



DEFENDING DEMOCRACY IN VIRTUAL WORLDS

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SUMMARY

The Virtual Worlds Panel and the Defence of Democracy Package, both focusing on the digital sphere, will be discussed in this policy brief to better understand how participatory mechanisms can be used for the benefit of democracy and to build a closer relationship between EU representatives and the citizens they represent. Information on these initiatives will be provided to better understand their proposals and their relation to citizen participation and democracy. Moreover, it is worth highlighting that both initiatives, despite being completed, have not yet been used by the European Commission to adopt policies regarding disinformation and virtual technologies. However, we expect to see the Commission's reaction to these events in the form of policy decisions later this year. Last, this policy brief will provide an insight into the different policies that the EU has already established as a means of tackling disinformation which can be divided into education and media pluralism, removing dangerous content, and hybrid methods which combine both approaches.

CONTENTS

1. Virtual worlds
2. Defence of democracy package
3. Policy alternatives
 - Approach 1 (Education and Media Pluralism)
 - Approach 2 (Removing Information)
 - Hybrid Approach
4. Issues for discussion

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INTRODUCTION

Following on from the [Conference on the Future of Europe](#), held between 2021 and 2022, which focused on citizen-led debates and discussions revolving around the future of the EU, the European Commission double-downed on its commitment to using citizen participation mechanisms such as citizen panels (in the case of the Virtual Worlds event), feedback and consultations (in the case of the Defence of Democracy package) to further develop the premise of the participation and engagement of EU citizens regarding EU policies and issues, especially in matters that directly affect the citizens such as disinformation and digital technology.

VIRTUAL WORLDS

As is emphasised by the European Commission on the [Virtual Worlds webpage](#), the development of Virtual Worlds, or Metaverses, can be compared to the development of the internet, in the sense that it will transform many aspects of the digital world that we work and engage in. Acknowledging this, the European Commission has established a citizen's panel on Virtual Worlds as a means of engaging with EU citizens about the potential benefits of Virtual Worlds as well as the potential drawbacks of it. This Virtual Worlds citizens' panel has been organised by the Directorate-General for Communications Networks with the Directorate-General for Communication Networks, Content and Technology. Also, there has been support from outside contractors such as Kantar Public (main contractor), Missions Publiques, ifok, Deliberativa, the Danish Board of Technology, and VO Europe.

This citizens panel on Virtual Worlds consisted of three sessions with 150 participating EU citizens. Virtual Worlds are being discussed as a means of developing these digital platforms in a safe way that does not jeopardise the values and norms of the EU. Additionally, the inclusion of citizens is central to this event as the Commission aims to consider and develop the discussions and recommendations made by citizens on Virtual Worlds. Therefore, the development of Virtual Worlds within the EU context revolves around harnessing the potential benefits of Virtual Worlds but also highlighting the potential risks and drawbacks as well as the impact they may have on democracy if used negatively.

It was evident since the first session that the leaders of the event were more in favour of talking about the benefits of Virtual Worlds rather than its potential drawbacks. Moreover, the topics that were discussed were directed by the Commission, topics such as finance and economics in relation to Virtual Worlds were discussed in detail, indicating that the EU was trying to push a certain narrative regarding Virtual Worlds rather than leaving the discussion among citizens from being more open with the citizens having more control over what to discuss.

The second session, 10-12 March, consisted of a plenary which included: a review of Session 1; discussions on various topics in relation to Virtual Worlds (such as economy, health, security, environment, society etc); and a presentation of the declaration of EU digital rights and principles. Day 2 of the second session was more practical as the citizens split up into several 'working groups' and discussed the different topics that were discussed in day 1 with the help of a facilitator who guided the discussions. Throughout, citizens were able to speak in their own languages thanks to headsets that could translate speech into the desired language of the specific listeners. Day 3 consisted of citizen discussion and ranking of 'metaverse values', in turn, creating consolidated action points.



The third and final session, which was held in Brussels, between 21-23 April, had the purpose of creating policy recommendations for the European Commission that could then be adopted and implemented into the EU's regulation on Virtual Worlds. In total, 12 groups came up with 23 recommendations for the Commission. Each recommendation was rated on a scale of 1 to 6 by the fellow citizen participants, with 6 being the best and 1 the worst. The recommendation which got the highest score was policy recommendation 10. It stated that teachers within the EU should receive training on "(1) the practical use of digital tools, (2) risks, safety and ethics within the Virtual Worlds, and (3) on new teaching opportunities through Virtual Worlds". Essentially, the goal of this recommendation is to get improve students' education as a means of raising awareness and to reduce the digital literacy gap.

