



Baltic Engagement  
Centre for Combating  
Information Disorders

# BECID

## THE REGULATION OF FACT- CHECKING AND DISINFORMATION IN THE BALTIC STATES

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## **EXECUTIVE SUMMARY**

This report provides an overview of how fact-checking and other attempts at combating disinformation are regulated in Latvia, Estonia, and Lithuania.

No laws, government regulations, or other legally binding documents in the Baltic States specifically deal with fact-checking. However, in most cases, fact-checking takes place within the regulatory context of journalism and mass media. Fact-checking is also linked with other initiatives and activities to limit disinformation, which the legal documents and policies in the Baltic states recognize as a problem that needs interventions. Examining how disinformation is targeted in the Baltic countries provides additional insight into the legal and political context in which fact-checking operates.

The report reviews the regulatory aspects of the Baltic states on various levels. First, we cover legal regulation and examine the appropriate laws, government regulations, policy documents, and other official papers. Second, we review the implementation of the 2022 Strengthened Code of Practice on Disinformation in the Baltic states. Third, we describe documents and activities associated with combating disinformation, strengthening the information space, and promoting media literacy outside the legal framework. The final part describes the self-regulation of journalism and fact-checking, including the codes of ethics and professional standards of journalists and fact-checkers.

The main findings are as follows:

1. The Baltic states have chosen different approaches to counter disinformation. On the one hand, the legal norms in the laws that deal with hooliganism or disturbance of public order can be applied to those who spread false information. On the other hand, the Criminal Code of Lithuania defines disinformation and explicitly forbids disseminating it. The countries have the legal means to block access to content that violates their laws—in particular, Russian-based TV channels that broadcast propaganda are blocked.
2. Lawmakers are adapting the legal framework to face the current challenges. One example is the 2024 amendment to Latvia's Criminal law, which makes using deep fakes (artificial intelligence) to manipulate elections illegal. In 2024, Lithuania amended its Criminal Code to outlaw the use of manipulated social media accounts to disseminate information aimed at harming the constitutional order, territorial integrity, defense, or other interests of the state.
3. The Baltic states differ in their regulation of journalism and the media. In Latvia and Lithuania, legal norms exist that describe what the professional standards of journalism media should be. This allows authorities to distinguish between legitimate media outlets and manipulative ones more easily, but it also creates risks to journalism. Estonia has fewer regulations in this regard.
4. The Baltic states have legal norms that allow them to block content that violates the laws (for example, threatens the security or public order of the state): access to certain websites may be restricted, and redistribution of certain TV channels forbidden (such as Russian-based outlets, which have distributed propaganda).

5. In their policies and communications, the Baltic states have described the importance of strengthening the informational resilience of societies. The acknowledgment of the dangers of disinformation and the need to promote media literacy and protect the national information space appear in several policy documents. This indicates that in the political agenda, the availability of quality content and the need to foster media literacy are being interpreted through a security lens. The attention the authorities have paid to supporting journalism varies. Latvia and Lithuania have introduced mechanisms that help media outlets, including financially, but Estonia does not have such policies.
6. The implementation of the Code of Practice on Disinformation is not actively monitored by the respective authorities in the Baltic states. The countries are still in various stages of establishing the National Coordinator for the Digital Services Act. In Estonia, the Digital Services Coordinator was not designated yet at the time of writing the report. In Latvia, the officials see the implementation of the Digital Services Act, which in a co-regulatory framework operates together with the Code of Practice, as being of higher priority, and they expect to have the resources and instruments to enforce the Digital Services Act. Since the Code of Practice on Disinformation is a voluntary document signed by platforms and the biggest platforms are legally registered in other countries, national officials do not rely extensively on the Code while doing their duties.
7. Many reports, studies, and commentaries by non-governmental and extra-governmental Baltic entities have been published in recent years. These include studies on disinformation and resilience to it in these countries, discussions about the safety of journalists, reports on the state of media literacy, etc. These documents indicate the high level of attention these issues have received in the public agenda.
8. The professional conduct of journalists, including fact-checkers, is shaped by codes of ethics. Each country has one or more organizations with their own code of ethics and enforcement mechanisms. These organizations rarely receive complaints about the work of fact-checking journalists, but two such cases have been examined in Latvia. Furthermore, several fact-checking organizations are part of the International Fact-checking Network and the European Fact-checking Standards Network. Each of these organizations has standards that regulate various aspects of the work of fact-checking organizations. These organizations need to comply with these standards to be admitted.
9. Fact-checking work is also regulated by unwritten rules that develop within newsrooms. Fact-checkers see countering disinformation, particularly Russian narratives, educating society, and promoting accountability of politicians as the primary purposes of their work. The fact-checking work is collaborative, which means that more than one person takes part in developing it (choosing the topic of the article, considering the sources, and reviewing it before publication). Some of the criteria that determine whether a claim is chosen to be checked are its popularity on social media and the prominence of its source (for example, whether the source is an influential politician). However, fact-checkers also employ their journalistic professional judgment regarding the harm level of the claim and its newsworthiness.

## INTRODUCTION

In the contemporary information environment, disinformation is a growing and widely recognized problem that concerns societies worldwide. In Europe, most people say that they have encountered online disinformation, and many believe that disinformation threatens democracy ([European Commission, 2022](#)).

Different mechanisms exist for countering disinformation. The states may use the laws to persecute those who produce and distribute harmful or false information, and policies can be developed that promote the resilience of the state and society against disinformation threats. Journalism is also crucial in this regard, both in its role of providing society with accurate information in general and the genre of fact-checking in particular. Other non-governmental actors, including those working in the media literacy field, are also important. Finally, one must consider the available knowledge base: both the governmental and non-governmental actors draw from research findings, expert commentary, and public reflections on the developments in the field.

One aspect to consider when discussing the limitation of disinformation through laws is the freedom of speech principle, which is typically enshrined in the Constitutions of democratic countries. The Baltic states are not an exception. International freedom of speech principles provide a framework through which the states' opportunities to limit certain speech can be assessed. Article 11 of the [Charter of Fundamental Rights of the European Union](#) (European Parliament, 2000) states that “everyone has the right to freedom of expression,” and public authority must not interfere with people’s right to access information and hold opinions. Article 19 of the [International Covenant on Civil and Political Rights](#) (United Nations, 1966) states that “everyone shall have the right to hold opinions without interference.” Still, it acknowledges that certain restrictions to this right exist, such as the necessity to respect the rights of others and protect national security, public order, public health, or morals. Likewise, Article 10 of the [European Convention on Human Rights](#) (European Court of Human Rights, 1953/2021) guarantees freedom of expression but at the same time stipulates that certain restrictions to it exist that are necessary to the functioning of a democratic society, prevention of crimes, and preservation of other legitimate rights and interests. These documents emphasize that if a person believes in false information and shares it, this does not necessarily provide a justification for the public authorities to prevent the person from doing so. When contemplating legislation that limits the spread of false information, the states need to balance the right of individuals to hold various, including questionable opinions, and the interests of the state and society. At the same time, the European Court of Human Rights recognizes the special status of journalists, who are required to provide the public with accurate and verified information ([Bladet Tromsø and Stensaas v. Norway, 1999](#)). For a thorough discussion on these issues, see [Verza \(2020\)](#).

Lately, the European Union has actively promoted a healthy information environment centered around the interests of citizens and democratic institutions. In 2022, the [Digital Services Act](#) entered into force (European Commission, 2022b). It introduced the obligation for digital service providers to counter illegal and harmful information, including disinformation. [The Strengthened Code of Practice Against Disinformation](#) (2022), a voluntary document whose signatories include various companies and organizations from the internet industries, including the leading social media platforms, complements the DSA. The

core interest of this report is the regulation of fact-checking. Little of the current regulations deal specifically with fact-checking. Still, the work of fact-checking organizations is shaped by the laws or other regulations that are applied to counter disinformation, strengthen the information space, or govern journalism. Fact-checking is strongly related to these aspects.

On the one hand, fact-checking is among the activities through which disinformation is being countered, but on the other hand, the way the state regulates the information space, including the media, shapes journalism, including fact-checking. Thus, government-imposed restrictions on information-related activities exist, and some of the activities aimed at curbing disinformation and other threats can possibly create obstacles to legitimate journalism. However, governments may also support journalism by granting journalists privileges regarding access to information, ensuring their security, or helping them withstand the market forces that may threaten their ability to produce quality content or simply survive.

This report analyzes the regulatory aspects of the information space on the national level of each of the Baltic countries. These countries have many historical and political similarities. They became independent republics after World War I, but their statehood was destroyed by Soviet occupation. The states regained independence at the beginning of the 1990s and later became members of the European Union and NATO. The border with Russia and Russia's ongoing attempts to influence their internal affairs, including through disinformation, is another common aspect ([TechSoup, 2022](#)). Due to these experiences, these countries have developed expertise in information disorders. At the same time, differences exist concerning how their information environments develop. This relates, among other things, to the laws and other regulations. Since the Baltic states are part of the European Union, its regulatory context informs their laws and policies, contributing to similarities in regulation. However, as this report shows, the policymakers and other involved parties have also differed in their approaches. All in all, the Baltic states' experiences provide a basis for a case study for approaches to combating disinformation.

The first section provides an overview of each country's laws that are being or could be applied to persecute disinformation or other harmful information-related activities. This section also covers the policies each country has in place, such as those aimed at strengthening the national information space and protecting journalists. The second section describes legally non-binding documents by official institutions that concern the information space.

The third section explains the current situation with the implementation of the Code of Practice Against Disinformation. This voluntary document functions as a co-regulating instrument of communication platforms under the Digital Services Act. The code contains commitments the signatories have promised to honor, including demonetization of disinformation, transparency of political advertising, and empowerment of users and researchers ([European Commission, 2022](#)). The platforms report to the European Commission, but national authorities also participate in the process to ensure that the platforms meet their obligations. This report is interested in the situation on the national level regarding the implementation of the code of practice.

The fourth section summarizes materials related to journalism, fact-checking, and disinformation produced by non-governmental entities. Such materials may play a role in shaping stakeholders' responses to disinformation. Many such materials exist, but this report is specifically interested in those developed by Baltic-based scholars, experts, organizations,

etc. This illustrates the intellectual contributions from each of these countries to the debate about the current situation and its challenges.

The fifth section details the ethical regulation and self-regulation of journalism and fact-checking organizations. We provide an overview of how fact-checking as a genre is regulated and describe the principles of the International Fact-checkers Network and the European Fact-checking Standards Network, of which several Baltic fact-checking organizations are a part. Then, we explain how professional ethics is regulated in each country and then focus on how fact-checkers describe their work principles.

The primary data source of this report is publicly available documents. Additional data sources were interviews with fact-checkers, conducted as part of other research activities by the Baltic Engagement Center Against Information Disorders, and interviews with state officials. To gather the documents, we identified the themes relevant to our inquiry: measures against disinformation and misinformation, strengthening of the information space, regulation of information access and journalism, including fact-checking. Then, we distilled the core aspects of these documents that relate to the topic of this report and expressed them as key phrases. The result, which shows the similarities and differences in the regulatory documents, can be seen in Table 1 (Appendix).

The five parts cover distinct but interrelated aspects, which describe the regulatory framework within which the Baltic fact-checkers work.

## **1. LEGAL REGULATION ON A NATIONAL LEVEL**

Laws and other legally binding documents shape the environment in which fact-checkers and journalists operate. These give insight into how the state defines and interprets issues related to public speech and the information environment and what remedies are being implemented.

Some of the policies and actions through which the state attempts to shape the national information space may be questioned by journalists, who may perceive some restrictions as negatively impacting their ability to work. At the same time, the state plays a vital role in developing an environment that is safe for journalists and allows them to do their jobs effectively. The review of the legally binding documents from the Baltic States seeks to provide insight into how journalists' rights and interests are balanced with regulations aimed at protecting society from the various risks associated with disinformation.

### **1.1. LATVIA**

#### **1.1.1. LAWS**

Latvia has increasingly dealt with disinformation, including false and harmful information that circulates on social media. High-profile cases, such as the one concerning the 2018 fake news article about [the collapse of a shopping mall in Rīga](#), the popularity of which impacted



the work of the emergency services, have invited discussions about whether the laws should specifically address the spreading of false information—and whether there is a need for a “fake news” law. Such laws have not been passed. However, spreading false information can be prosecuted under other laws, such as [Article 321](#) of the Criminal law, which provides criminal liability for hooliganism. It is defined as a gross disturbance of public order, manifesting in blatant disrespect for the public or insolence, ignoring generally accepted standards of behavior, and disturbing the peace of individuals or the work of institutions, companies, or organizations. Obviously, hooliganism can take place both online and offline. The Criminal law also stipulates criminal liability for defamation or intentional public distribution of false information that is known to be untrue and defamatory of another person (Article 157). Owners of fake news websites in Latvia have been [charged](#) based on the hooliganism clause.

In 2024, amendments were made to the Criminal law, which introduced criminal liability for influencing the election process with the help of [deep fake technology](#) (artificial intelligence). The newly introduced Article 90.<sup>1</sup> stipulates that deliberate production or dissemination of false and discrediting information about a political party or a candidate for the parliament, municipal council, or European Parliament if this has been done using deep fake technologies during the pre-election campaign period or on election day, is punishable by imprisonment for up to five years. However, lighter punishment, including community service, can also be given.

In lighter cases, information-related crimes can incur administrative rather than criminal liability and be classified as disturbing public order. Article 11 of the [Law on Administrative Penalties for Offences in the Field of Administration, Public Order, and Use of the Official Language](#) describes the disturbance of public order. It defines the disturbance of public order as “a violation of generally accepted norms of behavior and disturbing the peace of a person, the work of an institution, merchant or other institution or endangering the safety of oneself or others.”

