

# PROPOSAL PACKAGE

**To create a healthy information  
environment, promote more accurate  
information and a more fact-based public  
discourse**

21 May 2026



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## Situation analysis, introduction

Over the past sixteen years, institutional, state-sponsored disinformation campaigns have been conducted in Hungary. The Hungarian state used (dis)information as a weapon against its own citizens. The “public media” [became the flagship of these disinformation campaigns](#).

The distortion of the Hungarian information environment over the past sixteen years is having a clear and measurable impact on public opinion. Various opinion polls – including [surveys by the Mérték Media Monitor, the Dimenzió Foundation, the Political Capital Institute, the 21 Research Centre, Eurobarometer](#) and other research institutes – reveal a lasting loss of trust, polarization, the spread of conspiracy theories and disinformation narratives, as well as severe and lasting damage to trust in institutions. Disinformation campaigns reinforce [fear responses](#), prejudice, and anxiety within society.

In Hungarian society, there is a [significant](#) receptiveness to pseudoscientific views, conspiracy theories and anti-science narratives, [even by international standards](#). This is not solely a consequence of political campaigns. Numerous domestic and international studies highlight that a significant proportion of the population is uncertain about the scientific consensus and [open to conspiracy explanations, pseudoscientific theories and alternative medicine](#). In Hungary, the acceptance of alternative, scientifically unsubstantiated claims is higher than the EU average. This phenomenon is partly linked to low levels of trust in institutions, shortcomings in critical information processing, and a polarized and fragmented information environment.

The erosion of media freedom, shrinking pluralism, and the dominance of state-controlled communication leave a growing proportion of citizens following politics in an information environment that is both narrow and distorted.

In an information environment where state-funded disinformation poisons public discourse, it becomes difficult to educate people in the conscious use of media, and media education suffers as a result. According to international research, Hungarian children’s digital literacy depends largely on where they are born and the family environment in which they are raised. The International Computer and Information Literacy Study (ICILS 2023) – which examined pupils’ digital competences and literacy at the end of primary school – found that Hungarian children rarely use digital technology for schoolwork; instead, they typically spend significant time online outside school, not for learning purposes. Based on an assessment of students’ digital reading comprehension, two-thirds are digitally illiterate; they are unable to identify the characteristics of scams in digital communication and have difficulty

assessing the reliability of social media content. This finding is supported by the OECD's PISA 2022 study, which shows that Hungarian students' performance in reading comprehension and information interpretation is declining, particularly in tasks requiring the critical evaluation of online information. According to domestic and international analyses, the development of media literacy in Hungary remains fragmented and under-institutionalized.

While these effects are reversible, a change in government will not automatically resolve them. The problems of the information environment cannot be addressed merely through a political shift, spontaneous social adaptation, or market self-correction. Instead, it requires institutional responses across three domains: media regulation, the protection of media pluralism, and educational programs that develop media literacy and critical thinking. [In the information autocracy established](#) by the previous government, domestic and international actors used information as a weapon against Hungarian citizens. Thus, strengthening resistance to disinformation is simultaneously a matter of democracy, social cohesion, and national security.

This package of proposals aims to formulate policy recommendations for creating a higher-quality information environment, implementable at the Member State level, that will facilitate the more effective enforcement of European Union regulations and reduce administrative and political obstacles arising during implementation and practical application.

The proposals adopt a deliberately differentiated approach, recognizing that the state's role in regulation and social domains is neither uniform nor unlimited. Where structural risks require it, stronger coordination and institutional safeguards are recommended; elsewhere, the emphasis falls on bolstering civil society, market actors, educational institutions, and international cooperation. Thus, our proposals are fundamentally based on the premise that citizens are active and competent participants in the democratic public sphere, not merely passive victims of disinformation and manipulation. The approach is not paternalistic or restrictive – it treats citizens as partners with the aim of enhancing their informational autonomy and critical capacity. Democratic resilience, in the long run, is not built through bans or censorship. It is built through transparency, media literacy, participation, and trust. The aim is not for the state to mould 'right-thinking' citizens, but to create an information and educational environment where citizens navigate autonomously through a digital space saturated with manipulation, disinformation and pseudoscientific content.