It is yet to be seen whether these recommendations will have an impact on the Commission's incorporation of citizen-led policies into their own policy decisions regarding Virtual Worlds. Therefore, it is difficult to assess the success of this citizen panel event. On the one hand, the fact that the EU and the Commission has reinforced their efforts to promote and develop citizen panels and other citizen participation events illustrates the positive direction in which the EU is going in. The incorporation and inclusion of citizens in events like this emphasises the EU's commitment to build a resilient and coherent democracy that focuses the representation of EU citizens in many facets of EU matters. On the other hand, involving citizens in these democratic processes and subsequently not following through on citizen recommendations could be problematic for the legitimacy of these events and may lead to criticisms and distrust about the EU's lack of commitment to enhance democracy.

DEFENCE OF DEMOCRACY PACKAGE

The [Defence of Democracy Package](#), 2023, stems from an earlier initiative launched by the European Commission in 2020 called the 'European Democracy Action Plan'. Two of the many elements related to democracy that this initiative wished to improve were 1) 'strengthening media freedom' and 2) 'fighting against disinformation', especially in relation to 'safeguarding the integrity of elections.' It has become increasingly evident that disinformation is at large in Europe which has a direct effect on the quality of democracy as it promotes the spread of false information, the stealing of data, and manipulating of decisions, and hacking elections.

The European Commission revised the European Democracy Action Plan due to the recognition that threats to democracy are constantly evolving, especially those coming from outside of the EU (foreign entities) meaning there needed to be a revision of the European Democracy Action Plan in order to address this issue of foreign interference. Consequently, the Defence of Democracy Package addresses the same issues as the European Democracy Action Plan but more through the lens of foreign interference. This is explicitly linked to the Ukraine-Russia war and Russia's illicit provocations in elections, media, and disinformation in Europe and beyond. It is against this backdrop that the European Commission has adapted its package as a means of addressing the looming threat of Russia and other nations such as China. The use of the terms 'defence of democracy' and 'defending democracy' highlights the security perspective that has been adopted by the European Commission in recent times. Moreover, the use of foreign lobbying and activities that influence public decision-making of EU member states (known as interest representation services)



has fragmented regulation measures, limited transparency, and public accountability, and contains gaps and loopholes exist, all of which raise concerns about democracy and legality.

In relation to disinformation and media freedom, this initiative aims to provide both legislative and non-legislative outcomes related to covert foreign interference, especially considering the 2024 EU elections, which poses a risk to EU democracy with citizen participatory mechanisms.

Regarding the objectives and scope of the package, it has been raised in a joint-letter-on-EU-Defence-of-Democracy-Package, signed by various civil society organisations, that the package runs the risk of focusing too much on foreign interference, with respect to the spread of disinformation, making it potentially 'counterproductive' as it "could easily be misused by autocrats to promote their own anti-democratic narratives." Therefore, it is necessary to focus on the strengthening of "democratic resilience within the EU's border" as well as external threats. Moreover, the similarity between internal and external threats to democracy that the EU faces are similar to one another, which means it is also necessary to "strengthen the link between the internal and external dimension of democracy support." The letter states that this new package should contain policy innovations in the areas of "electoral processes and civil participation, news media, disinformation and media literacy, civic space, and the rule of law." This highlights a continuation of the European Democracy Action Plan along with the added incentive of building greater resilience to foreign intervention.

Furthermore, the inclusion of the public's opinion on how to prevent the spread of disinformation and promote democracy can be seen as an exercise in citizen participation which the European Union, and the European Commission specifically, has been strongly promoting since the Conference on the Future of Europe.

The means in which citizen participation is being carried out during this ongoing initiative varies from other participatory events such as the Virtual Worlds initiative. The Defence for Democracy Package consists of two participatory mechanisms, the first being the 'call for evidence' which is an online feedback tool for EU citizens - but also for public authorities, business associations, NGOs, and Academic/research institutions - which helps to define the scope of an important new policy. Those wishing to give feedback and be part of the consultation are provided with a call for evidence document that describes the political context and the problems which the initiative aims to address, giving participants a better understanding about 'covert foreign interference' and its implications for democracy. This feedback period was open from February 16 to April 14 (2023) and the Commission has received 1209 valid feedbacks, the majority of which have come from EU citizens (1102) but there has also been feedback from NGOs (64), non-EU citizens (15), public authorities (10), and academic/research institutions (4). Moreover, citizens from EU Member States that participated most include Slovakia (70%), Germany (6%), France (3%), and Austria (2%). It could be seen as problematic that most of the participants, 850, are from Slovakia, as there is less of a sense that a variety of different European citizen's voices are being represented. Nevertheless, there is enough variety of voices from EU and non-EU citizens being represented to make this call for evidence valuable. The Commission affirms that the comments citizens leave in the feedback section will be taken on board for the 'fine-tuning' of the initiative. This statement is a bit ambiguous because it does not provide participating EU citizens with guarantees that there will be any adoption or consideration of their comments when it comes to forming an adherent policy on the issue of combatting disinformation.