Hate speech is excluded from protected speech and criminalized. In 2020, a person in Latvia was arrested after he made false claims about the spread of Covid-19 in Latvia and [said that](#) “Chinese people and China as a country need to be eliminated, and the Chinese only know how to make fake goods and fake mobile phones.” Criminal proceedings were initiated based on Article 78 of the Criminal Law, namely, for an action aimed at inciting national and ethnic hatred and discord, committed using an automated data processing system (in this case—on social media). (In 2023, the person was acquitted, but the persecutor has [appealed the verdict](#).) In addition, the Criminal law prescribes punishment for justifying genocide, crimes against humanity, crimes against peace, and war crimes (Article 74.<sup>1</sup>); describes inciting national, ethnic, and racial hatred (Article 78); inciting social hatred and discord (Article 150). Article 148 defines an offense committed due to racial, national, ethnic, or religious motives or social hatred as an aggravating circumstance.

Even though no laws specifically regulate fact-checking in Latvia, several laws concern the information environment and regulate the work of journalists and mass media. This is relevant for this report because the majority of professional fact-checking in Latvia is performed within the journalistic framework. What follows is an overview of how the media environment is regulated in Latvia concerning disinformation and the work of the media.

The law [On the Press and Other Mass Media](#) is one of those that deals with information

access. “Mass media have the right to receive information from the state and public organizations,” Article 5 of the law says. The law also defines what a journalist—someone who can exercise the right to information this law defines—is. Article 23 states that a journalist is a person “who collects, compiles, edits, or otherwise prepares materials for a media outlet and who has concluded an employment contract with it or performs this work on behalf of a media outlet, or is a member of journalists’ organizations.” This means that only those fact-checkers who work as journalists for the media outlets recognized by the law or are members of professional organizations can claim the special rights that this law grants the media. Article 32 establishes the liability for obstruction of journalist work.

Under certain circumstances, access to online media can be limited. Article 112.1. of the [Electronic Communications Act](#) stipulates that the media regulator, the National Electronic Media Council, has the power to restrict access to websites that threaten security or public order and safety within the territory of Latvia. The council adds websites to the list based on the information provided by other state institutions. This decision can be challenged in court. Furthermore, the [Law on Information Society Services](#), which regulates the free movement of information services, the transparency of the terms of online platform service providers, and the protection of hosting service providers against abuse in the form of the dissemination of terrorist content online, also play a role in the regulatory framework. It states that the providers of intermediary services do not have a duty to monitor the user information they provide or store for possible violations of the law. The liability for content rests on the person who has transmitted or stored it.

Another law that creates the basis for limiting the distribution of certain media content is the [Electronic Mass Media Law](#). Article 21<sup>5</sup> of the law stipulates that the distribution of foreign audiovisual media programs and on-demand audiovisual services can be prohibited. This can happen, in particular, if “the country of jurisdiction of the audiovisual program or audiovisual service on demand undermines or threatens the territorial integrity, sovereignty, or national independence of another country.” After Russia invaded Ukraine, based on these considerations, the distribution of [all Russian-registered TV channels](#) was stopped in Latvia. Before that, the National Electronic Media Council also had targeted particular Russian TV channels for spreading false information, propaganda, hate speech, and other unlawful forms of content.

Furthermore, Article 26 of the Electronic Mass Media law defines content that must not be broadcasted in electronic media, including pornography, scenes that highlight violence, calls for war, incitement to overthrow the state's power, and other common-sense types of content. Among the prohibited content is that which “threatens public health or could create serious and serious risks of endangering it.” This became particularly important during the Covid-19 pandemic and the vast amounts of false information that emerged during that time. In 2021, the National Electronic Media Council administered a fine to a TV channel for making [false claims about Covid-19](#).

Important in this law is Article 24(4), which states:

[Electronic media must ensure that facts and events are reflected fairly, objectively, with due accuracy and neutrality in broadcasts. They must promote the exchange of opinions and comply with generally accepted principles of journalism and ethics. Comments and opinions must be separated from the news, and the author of the opinion piece or commentary must be named. In informative documentaries and news](#)



programs, the facts must be presented in a way that does not intentionally mislead the audience.

On the one hand, this article states some self-evident and widely accepted principles of how journalism media should operate. On the other hand, this is a case of the state enforcing journalism norms that usually are defined as part of professional self-regulation. The risk here is that the state decides what legitimate journalism is and punishes acts of journalism that the state does not view favorably. Professional standards and ethical principles are usually expressed through broad and abstract concepts. If the state strives to explain them—for example, what neutrality in the media should look like—this creates a risk for media freedom. This article was written in the law in 2018 as an amendment so that Latvia could fight propaganda more effectively (the fact that propaganda media do not adhere to journalism standards would allow the state to go after such media outlets). However, a recent application of Article 24(4) highlights that it is not easy to introduce mechanisms that fight bad media actors in a way that cannot be abused.

In 2023, the media regulator, The National Electronic Mass Media Council, cited this Article to [impose a fine](#) against a Latvian online news site, TVnet. The justification for the fine was that the journalists of the media outlet did not push back when an interviewee during a video broadcast interpreted a policy by the Latvian government in a particular way. The politician used the term “deportation” to criticize a contemporary policy of the state, but [the council](#) emphasized that this term has a specific and tragic meaning in the context of Latvian history. (The council had a problem with the performance of journalists, rather than what the interviewee said; the interviewees are deemed free to state their views, but according to the council, the journalists are obliged to point out inaccuracies in case they are being expressed.) Much of the reporting on the following issue focused on whether the council was right to decide the correct meaning and use of a particular term in the media. However, this controversy was about something bigger: a state institution was telling the media outlet what the truth about the governmental policy in question is and how it should be reported. If one looks narrowly at media outputs, it is not hard to find other cases that could be passed as a violation of Article 24(4), not least because such terms as neutrality and objectivity are very complex and are interpreted considerably differently. It is not uncommon for an interviewee to say something controversial and outright questionable in the media. Still, a journalist might not catch it on time or simply decide to allow it for the sake of the diversity of opinion. The state usually does not interfere with such editorial decisions and leaves these issues to media self-regulation, as it should be. However, the case of TVnet is a reminder that things can go differently if authorities choose to raise an issue with how the media work. (In March 2024, the District Court of Rīga [upheld the decision](#) by the media regulator that TVnet had broken the law and must pay a fine.)

Several other laws exist that regulate work with information. [The Law on the Processing of Personal Data](#), which regulates personal data protection, balances this protection with the principles of freedom of speech and information. The law recognizes journalism as one of those fields in which a legitimate need to process data exists. Article 32 stipulates that “a person has the right to process data for the purposes of academic, artistic or literary expression in accordance with the regulations, as well as to process data for journalistic purposes if this is done with the aim of publishing information concerning public interests.”

Furthermore, [The Freedom of Information Law](#) (1998) regulates the procedures by which private individuals can obtain information that public institutions possess. This law aims to

ensure that the public has access to information at the disposal of institutions unless special reasons exist for restricting the sharing of such information. This law is also essential to journalists who need to receive information to do their work. In 2023, the Latvian parliament passed amendments to the Freedom of Information law as well as the Law on State Secret, which together placed new restrictions on information that has the status “for service (work) purposes” (or internal-only information), making it a category of state secret. It means that access to such information is no longer regulated by the Freedom of Information Act but by the Law on State Secrets. Several NGOs, including the Latvian Association of Journalists and the Ombudsman’s office, initially [criticized these changes](#) in the law—they argued that the amendments would increase the amount of information that the public could not access. The supporters of the amendments argued that they addressed previous deficiencies in how state secrets are being protected. The initial version of the amendment of the law was updated to take into consideration some of the criticisms.

The [Law on Advertising](#) can also be applied to combat the dissemination of false information. The law, among other things, prohibits advertising that misleads or could potentially mislead a person and affect his or her economic behavior or harms/could harm a competitor (Article 8(2)). Furthermore, the [Law on Prohibition of Unfair Commercial Practices](#) defines misleading commercial practice as one that influences the decision or behavior of a consumer about a transaction in which the consumer otherwise would not have engaged (Article 9(1)). In recent years, the Consumer Rights Protection Center has been paying attention to influencer marketing on social media and documented various transgressions by them against the laws regulating this practice. These include failure to clearly mark commercial messages (hiding the fact that the post in question is an ad is an example of misleading commercial practice), not attaching warning labels that the law requires when advertising special categories of products, such as dietary supplements, and attributing non-existent properties to the product ([The Consumer Rights Protection Center, 2023](#); [LETA, 2023](#)).

This overview of the laws is not intended to illustrate media freedoms in Latvia, which is outside the scope of this report. Citizens and journalists generally enjoy a high level of freedom of expression, and freedom of information is balanced with other rights of people. However, the application of these laws may result in the restriction of the distribution of certain information. This illustrates a growing concern among lawmakers about state security and the security of the information environment. In public debates, the various stakeholders attempt to balance security and freedom of expression.

### 1.1.2. POLICY DOCUMENTS; POLICIES

Several policies exist that, in one way or another, describe the challenges of the contemporary information environment and the directions of action the state institutions envision to tackle them.

The [declaration](#) on the planned activities of the Cabinet of Ministers headed by current Prime Minister Evika Siliņa contains the priorities of the political agenda. One of the priorities is safety and defense. This section details, among other things, the “strategic role of the media in promoting security” and strengthening societal resilience against disinformation. The theme of security can be found in several other current policy documents.

[The national development plan](#) is a planning document that sets out the priorities of the Latvian state for seven-year periods and describes its developmental aims, investment directions, and planned reforms and policies. The current plan is for the period from 2021 through 2027. One of the priorities described in it is cohesion, security, and openness of society. It includes, among other things, strengthening the national information space, preventing disinformation, and strengthening media literacy. Paragraph 397 states:

One of the main obstacles to societal cohesion is the risk of manipulation: if one gives in to the power of stereotypes, discrimination may follow. The media and political rhetoric in certain countries can create cracks in society. Therefore, the information space must be strengthened, disinformation prevented, media literacy improved, participation in politics, and communication skills among different groups and cultures promoted. The content created in the information space, including the media, helps to sustain democracy and strengthen civic values. Access to high-quality media content in the national language and sufficient and high-quality information about what is happening in society also strengthens us as a society and a democratic country.

[The National security concept](#) (2023) also contains similar ideas, but this document is formulated from the security perspective. It describes the strategic principles and priorities of eliminating threats that need to be considered when new policy documents, legal acts, and action plans in the field of national security are being developed.

Among the threats, the document mentions information campaigns, dissemination of disinformation, and the exploitation of the potential for dissent and conflict in society. Thus, the information environment is recognized as one of the spaces where things perceived as dangerous can take hold. “The current legal regulation of media activities does not address the current challenges to the safety of the Latvian information space,” states the document, which particularly emphasizes the risks of Russian activities aimed at influencing the processes in Latvia. “A strong and secure information space is based on strong local Latvian media and high-quality local content in the Latvian language,” states the document.

One of the themes of the document is the security of journalists. It emphasizes the need to protect journalists from local and foreign actors, including disinformators, and envisions zero tolerance against threats to the freedom and security of the media. The section also calls for investment in further education for journalists. “It is necessary to ensure that journalists know how to create reliable and high-quality content, know how to recognize fake news and disinformation, and also be able to show to the public the creators and distributors of such content,” the document says. Furthermore, the document stresses the need for media and information literacy to ensure that people are able to identify false information and disinformation and do not share it, thus, among other things, limiting the threat of external propaganda and increasing societal resilience.

The National Security Concept notes that Latvia is generally safe for journalists but recognizes the need to do more to protect journalists in both online and offline environments against various potential attacks from local and foreign actors, including disinformators. It emphasizes the zero-tolerance principle against those who threaten the freedom and safety of the media.

Another document that describes the Latvian information environment through a security lens

is the [Conceptual report on the national strategic communication and security of the information space 2023—2027](#). Its stated objective is to promote the security of the information space by ensuring that Latvian state institutions and society are resistant to interference in its democratic processes through activities in the information space, as well as they are capable of coordinated cooperation to overcome crises and threatening situations effectively. The document defines six directions of action: the implementation of national strategic communication and development of these capabilities; measures to promote the resilience of information space against security threats; the strengthening and improvement of the media environment; a society that is engaged and resilient against information space threats; partnership with civil society, private and academic sector; and international cooperation.

The document describes the security of information space as dependent on three elements: effective communication by the state and municipal institutions; the media environment that is strong and of high quality and the performance of journalism; and the society that is engaged, skilled, and educated and is able to discern and resist manipulations in the information space.

It further notes that journalists and the media “play a critically important role in informing and educating their audiences about manipulations in the information space, including disinformation messages and manipulation methods directed against Latvia.” While fact-checking is not explicitly mentioned here, the document instead emphasizes the importance of state support toward “investigative and analytic journalism” In this context, fact-checking can be interpreted as a key type of content that can inform the audience about falsehoods and manipulations.

The document provides the definitions of disinformation, misinformation (in Latvian, translated as “misleading information”), information influence operation, and foreign interference in the information space. These are adopted from the European Democracy Action Plan ([COM/2020/790 final](#)). According to the European document, misinformation is false or misleading content being shared without the intent to cause harm (it is being shared in good faith), even though such information can still be harmful. Disinformation is false or misleading information that is being distributed to deceive and achieve economic or political gain for someone.

The document also notes the importance of journalists' safety. It states that it is in the interests of the state and society that journalists and the media can do their work in accordance with the constitution and national laws, be independent of political and economic pressure, and be free from fear of physical and other kinds of threats (Article 7.5).

Another document that concerns the information environment is the [National Strategy for the Development of the Electronic Media Industry 2023—2027](#). It describes the vision of the electronic media industry—“a safe, innovative and diverse Latvian information space in a democratic, Latvian environment and a united Europe”—and formulates several objectives and directions of action.

The objective that most closely relates to the problem of disinformation is “protected and strong information space.” It is divided into five sub-sections: safe Latvian information space, high-quality and diverse content in the Latvian language, media-literate Latvian society, restrictions on illegally distributed content, and international cooperation by the relevant

public authorities, which includes, among other things, the strengthening of democracy and fight against disinformation in the digital environment.

