverified content label share warning pop-up indicates the percentage of users who do not share a video after seeing the label pop up. This metric is based on the approximate location of the users that engaged with these tools.	
	Number of videos tagged with the unverified content label	Share cancel rate (%) following the unverified content label share warning pop-up (users who do not share the video after seeing the pop up)
Cyprus	1.033	25
Greece	1.874	27
Malta	1.101	32.5
Total EU	82.147	29.7

3.5.2 TikTok: Empowering the Research Community

Pillar-VI: Empowering the Research Community, *Commitment 26: Empowering the Research Community* *pages 208 - 215*				
Evaluation with scale 1-5 based on EDMO methodology				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 26	3	3	3	3

TikTok Access to data for researchers:

Research API[59]: Provides programmatic access to *public* TikTok content and account metadata, including comments, captions, subtitles, counts of comments/likes/shares/favourites, follower/following lists, etc. Initially launched for U.S. academic researchers; now open to qualified non-profit academics in the EEA, UK and Switzerland.

Virtual Compute Environment (VCE): A secure, sandboxed environment for qualifying academic, not-for-profit researchers in the EU. There is a two-stage process to analyse public data from TikTok: 1) Test Stage: SDK queries return random samples (up to 5,000 records per day). 2) Execution Stage: Researchers submit analysis scripts against the full public dataset; TikTok reviews the scripts outputs to ensure only aggregated data is extracted. If TikTok approves the output, the researcher will receive a link to download the results.

Commercial Content API[60]**:** As mandated by the DSA, provides ads and advertiser metadata (creative, run dates, targeting parameters, reach, etc.). Access by approved TikTok for Developers account holders worldwide, with EU data currently included.

Commercial Content Library[61]**:** Publicly searchable repository of all paid ads (and tagged commercial-nature content) served in the EEA, UK and Switzerland. Includes creatives, metadata (targeting criteria, impressions, dates), and remains available for one year after last view.

TikTok Transparency Centre: The following reports are available in the Transparency Center:

1) COPD Transparency Reports[62] (biannual): granular take-down and moderation data for EU/EEA.

[59] https://developers.tiktok.com/products/research-api/
[60] https://developers.tiktok.com/products/commercial-content-api
[61] https://library.tiktok.com/ads
[62] https://www.tiktok.com/transparency/en/copd-eu/

2) Community Guidelines Enforcement Reports[63] (quarterly): proactive removals and account actions since 2019, with downloadable aggregated datasets.

3) DSA Transparency Reports[64] (biannual): Detailed EU content-moderation metrics under the Digital Services Act. Expanded downloadable data (e.g., removal counts by policy category for top-50 markets, live-stream enforcement, view-counts prior to removal).

Major Comments:

- TikTok provides a relatively comprehensive set of tools, documentation, and processes to support access to non-personal data for disinformation research.
- TikTok has documented definitions for public data (Research API Codebook[65] and the Commercial API Data structures[66]) and the application processes for accessing these datasets.
- Researchers in Cyprus, Greece, and Malta have access to the reports. Additionally, researchers can freely access the Commercial Library. However, for accessing the Research API, Commercial API, and VCE, researchers must complete an application form which will be later reviewed by TikTok based on a number of criteria.
- TikTok reported the numbers of applications received for researchers' access to the Researcher API and Commercial API. There were no applications from researchers in Cyprus, and Malta for both the APIs. In Greece, two applications were submitted for the Research API, and only one got accepted.
- Looking at the codebook of the Research API, it is not clear if the researchers can get information if a video received the 'unverified content label', or the 'state-affiliated label', nor if the video was demoted from the recommendation algorithm.
- There are no metrics on the impressions, or downloads of the reports TikTok mentioned.
- Overall, TikTok has shown a commitment to supporting academic research and has taken steps in this direction. While improvements have been noted, further efforts are necessary to provide more targeted, complete, and meaningful data as well as information to verify the data provided by the platform.

63 https://www.tiktok.com/transparency/en/community-guidelines-enforcement-2021-2/
64 https://www.tiktok.com/transparency/en/dsa-transparency/
65 https://developers.tiktok.com/doc/research-api-codebook?enter_method=left_navigation
66 https://developers.tiktok.com/doc/commercial-content-api-get-ad-details?enter_method=left_navigation

Pillar-VI: Empowering the Research Community, ***Commitment 27: Governance Structure for Access to Data for Research Purposes Requiring Additional Scrutiny,*** *pages 215 - 217*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 27	3	3	3	3

TikTok Pilot Programs for data sharing:

TikTok completed the data access pilot with EDMO, which trialled the process for sharing data with vetted researchers designated under the DSA.

TikTok refined their standard operating procedure for vetted researcher access to ensure compliance with the provisions of the Delegated Act on Data Access for Research.

TikTok reported that they actively participate in the EDMO working group for the creation of the Independent Intermediary Body (IIB) to support research on digital platforms.

Major Comments:

- Completing the EDMO pilot is a concrete milestone that demonstrates TikTok's early technical and procedural readiness for DSA-mandated data-sharing. Beyond noting completion, TikTok does not provide metrics or case studies—e.g., the number of researchers participated, the types of queries run, or lessons learned—that would illustrate real-world usability.
- TikTok's involvement in the IIB working group shows strategic commitment to shaping the intermediary's design. The report lacks specifics on TikTok's contributions—such as proposed governance models or procedural recommendations—that would evidence substantive influence on the body's emerging framework.
- TikTok reported refining internal processes to signal compliance readiness. Without details on what was changed (e.g., data-handling safeguards, researcher vetting criteria), it's difficult to assess whether these refinements materially enhance transparency or researcher protections.
- TikTok's narrative confirms formal participation and completion of key tasks—but offers limited new insight into outcomes, researcher experiences, or quantitative achievements.