The second mechanism used was a public consultation, which is linked to the feedback tool. Likewise, it is on the Commission webpage and was open for the same amount of time as the feedback tool. The target audience for this consultation includes “a wide range of public and private stakeholders” in the EU and beyond, such as the research community and academia; representative organisations of relevant sectors of the business community; civil society organisations, subject matter experts; national authorities; political party representatives and relevant international organisations and standard-setting bodies, such as the OECD and the Council of Europe, as well as citizens. The consultation took place through an online questionnaire that aims to gauge the opinions of those who want to participate, with special reference to the ‘covert interference’ of third countries in EU politics. According to the Commission, the aim of this consultation is to gather a variety of views of citizens and stakeholders in a participatory and transparent manner which will, in turn, help to give the Commission an overview from a variety of different perspectives on the issue of democracy and disinformation. There were 840 valid feedbacks received with the majority being taken up by EU citizens (91.90%), followed by NGOs (3.33%), and then public authority, academic/research institutions, and ‘others’ all made up the rest of the remaining respondents. In the same case as the call for evidence, the results of this participatory mechanism are yet to be seen, it will be interesting to see the results and if any policy recommendations, based on the views of public and private stakeholders, will be adopted as a means of strengthening democratic resilience and combating disinformation. The ‘Commission’s adoption’ of recommendations is due to take place in the second quarter of 2023.

POLICY ALTERNATIVES

Both the Virtual Worlds and Defence of Democracy Package are linked to promoting democratic standards and the threats posed by the digital world, especially disinformation.

Aiming to tackle disinformation and harmful digital content in the online sphere, the EU institutions have developed a set of policies, including methods such as strengthening of civil society, monitoring, cooperation with EU and foreign stakeholders, etc. These initiatives are summarized in [this flowchart](#).

There are multiple approaches to dealing with this contemporary security challenge, one of which is tackling disinformation through:

- a) education and media pluralism,
- b) removing dangerous content,
- c) hybrid method combining both approaches.

Out with the citizen participation mechanisms, it is necessary to consult the existing laws and regulations that have been implemented in recent years which have been instrumental in the European Union’s attempts to protect democracy within the European Union and its Member States.

Approach 1 (Education and Media Pluralism)

The European Union has set out different initiatives in recent times which aim to raise awareness among citizens about disinformation through education, as well as the promotion of media pluralism as a way of representing a variety of coexisting political views and interests. Such measures taken



by the EU which aim to combat these problems of disinformation from the educational and pluralistic perspectives include the strategic framework for European Cooperation in Education and Training (ET2020), which has focused primarily on the promotion of learning amongst EU citizens and improved quality of education and training. This initiative clearly focuses on digital literacy and education more generally, this is an aspect that the citizens in the Virtual Worlds event focused on. Therefore, it is evident that raising skills, awareness, and educational standards are an integral part of the fight against disinformation, highlighted by the EU representatives and EU citizens. In addition, other initiatives launched by the EU, including the High-Level Expert Group on Fake News and Online Disinformation (HLEG) and tackling online disinformation: a European Approach, both launched in 2018, emphasise the importance of improving transparency and promoting pluralistic and diverse information sources in the digital media realm. This is interlinked to a certain extent with the Defence of Democracy Package which prioritises ‘transparency measures to prevent covert foreign interference’.

Approach 2 (Information Control)

Depending on the nature and urgency of fighting disinformation and dangerous content, the European Commission has also developed policies and measures that are based on controlling information flows, while focusing on interinstitutional cooperation, international monitoring, and strategic information. These policies were mainly developed aiming to respond to some of the challenges that require more immediate and drastic actions, such as threats of terrorism, foreign influence and meddling with EU or state institutions, information thefts, as well as other forms of problems that could threaten the EU democracy and, eventually, put the stability and safety of governments and people in danger.

The EU Internet Referral Unit (July, 2015), which was established under the support of Europol, as well as the EU Internet Forum (December, 2015) were launched with the goal of raising awareness about the importance of reporting online extremist content, monitoring the virtual space for dangerous content, and supporting cooperation with other relevant EU stakeholders. These initiatives aim to detect and remove harmful content from the internet and prevent its dissemination.