Among the aims defined in the document to increase information space security is the education of media professionals about the various issues and topicalities in the media environment, which includes disinformation and other risks (A-1-6). The document also calls for strengthening media literacy in society and increasing the analytical and research capacity of mass media (A-1-7). Another step that this document advocates for is strengthening the regulatory regime, including the ability of the media regulator, the National Electronic Media Council, to respond to various problems quickly (A-1-7) and improve the regulator's monitoring capabilities concerning media content and communication platforms (A-1-8). Combined with the aims to strengthen the regulation are calls to investments in Latvian media, supporting the media institutions, and producing content that adheres to the principles of quality journalism. The document calls for the support of the production of content that serves the interests of the Latvian society (A-2-1) and strengthening local journalism, including the development of competitive, financially stable media organizations that grow their audiences, but simultaneously, the document emphasizes the need for “consistent regulation of the media and monitoring of their quality” (A-2-2).

The document sees mass media as pivotal in maintaining and improving the security of the national information space. It calls for promoting media content that contributes to society's sustainability—in particular, it educates society and supports public health as well as business, financial, and legal literacy, informs society, and entertains it (A-2-5).

As for media literacy, the document emphasizes its importance in that it allows people to participate in various aspects of society (for example, it states that media literacy enables people to make informed decisions both as a citizen and an individual, thus improving the quality of life and creating a public benefit) as well as in promoting the societal resilience, hence strengthening the country in times of disinformation and hybrid warfare. “Therefore, media literacy ensures preventive protection of Latvia's information space and is also essential in the context of national security,” the document says.

The document provides the definition of disinformation, which is adapted from the European Commission's April 26, 2018, statement, “[Tackling disinformation online: A European approach](#).” It states that disinformation is “false or misleading information prepared, published, and distributed for economic gain or to deceive or cause harm.”

In 2016, the [Media Policy Guidelines](#) were adopted for the first time. The document signified a clear recognition by the Latvian state that the information environment and the media cannot be left purely to market forces if one expects to have high-quality journalism and an informed society. For quite some time, the economic situation of media outlets was becoming increasingly challenging, and market pressures did not leave space for the media to invest in quality journalism.

The guidelines defined five media policy directions: diversity of the media environment, quality and responsibility of the media, education of media sector professionals, media literacy, and securitability of the media environment. The document introduced state support mechanisms for media outlets, which allowed them to withstand negative market pressures (including financial support).



One instrument envisioned in these guidelines is The Media Aid Fund, which, through regular grant competitions, supports non-commercial and societally significant journalism activities and aims. The fund has defined broad overarching aims, such as strengthening national values, the Latvian cultural space, media responsibility, critical thinking, and social cohesion based on the shared use of the Latvian language. However, the fund does not meddle with the editorial policies of media companies that receive state money.

Many leading national and local media currently participate in these grant competitions and receive state support. One of the criteria for evaluating the proposals is whether the proposed activity concerns “lie deconstruction,” which refers to uncovering falsehoods and thus relates, although is not limited, to fact-checking journalism. Hence, the Latvian government encourages fact-checking and related activities through its media policy.

However, the policy mentioned above was for 2016 through 2020. The grant competitions for media organizations are still organized and various other activities that started during that period also continue. As of the writing of this report, the work on the new media policy guidelines for the next period is in the final stages. Some of the core principles in the [new Media Policy Guidelines](#) concern the promotion of media literacy, strengthening local media, journalists’ safety, and the development of journalists’ skills.

All in all, these documents signal the perception of the state that disinformation is a burning problem and that diverse and complex activities are needed, including strengthening the local information environment, supporting quality journalism, and promoting media literacy in society.

## 1.2. ESTONIA

### 1.2.1. LAWS

Concerning disinformation and applicable legal provisions, the violation of which would result in negative consequences, two provisions can be highlighted in the Estonian legal system: subsection 6 of §12 of the Public Health Act as well as §263 and §278 of the Penal Code.

Subsection 6 of §12 of the [Public Health Act](#) states the following: “Legal persons in public law, legal persons in private law and natural persons shall not by word, print or other means disseminate ideas, opinions, beliefs or other information which could be hazardous to human health and the physical and social environment.” The provision establishes a prohibition, which applies to legal and natural persons alike, against the spreading of ideas, opinions, beliefs, or any other information that falls under the general moniker of ‘health disinformation’ if the spreading of such information could be considered hazardous, in particular, to human health. A new legislative proposal to update the approach to public health matters and revamp the Public Health Act currently in force is being discussed in Estonia (Legislative Proposal for the Public Healthcare Act, 2023). According to the explanatory memorandum accompanying the updated law, the fines for violating the prohibition against disseminating false information regarding the health benefits of dangerous chemicals and substances would be increased in the updated law.

This law has been applied to entities that during the Covid-19 pandemic did not follow safety measures. In one case, the Police and Border Guard Board (PBGB) found during repeated

inspection visits that [Elvis Brauer's Mém Cafe](#) ignored the requirements established based on the government order. Among other things, the company did not check the visitors' vaccination status or virus tests and failed to identify the customers' identities. On the order of the Health Board, the cafe asked to be closed.

Section 263 of the [Penal Code](#) sets out the consequences for the offense of aggravated breach of public order. In the context of disinformation, clause 2 of subsection 1 of §263 is of particular importance, as it sets out the consequences for the aggravated breach of public order if it was committed “by using threat with a weapon or any other object used as a weapon, an explosive device or explosive substance.” Bomb threats, such as those sent to Estonian, Latvian, and Lithuanian schools in October 2023 ([ERR, 2023](#)), are relatively easy to disseminate on a large scale and pose an informational threat to society. On a smaller scale, individuals making similar threats, including in “a joking manner” ([Pihlak, 2024](#)), have recently been found guilty and punished by detention.

Similarly to §263 of the Penal Code, §278 describes the misdemeanor offense of making false emergency calls. Subsection 1 of the provision describes the misdemeanor act as “Making knowingly false emergency calls to the Rescue Board, police, emergency medical care or any other emergency or road service, or causing a knowingly false dispatch of a corresponding emergency vehicle” (Penal Code, §278). For instance, three young people who caused an expensive rescue operation by falsely claiming that a man had jumped off a bridge ([Kirsiberg, 2018](#)) all received punishments of detention. In the summer of 2023, the Estonian Ministry of Interior sent out a legislative intent document, which would, in connection with the misdemeanor offense set out in §278 of the Penal Code, also address the issue of “disrupting the work of the emergency call line.” The disruptions, aside from those already established in the currently applicable wording of §278 of the Penal Code, could also come from “empty calls,” i.e., calls that last for less than ten seconds and usually involve no communication from the caller, “serial callers,” i.e., people who persistently dial the emergency number absent any actual emergency and, therefore, negatively impact the operation of the emergency call center without particular purpose (see [Estonian Emergency Response Center, 2023](#)).

Estonia's Public Information Act ([Avaliku teabe seadus, 2014](#)) underlines the legal framework governing public information access and dissemination. By this law, the information holders must grant access to public information. §35 states that a holder of information must classify certain types of information as intended for internal use. This essentially restricts access to sensitive data collected during legal proceedings unless such information is subjected to laws that stipulate its disclosure. However, this law ensures that sensitive information is handled with privacy and security considerations. §4 of the Personal Data Protection Act ([2019](#)) stipulates a journalistic exception: “Personal data may be processed and disclosed in the media for journalistic purposes without the consent of the data subject, in particular, disclosed in the media, if there is public interest and this is in accordance with the principles of journalism ethics. Disclosure of personal data must not cause excessive damage to the rights of any data subjects.” The latter has also been under public debate in Estonia, resulting in a court decision against a journalistic outlet ([Court decision, 2013](#)).

Chapter 2 (§3 and §4) of the "Restriction of Unfair Competition and Protection of Business Secrets Act" of Estonia emphasizes addressing deceptive practices such as the

dissemination of misleading information and the unauthorized use of business secrets ([2024](#)). This act indirectly supports efforts to combat disinformation by establishing legal avenues for action against entities spreading false or misleading information that could harm competitors or the economy. It provides mechanisms against the unlawful use of information, discouraging disinformation by imposing legal consequences.

Amendments to the [Estonian Media Services Act](#) were enacted on March 9, 2022. These include provisions relevant to fact-checking practices and combating disinformation. Specifically, it outlines obligations for video-sharing platform operators to prohibit content inciting hatred, violence, discrimination, violating the law, or depicting child pornography, mandating immediate removal of such content. Although not directly related to fact-checking practices, this legal framework helps to handle disinformation and harmful content on video-sharing platforms ([A glimpse at Estonia's new rules for audio-visual media services, 2022](#)).

### 1.2.2. POLICY DOCUMENTS; POLICIES

The country's long-term development strategy, [Estonia 2035](#), aims to promote and support the well-being of the people. The strategy provides a unified direction for policymakers and decision-makers. The strategy has highlighted the spread of false information as a security threat and understands countering it as necessary to ensure the safety and security of society.

[The National Defense Development Plan 2022—2031](#) aims to implement the military and non-military capacity-building elements over the next ten years. In the document, fact-checking is being discussed in association with the fight against disinformation as it is connected to the psychological defense of the people. The document recognizes the risks of disinformation and sees situational awareness as a critical capacity to develop in the information space.

On content blocking, similarly to Latvia, there was [an announcement](#) on 25.02.2022 by the Consumer Protection and Technical Supervision Agency in Estonia that decided to ban the rebroadcasting of five TV channels in Estonia as broadcasting a speech by the President of the Russian Federation to justify a military attack, to call for it and to justify the disregard of the general principles of international law violated the requirements of the Media Services Act in Estonia. The organization continued to monitor TV channels and websites. On 04.08.2022, there was an [announcement](#) that The Consumer Protection and Technical Supervision Agency had ordered communication companies to block access to four websites that had spread war propaganda, had justified and supported the commission of a crime of aggression, and had incited hatred, thereby posing a threat to public order in Estonia.

Furthermore, on 04.05.2023, [another announcement](#) was made that Estonia had restricted the availability of another 195 websites and 51 TV channels to protect the information space and ensure compliance with sanctions. Similar announcements have continued to be made regularly later, too.

## 1.3. LITHUANIA

### 1.3.1. LAWS

In Lithuania, a few laws and regulations deal with the risks of disinformation and other information disorders, which are the direct objects of the fact-checking process.

Harmful content is addressed in Lithuania's [Criminal Code](#). For instance, Article 170 describes the legal consequences of hate speech. The article stipulates that a person who “publicly ridicules, despises, incites hatred, or incites discrimination against a group of people or a person belonging to such a group on the grounds of age, gender, sexual orientation, disability, race, color, nationality [...] shall be punished by a fine or restriction of liberty, or by arrest, or by imprisonment for a term not exceeding two years.” This applies to people “who endorse, deny, or grossly disparage genocide or other crimes against humanity or war crimes recognized by the legislation of the Republic of Lithuania or the European Union or by the final judgments of the Republic of Lithuania or international tribunals (if it was committed in a threatening, abusive or insulting manner, or that it resulted in a disturbance of the public order).” This is important because fact-checkers not only have to check the content that includes hate speech but also experience the implications of such, very often malicious, attacks themselves.

[Article 285](#) deals with falsely reporting a danger or disaster to the public and describes the punishment for falsely reporting or spreading the information about “imminent danger or serious disaster to the public or an object of national importance.”

In 2024, [a new amendment](#) to the Criminal Code that deals with the malicious use of social media came into force. Article 118 of the law now states that “anyone who, by manipulating the accounts of an online social networking service platform, significantly increased the dissemination of information aimed at acting against the Republic of Lithuania—its constitutional order, sovereignty, territorial integrity, defense, or economic power, shall be liable to a fine or a restriction of liberty, or to arrest, or to imprisonment for up to five years.” Legal persons are also liable for such acts. This can help the authorities to deal with so-called “[troll farms](#).”

A key document that regulates misleading content and disinformation is the [Law on the Provision of Information to the Public](#). It defines disinformation and states that it is forbidden to disseminate disinformation as well as other types of harmful information (including war propaganda, incitement to war, instigation of discrimination, and incitement to violate the sovereignty of Lithuania).

[Article 22](#) of the law specifies the obligations of the producers and disseminators of public information. Some of these are as follows. They must not distort information and “use it for selfish purposes.” They must be objective and impartial, and on contentious political, economic, and other issues of public life, they must present as many opinions as possible/ They must not publish unfounded, unverified, unsubstantiated allegations; they must not publish biased information about religion. They must not promote supernatural and paranormal phenomena by presenting them as real.

[Article 41](#) of the law describes the duties of journalists. Among other things, journalists must

“provide correct, accurate and impartial news, critically assess the sources of their information, check facts closely and attentively, refer to several sources,” and observe journalism ethics.

At the same time, the law describes the rights to receive information from public institutions about the work of these institutions, their official documents, etc. ([Article 6](#)). Article 547 of the [Code of Administrative Offenses](#) deals with obstruction of journalism. It makes it illegal for the heads of public institutions to refuse to provide information to mass media representatives or hinder journalists' ability to perform their professional duties.

Other laws might also indirectly impact fact-checking processes and the fight against disinformation. For example, unfair commercial practices are regulated primarily by the [Law on Advertising](#) (revised in 2017), which incorporates provisions from the Unfair Commercial Practices Directive. This law prohibits unfair practices, including false or deceptive advertising, aggressive commercial practices, and misleading omissions. While these laws primarily target commercial activities, they may also apply to situations involving disseminating false information for commercial gain.

Data and information protections are provided by the [Personal Data Act](#). The law governs the processing and protection of personal data in Lithuania. This law aims to safeguard individuals' personal data while defining the legal requirements to balance privacy rights and the public's right to information. While the act provides strong data protection, journalists might face challenges accessing personal data held by organizations, requiring them to justify their need for access under public interest grounds. Journalists must balance individuals' privacy rights with the public interest in information disclosure. The law envisions exemptions that consider journalism's role in a democratic society.

