

(English version)

**Question for written answer E-000410/26
to the Commission
Christine Anderson (ESN)
(2 February 2026)**

Subject: Distinction between foreign disinformation operations and domestic amplification

The Commission has identified Foreign Information Manipulation and Interference (FIMI), including Russian-linked operations commonly described as ‘troll factories’, as a real and persistent threat to democratic processes in the EU. The European External Action Service (EEAS) has described the typical *modus operandi* of such operations ⁽¹⁾, while the Commission has underlined that investigation and attribution remain within the competences of the Member States ⁽²⁾.

EU-level responses increasingly operate through horizontal regulatory obligations imposed on platforms established in the EU, with indirect effects on the dissemination and visibility of lawful speech by EU citizens, including domestic actors amplifying content originating from abroad.

In the light of Articles 11 and 52(1) of the Charter of Fundamental Rights of the European Union and the principles of conferral and proportionality (Article 5 TEU), in particular where action is based on Article 114 TFEU:

1. Could the Commission explain which objective criteria it refers to in order to distinguish between regulatory measures countering external FIMI operations and measures whose practical effects influence the amplification or visibility of lawful content by domestic actors within the EU?
2. How does the Commission assess necessity and proportionality where the justification for intervention lies in FIMI, but the regulatory effects influence domestic political discourse?
3. What safeguards ensure that the scope and intensity of regulatory responses to disinformation are not indirectly escalated by broader geopolitical tensions or hostile conduct by non-EU countries in other policy domains?

Submitted: 2.2.2026

**Answer given by Executive Vice-President Virkkunen on behalf of the European Commission
(23 March 2026)**

The Digital Services Act (DSA) ⁽¹⁾ requires providers of very large online platforms (VLOPs) and very large online search engines (VLOSEs) to diligently identify and assess at least once a year, and to put in place effective measures to mitigate the systemic risks stemming from the design, functioning or use made of services, including any actual or foreseeable negative effect to civic discourse and electoral processes. Providers of VLOPs and VLOSEs should also analyse whether and how these risks are influenced by a manipulation of their service, such as the use of bots or fake accounts.

The DSA does not prescribe which content is illegal; this is determined purely by national law or other EU laws. The DSA does not regulate electoral processes or political debate.

The DSA empowers citizens and helps protect fundamental rights, including freedom of expression. It requires providers of online platforms to, amongst others, put in place an internal complaint-handling mechanism for users who deem they have faced an undue moderation decision. Since its application, platforms have overturned 30% of appealed moderation decisions ⁽²⁾ proving users have real recourse mechanisms.

When applying regulatory responses, Member States and the Commission must respect the Charter of Fundamental Rights. Decisions can be challenged respectively before national courts or the Court of Justice of the EU.

¹ EEAS report of January 2024 entitled, ‘2nd EEAS Report on Foreign Information Manipulation and Interference Threats’; see also earlier EEAS FIMI threat reports describing tactics, techniques and procedures rather than actor-specific enforcement.

² See, *inter alia*, Commission answers to Written Questions E-003428/2022, E-000861/2025 and E-002651/2025, emphasising reliance on EEAS analysis and Member State competences for investigation and attribution.

⁽¹⁾ 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), OJ L 277, 27.10.2022, pp. 1-102, <https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng>.

⁽²⁾ <https://digital-strategy.ec.europa.eu/en/news/two-years-digital-services-act-allows-50-million-content-moderation-decisions-platforms-be-reversed>.

It should be noted that the EU has imposed targeted restrictive measures on certain Russian state-controlled outlets, which have played a key role in spreading war propaganda related to Russia's illegal war of aggression against Ukraine. These outlets are included in Annex IX to Council Decision 2014/512/CFSP ⁽³⁾ and Annex XV to Council Regulation (EU) No 833/2014 ⁽⁴⁾.

⁽³⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014D0512-20251224>.

⁽⁴⁾ <https://eur-lex.europa.eu/eli/reg/2014/833/2025-05-21/eng>.