Furthermore, foreign influence, especially in terms of interfering in elections, social movements, and political parties threatens the functioning of institutions, and democratic processes, so several policies were developed to combat disinformation activities by external actors. The Joint Framework to Counter Hybrid Threats was adopted by the EU Commission and High Representative in April, 2016, and it aims to develop situational awareness and improve the ability to respond to hybrid threats, especially through new technologies. In 2020, the EU Security Agenda was introduced, which aimed to enhance external and internal security through diplomacy, aid, crisis management, and prevention of threats such as terrorism and cybercrime.

Hybrid Approach

While many policies are based on either of the two approaches, the EU is mostly combining both pathways, creating hybrid programs and strategies aiming to tackle disinformation by both investing



and empowering media literacy and education, and at the same time, monitoring, and analyzing security threats such as foreign influence, cybercrime, etc.

The measures that fall into this category include the East StratCo Task Force launched by the European External Action Service (EEAS) (October 2015), Code of Practice on Disinformation (October, 2018), European Parliament resolution on foreign interference in all democratic processes in the EU, including disinformation (March, 2022), the Strengthened Code of Practice on Disinformation (June, 2022), and European Media Freedom Act (September, 2022). These policies brought by the European Union are a combination of actions including strengthening public diplomacy, media pluralism, crisis management, monitoring, and digital transparency, and are therefore considered hybrid.

Considering the wide unknown aspect of virtual worlds, besides the positive opportunities that they can present, there are considerable threats associated with this technology that challenge our democratic norms. Echo chambers, disinformation, hate speech, and manipulation of information are all threatening the well-being of democratic processes in the European Union. Additionally, virtual worlds create a higher risk of foreign interference in the internal issues of the Member states, or the European Union in general. Finally, immersion in digital worlds invokes questions concerning cybersecurity, data protection, and the security of financial transactions, especially when it comes to vulnerable groups, such as minors.

The European Union has recognized in multiple occasions the opportunities that exist in the development and usage of virtual worlds, especially in the context of economic and technological innovation, educational tool, as well as social and cultural cooperation and cohesion. In the Digital Single Market strategy (adopted in 2015), the European Union has noted the significance of supporting the development of “virtual world” technologies, considering the opportunities they bring to the economic, educational, health sector, etc. Furthermore, they are particularly important for the EU considering that they remove additional barriers of cooperation between EU MS, this time in the virtual world.

Besides the possibilities for development and cooperation, the EU does recognize the risks that can be associated with virtual worlds, and the way in which it might impact the democratic processes both on a social and institutional level. For that reason, there are multiple directives that were introduced to try to tackle these issues, including the Network and Information Security Directive (NIS) (introduced in 2023), as well as more the broader General Data Protection Regulation (GDPR) (introduced in 2016).

As presented in this report, the European Union has developed numerous policy initiatives regarding tackling misinformation, and dangerous influences in the online sphere. While those programs and declarations effectively control and improve aspects of our virtual safety, the constant development of the digital world, calls for new measures to be developed to be able to respond to new challenges. The technology of the virtual worlds remains a fairly new area, both in terms of developing, but also in the policies established that would repeat, or intensify the already existing threats possessed by misinformation, online foreign influence, cybercrime, etc.

While certain directives and regulations have been developed on the EU level, there are two main tasks that need to be done by further development on this issue. Firstly, internet space and social



media in general are still creating various challenges for the EU, however, certain regulatory framework does exist. The regulation of virtual worlds, as it is a fairly new technology is still mostly unknown in these frameworks, so existing directives need updates. Secondly, most of the action plans of the of EU programs working on protecting democracy online are based on a model of securitization via governmental legislative programs, so there must be a wider cooperation with the civil society, for instance through education, fora, and other forms of deliberative participation. Therefore, programs such as the Virtual Worlds Panel and the Defence of Democracy Package represent viable forms of bridging the EU and its citizens closer, while at the same time protecting the security and stability of the EU from the challenges of virtual worlds.

ISSUES FOR DISCUSSION

Considering the wide unknown aspect of Virtual Worlds, besides the positive opportunities that they can present, there are considerable threats associated with this technology that challenge our democratic norms. Echo chambers, disinformation, hate speech, and manipulation of information are all threatening the well-being of democratic processes in the European Union. Additionally, virtual worlds create a higher risk of foreign interference in the internal issues of the Member states, or the European Union in general. Finally, immersion in the digital worlds invokes questions concerning cybersecurity, data protection, and the security of financial transactions, especially when it comes to vulnerable groups, such as minors.

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Other risks that can threaten democracy in relations with virtual worlds technology concern online radicalization and hate speech EU internet forum (launched in 2015), which enables relevant stakeholders (governments, internet industry, and other actors) to discuss and collaborate in the field of reducing accessibility to terrorist content, and introducing content that will work on deradicalization and promotion of cohesion and democratization within the EU.

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