Pillar-VI: Empowering the Research Community, *Commitment 28: Cooperation with Researchers,* *pages 217 - 224*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 28	3	3	3	3

TikTok outlines a broad and growing set of initiatives to support independent research and transparency, particularly in relation to misinformation and disinformation. Key elements include:

- **Research Tools and Data Access**: TikTok has expanded its Research API to provide access to public content and account data and introduced the VCE (Verified Research Environment) for qualifying non-academic, not-for-profit researchers in the EU. These tools ensure privacy and security while enabling meaningful analysis of platform dynamics.

- TikTok also maintains open access to its Commercial Content API and Commercial Content Library, which include ad metadata, targeting information, and metrics on ad impressions.

- **Transparency and Accountability**: TikTok operates four Transparency and Accountability Centers (TACs) in Dublin, Los Angeles, Singapore, and Washington, DC. These facilities host stakeholders and allow them to observe TikTok's moderation and platform safety processes.

- **Collaborations with Expert Councils**: TikTok engages with nine Safety Advisory Councils, including the European Safety Advisory **Council** and the Youth Advisory Council, to incorporate expert and civil society input into policy design and feature development—such as the AI-generated content label.

- **Academic and Civil Society Engagement**: TikTok collaborates with external experts and academics (e.g., MIT's Dr. David Rand) and consults with researchers on topics such as election misinformation and AI content disclosure. They held expert briefings (e.g. the Election Speaker Series) with fact-checking organizations across the EU in the lead-up to the 2024 European Parliamentary Elections.

- **Event Participation and Outreach**: TikTok actively participates in research events, including GlobalFact **11**, hosted webinars with EDMO, and other digital rights and tech summits. They estimate reaching ~135 research stakeholders during the reporting period through such engagements.

- **EDMO and DSA Engagement**: TikTok completed a pilot program with EDMO to trial data sharing with vetted researchers under the Digital Services Act (DSA)**.** They expressed a willingness to continue collaborating with EDMO and the forthcoming Independent Intermediary Body (IIB)**.**

- **Commitment to Continuous Improvement**: TikTok states that it continuously refines its tools, data-sharing processes, and transparency mechanisms, and will report further developments in future Code of Practice on Disinformation (CoP) submissions.

Major Comments:

- TikTok reported having multiple dedicated teams (e.g., product, policy, data science, legal, outreach) to support research engagement. They mentioned hosting Transparency and Accountability Centers (TACs) and working with several advisory councils. However, no specific reference is made to dedicated points of contact or resources in Cyprus, Greece, or Malta, and no country-specific activities or research collaborations were reported.

- TikTok described multiple tools available to researchers, including the Research API, the new VCE (for vetted non-academic researchers), and the Commercial Content API. While these tools offer access to public account and content data, the platform did not provide metrics on usage or uptake by researchers from Greece, Cyprus, or Malta. Importantly, it is unclear how accessible these tools are for smaller, less-resourced research institutions in these Member States.

- TikTok did not disclose any concrete figures or breakdown of financial or technical resources allocated specifically for disinformation research. Statements on resource allocation are vague, and there is no evidence of country-level funding support or investment in localized research.

- TikTok noted the completion of a data-sharing pilot with EDMO, which is a positive step. However, there is no follow-up on resource allocation, researcher uptake, or whether any researchers from Cyprus, Greece, or Malta participated in or benefited from this pilot.

3.5.3 TikTok: Empowering the fact-checking community

Pillar-VII: Empowering the fact-checking community *Commitment 30: cooperation with the fact-checking community,* *page 226-234*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 30	3	3	3	2

TikTok and Fact-checking organizations:

TikTok works with 19 IFCN-accredited fact-checking organisations globally, covering 23 official languages in the European Economic Area (EEA): Bulgarian, Croatian, Czech, Danish, Dutch, English, Estonian, Finnish, French, German, Greek, Hungarian, Italian, Latvian, Lithuanian, Norwegian, Polish, Portuguese, Romanian, Slovak, Slovenian, Spanish, Swedish. In Europe, TikTok collaborates with 12 IFCN-accrediated fact-checking organizations: Agence France-Presse (AFP) –covering Greece and Cyprus, dpa Deutsche Presse-Agentur, Demagog, Facta, Faktograf (onboarded in 2024), Lead Stories, Logically Facts, Newtral, Poligrafo, Reuters, Science Feedback, Teyit.

During high-risks events, TikTok makes temporary agreements with fact-checking partners to cover additional languages. For example, during the 2024 EU Elections, TikTok also covered fact-checking in the Maltese language.

TikTok Fact-checking Partners receive videos flagged either algorithmically or via user reports and evaluate each piece against TikTok's classification schema (e.g., misinformation, unverified, partly false). Fact-checkers assign a rating and, where appropriate, submit written reports on emerging disinformation trends. TikTok moderators then use these independent assessments to remove content, prevent it from being recommended, or apply an "unverified content" label.

All fact-checking partners sign from TikTok's master services agreement template, which defines:

- Scope of services (content review, rating, trend reporting)
- Performance expectations and service levels
- Language coverage commitments and ad-hoc project support
- Reporting obligations and optional proactive flagging
- Fees, term length, and renewal processes

Media Literacy Campaigns: TikTok also reported a number of collaborations with its fact-checking partners for media literacy campaigns (e.g., 2024 EU Parliamentary Election, 2024 French Parliamentary Election, 2024 Slovak Presidential Election, etc.).