### 1.3.2. POLICIES, POLICY DOCUMENTS

[The program of the current Lithuanian government](#) (2020) includes a specific section on information threats, resilient society, free media, and secure internet. This section consists of such aims as conducting a comprehensive assessment of Lithuanian media policy together with independent experts while developing guidelines for its improvement. The next task is to improve critical thinking and resilience through media and digital literacy intervention. There was also a task to renew the media support model to “ensure the sustainability of support, media independence, and priority areas of support.” The newly re-established Media Fund aims to support the creation and dissemination of public information that is relevant to society, of high quality, and ethical and politically neutral. The Media Fund seeks to achieve media pluralism, diversity of opinions and national cultures, and accessibility of socially relevant, culturally sensitive information in society, including accessibility for persons with disabilities, by providing state support to producers and/or disseminators of public information, ensuring rational and reasonable use of public funds. Until now, public funding has only been available for projects by producers of public information and only legal entities. The program promised to “seek to strengthen the protection of journalists against persecution for criticism.”

One of the objectives described in the national development plan “[Lithuania 2030](#)” concerns the development of a vibrant information environment, the promotion of responsible media—



freedom of the press and effective self-regulation. In addition, the strategy also calls for the promotion of media literacy among the population.

[Lithuanian National Security Strategy](#) primarily focuses on cybersecurity; however, it also includes professional media and journalism as elements of security and resilience. The document calls for strengthening society's resilience to disinformation and other information threats. To achieve this, media and information literacy programs are recognized as necessary, along with improvements in the education system, development of cultural services, strategic communication, and cooperation between the public, private, non-governmental, and academic sectors.

Another example that does not impact fact-checking directly but instead emphasizes the Lithuanian priorities of mitigating risks of disinformation and sharing the experience is [The Strategic Directions for Development Cooperation of the Republic of Lithuania](#). This document sets the planning and management conditions for a more coherent, rational, and cohesive development cooperation policy. Through development cooperation programs, Lithuania seeks to share its experience by prioritizing societal resilience against disinformation with partner countries such as Armenia, Moldova, and Georgia. The funding principles include spreading democratic ideas by empowering independent media and strategic communication. The latest funding has been allocated to building strategic communication to *Counter Russian Disinformation in Moldova* (Eastern Europe Studies Centre). Another project was awarded to *Delfi* to strengthen resistance to disinformation in the Eastern Partnership countries of the European Union, with a particular focus on independent media (Armenia, Azerbaijan, Belarus, Moldova, Georgia, Ukraine).

## **2. LEGALLY NON-BINDING DOCUMENTS BY OFFICIAL INSTITUTIONS**

Apart from the legally binding regulations, governments and public institutions issue other documents and communications that reflect their understanding of disinformation and how to counter it. This section provides an overview of the most significant such documents in the Baltic states.

### **2.1. LATVIA**

#### **2.1.1. GOVERNMENT COMMUNICATIONS**

In 2022, the State Chancellery of Latvia published the "[Handbook against Disinformation: Recognize and Fight Back](#)," which is primarily aimed at those who work in government institutions but has a secondary audience of all Latvians. The book offers information about threats to the information environment, emphasizing Russian propaganda narratives, and provides counter-explanations. The document explains what individuals should do if they encounter false information, informs about the state institutions involved in monitoring the information environment and responding to threats, and states the possible activities a person

and an institution can do upon encountering false information. It also states the most common Russian propaganda narratives about Latvia and offers a refutation.

Among other things, the handbook explains various types of problematic information, including misinformation and disinformation. It employs the definitions adopted from the European democracy action plan ([COM/2020/790 final](#)), which interprets misinformation as intentionally false or misleading information, and disinformation is interpreted as deliberately deceptive information that is being spread for political or economic gain.

In 2023, the Strategic Communication Coordination Department of the State Chancellery launched a long-term communication project, “[Melnis uz balta](#)” (“Black on white”). This project employs textual, video, and podcast formats to discuss various aspects of disinformation and deception. In addition, the project invites the audience to report disinformation cases to the State Chancellery.

The Ministry of Culture and the National Electronic Mass Media Council are the two public institutions most actively researching media literacy in Latvia. According to one study, in 2020, 18% of the Latvian population said that they lacked the skills to distinguish trustworthy from misleading information ([Latvijas fakti, 2020](#)).

## 2.1.2. COMMUNICATIONS BY OTHER OFFICIAL INSTITUTIONS

In 2023, Latvia assumed the rotating Chairmanship of the Council of Europe’s Committee of Ministers, and [among its priorities was](#) the promotion of freedom of expression and the safety of journalists. (Media freedom, the safety of journalists, and the fight against disinformation were among the [priorities of the Latvian foreign policy](#) before that, too.) The conference “The Pen is Mightier than the Sword?” illustrated Latvia’s willingness to draw attention to these issues, which it organized in cooperation with the Council of Europe. Representatives from governments, international organizations, NGOs, and other entities active in the media and journalism field attended the event. During the conference, the first meeting of the [contact point for journalists](#) took place. The Latvian journalists and their colleagues from other countries discussed the issues related to the protection of journalists.

## 2.2. ESTONIA

### 2.2.1. GOVERNMENT COMMUNICATIONS

Significant discussions about disinformation began in Estonia as early as 2006 and 2007 when there was a debate about the relocation of the Second World War monument (also known as the Bronze Soldier crisis) from Tallinn’s urban space. Since 2007, the Estonian government has recognized and advocated the issue of fighting disinformation through its different formations. Cyberattacks that followed the 2007 (and 2006) events associated with the relocation of the Bronze Soldier of Tallinn initiated a more comprehensive process of dealing with disinformation. One result was the establishment of the NATO [Cooperative Cyber Defence Center of Excellence](#) in Tallinn in 2008. In addition, since then, the State Office has paid particular attention to the threats related to disinformation. It ended with the establishment of the Strategic Communication unit within the State Office.

Concerning strategic communication, two more documents must be mentioned:

1) The Estonian long-term strategy, “[Estonia 2035](#).” Among other things, it says that the long-term goal of government is “ensuring a strong cultural space that promotes cohesion and knowledge-based public space that supports communication decreases the probability of value conflicts in society.”

2) the National [Defence Development Plan 2031](#). It emphasizes strengthening national information resilience but does not provide a detailed account.

Inspired by a [handbook](#) published in Sweden in 2018, in 2019, the Estonian State Chancellery (the leader of the State Office) published a [guide to dealing with information attacks](#). It is a guideline mainly for ministries and government institutions but also may be useful in general, especially for people working in communications. It covers topics such as preparing for disinformation attacks, responding to information attacks, and lessons for the future. It also includes examples of common influence methods and explains what bots are. In addition, [the Estonian governmental communication handbook](#), which was updated in 2021 and primarily aimed at incoming communication specialists in governmental institutions, the heads of government agencies, and also students, has a section about spreading false information. It highlights that Estonian government communication employees have the complex and responsible task of being able to identify the spreaders of false information. It also emphasizes cooperating with journalists who have to be confident in the validity of information. Some channels spread false information, but they are not considered proper journalism. The handbook guidelines have been based on the US, British, Finnish, and Dutch government communication manuals and guides.

### 2.2.2. COMMUNICATIONS BY OTHER OFFICIAL INSTITUTIONS

Three initiatives may be relevant in the context of fact-checking:

1) When Russia launched a full-scale war in Ukraine in 2022, Estonia became even more determined to deal with Russia's influence in the information space and the dangers it poses. Before that, the Ministry of Education and Science in 2021 established a media literacy initiative described in the so-called White Paper of Media Literacy (unpublished). It clearly defined the main targets of sustainable media literacy strategy to be developed at schools. Currently, it is still in the development stage. Although several other competencies are being developed concerning media literacy (such as digital literacy), media literacy as a general set of skills and competencies is not being taught at regular schools, colleges, or universities. It is usually taught as part of the Estonian language and literature courses. However, it does not include instructions for fact-checking and critical thinking as something that should be valued in everyday life.

2) Fact-checking has been discussed in the context of [elections](#), as the Estonian Election Committee has debunked many myths about the threats of e-voting on democracy.

3) The Estonian Research Council has established a science communication [strategy](#) for 2020—2035, “Estonia knows.” Among other things, it states that research-based, fact-based, and evidence-based approaches are essential for developing society's competitiveness, health, welfare, and education. Fact-checking and critical evaluation of information are the foundations for reliable communication (p.10).

## 2.3. LITHUANIA

### 2.3.1. GOVERNMENT COMMUNICATIONS

In 2018—2020, the Lithuanian Government implemented the "[Strengthen your immunity](#)" campaign, which provides information on identifying and countering online threats in online and regional media, radio, and TV. The website is structured around three key areas: cyber-literacy for employers and employees, with a particular focus on small and medium-sized businesses, information on online threats, and information on how to avoid falling for disinformation and misinformation.

### 2.3.2. COMMUNICATIONS BY OTHER OFFICIAL INSTITUTIONS

Analysts of the Strategic Communications Department of the Lithuanian Armed Forces continuously [monitor disinformation threats to Lithuania and post their monthly](#) reports on their website (which are then distributed across the media). Lithuania is also a part of the steering committee in the [OECD Expert Group on Governance Responses to Mis- and Disinformation](#).

## 3. THE IMPACT OF THE CODE OF PRACTICE ON DISINFORMATION

In 2022, the strengthened [Code of Practice on Disinformation](#) came into force. It describes a set of self-regulatory standards that the providers of digital services commit to obey to limit the spread of harmful and false information. These standards regulate the placement of ads (with a particular emphasis on political ads), integrity of services (including the transparency considerations and prohibition of platform manipulation), empowerment of users (including the strengthening of media literacy and enabling the users to identify and flag misleading information, and offering them a transparent mechanism for appeals regarding the content decisions by platforms); empowerment of researchers (including access to platform data and sharing of data and research findings with the research community); and empowering fact-checkers (including the cooperation with fact-checkers and providing fact-checkers with access to relevant information). The [signatories](#) of the document include the owners of the biggest online platforms and services, including Google, Meta, Microsoft, and TikTok.

To date, several EDMO hubs have already analyzed the implementation of the Code of Practice on Disinformation. An EDMO Ireland and GADMO study analyzed the [baseline reports](#) by the largest signatories, Google, Meta, Microsoft, TikTok, and Twitter/X (the latter has since withdrawn from the Code). The researchers found deficiencies in the quality of information that platforms have submitted to demonstrate their adherence to the document. BROD has published reports on the implementation of the Code in [Bulgaria](#) and [Romania](#).

The studies focused on the data the platforms have submitted specifically concerning the two countries and aimed to identify the gaps that should be addressed in the subsequent responses by the platforms. The report on Bulgaria found particular deficiencies regarding advertising: the submitted responses tended to be too brief, devoid of detail, or of little relevance. The platform integrity aspect was covered more extensively, but the responses were not sufficiently verifiable or testable. Researchers' access to platform data was deemed to be limited. The report on Romania notes differences in emphasis the platforms have placed on various principles described in the Code. In general, it characterizes their actions against disinformation as “modest”: the intention to contribute to a better online environment is present, but the steps to be taken to achieve this goal are insufficient. The platforms do remove fake and bot accounts that spread disinformation. Still, the report emphasizes that they have not done enough to limit the financial incentives for spreading disinformation, for example, by hampering their ability to acquire revenue through advertising. In addition, the reports submitted by the platforms do not contain information for Romania about the content recommendation algorithms that play an essential role in determining which information reaches the audience. Another study on CoP has been conducted by [ADMO](#). It focused on one aspect of the code—the empowerment of the research community. By studying the platform reports and the experiences of Slovenian and Croatian researchers, they concluded that platform access is still underdeveloped in the European Union, and gaps exist between what the platforms claim regarding the provided access and what the researchers have experienced.

The present report by BECID does not analyze the reports by the signatories. Instead, it deals with how the CoP is being implemented in each of the Baltic states and focuses on the perspective of state institutions. The results of our inquiry show that this process is in its early stages.

### 3.1. LATVIA

The monitoring of The Code of Practice on Disinformation in Latvia is based on the principle of volunteerism—no specific mechanisms of institutional oversight have been developed for this purpose. However, several institutions deal with issues related to platform governance and rely on the principles contained in the Code of Practice as far as they have the capacity to do so.

The Code of Practice functions in a co-regulatory framework with the DSA. In Latvia, the coordinating institution of DSA is The Consumer Rights Protection Center, which is overseen by the Ministry of Economics. In 2024, the Latvian parliament passed the necessary amendments to the Law on Information Society Services, which defines the tasks of the coordinator, the procedure on how the coordinator exercises its powers, liability for breaches of the DSA, and the procedure for appealing against the coordinator's decisions. After the amendments were passed, Viktors Valainis, the Minister of Economy, emphasized that the DSA is vital for Latvia, which faces threats of disinformation. “The Consumer Rights Protection Center will monitor the trends in online platforms and, if necessary, will inform the European Commission about violations,” [he explained](#).



Currently, the Consumer Rights Protection Center is in the process of setting up the National Coordinator unit that is responsible for the implementation of the DSA. After this is finalized, the institution will be able to react to complaints, investigate the possible violations, register the platforms in the transparency database, and participate in establishing shared measures aimed at establishing and developing a unified policy on the level of the European Union. Additionally, it will examine the market on a national level—in Latvia, online platforms are relatively small. As far as the resources permit, the institution will monitor how digital services are provided to ensure that there are no violations, such as showing children targeted ads, using dark patterns, and shortcomings in observing the transparency requirements. Six employees are expected to be responsible for these activities. The interviewee expects that preparing various reports will consume considerable resources available to the institution.

The interviewee admitted that the requirements under the DSA are not well understood in the industry. The Ministry of Economics and the Consumer Rights Protection Center intend to work with NGOs and organize outreach and education activities, which will be the institution's focus during its first year. Currently, the Latvian authorities do not have precise information about how many platforms comply with the DSA, but they expect some backlash or protests from market players regarding the new requirements.

