EDMO Hungarian hub against disinformation ("LAKMUSZ") – Hungarian Digital Media Observatory (HDMO)
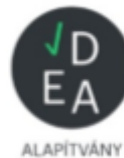
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INTRODUCTION

LAKMUSZ - HDMO is the first EDMO hub in Hungary, built as a national platform to become the reference space for all anti-disinformation stakeholders in the country.

The hub is based on the successful pilot project LAKMUSZ, co-funded by the European Commission in 2022. Lakmusz. hu, the website launched as part of the pilot project is already established as a fact-checking platform.

HDMO stands for Hungarian Digital Media Observatory. The new project's three pillars are fact-checking, studies & research, and media literacy. It brings the initial project to a mature phase, while expanding, reinforcing all the activities.

The 6 partners are **Magyar Jeti (444.hu), Political Capital, Mertek, AFP, Idea Foundation and epresspack.**

This document presents the policy recommendations on limiting the impact of disinformation on online platforms planned in Work Package 5:

"Narrative report summarizing policy recommendations based on the monitoring, to be published in electronic (PDF) format in English"

STARTING POINTS

The toolkit for combating disinformation has been significantly expanded with the adoption of the Code of Conduct, its amendment in 2022, and its incorporation into the Digital Services Act in 2025. However, political changes in the United States are causing considerable uncertainty regarding the effective application of European regulatory and policy instruments. Monitoring the enforcement of the Code of Conduct in recent years has already shown that platforms are more concerned with formal compliance than with achieving the actual objectives of the regulation. The implementation of the commitments made under the Code of Conduct began during the term of the EDMO, including the Lakmusz-HDMO. During this time, there would have been an opportunity to fine-tune the implementation and see the actual results.

The experiences of Lakmusz-HDMO do not warrant excessive optimism. Neither the availability of information on abuses related to Hungary on the platforms nor the consistency of the platforms' actions against abuses has increased significantly.

Hungary differs from all other EU member states in that the primary and most important source of disinformation is the state itself. This is clearly reflected in the amount of resources (from public funds) allocated to spreading disinformation, the party's propaganda-focused nature of the disinformation, and the constant questioning of the legitimacy of the fight against disinformation. The effectiveness and realistic goals of the project are fundamentally reinterpreted by the fact that our analyses and critiques focus on the activities of our government.

During the project period, European Parliament and local elections took place in Hungary. As a result, research findings related to political advertising and digital political communication constitute a significant part of the project's results.

The legal arsenal for combating disinformation has recently been expanded with two new European regulations. The European Media Freedom Act and the Regulation on the transparency and targeted continuation of political advertising will both profoundly shape the legal environment for the dissemination of disinformation from the second half of 2025 onwards.

Based on the above, we make the following recommendations:

RECOMMENDATIONS TO THE INSTITUTIONS OF THE EUROPEAN UNION

1. The reports produced under the Code of Practice and the DSA should be harmonised in terms of timing, format, and data content, to ensure that the huge amount of data they make available can be processed as efficiently as possible and used for evaluation at the national level. To this end, the European Commission and the European Digital Media Observatory should develop a template to ensure that all relevant data is readily available from the report itself, facilitating the automated processing of the widest possible range of data.

2. The range of data at the Member State level should be extended and its format standardised. It is proposed that reports should provide a much greater degree of comparability of quantitative data.

3. A clear description of the types of cases and the full text of at least some of the decisions made by the providers regarding content and user behaviour on their platforms is essential to assess the rule-making and enforcement practices of these platforms. In their absence, even more detailed quantitative data will not provide sufficient insight into the criteria and procedural conditions under which regulatory decisions are taken by platforms. We recommend that the Commission clarify in an interpretative recommendation that the reasoning behind decisions taken by platforms (Article 17 of the DSA) should also be made public in an anonymised form.

4. For the Code of Conduct to be a more effective tool in the fight against disinformation, it would be necessary to introduce measures to enforce the fact that platforms disclose all the required data first. Additionally, a rigorous and independent verification mechanism would be necessary to ensure that the disclosed information is accurate and reliable. It would also be necessary to create a more standardised and transparent format for signatories than is currently the case, so that the effectiveness of the measures taken can be genuinely monitored.

5. The policy analysis work would be greatly assisted if each platform were required to designate a contact person representing the country or at least the relevant region, who could be contacted directly and through whom data could be requested.

6. Since the Digital Services Coordinator can be an effective organiser of the ongoing discourse on Member States' assessment of systemic risks affecting the functioning of platforms, we recommend strengthening and detailing the European requirements for the independence of the Digital Services Coordinator (Article 50 of the DSA). If a Member State appoints its media regulatory authority or its decision-maker as the digital services coordinator, the Commission should take into account the findings on the independence of the media regulatory authority in its annual Rule of Law Report when assessing the independence of the digital services coordinator.