Major Comments:

- Overall, TikTok shows a strong commitment on collaboration with fact-checkers, as evidenced by its partnerships with multiple IFCN-accredited organisations and the development of advanced tools to detect misinformation.
- There is no fact-checking organization covering Malta, or the Maltese language. Agence France Presse (AFP) covers Cyprus and Greece, and the Greek language.
- Regional adaptations, such as temporary Maltese language support during EU 2024 elections, reflect TikTok's responsiveness to important local events.
- However, the lack of detailed reporting on resource allocation, evaluation frequency, and the depth of collaborations limits the ability to assess the program's actual impact.
- Additionally, the frequency and method of reviews with fact-checkers are not described in detail, though TikTok claims to have regular meetings and ongoing dialogue with partners.
- Emphasis on fair compensation and transparent processes for fact-checking partners is a positive step. The absence of specific quantitative data reduces transparency, especially regarding how compensation is distributed, and which countries receive the most support.

Pillar-VII: Empowering the fact-checking community *Commitment 31: use and integration of fact-checking* *page 235-243*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 31	2	2	2	1

Fact-checking work integration on TikTok:

The fact-checking partners collaborate with the platform in three primary ways:

1. Fact-checking specific videos flagged by moderators.
2. Contributing to a global database of fact-checked claims.
3. Participating in a proactive detection program to flag new and evolving claims.

Fact-checkers offer advisory input only, while TikTok's moderation team makes the final decisions on content. If a fact-check is inconclusive, TikTok informs viewers with a banner ("Unverified content label") suggesting reduced sharing. Such videos may be excluded from recommendations in the "For You" feed.

- Major Comments:

- TikTok states that moderators use fact-checkers' ratings to determine whether to remove content or label it as "Unverified Content." However, the exact decision-making process remains unclear. There is no transparency on how fact-checker inputs are weighed or translated into moderation actions, leaving a gap in understanding the real influence of third-party verification on enforcement decisions.

- During the reporting period, TikTok submitted just 17 videos from Cyprus, 215 from Greece, and a single video from Malta to fact-checking partners. These figures are exceptionally low—particularly in Malta and Cyprus—and raise questions about the coverage and prioritisation of content in these markets. The platform appears to be significantly underutilising its partnerships with fact-checkers in these countries.

- Following fact-checking assessments, TikTok moderators removed only 2 videos from Cyprus, 31 from Greece, and none from Malta. These numbers are disproportionate when compared to the total volume of misinformation likely circulating on the platform, suggesting that either the

threshold for removal is high or that many potentially harmful posts are not reaching fact-checkers at all.

- TikTok also reported removals based on internal moderation triggers—such as policy guidelines, known misinformation trends, and a knowledge-based repository. These resulted in 329 removals from Cyprus, 2,294 from Greece, and 72 from Malta, none of which underwent fact-checking assessment. The significant gap between removals via internal systems versus fact-checked content calls into question the role and value of the fact-checking process in TikTok's overall moderation pipeline.

- There is no baseline or reference data provided, making it impossible to fully contextualise or assess the meaning of these figures. Without publicly available historical data or benchmarks, the numbers—however precise—remain difficult to interpret.

- All reported data originate from TikTok's internal systems, with no external audits or third-party verification mechanisms in place. Aside from informal input from fact-checking partners, there is no local or EU-level infrastructure to corroborate the statistics. This raises doubts about the reliability of the reporting.

- The sharp contrast between videos removed after fact-checking assessments and those removed purely through policy enforcement is striking across all three countries. It suggests either limited integration of fact-checking workflows or inefficiencies in flagging high-risk content to external verifiers.

- TikTok claims to be developing a repository of fact-checked claims to support moderator decisions but provides no technical details or scope of the initiative. The absence of information on how this repository functions, what content it includes, or how often it is updated makes it impossible to assess its effectiveness.

- Despite repeated references to fact-checking partnerships, TikTok offers little insight into the actual contributions of fact-checking organisations. There is no data on verification turnaround times, feedback loops, or the types of claims reviewed, leaving their operational role poorly defined.

- TikTok should substantially improve transparency by disclosing how fact-checking decisions are made, how content is routed for review, and the criteria moderators use in applying or dismissing fact-checker recommendations. The absence of such contextual detail significantly undermines the credibility of the reported metrics and hampers meaningful evaluation of their effectiveness.

Table 10: TikTok's reported quantitative information for SLIs 31.1.1 – 3

TikTok				
SLIs 31.1.1-3	**(SLI 31.1.1)** Methodology of data measurement: The number of fact checked videos is based on the number of videos that have been sent for review to one of our fact-checking partners in the relevant territory.	**(SLI 31.1.2)** Methodology of data measurement: The number of videos removed as a result of a fact-checking assessment and the number of videos removed due to policy guidelines, known misinformation trends, and our knowledge-based repository is based on the country in which the video was posted. These metrics correspond to the numbers of removals under the harmful misinformation pol,icy as all enforcement is based on the policy guidelines, known misinformation trends and a knowledge-based repository.		**(SLI 31.1.3)** Methodology of data measurement: The metric we have provided demonstrates the % of videos that have been removed as a result of the fact-checking assessment, in comparison to the total number of videos removed due to violating our harmful misinformation policy.
	Number of fact checked videos (tasks)	**Number of videos removed as a result of a fact checking assessment**	**Number of videos removed because of policy guidelines, known misinformation trends and knowledge based repository**	**Number of videos removed as a result of a fact checking assessment / number of removals under harmful misinformation policy**
Cyprus	**17**	**2**	**329**	**0.6%**
Greece	**215**	**31**	**2294**	**1.4%**
Malta	**1**	**0**	**72**	**0**
Total EU	**8.729**	**1.661**	**262.652**	**0.6%**

Pillar-VII: Empowering the fact-checking community *Commitment 32: fact-checkers access to relevant information* *page 244-245*				
Evaluation with scale 1-5				
	Evaluation of Reported Actions (QREs)	**Evaluation of Implementation (SLIs)**		
		Greece	**Cyprus**	**Malta**
Commitment 32	2	2	2	2

TikTok's tools for their fact-checking partners:

Dashboard: TikTok provides fact-checkers with access to a dashboard where they can review flagged content. The dashboard provides some quantitative information, including the number of videos queued for assessment, the time taken for review, and the ratings applied by fact-checkers in their previous assessments.

