

(English version)

**Question for written answer E-000875/25
to the Commission
Christine Anderson (ESN), Marieke Ehlers (P/E)
(27 February 2025)**

Subject: Debunking pre-bunking

In ‘Europe’s Choice: Political Guidelines for the next European Commission (2024-2029)’, Ms Von der Leyen proposes creating ‘societal resilience and preparedness, through increased digital and media literacy and boosting prevention through pre-bunking’⁽¹⁾.

1. Can the Commission clarify the definition of ‘pre-bunking’ and what it would entail in practice?
2. What is the legal basis for ‘debunking’ disinformation, and what is the legal basis for undertaking actions that are aimed at ‘pre-bunking’ so-called disinformation?
3. Is the Commission seriously comparing alleged disinformation to a ‘mind virus’ that is ‘infectious’ and requires ‘vaccination’⁽²⁾?

Submitted: 27.2.2025

**Answer given by Executive Vice-President Virkkunen on behalf of the European Commission
(16 April 2025)**

Prebunking is generally understood as helping citizens recognise and avoid false claims. In practice, it often entails the development of awareness raising campaigns to encourage critical thinking.⁽¹⁾

Since 2015, the Council has called on the Commission to counter disinformation in several Conclusions⁽²⁾. The Defence of Democracy Communication⁽³⁾ and Commission Recommendation (EU) 2023/2829⁽⁴⁾ acknowledge that prebunking and debunking can be effective to counter foreign information manipulation and interference (FIMI) and disinformation, while fully upholding fundamental rights, including freedom of expression.

Whereas the Digital Services Act (DSA)⁽⁵⁾ does not explicitly address prebunking or debunking, it requires providers of very large online platforms and search engines to assess the systemic risks to which their service gives rise in relation to *inter alia* civic discourse, electoral processes and public security, and to put in place measures to mitigate such risks.

The DSA election guidelines recommend developing measures that pre-emptively build resilience against possible disinformation narratives and manipulation techniques by informing users.⁽⁶⁾

The Commission’s approach is based on a variety of tools to promote critical thinking and empower individuals to recognise and respond to disinformation effectively.

The upcoming European Democracy Shield will provide a strategic framework to better protect and promote democracy in the EU, ensuring respect for democratic values and fundamental rights, including freedom of expression.

It aims, among others, at reinforcing societal resilience and preparedness, including our capacity to detect, analyse and respond to FIMI and disinformation.

¹ https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648_en?filename=Political%20Guidelines%202024-2029_EN.pdf, p.23.

² Speech delivered at the 2024 Copenhagen Democracy Summit, <https://www.euronews.com/my-europe/2024/05/14/von-der-leyen-pitches-plan-to-shield-eu-from-foreign-interference-if-re-elected> and https://x.com/Glenn_Diesen/status/1796036374337843526/video/1.

⁽¹⁾ For instance European Digital Media Observatory: ‘Prebunking AI-generated disinformation ahead of EU elections’, 27 March 2024: <https://edmo.eu/publications/prebunking-ai-generated-disinformation-ahead-of-eu-elections/>

⁽²⁾ See, European Council meeting (19 and 20 March 2015): <https://www.consilium.europa.eu/media/21888/european-council-conclusions-19-20-march-2015-en.pdf>, Council conclusions on Foreign Information Manipulation and Interference (FIMI) 18 July 2022: <https://data.consilium.europa.eu/doc/document/ST-11429-2022-INIT/en/pdf>, Council conclusions on democratic resilience: safeguarding electoral processes from foreign interference 21 May 2024: <https://data.consilium.europa.eu/doc/document/ST-10119-2024-INIT/en/pdf>

⁽³⁾ Communication from the Commission on Defence of Democracy.

⁽⁴⁾ Commission Recommendation (EU) 2023/2829 of 12 December 2023 on inclusive and resilient electoral processes in the Union and enhancing the European nature and efficient conduct of the elections to the European Parliament.

⁽⁵⁾ Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act) <http://data.europa.eu/eli/reg/2022/2065/oj>

⁽⁶⁾ Communication from the Commission: Commission Guidelines for providers of Very Large Online Platforms and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes pursuant to Article 35(3) of Regulation (EU) 2022/2065 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C_202403014&qid=1714120357136