During an interview, a representative of the Ministry of Economics stressed that the Code of Practice on Disinformation is binding for those parties who sign it, but for others, it is voluntary. Therefore, the involvement of the Consumer Rights Protection Center in its implementation is "optional." None of the signatories to the Code are Latvian entities. The Latvian official thinks that Ireland, where the European operations of many platform companies are registered, should be the country that is extensively involved in the implementation of the Code. For their part, the representatives of the Ministry of Economics and the Consumer Rights Protection Center mainly focus on the implementation of the DSA. As explained by the representative of the Consumer Rights Protection Center, "if the provisions of the Code were so important, they would already have been written into the Regulation [DSA] itself." This indicates that the Code is seen as a set of additional commitments and requirements not agreed upon by the EU member states while developing the DSA but with which the platform and service companies have agreed to comply.

Because of this, Latvian officials place more emphasis on the DSA than the Code of Practice. The staff of the National Coordinator are receiving training that is centered on the implementation of the DSA, and corresponding guidelines and plans are being developed. "The purpose of the Code is to have a guidance of what disinformation actually means because platforms have said that illegal content can vary from country to country," explained the representative of the Consumer Rights Protection Center, who sees the Code as an instrument that promotes a common understanding among the platforms concerning the various platform governance issues. According to the representative, the Code plays a vital role in another aspect: failure to sign it signals that a platform does not meet the commitments: "Not signing the code in itself implies the existence of an infringement."

The DSA, as well as the Code of Practice, envisions the rights of researchers to access data from the very large online platforms. To acquire the status of a "vetted researcher" under the DSA, researchers must contact either the European Commission or the Digital Services Coordinator in the country where the platform is registered or the coordinator in their own country. In the case of Latvia, that would be The Consumer Rights Protection Center. The national coordinator will prepare the initial assessment of the request and forward it to its

counterpart in the country where the platform is registered. The interviewee emphasized that such access to platform data is crucial to platform governance. Currently, the platforms themselves are unable to react to all applications or requests of any type they receive. Thus, the introduction of additional mechanisms is justified. In addition, the interviewee mentioned the risks of unsupervised data access—for example, organizations from hostile countries could use them as part of spying operations.

The DSA also introduced the “trusted flaggers,” who monitor the platforms and alert them to potentially illegal content. The national coordinator is responsible for assigning this status. Given the special powers associated with the roles of trusted flaggers and vetted researchers, the Consumer Rights Protection Center of Latvia currently awaits more precise guidelines on accessing the candidates and under what circumstances this status may be revoked.

Another state institution that participates in developing the information space is the State Chancellery. It acts as a contact point for the public administration when dealing with social media platforms. It reports fake profiles of senior public officials, misleading and fraudulent advertisements, and other content that it sees as not being compliant with the rules and community standards of the platforms (such as Meta, TikTok, and Google). The Chancellery identifies these violations as part of its monitoring activities of the Latvian information space. It also solicits reports of possible violations from Latvian citizens. In addition, the Chancellery coordinates activities related to the security of the information environment, including within the framework of [The Coordination Group of the Security of National Information Space](#). The Chancellery does not monitor political advertising on the platforms—this is the task of the Corruption Prevention and Combating Bureau, which, among other things, monitors campaign expenses of Latvian political parties.

The Ministry of Culture is the institution responsible for media policy in Latvia. It is not directly involved in monitoring the implementation of the Code of Practice. In the interview, the ministry representative said that they do not have sufficient resources to do so.

The media regulator, the National Electronic Media Council, is another interested party in developing the information environment. It is part of the European Regulators Group for Audiovisual Media Services (ERGA). The representative of the regulator has explained that the institution within ERGA has participated in pilot studies, monitoring and analyzing the 2018 Code of Practice, thus contributing to the development of the 2022 Strengthened Code of Practice. ERGA has delegated four members to work in the Permanent Task Force on the Code of Practice on Disinformation, which is concerned with monitoring and developing the Code. Thus, the Latvian media regulator is engaged with the implementation of the Code through its cooperation with ERGA, including participating in all of its working groups. One of the groups is “Countering disinformation and strengthening democracy in the digital environment.” One of its objectives in 2024 is to consult the European Commission about the effective implementation of the Code and prepare reports about the current situation. The working group intends to publish a report about the findings.

### 3.2. ESTONIA

The official media regulator in Estonia is the [Consumer Protection and Technical Regulatory Authority](#) (CPTRA). CPTRA represents Estonia at The European Regulators Group for

Audiovisual Media Services (ERGA). ERGA has a Subgroup 3, “[Countering disinformation and strengthening democracy in the digital environment](#).” However, in Estonia, there have not been any official reports published by the CPTRA measuring the effectiveness of the 2022 Strengthened Code of Practice on Disinformation. The Code is not systematically monitored at the state level.

The Commission and National Digital Service Coordinators (DSCs) are responsible for supervising, enforcing, and monitoring the DSA. An [information sheet](#) published on CPTRA’s website on 24.01.2024 stated that they would become Estonia’s digital services coordinator and supervisory authority. The task of the CPTRA would be to coordinate the orders and other information related to the DSA and to share it both internally and with the European Commission and other member states’ institutions. In addition, the TTJA will supervise the application of the regulation and, if necessary, ensure the fulfillment of obligations arising from the regulation.

[A video of a webinar](#) by the Ministry of Economic Affairs and Communications introducing the DSA to the relevant parties was uploaded to YouTube on February 22, 2024.

On April 24, 2024, the European Commission published a statement in which it called on several countries, including Estonia, “[to designate and fully empower their Digital Services Coordinators under the Digital Services Act](#).” On this day, the European Commission [opened infringement procedures](#) by sending letters of formal notice to those member states. Also, there has not been any public discussion on implementing the DSA and the Code of Practice in Estonia.

### 3.3. LITHUANIA

The Communications Regulatory Authority is Lithuania’s national coordinator for the [Digital Services Act](#). However, no information from 2024 has been posted or updated.

[Debunk EU](#), an independent think tank and a nongovernmental organization dedicated to researching disinformation and implementing educational media literacy initiatives, is a signatory of the Code of Practice on Disinformation.

## 4. NON-GOVERNMENTAL OR EXTRA-GOVERNMENTAL INTERVENTIONS

Various non-governmental entities have participated in discussions about developing the contemporary information environment. These issues are examined in scientific studies, commentaries, public debates, and other forms of knowledge sharing. Even though many useful and influential materials exist and their insights are being transmitted over national borders, this report is specifically interested in the output that originates from the Baltic countries. Hence, this section shows what aspects related to regulating the media, combatting disinformation, and developing fact-checking are covered by institutions and individuals based in the region.

One document worth mentioning is the research [article](#) “Countering Russian Information Influence in the Baltic States” by the journalist and researcher Johannes Voltri. It examines how Latvia, Lithuania, and Estonia are responding to information influence operations by Russia and focuses on strategic communication, media literacy education, and state regulation, including media policy in these countries. A key difference among the countries is their varied position of the state toward media regulation and the role of the state in shaping the national media environment. Unlike Latvia and Lithuania, Estonia currently does not have a media policy through which the state can support journalism. At the same time, Estonian public media focuses more on addressing Russian-speaking audiences. The article emphasizes the need for government institutions to publish assessments of the information environment, which helps to raise awareness among the population about threats. The article also advocates adding more media literacy aspects to school curricula, including media analysis skills and knowledge about artificial intelligence and algorithms.

Similar issues are examined in the [report](#) “Resilience Against Disinformation: A New Baltic Way to Follow?” by the Estonian International Center for Defense and Security examines the experiences and capabilities of the Baltic countries concerning the fight against disinformation of foreign origin. The study points out that one of the sources of resilience in the Baltic states is historical experience dealing with aggressive foreign influence, especially Russia. It emphasizes the role of formal and informal education in strengthening resilience and the media.

Fact-checking is described in one of the Rīga-based NATO Strategic Communications Center of Excellence [reports](#). The document “Fact-checking and Debunking: A Best Practice Guide to Dealing with Disinformation” provides an overview of how fact-checking and debunking take place in the contemporary media environment and emphasizes the wide range of actors—from governments to mass media to non-profit organizations to philanthropists—that are known to employ these approaches. It also included a list of recommendations to make fact-checking endeavors more effective, among which one of arguably the most important is that “debunking is not a standalone solution,” and combating false information also requires respective legislation as well as deterrence and resilience-building activities. The document includes an overview of resources for information verification and analysis.

The experiences of Baltic journalists are analyzed in the study “[Disputes over Access](#),” which explores the mechanisms that enable journalists to access information in the Baltic states. The study found that differences exist in the Baltic countries regarding the availability of information to journalists. The information access mechanism in Estonia was deemed the most efficient, and it is based on the availability of a simple and accessible appeals procedure. In Lithuania, this procedure was considerably more arduous. At the same time, the holders of information (officials from whom journalists need to acquire it) in all Baltic states tend to misinterpret and miscommunicate their obligation to disclose information. This results in a situation in which various state institutions or institutions funded by the government use the same regulation on information disclosure but make different judgments about whether the information may be disclosed. The document suggests that improved legislation, more precise definitions of journalistic activities, and more understandable procedures for accessing information could significantly help journalists and support tackling disinformation.

## 4.1. LATVIA

### On developing laws against disinformation

In 2021, law expert Emīls Jonins analyzed the [issues surrounding the fight against disinformation in Latvia](#). He highlighted the risks associated with ill-advised and excessive efforts to limit disinformation through legal regulation (amendments to the laws). He advocated for alternative means of reducing the amount of misleading information, such as supporting journalism and media literacy.

Jonins noted that there have been calls to amend the laws to specifically target disinformation in Latvia. However, the author argued that the European Court of Human Rights has defined only specific types of information that are not protected within the international principles of freedom of speech. These are calls to violence, hate speech, and discrimination, as well as Holocaust denial. The dissemination of false, misleading, or distorted information is not outside the speech that is protected under the International Covenant on Civil and Political Rights nor the European Convention for the Protection of Human Rights and Fundamental Freedoms. Furthermore, in 2017, a [Joint declaration](#) on freedom of expression and “fake news,” disinformation, and propaganda was signed by the representatives of international organizations. Among other things, the document stressed that “the human right to impart information and ideas is not limited to “correct” statements, that the right also protects information and ideas that may shock, offend and disturb, and that prohibitions on disinformation may violate international human rights standards, while, at the same time, this does not justify the dissemination of knowingly or recklessly false statements by official or state actors.”

Based on these observations, Jonins states that any attempts to limit the dissemination of false information must correspond with the criteria established by the Latvian and international courts and other institutions. Namely, attempts to restrict the dissemination of disinformation need to be written in the law, necessary, and proportionate. Then, he proceeds to demonstrate how the currently widely accepted definitions of disinformation, which attempt to cover the wide spectrum of problematic information, are too broad and vague to be written into law directly. Otherwise, these might not be effective or may end up being abused to persecute the wrong targets, such as journalists who make honest mistakes. The situation is not helped by the fact that no clear distinction between disinformation and misinformation exists in the Latvian language. (The policy documents cited above translate misinformation as “misleading information,” which is not a very precise term in itself.) Jonins also warned about the risks that may arise when state institutions are given the power to define the truth. Citing the report by the UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, the author reminded of the various examples where “disinformation laws” have enabled the states to punish people for political agitation or expression of unpopular, controversial or minority opinions. It could only be permissible to target the dissemination of disinformation (that is, intentionally false information), but in practice, proving the intention could be challenging, he argues.

“Thus, it can be concluded that it is difficult to include the concept of disinformation in normative legal acts not only because this concept itself is complicated and difficult to define but also because the normatization of this concept is inevitably related to the use of broad and open legal concepts, which in turn give executive powers too wide a discretion to determine what true and false statements, as well as punishable and non-punishable



statements are,” he writes. “Excessive restrictions on the dissemination of false, misleading, or distorted information will have a chilling effect on freedom of expression, forcing individuals, including journalists, to refrain from expressing critical views or spreading shocking, sometimes erroneous, information because of fear of possible penalty for publishing opinions and other information that public authorities or influential persons do not like.”

Ultimately, Jonins points to the document by the European Commission, “[Tackling online disinformation: a European approach](#),” to advocate for a fight against disinformation that does not involve the creation of new legal norms and instead works to improve the transparency of information with respect of its origins and dissemination; promote the diversity of quality information available to citizens; foster the credibility of information by attaching information by trusted flaggers that indicate its trustworthiness; and work on long-term and inclusive solutions that raise the public awareness and media literacy by involving many stakeholders, including public authorities, online platforms, journalists, trusted flaggers, and others. In Jonins’ opinion, the Latvian authorities and/or respective institutions to date have not sufficiently effectively used all internationally recognized means of combatting disinformation, and we should start with these.

## Experience of Latvians with fact-checking

In 2022, the Latvian Media Ethics Council [commissioned](#) a study about the experience of the Latvian public with fact-checking journalism.

According to the results, 39% of the respondents had noticed fact-checking publications in the media, 47% said that they had not seen these, and 14% found it hard to answer this question. Of those who had noticed fact-checking publications, about 85% said that these publications are useful. The results thus offer a conflicting perspective. On the one hand, even though disinformation is recognized as a problem in the public agenda and fact-checking is being done by prominent media organizations, many people are unfamiliar with this genre. One of the challenges of fact-checking is to reach those who have been exposed to or believed in the refuted information. Still, the results indicate that the problem with reaching the audience might be even more significant. It is possible, though, that some people have encountered fact-checking materials but are unaware that this is a particular journalism genre. On the other hand, the positive evaluation among those who are aware of fact-checking somewhat diminishes the concern that fact-checking backfires because people do not want to be told that what they believe in is not true. Fact-checkers are known to encounter hostility among those who are being fact-checked, and the high visibility of the hostility might create an impression that a large part of the audience rejects such interventions. The results of the Ethics Council study suggest that most of their actual audience appreciates their work.