7. There is a significant risk in extending the scope of action of the Hungarian media and telecommunication regulatory body and its President into the area of platform regulation. Although the EU Commission could not have prevented the designation of the NMHH by legal means, it would have been appropriate for it to publicly express its concerns about the lack of political independence.

8. Although state-sponsored disinformation is not currently a widespread phenomenon in EU member states, there is no effective European instrument for detecting and combating it. The European Media Freedom Act regulates the distribution of state advertising; however, there is no experience yet with enforcing these rules. In addition, the European Union must seize every opportunity to make it clear that state-sponsored, and therefore systematic, disinformation precludes democratic decision-making and expression of will, and ultimately the possibility of free and fair elections, and is utterly incompatible with European values. We recommend that state-sponsored disinformation be considered a violation of the rule of law, which would also justify the suspension of European subsidies.

RECOMMENDATIONS FOR THE PLATFORMS

1. According to information received from Hungarian online content providers, despite European regulation and the Code, the lack of transparency in algorithms and content management is the biggest problem for most media. The editorial teams have difficulties interacting with platforms, especially Facebook. They lack an effective and direct communication channel to ask questions or solve problems. These experiences should be considered when analysing the effectiveness of Code and DSA.

2. The fact that signatories attempt to comply with different internal rules regarding the same Commitment makes it challenging to assess the effectiveness of the measures, so users may only occasionally be aware of the advertising rules that apply to them. Creating a single set of rules based on the Commitments would be worthwhile. In addition, it is necessary to look at the SLIs that seek to provide data to illustrate the effectiveness of the Commitment, as in most cases, the signatories will ultimately comply with the data disclosure obligations, but these do not provide any indication of the extent to which the measures taken have contributed to reducing the spread of disinformation.

3. We recommend that platforms initiate closer cooperation with fact-checking organisations in Member States that adhere to international standards and consider the findings of these organisations' fact-checking activities in their efforts to combat political disinformation.

4. Platforms have already taken practical steps to ensure transparency in political advertising and promotion. At the same time, we recommend that the exact amount of such spending be disclosed. The fact that platforms may not publish paid political advertisements in the future could harm political debate and mobilisation. At the same time, this practice could prevent several questionable cases of campaign financing. From a policy perspective, such decisions by platforms (Alphabet, Meta) are not objectionable.

5. Platforms are key areas for election campaigns, so it's super important to have clear, consistent, and predictable practices for political communication, especially for election campaigns. Currently, decisions regarding political content do not meet these conditions. The decision alone that the largest platforms will not allow political advertising in the future does not solve the related problems.

6. Experience clearly shows that the practice of classifying individual advertisements as political advertising is not uniform even within a given platform, and that different platforms use different criteria. To develop a uniform and transparent concept of political advertising, the Code of Conduct also requires cooperation among platforms (Commitment 3). Although the uniform definition was to be adopted in the first year of the Code of Practice's application, it appears that the entry into force of the Regulation on transparency and targeted continuation of political advertising activities presents an opportunity to develop a uniform concept. We recommend that platforms develop an interpretative recommendation for the definition of political advertising in the regulation (Article 2(2)) before the regulation enters into force, which would help categorise advertisements with supporting examples.

7. A clear and unambiguous definition of political advertising is necessary, even if the largest platforms do not publish any political advertising after the regulation comes into force, as political actors can circumvent a total ban. One of the biggest risks associated with this is the involvement of proxy organisations in disseminating political messages, which masquerade as civil society organisations, media service providers, or even market players. The transparency and consistency of categorising paid content are fundamental requirements of European regulation and fair political campaigning.

8. In Hungary, the use of state advertising for political purposes poses a significant risk. Platforms need to develop clear practices for distinguishing between public interest information published by state bodies and political advertising published as state advertising, taking into account European regulations and the principles of fair elections.

9. Since hidden political advertising is primarily detected by users, it is particularly important to handle user complaints more effectively, simplify procedures, and make them more transparent and faster.

10. The European Media Freedom Act provides for privileged treatment of media service providers, provided that, among other things, the media service provider declares itself editorially independent from Member States, political parties, third countries, and organisations controlled or financed by third countries. However, the EMFA does not oblige or empower platforms to verify this, nor does it provide for a dispute resolution procedure if third parties dispute the media service provider's declaration. Platforms act in accordance with their social responsibility if they at least voluntarily allow room for dispute resolution.

11. We recommend that giant platforms and highly popular search engines establish independent review boards, at least during election campaigns, consisting of experts familiar with the language, social context, and electoral rules of the country concerned, to assist the platforms in evaluating political messages.

12. We recommend that platforms strive to obtain and publish data on the actual financiers of political advertisements. Currently, the financial background of political advertisements can be concealed by registering organisations that have no real activity other than financing advertisements on platforms. Simply publishing real company data would significantly increase transparency.