Major Comments:

- TikTok does not report any additional interfaces or automated tools beyond the dashboard for fact-checkers.
- No details are available on the dashboard or user engagement metrics.
- TikTok does not specify the communication channels or frequency of exchanges with the fact-checking community.
- Without objective evidence, it is challenging to validate TikTok's claims or assess their compliance with relevant commitments.

4 MedDMO Fact-Checking Partners Collaboration with VLOPs

The MedDMO consortium includes three fact-checking organisations certified by the International Fact-Checking Network (IFCN): Agence France-Presse (AFP), Ellinika Hoaxes (EH), and the recently established Fact-Check Cyprus. In parallel, the Times of Malta and the University of Malta carry out fact-checking activities focusing on misinformation trends within Malta. All fact-checks related to Malta are accessible via the MedDMO website.

Two of our IFCN-certified partners, Ellinika Hoaxes and Agence France-Presse, maintain ongoing collaborations with certain Very Large Online Platforms (VLOPs) in the fight against disinformation. These collaborations include participation in VLOP third-party fact-checking programmes, engagement in media literacy campaigns, and the application of platform-provided tools to label or contextualise false or misleading content.

To gain further insight into the nature of these collaborations, we invited both organisations to respond to an open-ended questionnaire detailing their experiences working with the platforms. The questionnaire is available in **Annex II**. Next, we present the main findings of the questionnaire.

Table 11:MedDMO Fact-Checking Partners Collaboration with Meta

Collaboration with Meta: Third Party Fact-Checking Program (3PFC)		
	EH	**AFP**
Collaboration:	Ellinika Hoaxes has been collaborating with Meta as part of the company's third-party fact-checking program since May 2019. EH fact-checks content on Facebook, Instagram, and, since 2024, on Threads as well.	AFP has collaborated with Meta in its Third-Party Fact-Checking (3PFC) program since 2017. The collaboration extends to fact-checking in 26 languages worldwide, covering various platforms including Facebook and Instagram.
Fact-Checked Content:	Under the 3PFC program, EH can fact-check content on Facebook, Instagram, and Threads, including text-only posts, images, videos, reels, and sponsored content.	Within the 3PFC program, AFP is authorised to fact-check content on Facebook and Instagram. The organisation fact-checks posts, including images, texts, videos, and sponsored content, monitoring comments to assess potential harm and virality. AFP do not systematically look at online advertisements.
Fact-Checking Process:	The process involves four stages: Detection, Evaluation, Refutation through investigation, and Ratings Submission. Check-worthy claims are first	AFP's fact-checking process involves manually monitoring social networks, Facebook queues, and WhatsApp queries. The process includes evaluating the fact-checkability and potential

	detected, primarily through manual monitoring or shared with EH by our audience. Subsequently, they are evaluated based on their virality and potential harm. Claims deemed worthy are investigated, and fact-checks are written and published. Ratings on the original content spreading the claim are submitted through the platform's provided system.	harm or virality of content, followed by fact-checking and verification. Fact-checks are written, reviewed, and published, with ratings applied to the original content within the platform's system.
Feedback from Platform:	Figures specifically detailing the impact of EH's work, as provided by the platform, are limited and we are unable to share them. Metrics on the overall impact of the 3PFC program are publicly shared by the company under its obligations to the DSA and CoP.	Meta publicly shares information about its collaboration with fact-checking partners, including AFP in its reports to the DSA, and the Code of Practice. Metrics regarding the impact of fact-checking programs are provided, including the number of non-shares after reading a fact-check. Specific reports by the platform on the impact of AFP's work on the platform are limited.
Number of Fact-Checked Content:	Ellinika Hoaxes produces up to 55 fact-checking articles per month, but the exact number of ratings applied in content by Meta as a result of Meta's third-party fact-checking program is confidential under Meta's partnership NDA.	AFP keeps track of the reports it publishes, although specific figures are considered confidential and not disclosed. AFP seeks access to the internal archives of platforms relevant to their fact-checking work, a recurring request.
Meta's Use of Fact-Checking Articles:	Meta utilises warning labels and notifications on content fact-checked by Ellinika Hoaxes. Meta links the fact-checked content on the platform with Ellinika Hoaxes fact-check articles.	Meta extensively uses AFP's fact-checks, connecting them to user posts for moderation actions, including labelling and adding context information. Users are informed about the fact-checks, and AFP's work is integrated into Meta's moderation actions.
Number of Fact-Checkers:	Ellinika Hoaxes has **10 editorial members** contributing through their work in Meta's third-party fact-checking program.	AFP has 2 fact-checkers assigned for Meta activities in Greece, contributing to the 3PFC program.

User Requests:	Ellinika Hoaxes receives requests from Meta users for fact-checking content. The exact number is not tracked, but users can seek a review of a fact-check rating or request a review of corrections made to their content.	AFP receives emails and suggestions for fact-checking via its various channels, including WhatsApp tiplines. While direct contact with Meta users is limited, AFP actively engages in reviewing and fact-checking content, contributing to a more informed online environment.