## Research on disinformation

Researchers also have contributed to the examination of various aspects of disinformation. For example, researchers from the University of Latvia have completed the [project](#) “Jeopardizing Democracy through Disinformation and Conspiracies: Reconsidering Experience of Latvia (2020—2022).” The researchers examined the role of disinformation

and conspiracy theories in the Latvian information space and their impact on people's lives in both the totalitarian era under the Soviet occupation in the 20th century and the period after Latvia regained independence and assessed the risks posed by disinformation and conspiracy theories on contemporary democracy and its values.

In 2020, The Global Disinformation Index and Center for East European Policy Studies published [a report on the disinformation risks](#) in Latvian media. The report interpreted such risks broadly, seeing them as resulting from the lack of completeness of information that the media report and share, including about themselves. Based on the analysis of 23 Latvian and Russian language online media outlets, the researchers noted that the analyzed media generally performed very well or poorly concerning disinformation risks. (They did not investigate the cases of actual disinformation per se.) The risks were generally low when it comes to content reliability indicators. Among the problems were the absence of author bylines, the use of emotional tone, and/or bias in the publications of some of the sampled outlets. Few sites openly communicate their principles of operational and editorial integrity, including the corrections policy and statements of editorial independence. Funding transparency is another area that was deemed to require improvement. It must be emphasized, though, that the online information environment has changed significantly since the report was published, and some of the sites included in the list of media no longer exist or are blocked in Latvia.

### Protection of journalists

The work of journalists is crucial in the fight against disinformation, but their work is not universally lauded in society. Many journalists [experience](#) verbal attacks (the problems in Latvia are not that much different from those in many other European countries, but that is not much of a consolation). The situation became particularly hard during the Covid-19 pandemic, when journalists, [and fact-checkers in particular](#), experienced many attacks from those who questioned the necessity of measures to limit the spread of the virus and saw journalists as accessories to governmental policies they disapproved of. The police have been criticized for not treating threats against journalists as severe enough.

In 2021, Latvian lawyer [Andris Tauriņš explained](#) that a police investigator with hundreds of other cases in his file sees dealing with a situation that does not involve a dead body or a stolen car as an unnecessary chore. Threats are not taken seriously as long as "nothing has happened." Tauriņš also noted that law articles regarding defamation, hate speech, threats, and harassment can be applied in situations where journalists are targeted. Still, as emphasized by Tauriņš, this requires creativity and willingness to interpret the laws accordingly. Too often, the actual legal practice puts the attacker, rather than the journalist, in an advantageous position, and many cases are dropped by the investigators. One of the few cases that has ended up in court saw the conviction of a harasser who had to [serve time in jail](#). In 2020, Latvian organizations for journalism professionals signed a [memorandum of cooperation with the Latvian police](#) to ensure the flow of information in cases where a journalist has received threats related to professional activity. The good news is that politicians and policymakers are increasingly recognizing the problem, and one can hope that more resources will be allocated to help the police tackle such crimes.

Another issue concerns SLAPPs (strategic lawsuits against public participation). In recent years, stakeholders in Latvia have become more aware of this problem, the essence of which is that journalists can be silenced by many unfounded lawsuits and other legal troubles. In

2023, the Latvian Media Ethics Council organized [a seminar and discussion](#) about SLAPPs.

## Media literacy research

[The 2021 report](#) by the Baltic Center of Media Excellence co-developed the media literacy sector mapping Georgia, Latvia, Moldova, and Ukraine. The report on Latvia notes, among other things, the “securitization of media literacy” (p. 5). Media literacy and critical thinking appear in the expert discourse on societal and informational resilience, hybrid threats, and other contexts. The authors of the report note that general awareness of the importance of media literacy exists, but an overarching strategy related to media literacy development was missing in Latvia. Cross-sectoral cooperation related to media literacy could be improved; sustainability and funding problems exist. Ongoing research on media literacy and improved assessment of media literacy levels are needed.

## 4.2. ESTONIA

### Calls for more fact-checking

The Estonian Debating Society, which is dedicated to fair, honest, and open public (online) debate, has repeatedly emphasized the need [for more fact-checkers](#). Debating Society has been one of the pioneers in promoting fact-checking practices in Estonia. It is challenging to find Estonian fact-checking materials or initiatives that have not stemmed from the Debating Society’s work. Besides publishing independent fact-checking materials and guidelines on the society’s [website](#), the organization has also partnered with numerous organizations nationwide. Praxis, a joint [project](#) with a center for policy studies, and collaboration with the news outlet Delfi to raise [awareness about fact-checking](#) Delfi are some worth mentioning.

The (former) leading figures of the Estonian Debating Society are among those fact-checkers who have faced hostility for their work. They have been regularly bashed by an Estonian conservative online portal, [Objektiiv](#), an outlet that aligns itself with the views of the Estonian conservative party EKRE.

### The issues with fact-checking

Although fact-checkers do essential work in limiting the spread of disinformation, media [scholar](#) and journalist Marju Himma [advises caution](#) with how fact-checking is being carried out by the media. She notes that fact-checking often brings to public attention harmful or false information that would otherwise have gone unnoticed by many people. Fact-checkers can inadvertently expose more people to such information. Hence, this genre of journalism in its current form may actually be dangerous. Himma believes that journalists should more thoroughly check the information *before* it gets published in their media outlets, rather than bring false information to the attention of the public.

### Access of information

Fact-checkers’ ability to examine information largely depends on the availability of reliable and trustworthy information. In this regard, the Estonian [report](#) on the usability of public data

(*Avaliku teabe kasutamise võimalused*) is important. It highlights the following hindrances ([Pild, Turk, Kose & Lehemets, 2022: 44](#)): public requests for large volumes of data require significant manual labor, sometimes judged as non-viable and leading to the refusal of such requests; the sheer volume of requests can overwhelm institutions, causing delays in response times; technical difficulties with the need to secure data exchange; requirements to maintain privacy and follow legal restrictions on information accessibility; lack of standardized internal procedures for state institutions for releasing public information; extensive labor for following the requirements to protect sensitive data, further complicating the accessibility of fact-checking materials.

### Media literacy research

The Estonia-based International Center for Defense and Security, in cooperation with the Baltic Center for Media Excellence, has tested a [methodology](#) for media literacy mapping. Overall, the media literacy discourse rarely moves away from [security concerns](#) and challenges. While the evaluated effective risk of disinformation has been average in Estonia, ominous disinformation challenges are [constantly in the background](#), and the number of channels disseminating it has been relatively high. However, with newer restrictions on malicious actors after the widespread sanctions against Russian influence channels, the number of effective channels ought to have lowered.

Think-tank NGOs, occasionally (co)funded by the EU institutions, seem to be at the forefront of [monitoring and reporting](#) the ongoing information influence. This speaks volumes of the civil democratic societies' approach to regulating information space—the clear division of power in state-funded (taxpayer-funded), but civil society's (e.g., NGOs, universities) led initiatives with an [emphasis on quality journalism](#). The EU does not control fact-checking practices, but it funds research into best practices and thus directly supports [countering disinformation at local and regional levels](#).

### Research on SLAPPs

SLAPPs (Strategic Lawsuits Against Public Participation) are an abuse of the legal system and a threat to democracy as they attempt to intimidate and silence public watchdogs like journalists, activists, and whistleblowers. According to a [report](#), SLAPPs are an increasing problem in Europe. None of the countries in the EU have established regulations that would help limit SLAPPs. A 2024 bachelor's thesis defended at Tallinn University on SLAPPs has highlighted the cases of two Estonian journalists who were alleged to have made an incorrect statement in their investigative journalistic TV show.

## 4.3. LITHUANIA

Besides legally binding and non-binding policies and regulations, there are various other levels in which stakeholders may participate in shaping the understanding of disinformation and the information space, which might also help fact-checkers.

A notable example is DIGIRES, the Baltic Research Foundation for Digital Resilience. According to the [published report in 2022](#), it becomes necessary to turn digital (media and information) literacy, as well as source verification acts and fact-checking, into long-term competencies so that knowledge and practical doings become a sustainable, democratic,

resilience-oriented, and mutually empowering force that provides a decisive response to manipulations and attacks on human rights and democracy. DIGIRES facilitates the collaboration of different stakeholders involved in building digital resilience, especially fact-checkers, which are few in Lithuania and need greater support and a more extensive network with other experts and stakeholders.

Several other Lithuanian non-governmental organizations aim to foster digital resilience. One such example is the [Civic Resilience Initiative](#), which works in the fields of security, media literacy, disinformation, cyber, civil, and grassroots activities, empowering civil societies to actively engage in educational activities themselves. Some of its media literacy [training materials](#) encourage the practice of fact-checking not only for the broader audience but also for regional journalists and schools. [Debunk EU](#) is a nongovernmental organization dedicated to researching disinformation and implementing educational media literacy initiatives. It also exists as a platform for the community of independent and volunteer citizen fact-checkers and online activists called “elves.” The Community brings together experts in different areas, including but not limited to foreign affairs, security, information technology, cyber, environment, and economics. The elves may react proactively or reactively according to the circumstances. They are active individually and in a community that is well organized on social media. They often debunk disinformation narratives on Facebook and report and expose trolls (accounts that spread disinformation on social media).

## **5. ETHICAL AND PROFESSIONAL (SELF)REGULATION**

Self-regulation plays a vital part in maintaining professional standards in journalism. This section reviews how journalism, including fact-checking, is being regulated from within the industry. The description of the internal regulation of fact-checking is based on publicly available articles published by media organizations and interviews with fact-checkers conducted within other research activities by BECID.

A number of the Baltic fact-checking organizations are members of the International [Fact-checking Network](#) (IFCN) or the [European Fact-checking Standards Network](#) (EFCSN). These organizations are guided by the requirements they must fulfill to qualify for membership.

The main principles that the media participating in these networks need to fulfill are as follows:

- Non-partisanship and impartiality
- Transparency of sources
- Transparency of funding
- Organizational transparency
- Transparency of methodology
- Transparent and honest corrections policy

In many cases, these are not different from general ethical standards. Still, since participating organizations must undergo vetting to be admitted to the network or renew their membership, they must explicitly demonstrate their compliance with the principles of the standards



organization.

## 5.1. LATVIA

### 5.1.1. CODES OF ETHICS

In Latvia, two professional organizations of journalists exist: the Latvian Union of Journalists and the Latvian Association of Journalists. Both have their own code of ethics. The Latvian Association of Journalists is more active—it occasionally receives complaints about alleged ethical violations of its members, evaluates the cases, and communicates the results to the public. Thus, this demonstrates that the organization has the mechanisms that are needed to make the code of ethics a functional part of professional regulation.

The codes of ethics of these two organizations share some of the principles. For example, both codes agree that the main task of a journalist is to provide the public with true and verified information. They both emphasize the need for objectivity and clarity in reporting and the obligation of journalists to examine the information acquired from their sources. The differences also can be observed. For example, [the code by the Latvian Association of Journalists](#) is much more detailed concerning the things a journalist must not do to prevent the violation of his or her independence (for example, journalists must not accept benefits from parties other than their employer, they must not simultaneously work in advertising and PR or be engaged with organizations that may interfere with their ability to fulfill their professional duties). In addition, the code contains a section that explains the principles that should inform professional relationships among journalists and describes the mechanism of how the code of ethics is being enforced.

In 2019, the Latvian Media Ethics Council was created. It was one of the results of the Latvian media policy. Currently the council has 47 member organizations, representing most of the players in the Latvian mass media field. One aspect that sets it apart from the previously mentioned professional organizations is that the Media Ethics Council issues opinions and evaluates cases about the work of any entity in Latvia rather than individual journalists who are members of the Latvian Association of Journalists and the Latvian Union of Journalists, respectively. The organization regularly receives complaints from the public, evaluates them, and publishes findings. In addition, it also proactively deals with topicalities in the Latvian media environment, such as comments on various issues and commissions studies on topics about which it aims to promote public discussions.

The Media Ethics Council has its own [Code of Ethics](#). It defines the values the document defends (including freedom of speech, the diversity of information and opinions, editorial independence, honesty (objectivity), human rights, equality, education of the audience, and trust between the media and the audience). Furthermore, it describes the main principles of media ethics: honesty, diversity, prohibition of discrimination and the incitement of hate, separation of facts and opinions, separation of editorial and advertising content, the collection and use of information (checking the facts and authenticity, and critical attitude toward the source), respect, confidentiality, observing copyrights, disclosing conflicts of interest, and transparency.

To date, the Media Ethics Council has evaluated two complaints about Re:Baltica, which is one of the leading fact-checking organizations in Latvia. [One complaint](#) was submitted by a

person whose statements had been fact-checked, and [the other one](#)—by the director of a public institution and the spouse of a politician, who was one of the subjects of a fact-checking [article](#). The article suggested that the politician has a conflict of interest due to his support for a legislative initiative aiming to allocate public funds for an activity carried out by the said institution. In the first case, in which Re:Baltica concluded that the president of the Latvian Merchants' Association had disseminated false information, the Media Ethics Council unanimously sided with Re:Baltica. In the second case, the council was divided. Some members supported the position of Re:Baltica, while others concluded that the principle of honesty, which prohibits the publication of false, distorted, or misleading information, has been violated.

### 5.1.2. FACT-CHECKING REGULATION WITHIN MEDIA ORGANIZATIONS

In its more tangible form, fact-checking is regulated within the media organizations conducting it. Media outlets that are part of the IFCN (Delfi and Re:Baltica) or EFCSN (Re:Baltica) are required to communicate their principles to the public.

Media organizations that are members of international fact-checking networks are obliged to publish guidelines that explain how they work. Thus, Re:Baltica, which is a member of both networks, [has explained](#) that they check statements from various organizations and posts on social networking sites. The fact-checkers only select statements that are fact-based claims rather than opinions. The checked fact ultimately is given one of the five marks: true, close to truth, half-truth, rather false, not true at all, and lacks context. Journalists in most cases attempt to contact the person whose statements are fact-checked. After the publication, that person also has a right to file a complaint, and the case is reviewed by two Re:Baltica journalists who are not fact-checkers on a daily basis.