We set out our recommendations in the following areas:

1. Research
2. Measures relating to platforms

3. Media system and media regulation
4. Strengthening societal resilience against disinformation, misinformation and pseudoscience; responsible use of AI
5. Institutional conditions for quality media education – developing critical media literacy

## 1. Research

### 1.1 SYSTEM-LEVEL AND REGULAR ANALYSES

To promote media freedom and pluralism, the fight against disinformation and the development of media awareness in Hungary need more comprehensive, long-term, and interdisciplinary research programs. It is essential to carry out regular, data-driven monitoring of media ownership concentration, the distorting effects of the state advertising market, and inequalities in access to information. Particular attention should be paid to rural communities and digitally vulnerable groups in deprived regions. Empirical research is needed to explore the mechanisms by which disinformation spreads and the operational logic of digital fraud, phishing, and other forms of deception that threaten users' financial security, health, and personal data. The role of platforms' recommendation algorithms must also be examined, along with the prevalence of conspiracy theories and pseudoscientific content, and the psychological and sociological factors underlying their social acceptance. Media literacy research lacks longitudinal and impact studies. These are needed to assess the effectiveness of educational and civil society programs in developing critical thinking, source evaluation, and digital citizenship skills. Other research should examine the social reception of generative AI – mapping public fears, expectations, attitudes, and practical experiences – to guide AI policy decisions and evaluate the effectiveness and social impact of initiatives already underway. Internationally comparable indicator systems and open research infrastructures are also needed to evaluate the effectiveness of EU regulations and policy interventions.

## 2. Measures relating to platforms

### 2.1 MARKET COOPERATION IN NEGOTIATIONS WITH PLATFORMS

EU copyright law allows publishers to demand royalties from platforms, but in Hungary this has been achieved through individual agreements between content providers and platforms rather than collective action by media actors. This approach is neither effective nor transparent. In addition to market players moving towards

cooperation, the legislator may encourage this through regulatory measures, such as mandating collective rights management arrangements.

## 2.2 CURBING THE POWER OF TECHNOLOGY COMPANIES MONOPOLIZING THE DIGITAL SPACE TO SPREAD DISINFORMATION AND MANIPULATE

To curb the disproportionate influence of large technology platforms over democratic public discourse, it is not enough to create new rules; existing EU legislation must be implemented consistently and effectively. In addition, we must encourage human-focused technological solutions that prioritize democratic values and user autonomy, and enforce greater transparency in platform operations – particularly regarding recommendation algorithms, political advertising, algorithmic content prioritization, and the management of disinformation risks.

The most important European regulatory instrument for this is the Digital Services Act (DSA), which came into force in November 2022. For the first time, it enabled the European Union to impose systemic obligations on the largest online platforms to ensure transparency, accountability and the mitigation of societal risks.

## 2.3 PROACTIVE ACTION BY THE DIGITAL SERVICES COORDINATOR

The Hungarian Digital Services Coordinator is currently focused on the formal fulfillment of its duties. It does not demonstrate any proactive, policy-driven action, either at the European level or in its interactions with domestic users and platforms, that would help ensure the effective protection of the Hungarian market and consumer interests. This could be simply improved by rethinking its role and approach.

## 2.4 DESIGNATION OF AN AUTHORITY ON THE TRANSPARENCY OF ONLINE ADVERTISING

An independent authority responsible for the domestic implementation of the EU Regulation on the Transparency and Targeting of Political Advertising (TTPA) must be designated without delay, and it must be granted adequate legal powers, professional capacity, and political autonomy to effectively fulfil its responsibilities. Hungary currently has no designated institution capable of effectively investigating, monitoring, and sanctioning manipulative or coordinated political advertising campaigns originating either domestically or abroad. This gap is especially acute on digital platforms. The resulting regulatory vacuum poses a serious risk to both national security and democracy, creating opportunities for foreign state and state-affiliated actors to interfere in Hungarian political processes.