Table 12: MedDMO Fact-Checking Partners Collaboration with TikTok

Collaboration with TikTok: Fact-Checking Program	
	AFP
Collaboration:	AFP has collaborated with TikTok since 2020 as part of their fact-checking program, embedded in the platform's moderation process. The collaboration extends across several regions globally, including Latin America, Europe, and the Asia Pacific.
Fact-Checked Content:	AFP fact-checks videos on TikTok, often including text within the content. The organisation monitors the platform independently and writes fact-checks based on the content resulting from this monitoring process.
Fact-Checking Process:	The fact-checking process involves manual monitoring of the platform or TikTok's back-office queues, or fact-checking queries on WhatsApp, evaluating the fact-checkability, assessing potential harm, and virality. AFP independently fact-checks videos, and the resulting fact-checks are published on the platform's back office.
Feedback from Platform:	TikTok publicly explains its collaboration with AFP in its global fact-checking program. The platform shares some metrics in its Code of Practice and DSA reports regarding the impact of fact-checking. However, the final moderation decisions remain with TikTok's moderators after the rating of the fact-checkers.
Number of Fact-Checked Content:	AFP keeps track of the reports it publishes but does not disclose specific figures, considering them commercial in confidence. AFP seeks access to the internal archives of platforms relevant to their fact-checking work, a recurring request.
Use of Fact-Checking Articles:	TikTok shares links to AFP's fact-checks in specific information pages created around events, such as elections[67]. The links are used to provide additional context and information to TikTok users.
Number of Fact-Checkers:	AFP has 2 fact-checkers assigned for TikTok activities, covering the same team members involved in Meta fact-checking for Greece.
User Requests:	While AFP is not in direct contact with TikTok users, the organisation actively monitors and fact-checks content on the platform, contributing to the fight against disinformation.

[67] https://activity.tiktok.com/magic/eco/runtime/release/64400a0478c79d0360a77740?appType=tiktok&magic_page_no=1

Table 13: MedDMO Fact-Checking Partners Collaboration with Google and other platforms

Other Collaborations		
	EH	**AFP**
Google	Ellinika Hoaxes does not have an active collaboration with Google. Like most fact-checking organizations globally, EH provides some data from its fact-checks through ClaimReview. This data is integrated into Google's search results and Fact Check Explorer. No compensation is provided for this data.	AFP does not engage in specific fact-checking of content with **Google**. Instead, the collaboration involves the development of training tools for journalists, journalism students, and wider audiences on investigating disinformation online. This training program operates at a global level and covers multiple languages, including French[68], English[69], Spanish[70], and Portuguese[71]. AFP also create tips and techniques videos in this context (French[72], English[73], Spanish[74]).
Other platforms	Ellinika Hoaxes doesn't have any other active collaboration with platforms beyond META. Yet we often fact-check content spreading on platforms like X, Telegram, and YouTube. Ellinika Hoaxes emphasises the importance of various platforms engaging more with fact-checking initiatives for an enhanced impact.	**AFP do not have contracts** with the following platforms, however, **they still fact-check content** on these platforms: Telegram, V-Kontakte, X, LinkedIn, Weibo, Snapchat, YouTube, Naver, Google and Bing Search, etc.

[68] https://fr.digitalcourses.afp.com/?_gl=1*x...
[69] https://digitalcourses.afp.com/
[70] https://es.digitalcourses.afp.com/?_gl=1*78krj...
[71] https://br.digitalcourses.afp.com/?_gl=1*1lb6m...
[72] https://www.youtube.com/playlist?list=PLo9T0OZu4qjk7MVqK7VxTFoiI5LTM4FYF
[73] https://www.youtube.com/playlist?list=PLo9T0OZu4qjk7MVqK7VxTFoiI5LTM4FYF
[74] https://www.youtube.com/playlist?list=PL3oLC6iSclxCCkNtfzRpxw9Fh0hsKzDe4

5 Supporting the National Authorities

As part of the MedDMO project, our mission is to assist media authorities in Cyprus, Malta, and Greece in addressing the complex challenge of disinformation.

To support this goal, we have actively engaged with the respective regulatory bodies—the Cyprus Radio Television Authority (CRTA), the Broadcasting Authority of Malta (MBA), and the National Council for Radio and Television (NCRTV) in Greece—with the aim of building collaborative partnerships. These relationships are designed to enhance information sharing, coordination, and strategic responses to disinformation threats across the Mediterranean region.

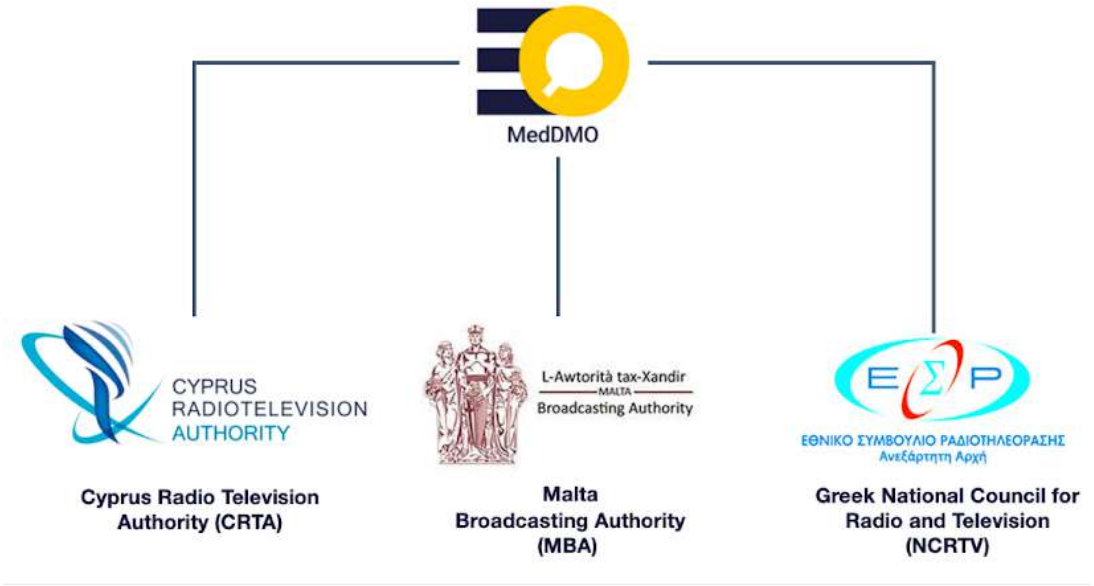


Figure 29: MedDMO collaboration with the national media authorities

Key Areas of Collaboration Between National Media Authorities and MedDMO:

The following initiatives illustrate the ongoing support and collaborative efforts with each of the three authorities in 2024:

The Case of Cyprus

Towards supporting Cyprus Radio Television Authority[75]:

- Cyprus Radio Television Authority (CRTA) members visited CUT and participated in a Fact-checking process Seminar (05/07/2024). A discussion followed for further collaboration between MedDMO and CRTA, mainly in media literacy activities.

[75] https://crta.org.cy/en/

- CUT visited CRTA premises (29/11/2024) and conducted a Fact-checking workshop for the staff of CRTA. This activity was a follow up activity after the CRTA visit to CUT, they requested to repeat the workshop for all the relevant staff of CRTA in their premises for their convenience to participate. The workshop ended with a Q&A session. The participants were very engaged in the workshop and the case studies of specific false claims spreaded in Cyprus. CRTA expressed their interest in co-organizing similar workshops for professional journalists in Cyprus.

- CRTA suggested the creation of a disinformation awareness video that could be disseminated widely through exploiting the authority's channels in TV and Radio productions in Cyprus. MedDMO partners are working towards the creation of a series of videos.

The Case of Greece

Towards supporting the National Council for Radio and Television (NCRTV)[76]:

- On October 18, 2024, the National Council for Radio and Television (ESR), the Journalists' Union of Athens Daily Newspapers (ESIEA), and MedDMO successfully hosted a seminar on disinformation and modern propaganda at ESIEA in Athens. Experts discussed the challenges of combating fake news, verification tools, and the role of journalism in promoting media literacy. The event attracted journalists, media professionals, and students, concluding with an open discussion on strengthening fact-checking and transparency in the digital era. The president of the CRTA board participated in the event co-organized by MedDMO and NCRTV, showcasing the strong connection between the two countries and their broadcasting authorities. Additionally, members of the CRTA were able to remotely attend the event.

The Case of Malta

Towards supporting the Broadcasting Authority of Malta (MBA)[77]:

- Organization of the “Webinar for Journalists in Malta” (19/06/2024). Members from the MedDMO Fact-checking organizations (ToM, AFP, EH, FCC) discussed the fact-checking procedure for investigating interesting misinformation cases. Our coordinator Nikos Sarris introduced MedDMO to the Maltese Journalists.

In addition to our direct collaboration with each regulatory authority, we actively share MedDMO project outcomes—such as reports, policy findings, and educational materials—that are relevant to their work. We remain open to requests for support and aim to respond to their evolving needs. At the same time, we value the information and insights they share with us, which contribute to our reporting and analysis. We also regularly invite them to MedDMO-organised events and other initiatives we believe align with their mandate, fostering a continuous and mutually beneficial exchange.

[76] https://www.esr.gr/information/
[77] https://ba.org.mt/

Collaboration with the Digital Service Coordinators in Cyprus, Greece and Malta

Under the Digital Services Act (DSA), each EU Member State appoints a Digital Service Coordinator (DSC)[78] tasked with ensuring compliance, coordinating enforcement, and fostering a safer online environment. In this context, MedDMO has established direct communication with the DSC in Cyprus (CRTA) and recently reached out to the DSCs of Malta and Greece for organising an introductory meeting. The corresponding DSC in Malta is the Malta Communications Authority (MCA)[79] and in Greece is the Hellenic Telecommunications and Post Commission (EETT)[80]. During this session, the DSCs were introduced to MedDMO and EDMO initiatives, and possibilities for further collaboration were discussed. As a direct outcome, the Maltese DSC (MCA) invited a MedDMO representative to participate in an upcoming event, further strengthening these cooperative efforts.

6 Conclusion

This report highlights that while Meta, Google, and TikTok have taken important steps to counter disinformation in Cyprus, Greece, and Malta, their efforts remain uneven and, in many cases, insufficiently tailored to local needs. Key challenges include limited support for the Maltese language, weak integration of local fact-checkers, underutilized research tools, and a general lack of transparency and impact metrics across all three countries.

Despite these shortcomings, the platforms' continued participation in the Code of Practice represents a valuable framework for accountability and improvement. The availability of tools, partnerships with fact-checkers, and emerging transparency mechanisms offer a foundation on which to build.

Looking ahead, there is clear potential for progress. By enhancing localization, ensuring equitable access to tools and data, and strengthening collaboration with national experts, platforms can significantly improve their disinformation responses in the region.

As part of the MedDMO project, we will continue to monitor the practices of these platforms and offer evidence-based recommendations. Our goal remains to support media experts and national authorities in Cyprus, Greece, and Malta in building stronger, more resilient information ecosystems.