Delfi, which is a member of the IFCN, provides [fewer details](#) about how it selects and verifies information. However, it explains that in its fact-checking, the media outlet pays attention to posts that have attracted a large audience on social media. Furthermore, it also describes the fact-checking work they do for Facebook.

Another Latvian media organization that has publicly explained its fact-checking operations is [TVnet](#). It states that statements by politicians, propagandists, and disinformators are being refuted, and myths are being busted. The selection process is described, too. TVnet selects statements that are about current and topical issues. Furthermore, it considers the audience the statement in question has the potential to amass on social media. Furthermore, only fact-based statements are being examined, rather than opinions. Statements are checked by consulting the data, studies, and information published by “trustworthy institutions.” In cases where fact-checkers are not able to independently establish whether a statement is true or not, they turn to experts. Fact-checkers also contact the person who has made the claim that is being verified to give an opportunity to explain it.

### 5.1.3. UNWRITTEN REGULATION WITHIN NEWSROOMS

Eight Latvian fact-checkers were interviewed as part of fact-checker research within BECID. They mainly represented mass media outlets, but a representative of an NGO that carries

out disinformation analysis was also included.

Apart from organizations that are part of IFCN/EFCSN or want to join these networks, the fact-checking rules tend not to be explicitly documented within the organizations. (Furthermore, even the fact that an organization is a member of such a network is not always perceived as tangibly shaping the conduct of a fact-checker because what these codes state is mostly in line with the regular journalistic practice they would have followed anyway.)

Within the editorial offices, fact-checking work has a strong collaborative dimension. Fact-checkers discuss among themselves and their superiors (editors) what claims to fact-check; they discuss how to approach the case, and before publication, the editor checks the article. This means that fact-checking practices reflect a broader newsroom-level understanding rather than individual reasoning.

Furthermore, fact-checkers, especially when they start working, consult the output of other organizations, which may influence the approaches they develop. In a small country like Latvia, they likely know their colleagues from other media outlets and occasionally meet each other at various events. However, Latvian fact-checkers rarely, if ever, reach out to their colleagues and ask for input when working on a publication.

Fact-checkers see countering disinformation and educating society as the primary purposes of their work. However, different fact-checkers put different emphasis, for example:

- (1) To counteract the misleading information that is being spread in vast amounts. [...] To require politicians to be accountable for what they say.
- (2) Fact-checking is one of the ways how journalism protects democracy.
- (3) We study Russian disinformation campaigns and aim to show that disinformation does not emerge just because someone in Russia is bored. [...] This information comes from a state with an aggressive agenda and is being systematically produced.
- (4) To dispel delusions. [...] Any delusions. [...] And to explain processes. So that a person can evaluate and see better for himself or herself.

Fact-checkers choose the claims to evaluate according to their media outlet's editorial interests and specialization. Most of the interviewed fact-checkers represent “general purpose” media interested in evaluating claims by prominent public figures or authors of popular social media posts. However, some have a specific focus on Russian disinformation that targets Latvia. There are no strict rules about the exact qualities that the potentially checkable claim must have. In the case of social media, fact-checkers evaluate the engagement statistics. The process involves the application of editorial judgment about the noteworthiness, novelty, and potential harm of the claim in question.

- (1) I consider how important [the claim] is at the moment. I have had dilemmas regarding how many likes are enough. Latvia is comparatively small, so if something has been watched by a couple of thousand people on Telegram, then this counts. On Twitter, I usually pick something up if there is a discussion about it or if it comes through multiple channels.

(2) We don't have concrete criteria; this is a work process. There is no strict scheme for how we work. [...] Every case is considered separately. And there are red flags to which we must react. [In the editorial office] we consult among ourselves whether it is worth writing about; maybe we have already covered this two times—do we really need to report for the third time that Russia has once again claimed that [Latvian] ports have gone bankrupt, or the sprats' factories have been closed down?

Fact-checkers say that the most trustworthy sources are statistical databases, scientific studies, and other hard evidence from reputable organizations. Fact-checkers tend to believe the official sources, although many do recognize situations where such sources may be an interested party and present things in a way that is beneficial to them. However, such information may not be available for many of the claims they deal with. Thus, they need to include more interpretive sources, such as experts or representatives of various institutions, and execute their professional judgment about what they say. One of the interviewees put it as follows:

I have a feeling about a person based on how he or she argues and whether he or she is capable of leaving aside the previously prepared text and speaking about another aspect. Or whether one merely retells a learned text and uses empty phrases. Those who understand [what they are talking about] speak more freely, and you feel that there is a thought in there.

One source that could be included in fact-checking publications is the author of the original claim so that he or she can explain and justify their position. The fact-checking networks explicitly require that members offer the subjects of their work the right to reply, but this is not always feasible in practice. Some of the usual publishers of false claims do not want to talk to journalists; if they do, they tend to be aggressive and unwilling to engage in dialogue. If fact-checkers learn that some of these sources are unwilling to talk to them (for example, block their phone numbers), they stop asking for their opinion. Fact-checkers who examine Russian propaganda for obvious reasons are unable or unwilling to contact those who produce such messages.

## 5.2. ESTONIA

### 5.2.1. CODES OF ETHICS

In Estonia, two self-regulatory bodies exist. The first, the Council for Freedom of Expression (CFE), was established in 1991 and includes publishers, broadcasters, consumer organizations, and journalists. The second, the Estonian Press Council (EPC), was formed in 2001 by the Estonian Newspaper Association (today's Media Alliance of Estonia) after disputes within CFE, and it is funded by this association. The EPC is a more influential organization that, with few significant exceptions, represents all private media in Estonia. It is also a member of News Media Europe and WAN-IFRA.

The [code of ethics](#) of EPC is a written set of moral and social principles established in an organization meant for the Estonian press. The principles were set by the Estonian Press Council, a voluntary body of media self-regulation that handles complaints from the public

about material in the media. The Council itself was set up in 2001 by the Estonian Newspaper Association.

According to the principles of the Estonian Press Council, the news editor checks, especially in the case of a critical publication, the truth of the information and the reliability of the sources. Even if the author of the material to be published/transmitted is not an employee of the editorial office, the editorial office must verify the contents of the material. The Council meets once a month to discuss complaints about material that has appeared in the press and provides the public with a possibility to find solutions to disagreements with the media (i.e., journalists and media organizations) without the need to go to court. The Council is a member of AIPCE (Alliance of Independent Press Councils of Europe).

The International Federation of Journalists' Global Journalists' [Ethics Charter](#), followed by the Estonian Association of Journalists, focuses on the responsibilities of a journalist, which also include fact-checking and source-checking. Similarly to the CFE, it is not so well known among the public. Also, the Estonian Association of Journalists is the only non-governmental organization of its kind in Estonia.

### 5.2.2. FACT-CHECKING REGULATION WITHIN MEDIA ORGANIZATIONS

Although not created directly by either of the self-regulating bodies for journalism, the [guide](#) "Of the Rights and Responsibilities of the Journalist: A Compact Legal Familiarization Guide for Estonian Journalists, talks about legal and professional principles that govern journalism. It understands disinformation as "information that is wrong or misleading." The source also highlights the role of a contemporary journalist who "acts as a filter and human firewall in respect to all kinds of "who knows where this came from" broken and occasionally malicious information, and sometimes even in respect to the disinformation circulating "out there"." Also, it highlights the task of the media: "the presentation of checked and verified facts."

Estonian newspaper "Postimees" explains the principles [of its fact-checking](#) to the public. An interviewee has confirmed that news outlets might have a fact-checking section describing their main principles and why the fact-checkers do what they do. The fact-checkers also aim to follow these principles, which helps them contribute to society by informing people what information is correct.

### 5.2.3. UNWRITTEN REGULATION WITHIN NEWSROOMS

During interviews with Estonian fact-checkers as part of BECID research, they shared their thoughts on the role and purpose of fact-checking and their experiences with the fact-checking process. Their personal and professional experiences, skills, and value judgments have also helped to shape the unwritten rules in newsrooms to a certain extent.

Firstly, one interviewee mentioned that their organization aims to give readers a blueprint for checking facts or thinking critically. Their work involves identifying which statements can be subject to verification and which cannot.



If there is a claim, we check its justification; on the basis of the why and how questions, we will also look at the proof that has been presented - we are trying to give a very clear model that people can use later.

The fact-checkers believe that their goal is to show readers certain skills and also bring to their attention the falsity of public statements. They also highlighted the need for international fact-checkers' guidelines as there was no good standard for determining what constitutes a good fact check or which requirements a good fact check should meet.

Such guidelines do exist in the form of IFCN and EFCSN standards. One of the interviewees had helped to write their organization's guidelines, which are inspired by the IFCN and EFCSN codes.

Still, the IFCN and EFCSN standards alone might not be sufficient because fact-checking, like journalism in general, has a strong local and regional dimension that reflects specific traditions and needs. One of the interviewees stressed the need to develop internal standards for fact-checking newsrooms to understand better, identify, and counter Russian propaganda.

## 5.3. LITHUANIA

### 5.3.1. CODES OF ETHICS

Journalists, including professional fact-checkers, adhere to the [Code of Ethics of Lithuanian Journalists](#). The Code outlines the fundamental principles and standards that journalists and publishers in Lithuania are expected to adhere to. The Code focuses on the production and dissemination of information. Journalists and producers of public information must be critical of their sources of information, check their facts carefully and diligently, and rely on multiple sources. While the Code does not highlight misinformation or other manipulation of information, it does outline the basic principles that journalists must follow, such as objectivity, integrity, and honesty.

The [Association of Public Information Ethics](#) ensures compliance with the norms of professional ethics, upholds the principles of ethics in public information activities, and raises public awareness in the context of assessing public information processes. Additionally, the Office of the [Inspector of Journalist Ethics](#) exists. Its strategic goal is the “protection of human rights in the media.” The inspector's primary responsibilities include making sure that public information respects people's rights and freedoms, fostering civil society and a critical approach to public information processes, increasing public awareness of human rights and the law, as well as fostering enduring relationships between the public and those who produce and disseminate public information.

### 5.3.2. FACT-CHECKING REGULATION WITHIN MEDIA ORGANIZATIONS

Lithuanian fact-checking initiatives that are a part of the IFCN ([Delfi Melo detektorius](#), [LRT faktai](#), [Patrikrinta 15 min](#)) network adhere to International Fact-Checking Network principles and codes of conduct. In 2024, [Delfi became the first Lithuanian member](#) of EFCSN.

Each newsroom in Lithuania that conducts fact-checking operations also has defined its fact-checking principles. The fact-checkers at Delfi [describe](#) the fact-checking process as follows: “We carefully analyze the public statements of Lithuanian politicians and experts to make sure that they are correct. Every day, we clean the internet of false comments, maintaining the highest standards of investigative journalism.”

News media outlet 15min [defines](#) their fact-checking mission as follows: “Experienced journalists of 15min, based on publicly available information, evaluate whether correct information is distributed on social networks and elsewhere on the Internet, or whether politicians, public figures, other famous persons publish the truth.”

The fact-checking project of the Lithuanian national broadcaster “LRT Faktai” undertakes to disclose impartially and comprehensively if misleading or false information is disseminated publicly. [LRT Faktai](#) states that its staff “do not check opinions, forecasts and obviously correct statements.”

### 5.3.3. UNWRITTEN REGULATION WITHIN NEWSROOMS

The interviews conducted with Lithuanian fact-checkers during BECID research emphasize that every news media outlet has its ethical guidelines and journalistic codes—they all share the principles of truth-seeking, fact-checking, searching for verified information, and providing the readers with meaningful information.

[Adherence to codes of conduct ensures transparency, integrity, and an orderly, standardized fact-checking process for the organization or fact-checkers. It also defines the investigative process and the sources to be used.](#)

Readers are encouraged to send suspicious information so that fact-checkers can verify it. In the same way, all colleagues know that they can suggest topics and alert fact-checkers to suspicious messages that may have been received by their relatives, friends, or acquaintances. After receiving the tips, it is decided whether the information is verifiable and worth verifying and making it public. The editor might comment that a lot has already been done on this topic, so they need to see if there is anything new. The editor might check the articles, sources, and arrangement of arguments. If something is missing, it needs to be supplemented, replaced, etc. Communication, collaboration, and consultation take place, but the main work is primarily done independently.

The main principle that fact-checkers follow is that there must be more than three sources, and there cannot be any emotion or conflict of interest. The article must follow a particular structure. Project methodologies specify which statements can be verified and which can not, and how the articles should be written. Most importantly, The IFCN is the primary code of rules that fact-checkers in Lithuania follow. Other sets of rules are secondary.

[\(1\) The IFCN is the primary code of rules that fact-checkers in Lithuania follow. Other sets of rules are secondary.](#)

[\(2\) The Code of Ethics for Journalists, the Law on Public Information, and on top of all](#)

that, which is already elementary, I would never work in something where there is a conflict of interest on one side or the other.

## 6. CONCLUSIONS

This report has reviewed a wide range of documents related to disinformation and media governance, from laws and policies to reports and opinions to the professional principles and internal rules of the newsrooms. The extent to which these various types of input shape the actual practice of fact-checkers varies greatly. In some instances, state laws may restrict what a journalist can do, but they also may grant journalists privileges that facilitate their work. Similarly, the states may develop a media policy that supports journalism, which could benefit fact-checkers, too.

The perception of the dangers of disinformation and the prominent place this issue has on the political agenda also indirectly shapes fact-checking. The review of the policy documents from the Baltic states shows that media literacy and access to trustworthy information are seen as key mechanisms through which societal resilience against disinformation can be increased. Fact-checking journalism is associated with these mechanisms. On the one hand, fact-checking demonstrates how information can be verified and warns about falsehoods that the public may encounter in the media. On the other hand, fact-checking produces trustworthy and verified content, which typically is available to the public without charge. Thus, the attention state authorities pay to disinformation and the measures they take against it may create opportunities for fact-checking organizations.