## 3. Media system and media regulation

### 3.1 RESTORING THE FUNCTIONING OF THE MEDIA MARKET

Over the last 15 years, systemic state intervention – from the ownership reconstruction to the allocation of state advertising – has distorted the media market. Now, independent media outlets have been placed at a competitive disadvantage, with a disproportionate share of organizational resources diverted to day-to-day survival. Thus, it would be beneficial to establish such a media system in which actors can compete under fair market conditions, enabling media outlets to pursue their own strategic objectives. This contributes to high-quality, reliable information and hinders the disinformation ecosystem's functioning.

### 3.2 GUARANTEEING THE SAFETY OF JOURNALISTS AND THEIR ACCESS TO INFORMATION

In recent years, Fidesz has used various means to obstruct journalists' work; it has made access to information more difficult, published defamatory material about journalists and their editorial offices, and surveilled journalists through illegal methods. For the media to perform its duties to a high standard, including effectively combating disinformation, a calm working environment is essential. The aim is to create a media environment in which journalists can carry out their work in accordance with the rules of the profession. Invitations to press events and press conferences must not be discriminatory; members of the government must strive for balance when handling interview requests, and public institutions have a duty to respond substantively to journalists' inquiries. Furthermore, access to data of public interest must be simplified through increased transparency, while data used in decision-making must be protected to safeguard confidentiality and privacy.

### 3.3 WELL-FUNCTIONING, IMPARTIAL PUBLIC SERVICE MEDIA

In well-functioning democracies, public service media is one of the most important actors in the fight against disinformation. Its credibility and social prestige make it well-suited to serve as a symbol of reliable news and information. Hungary is not in a good position in this respect, as public service media has lost its social standing. Nevertheless, it is essential to work towards establishing a public media capable of meeting the standards of reliable, credible, impartial, and high-quality journalism. A universally accessible and genuinely public service-oriented public media can serve as an important safeguard against the spread of disinformation.

### 3.4 A REGULATORY STRUCTURE CAPABLE OF ADDRESSING THE REGULATORY CHALLENGES OF THE DIGITAL ECOSYSTEM EFFECTIVELY AND FAIRLY

Digital services span a broad ecosystem, from physical networks to artificial intelligence systems. Effective management of this ecosystem requires independent, cooperative, and professionally capable regulatory authorities that are recognized and legitimate at the European level. Coordination mechanisms must be established between the competition authority, the media authority, and the authorities responsible for telecommunications, platforms, and AI.

### 3.5 IMPLEMENTATION OF EUROPEAN LEGISLATION RELEVANT TO THE MEDIA SYSTEM

A healthy, well-functioning media system requires both a rethinking of the Hungarian regulatory framework and the implementation of the relevant EU regulations. These include the European Media Freedom Act (EMFA), the Audiovisual Media Services Directive (AVMSD), the Anti-SLAPP Directive, the Whistleblower Protection Directive, the Transparency and Targeting of Political Advertising (TTPA) regulations, Article 85 of the General Data Protection Regulation (GDPR) in Hungary, and the judgments issued by the European Court of Human Rights (ECHR).

### 3.6 GREEN LIGHT FOR EUROPEAN UNION MEDIA FUNDING

Within the AgoraEU framework, the European Union is expected to allocate resources to media funding in the coming years. Moreover, the EU is expected to continue funding projects specifically designed to combat disinformation. The Hungarian government should avoid obstructing these projects and refrain from using official communications to discredit or stigmatize media outlets seeking EU funding.