[78] https://digital-strategy.ec.europa.eu/en/policies/dsa-dscs
[79] https://www.mca.org.mt/initiatives/dsa
[80] https://www.eett.gr/

7 References

[European Commission, 2022] European Commission (2022). Strengthened Code of Practice on Disinformation. https://digital-strategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation

[European Commission, 2018] European Commission (2018). Code of Practice on Disinformation. https://digital-strategy.ec.europa.eu/en/library/2018-code-practice-disinformation

[BBC News, 2025a] The TikTokers accused of triggering an election scandal, 30 April 2025. https://www.bbc.com/articles/cqx41x3gn5zo

[BBC News, 2025b] Facebook and Instagram get rid of fact checkers, 7 January 2025. https://www.bbc.com/news/articles/cly74mpy8klo

[Kaplan, 2025] Kaplan, J. (2025, January 7). More speech and fewer mistakes. https://about.fb.com/news/2025/01/meta-more-speech-fewer-mistakes/

[Global Witness, 2025] TikTok and X recommend pro-AfD content to non-partisan users ahead of the German elections, 20 February 2025. https://globalwitness.org/en/campaigns/digital-threats/tiktok-and-x-recommend-pro-afd-content-to-non-partisan-users-ahead-of-the-german-elections/

[European Commission, 2023] European Commision,. Flash Eurobarometer: Media & News Survey 2023. https://europa.eu/eurobarometer/surveys/detail/3153

[Meta, 2024] Meta. Code of Practice on Disinformation – Report No. 4 (September 2024). https://disinfocode.eu/reports?signatory=&type=&year=2024

[Google, 2024] Google. Code of Practice on Disinformation – Report No. 4 (September 2024). https://disinfocode.eu/reports?signatory=&type=&year=2024

[TikTok, 2024] TikTok. Code of Practice on Disinformation – Report No. 4 (September 2024). https://disinfocode.eu/reports?signatory=&type=&year=2024

[Leonidou et al., 2023] Pantelitsa Leonidou, Nikos Salamanos, Michael Sirivianos, Loukia Taxitari, Socrates Ioakeim, Andreas Phylactou (2023), 1st Report of platform practices and national authorities support 2023 (for Cyprus, Greece & Malta). https://meddmo.eu/wp-content/uploads/2024/05/FINAL_1stReport_Monitoring_the_platform_p ractices_compressed.pdf

[Leonidou et al., 2025] Pantelitsa Leonidou, Nikos Salamanos, Paschalia Spyridou, Michael Sirivianos (2025). MedDMO Fact-Checks Archive Analysis for monitoring the media landscapes in Cyprus, Greece, and Malta https://meddmo.eu/mapping-disinformation-circulation-in-cyprus-greece-and-malta-and-evaluating-platforms-moderation-practices-insights-from-meddmo-fact-checks-archive-january-june-2024/

[Botan et al., 2025] Madalina Botan, Trisha Meyer (2025). Implementing the EU Code of Practice on Disinformation: An Evaluation of VLOPSE Compliance and Effectiveness (Jan–Jun 2024). https://edmo.eu/wp-content/uploads/2025/06/EDMO-Report-%E2%80%93-Implementing-the-EU-Code-of-Practice-on-Disinformation.pdf

[Irrational Labs, 2021] Irrational Labs (2021). How Behavioural Science Reduced the Spread of Misinformation on TikTok. https://irrationallabs.com/case-studies/tiktok-how-behavioral-science-reduced-the-spread-of-misinformation/

[Hassoun et al., 2024] Amelia Hassoun, Ariel Abonizio, Beth Goldberg, Katy Osborn, Cameron Wu (2024). The Influencer Next Door: How Misinformation Creators Use GenAI. 10.48550/arXiv.2405.13554.

[Maertens et al., 2025] Rakoen Maertens, Jon Roozenbeek, Jon Simons, Stephan Lewandowsky, Vanessa Maturo, Beth Goldberg, Rachel Xu, and Sander van der Linden (2025). Psychological Booster Shots Targeting Memory Increase Long-term Resistance Against Misinformation. PsyArXiv. March 11. doi:10.31234/osf.io/6r9as_v3.

[Dufour et al., 2024] Nicholas Dufour, Arkanath Pathak, Pouya Samangouei, Nikki Hariri, Shashi Deshetti, Andrew Dudfield, Christopher Guess, Pablo Hernández Escayola, Bobby Tran, Mevan Babakar, Christoph Bregler (2024). AMMeBa: A Large-Scale Survey and Dataset of Media-Based Misinformation In-The-Wild. https://arxiv.org/abs/2405.11697

Annex I: CoP Signatories Reports Assessment Scores and Missing SLIs.

Table 14: Meta's CoP Report No.4 Summary of Assessment Results

Meta

Scores: 1 (“very poor”), 2 (“poor”), 3 (“fair”), 4 (good), 5 (excellent), n/a (“not applicable”)

	Evaluation of Reported Actions/Policies (QREs)	Evaluation of Quantitative data (SLIs) & Implementation		
		Greece	Cyprus	Malta
Pillar-V: Empowering Users				
Commitment 17	3	2	2	2
Commitment 21	3	2	2	1
Average	**3**	**2**	**2**	**1.5**
Pillar-VI: Empowering the Research Community				
Commitment 26	**3**	**2**	**2**	**2**
Commitment 27	**3**	**3**	**3**	**3**
Commitment 28	**2**	**2**	**2**	**2**
Average	**2.7**	**2.3**	**2.3**	**2.3**
Pillar-VII: Empowering the Fact-Check Community				
Commitment 30	3	2	2	1
Commitment 31	3	3	3	2
Commitment 32	2	2	2	2
Average	**2.7**	**2.3**	**2.3**	**1.7**

Table 15: Google's CoP Report No.4 Summary of Assessment Results

Google

Scores: 1 (“very poor”), 2 (“poor”), 3 (“fair”), 4 (good), 5 (excellent), n/a (“not applicable”)

	Evaluation of Reported Actions/Policies (QREs)	Evaluation of Quantitative data (SLIs) & implementation		
		Greece	Cyprus	Malta
Pillar-V: Empowering Users				
Commitment 17	4	3	3	2