Scientific studies, reports from think tanks, and opinion pieces arguably have a less tangible influence on fact-checkers' work. However, these inputs have the potential to shape the public discourse and, by extension, the perceptions and practices of journalists and fact-checkers.

Fact-checking is also regulated from within. First, fact-checking as a genre of journalism is subject to ethical self-regulation mechanisms. Second, several Baltic fact-checking organizations are members of international networks that have their own rules and standards with which they must comply. Lastly, newsroom-level regulations and routines also develop, which likely reflects the influences of all other regulatory levels described in this report.

## APPENDIX

Table 1. The comparison of documents related to fact-checking practices in the Baltic States

Legal regulation on a national level: Laws		
Estonia	Latvia	Lithuania
	<p><u><a href="#">Criminal law</a></u> liability for:</p> <ul style="list-style-type: none"> <li>• deep fakes in elections</li> <li>• hooliganism</li> <li>• defamation</li> <li>• justifying crimes</li> <li>• hate speech</li> <li>• inciting hatred</li> </ul>	<p><u><a href="#">Criminal Code</a></u> liability for:</p> <p>organized disinformation; troll farms hate speech false reports inciting panic</p>
<p><u><a href="#">Penal Code</a></u> (disturbance of public order)</p>	<p><u><a href="#">Law on Administrative Penalties for Offences in the Field of Administration, Public Order, and Use of the Official Language</a></u> (disturbance of public order)</p>	
<p><u><a href="#">Public Health Act</a></u> (liability for harmful disinformation)</p>		
	<p><u><a href="#">Law on the Press and other Mass Media</a></u> (obstruction of journalism)</p>	<p><u><a href="#">Law on Administrative Penalties</a></u> (obstruction of journalism)</p>
	<p><u><a href="#">Law on the Press and other Mass Media</a></u>, definition of a journalist (incl. info access)</p> <p><u><a href="#">The Electronic Mass Media Law</a></u> (requirement that broadcast media are objective, neutral, accurate, etc.)</p>	<p><u><a href="#">Law on the Provision of Information to the Public</a></u></p> <p>(definition of a journalist; describes the obligations of journalists)</p>
	<p><u><a href="#">The Electronic Mass Media Law</a></u></p> <p><u><a href="#">Electronic Communications Act</a></u> (restricting certain media content)</p>	<p><u><a href="#">Law on the Provision of Information to the Public</a></u></p> <p>(defines disinformation; prohibits the dissemination of disinformation and other types of information)</p>

<a href="#"><u>Public Information Act</u></a> <i>(classifies specific data; governing access to and dissemination of public information)</i>	<a href="#"><u>The Freedom of Information Act</u></a> <i>(regulates information access)</i>	
<a href="#"><u>The Personal Data Protection Act</u></a> <i>(journalistic exceptions for disclosure)</i>	<a href="#"><u>The Law on the Processing of Personal Data</u></a> <i>(journalistic exemptions for processing data)</i>	<a href="#"><u>The Personal Data Act</u></a> <i>(the procedure for the investigation by the Inspector of Journalists' Ethics of breaches of legislation on the protection of personal data)</i>
<a href="#"><u>Advertising Act</u></a> <i>(prohibits misleading advertising)</i>	<a href="#"><u>The Law on Advertising</u></a> <i>(prohibits misleading advertising)</i>	<a href="#"><u>Law on Advertising</u></a> <i>(prohibits misleading advertising)</i>
<a href="#"><u>Restriction of Unfair Competition and Protection of Business Secrets Act</u></a> <i>(prohibits dissemination of misleading information)</i>	<a href="#"><u>Law on Prohibition of Unfair Commercial Practices</u></a> <i>(prohibits misleading commercial content)</i>	
<b>Legal regulation on a national level: Policy documents</b>		
<b>Estonia</b>	<b>Latvia</b>	<b>Lithuania</b>
<a href="#"><u>National Development Plan 2035</u></a> <i>(highlights false information security threat)</i>	<a href="#"><u>National Development Plan 2021-2027</u></a> <i>(strengthening national information resilience)</i>	<a href="#"><u>Lietuva 2030—The Strategy for Progress in Lithuania</u></a>  <i>(vibrant public space, responsible media, media literacy)</i>
		<a href="#"><u>The Strategic Directions for Development Cooperation</u></a>  <i>(emphasizes strengthening national information resilience)</i>



<p><b><u>National Defense Development Plan 2022-2031</u></b> 2022-2031 (<i>emphasizes strengthening national information resilience</i>)</p>	<p><b><u>National Security Concept</u></b> (<i>emphasizes strengthening national information resilience</i>)</p>	<p><b><u>National Security Strategy</u></b> (<i>emphasizes professional journalism/strengthening national information resilience</i>)</p>
	<p><b><u>Conceptual Report on the National Strategic Communication and Security of the Information Space 2023-2027</u></b> (<i>Promotes security in the information space. Emphasizes, among other things, quality journalism; provides misinformation definitions; safety of journalists</i>)</p>	
	<p><b><u>National Strategy for the Development of the Electronic Media Industry 2023-2027</u></b>  (<i>Incl. defended and strong information space; emphasis on media literacy; disinformation definitions</i>)</p>	
	<p><b><u>Media Policy Guidelines</u></b> (<i>defining media policy directions, incl. improving media literacy, quality journalism</i>)</p>	
	<p><b>The Declaration of the current Latvian government</b> (<i>among the priorities: societal resilience against disinfo; strategic role of the media</i>)</p>	<p><b>The program of the current Lithuanian government</b>  (<i>among the priorities: countering information threats; promoting a resilient society; free media, and secure internet; emphasizes information hazards/journalists' safety</i>)</p>

**Legally non-binding documents by official institutions: Government communications**

Estonia	Latvia	Lithuania
<p><a href="#">The Estonian Governmental Communication Handbook</a></p> <p><i>(responsibility of government employees to help limit the spread of false information; differentiation between proper journalism and other content)</i></p>	<p><a href="#">Handbook against disinformation: Recognize and fight back</a> <i>(emphasizes information hazards; focus on propaganda; counter-measures; includes definitions of false information)</i></p>	
<p><b>Guide to dealing with information attacks</b></p> <p><i>(overview of disinformation, information attacks, and how to respond)</i></p>		
	<p><b>Communication project “Melns uz balta”</b> “Black on white” <i>(informs the society about disinformation; promotes media literacy)</i></p>	
<b>Legally non-binding documents by official institutions: Communications by other official institutions</b>		
Estonia	Latvia	Lithuania
<p>Fact-checking <a href="#">blog post</a> by the National Elections Committee <i>(official website; blogpost)</i></p>	<p><a href="#">Chairmanship of the Council of Europe’s Committee of Ministers</a> <i>(prioritizing freedom of expression/safety of journalists)</i></p>	
<p><a href="#">Science communication strategy 2020–2035 „Estonia knows“</a> by the Estonian Research Council <i>(strategy document; measures against false news)</i></p>	<p><a href="#">Latvian foreign policy</a> <i>(prioritizing media freedom/safety of journalists/fight against disinformation)</i></p>	
	<p><a href="#">Memorandum of cooperation</a> with the Latvian police signed by Latvian organizations for journalism professionals <i>(ensuring information flow; protection of journalists)</i></p>	
<b>Non-governmental interventions (opinions, commentaries, scientific findings, etc.)</b>		
Estonia	Latvia	Lithuania
<p><a href="#">Disinformation and Civil Society Mapping Report: Baltic Region</a>, September 2023.</p>		

Report “ <a href="#">Disputes over Access</a> ” about journalists' access to information ( <i>compares the experiences of journalists with using data access mechanisms</i> )		
“ <a href="#">Countering Russian Information Influence In The Baltic States: A Comparison Of Approaches Adopted In Estonia, Latvia, And Lithuania</a> ” ( <i>compares policies of the Baltic states, scientific study</i> )		
Report “ <a href="#">Resilience Against Disinformation October 2022 A New Baltic Way to Follow?</a> ” ( <i>highlights challenges/current situation</i> )		
<b>V.D.D: Report</b> on main trends and legal developments at national level on <b>disinformation and national policies during the electoral campaigns / Policies to tackle disinformation in EU member states—part 2</b> ( <i>EDMO report; highlights disinformation challenges</i> )		
<a href="#">Fact-checking And Debunking A Best Practice Guide To Dealing With Disinformation</a> by the NATO Strategic Communications CoE (description of the phenomena; governmental perspective; <i>strategy guidelines</i> )		
<a href="#">The Media and Entertainment Law Review</a> , ed. Benjamin E. Marks (2020). Ch 4 Estonia, Mihkel Miidla and Kirsi Johanna Koistinen	<a href="#">The Media and Entertainment Law Review</a> , ed. Benjamin E. Marks (2020). Ch 8 Latvia, Gunvaldis Leitens and Andris Tauriņš	<a href="#">The Media and Entertainment Law Review</a> , ed. Benjamin E. Marks (2020). Ch 4 Lithuania, Stasys Drazdauskas and Paulius Mockevičius
Debating Society’s <a href="#">calls for more fact-checkers</a> ( <i>outreach</i> )	<b>Legal analysis</b> of the <a href="#">issues surrounding the fight against disinformation</a> ( <i>highlights risks of limiting disinformation through legal regulation; advocates for supporting journalism/media literacy</i> )	
<b>Report</b> on the usability of <b>public data</b> ( <i>highlights challenges; study results</i> )	<b>Study</b> of the <b>experience of the Latvian public</b> with fact-checking journalism ( <i>study results; exposes challenges</i> )	
<b>Research article</b> “ <a href="#">Debunking False Information: Investigating Journalists’ Fact-Checking Skills</a> ” ( <i>scientific study</i> )	<b>Scientific project</b> “Jeopardizing Democracy through Disinformation and Conspiracies: Reconsidering Experience of Latvia 2020–2022” ( <i>scientific study</i> )	
<b>Report</b> “ <a href="#">Media literacy sector mapping: Estonia country report</a> ” ( <i>highlights challenges/solutions; study results</i> )		
<b>Report</b> “ <a href="#">Media Market Risk Ratings: Estonia</a> ” ( <i>evaluates select media outlets for completeness of information</i> )	<b>Report</b> “ <a href="#">Media Market Risk Ratings: Latvia</a> ” ( <i>evaluates select media outlets for completeness of information</i> )	

<p><a href="#">Report</a> on the January 2018 Joint EFJ-ECPMF Mission to Tallinn and Vilnius by the European Center for Press and Media Freedom (<i>mission report; state of journalism</i>)</p>		<p><a href="#">Report</a> on the January 2018 Joint EFJ-ECPMF Mission to Tallinn and Vilnius by the European Center for Press and Media Freedom (<i>mission report; state of journalism</i>)</p>
<p><a href="#">Report</a> on the NATO Parliamentary Assembly Mission to Tallinn by the Committee on Democracy and Security (<i>mission report; combatting disinformation; strategy descriptions</i>)</p>		
<p><a href="#">Handbook</a> “Developing a handbook on good practice in countering disinformation at local and regional level” by the European Committee of the Regions (<i>describes the example of Estonia; guidelines</i>)</p>		
<p><b>Gencs Valters</b> Law Firm, <a href="#">Media, Advertising &amp; Entertainment Contracts in Estonia</a></p>		
<p><a href="#">Report</a> on the main trends and legal developments at the national level on disinformation and national policies during the electoral campaigns by the EDMO (<i>highlights disinformation challenges</i>)</p>		
<p><a href="#">Guide</a> “Of the Rights and Responsibilities of the Journalist: A Compact Legal Familiarization Guide for Estonian Journalists (<i>guidelines</i>)</p>	<p><a href="#">Handbook</a> “Rokasgrāmata žurnālistiem Īsi par mediju likumiem (Handbook for journalists: A short overview about the media laws)”</p>	<p><a href="#">Guide</a> “Legal guide for journalists”</p>
<b>Ethical and professional (self)regulation: Codes of Ethics</b>		
<b>Estonia</b>	<b>Latvia</b>	<b>Lithuania</b>
<p>The <a href="#">International Federation of Journalists' Global Journalists' Ethics Charter</a>, followed by the <b>Estonian Association of Journalists</b></p>	<p><b>The Latvian Association of Journalists</b> (<a href="#">code of ethics</a>)</p> <p><b>The Latvian Union of Journalists</b> (<a href="#">code of ethics</a>)</p>	<p>Union of Lithuanian Journalists (<a href="#">code of ethics</a>)</p>

<p><b>The Estonian Press Council</b> (<a href="#">code of ethics</a>)</p>	<p><b>The Media Ethics Council</b> (<a href="#">code of ethics</a>)</p>	
<p><b>Ethical and professional (self)regulation: Fact-checking regulation within the media</b></p>		
<p><b>Estonia</b></p>	<p><b>Latvia</b></p>	<p><b>Lithuania</b></p>
<p><a href="#">Propastop</a> (explanation of fact-checking)</p>	<p>Re:Baltica <a href="#">procedures/principles</a> of fact-checking (<i>member of IFCN/EFCSN; explanation of fact-checking</i>)</p>	<p><a href="#">Patikrinta 15 min</a>: fact-checkers part of IFCN (website; disclaimer)</p>
<p><a href="#">Delfi</a> (<i>member of IFCN; explanation of fact-checking</i>)</p>	<p><a href="#">Delfi</a> (<i>member of IFCN; explanation of fact-checking</i>)</p>	<p><a href="#">Delfi</a> (<i>member of IFCN; explanation of fact-checking</i>)</p>
<p>Newspaper "<a href="#">Postimees</a>" (<i>explanation of fact-checking</i>)</p>	<p><a href="#">Tvnet</a> (<i>explanation of fact-checking</i>)</p>	<p>LRT faktai by the <a href="#">Lithuanian National Radio and Television (LRT)</a> (<i>explanation of fact-checking</i>)</p>