## 4. Strengthening societal resilience against disinformation, misinformation and pseudoscience; responsible use of AI

### 4.1 WE MUST TAKE UP THE FIGHT AGAINST HYBRID WARFARE AND FOREIGN INFORMATION INFLUENCE OPERATIONS

Like other EU member states, Hungary must take active steps to preserve the plurality and integrity of its information space and to mitigate the impact of malicious foreign information manipulation and interference (FIMI) operations – primarily, though not exclusively, of Russian origin. Modelled on the Swedish [Psychological Defense Agency](#), Hungary should establish an independent government institution specializing in the identification, analysis and public communication of hybrid threats. The Swedish model, based on the “whole of society” principle, does not treat hybrid

threats solely from a security policy or intelligence perspective, but also regards the strengthening of democratic resilience, social trust and media literacy as central elements. Established in 2022, the Swedish institution is tasked with monitoring foreign influence operations and disinformation campaigns, strengthening coordination between state and societal actors, and developing population resilience. Through collaborations with local authorities, civil society organizations, educational institutions, and the media, the Swedish Psychological Defense Agency monitors threats to democratic public life through regular reports and analyses and raises public awareness.

#### **4.2 STATE AND CIVIL SOCIETY EFFORTS MUST BE COORDINATED TO FIGHT INFORMATION OPERATIONS AND DISINFORMATION.**

Cross-collaboration among state institutions, the research community, civil society organizations, and the media is essential to combat disinformation and foreign information operations effectively. The Ukrainian and Taiwanese collaborations in the fight against disinformation provide examples of international cooperation. Fundamental to increasing democratic resilience in Hungary is ensuring that the state itself is not a source of manipulation and misleading communication. Disinformation campaigns by government actors and pro-government media networks that undermine public trust and reinforce harmful misconceptions must end. In parallel, the flow of information and professional coordination among authorities, researchers, and civil society organizations must be institutionalized, particularly to enable the early identification of disinformation narratives and foreign influence operations.

#### **4.3 IT IS NECESSARY TO COUNTERACT THE EFFECTS OF THE DAMAGE CAUSED BY RUSSIAN DISINFORMATION**

It is not only a matter of democratic and social imperative, but also a matter of national security to curb communication that is anti-Ukrainian and anti-Western and seeks to delegitimize Euro-Atlantic alliances. In recent years, the Hungarian ‘public media’ and several government-aligned communication channels have played a significant role [in spreading geopolitical disinformation narratives](#) that have relativized Russian aggression, fostered mistrust towards the European Union and NATO, and routinely conflated Western integration with the narrative of a loss of national sovereignty. In Hungary, the social acceptance of pro-Russian conspiracy theories and Kremlin-compatible narratives [is exceptionally high, even by regional standards](#). In the long term, this communication environment weakens social cohesion, reduces trust in institutions, and makes society more vulnerable to foreign information influence operations.

#### 4.4 TRANSPARENT AND FAIR USE OF GENERATIVE AI

The rapid spread of generative artificial intelligence is fundamentally transforming the functioning of the democratic public sphere. AI-based content creation is not only a technological issue but a democratic integrity risk: artificially generated or manipulated content could be used to distort electoral processes, erode public trust, exacerbate political polarization, or spread misinformation about key issues, such as health and security. Thus, the media, influencers, political actors, and state institutions need to establish clear ethical and professional standards for the transparent and responsible use of AI systems. Self-restraint by the political elite and state actors is particularly important: politicians, parties, government bodies, and publicly funded media must refrain from using AI-generated content that is manipulative, misleading, or capable of causing social harm, such as deepfake videos.

AI-generated or significantly AI-manipulated content must be clearly and prominently labeled, regardless of which part of the content is affected or what purpose the modification serves. Moreover, media figures and public opinion leaders have a duty to check that the manipulated videos, images, or audio material they disseminate are properly labeled.