Commitment 21	3	3	3	2
Average	**3.5**	**3**	**3**	**2**
Pillar-VI: Empowering the Research Community				
Commitment 26	**4**	**4**	**4**	**3**
Commitment 27	**1**	**1**	**1**	**1**
Commitment 28	**2**	**2**	**2**	**2**
Average	**2.3**	**2.3**	**2.3**	**2**
Pillar-VII: Empowering the Fact-Check Community				
Commitment 30	3	3	3	3
Commitment 31	3	3	3	3
Commitment 32	2	2	2	2
Average	**2.6**	**2.7**	**2.7**	**2.7**

Table 16: TikTok's CoP Report No.4 Summary of Assessment Results

TikTok

Scores: 1 ("very poor"), 2 ("poor"), 3 ("fair"), 4 ("good"), 5 ("excellent"), n/a ("not applicable")

	Evaluation of Reported Actions/Policies (QREs)	Evaluation of Quantitative data (SLIs) & implementation		
		Greece	Cyprus	Malta
Pillar-V: Empowering Users				
Commitment 17	3	3	3	2
Commitment 21	3	3	3	2
Average	**3**	**3**	**3**	2
Pillar-VI: Empowering the Research Community				
Commitment 26	3	3	3	3
Commitment 27	2	2	2	2
Commitment 28	3	3	3	3
Average	2.7	2.7	2.7	2.7
Pillar-VII: Empowering the Fact-Check Community				
Commitment 30	3	3	3	2
Commitment 31	2	2	2	1
Commitment 32	2	2	2	2
Average	**2.3**	**2.3**	**2.3**	**1.6**

Table 17: Missing Service Level Indicators (SLIs) information in Signatories Reports

Service Level Indicators (SLIs) reported per platform/service
✓ - reported SLI
x - no SLI reported
N/S - platform/service did not subscribe to the relevant Measure
N/A - platform/service consider the SLI not applicable

Measures	SLIs	Meta Facebook	Meta Instagram	Google Search	Google YouTube	TikTok
17.1	**17.1.1**	**x**	**x**	✓	✓	✓

17.2	**17.2.1**	✓	✓	**x**	✓	✓
21.1	**21.1.1**	✓ **mentioned as same with SLI 21.1.2**	✓ **mentioned as same with SLI 21.1.2**	✓	**x**	✓
	21.1.2	✓	✓	**N/A**	**N/A**	✓
26.1	**26.1.1**	✓	✓	✓	✓	**x**
26.2	**26.2.1**					✓
27.3	**27.3.1**	N/A	N/A	**x**	**x**	N/A
30.1	**30.1.1.**	✓ **(reference to QRE 30.1.2)**	✓ **(reference to QRE 30.1.2)**	**N/A**	**N/A**	✓
31.1	**31.1.1**	✓	✓	✓ **(reference to SLI 21.1.1)**	**x**	✓
	31.1.2	✓	✓	**N/As**	**N/A**	✓
	31.1.3	✓	✓	**x**	**x**	✓
32.1	**32.1.1**	✓ **(reference to QRE 30.1.2)**	✓ **(reference to QRE 30.1.2)**	**N/A**	**x**	N/A
Total Missing SLIs information		**1**	**1**	**3**	**5**	**1**

Annex II: Questionnaire for MedDMO fact-checking organizations partners

Fact-checking collaboration with platforms

Questions for MedDMO fact-checkers partners

Meta's Third-Party Fact-Checking program:

1. Do you have a collaboration with Meta for fact-checking users' content?

2. When did your collaboration start?

3. Which Meta services' content are you authorised to fact-check within the 3PFC?

- Facebook,
- Instagram,
- Messenger,
- WhatsAPP

4. If there are similar programmes to 3PFC but with other platforms (which offer multiple services) please provide info for which services, you are authorised to fact-check within the specific programmes.

5. Please provide further info on which platform services you fact-check generally (not in the context of the fact-checking programmes) or other information you consider to be useful in Question 14.
What content are you authorised to fact-check (posts, images, comments, advertisements, ads other:...) within the Meta's 3PFC? If there are similar programmes to 3PFC but with other platforms, please provide info for what content you are authorised to fact-check within the specific programmes. Please provide further info of what content you fact-check generally (not in the context of the fact-checking programmes) or other information you consider to be useful in Question 15.

6. What is the process of reporting disinformation/fact-checking?

7. Did you receive any feedback from the platform related to the flagged content? (if the content you reported is moderated/labelled, how many users see the label, how many shared the content anyway, the time between the reported content and the flagging of the content from Meta, others)

8. What is the amount of fact-checked content (number of reports) by your organisation for each year? Do you keep track of those reports?

9. Did Meta publish or use any fact-checking article from your organisation?

10. How many fact-checkers in your organisation are assigned to participate in Meta third party fact-checking programme for the specific country (if applicable)? Greece: ….. Malta:..... Cyprus:.....

11. Did you receive any requests from Meta users by email for fact-checking content? How many requests? What is the procedure you follow to reply to these requests?

''From CoP Measure 23.1. - Meta report: *Fact-check: users are also able to request review of a fact-check rating issued by a third-party fact-checker or matched by Meta's technology. They can do this by appealing in-product.* ***In addition, they can reach out directly to the third-party fact-checking organisation via email. Fact-checkers are responsible for evaluating the validity of each correction.''***

12. What are the penalties for accounts/pages/groups that spread disinformation by Meta?

13. What about Meta advertisements fact-checking? Is your organisation report also concerned with disinformation in ads? Please explain.

14. Please add any other information not covered from the previous questions, or comments for your collaboration you consider useful.

15. Please also elaborate on your collaborations with other platforms (i.e., Google, TikTok)

Mediterranean Digital Media Observatory

MedDMO is a Digital Europe SME Support Action project co-financed by the EC under Grant Agreement with project ID: 101083756. The content of this document is © the author(s).
For further information, visit www.meddmo.eu