### 5. Institutional conditions for quality media education – developing critical media literacy

#### 5.1 THE DEVELOPMENT OF CRITICAL MEDIA LITERACY MUST BE INCLUDED AS A PRIORITY TOPIC IN PUBLIC EDUCATION AND HIGHER EDUCATION

A fundamental prerequisite for the development of critical media literacy is an education system that effectively fosters critical thinking and media awareness. The umbrella term ‘critical media literacy’ encompasses the areas of media literacy necessary to assess the reliability and credibility of information. Formal and informal educational programs and teaching materials that foster critical media literacy should be guided by the [EDMO Guidelines for Effective Media Literacy Programs](#). In this spirit, the planning of various educational programs must consider age differences, socio-cultural backgrounds, and digital competence levels, as well as the needs of the target group. A practical focus is key to curriculum design; real-world media content, simulated scenarios and case studies facilitate the acquisition of skills applicable in real-life situations. Programs must also be inclusive and accessible, ensuring that learners from diverse social backgrounds, with varying abilities and levels of digital access, can benefit from them. Program design should draw on consultation with media literacy organizations and the latest research in pedagogy and the social sciences.

## 5.2 TEACHER TRAINING AND PROFESSIONAL DEVELOPMENT

Critical media literacy should be a standalone component of teacher education. Teacher professional development courses should give particular prominence to training initiatives that are aligned with the EDMO Guidelines outlined above.

## 5.3 INSTITUTIONALIZED COORDINATION FOR RESPONSIBLE MEDIA USE

The relevant ministries (e.g., the Ministry of Children and Education, the Ministry of Social Relations and Culture, the Ministry of Social Affairs and Family, the Ministry of Health) together with the National Media and Infocommunications Authority (NMHH) and the previously proposed institute for countering hybrid threats, should develop a national strategy for media literacy and critical media awareness, covering both content and institutional implementation. As part of developing this strategy, a dedicated state body should be established, modeled on the Finnish National Audiovisual Institute (KAVI), to coordinate and oversee the implementation of actions set out in the strategy.

## 5.4 DEVELOPING RESISTANCE TO PSEUDOSCIENCE AND INFORMATION MANIPULATION

Teaching science and research must shift away from the transmission of factual knowledge toward a stronger emphasis on critical thinking, scientific methodology, source evaluation, and digital media literacy. Skills in assessing information, recognizing algorithmic media environments, and pseudoscientific and manipulative communication must be systematically embedded in public and teacher education. Education must move beyond ready-made scientific conclusions. Students and citizens need to understand how scientific proof works, how uncertainty is managed, and how expert consensus forms — because research suggests that uncritical deference to scientific authority alone can leave individuals vulnerable to pseudoscientific manipulation. Therefore, pre-bunking approaches are effective for introducing students to manipulation techniques and the typical patterns of fake news and pseudoscientific arguments in a controlled educational environment. This allows students to become more resilient to them later. Both international and domestic experimental research shows that interactive, gamified methods – such as online games that simulate disinformation strategies – effectively develop the ability to recognize manipulation and reduce the persuasive power of false information. Interventions are particularly effective when they do not treat participants as passive recipients but instead empower them by positioning them as experts. When participants identify and analyze manipulation techniques – or create simulated disinformation content – they become more resistant to future manipulation.

## 5.5 THE ROLE OF PUBLIC MEDIA IN DEVELOPING INFORMATION LITERACY

The reorganization of public service media should include a mandate to produce daily, high-quality children's news programs, developed in accordance with the EDMO Guidelines, which include professional and ethical standards and editorial guidelines.

Within this framework, public media should provide news and information content for children and young people that actively develop critical media literacy competencies. Thus, programs must develop children's critical thinking and critical media literacy, taking into account the differing media-use needs and interpretative frameworks of various age groups. They must ensure accessibility, comprehensibility, and language and presentation styles appropriate to the age groups. During program production, editorial principles, source management, and content production processes must be transparent and enable ex-post impact assessment. Furthermore, due to the rapidly changing media environment, content must adapt to these rapid changes, and previous experience must be continuously incorporated into program development.

## 5.6 JOURNALISM EDUCATION

Higher education journalism courses should foster critical media literacy, including knowledge of the criteria for quality news content suitable for audiences of different ages. The topics covered in the above-mentioned EDMO Guidelines should also be included in journalism education.

## 5.7 CHILD PROTECTION ASPECTS OF POLITICAL COMMUNICATION

When reforming the rules on political advertising, consideration should be given to establishing a legal and regulatory framework that adequately protects the mental health of minors.