



Baltic Engagement
Centre for Combating
Information Disorders

COLLABORATIVE BALTIC POLICY MONITORING FRAMEWORK

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INTRODUCTION

The Baltic region faces a unique constellation of risks, including linguistic fragmentation, geopolitical vulnerabilities, and a high reliance on digital platforms. The DSA introduces obligations for Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) to mitigate systemic risks and provide transparency. The CoPD (Code of Practice on Disinformation, a cornerstone of the DSA as of summer 2025) complements these obligations with commitments on ad transparency, algorithmic accountability, and cooperation with fact-checkers.

However, [EDMO's 2025 report on implementing the Code of Practice](#) underscores persistent gaps: platforms often fail to provide granular data, ad repositories lack functionality, and commitments on researcher access remain aspirational. [The EDMO DSA Data Access Pilot in 2024](#) further revealed that data provision processes are as critical as the data itself, requiring governance frameworks and secure processing environments.

Against this backdrop, the Baltic collaboration framework aims to:

- Establish a monitoring structure for assessing compliance with DSA and CoPD obligations.
- Avoid duplication of efforts across Estonia, Latvia, and Lithuania.
- Integrate EDMO structural indicators into Baltic-level reporting for comparability and interoperability with EDMO's Policy Research and Analysis Working Group.
- Strengthen stakeholder collaboration among national authorities, DSCs, and BECID.
- Support joint investigations conducted by EDMO EUI once their hub is operational again with input.
- Provide actionable insights for national Digital Services Coordinators (DSCs) and civil society actors.

The foundation of this framework is based on EDMO's structural indicators and service-level commitments, as outlined in its reports on the Code of Practice and the DSA Data Access Pilot. The framework is not a static blueprint but a living instrument, evolving through feedback loops and harmonised with EDMO's EU-wide methodologies.

As the EDMO structural indicators suggest, effective monitoring requires a dual lens: measuring what platforms do (investments, enforcement actions) and assessing the impact of those actions (prevalence of disinformation, audience exposure, and demonetization).

GOVERNANCE STRUCTURE

The governance model mirrors EDMO's pilot approach for Article 40 compliance, with UTARTU as the lead coordinator, representatives from Estonia, Latvia, and Lithuania from BECID's side + DSA coordinators from each country. Let us dub them the **Baltic Policy Monitoring Working Group**.

This group shall convene every quarter, usually, and on an ad hoc basis for elections and crisis response (T6.2). It shall also include EDMO liaisons when conducting pan-European joint investigations (T6.3). The working group will report back at Quarterly Steering Committee meetings and include written reports in the Quarterly Briefs.

Such a governance structure ensures **horizontal collaboration across the Baltics and vertical alignment with EU-level initiatives**, which in addition to the DSA and CoPD also include the policy instruments laid out by the Audiovisual Media Services Directive, the Digital Markets Act, the European Media Freedom Act and the AI Act, and of course, all the methodological groundwork laid out by the EDMO network as a whole.

But why?

The reason for establishing such a Working Group stems from the two meetings with the National Authorities of the three Baltic states that we had during BECID1, as well as the meeting with the National Regulator and DSA Coordinator in Estonia (TTJA) in September 2025.

The needs we have seen overlap between the DSA Coordinator and BECID are:

- testing new tools to support the semi-automation of some work processes related to compliance, and
- supporting more collaboration between the 3B when it comes to monitoring platform compliance, which is especially relevant as several projects funded by VLSE-s or VLOP-s are from one organisation that claims to cover all of the Baltics, but might only be active and known in one country, for example.

METHODOLOGY

The framework draws heavily on EDMO's approach to systematic monitoring under the DSA and the Code of Practice on Disinformation. As the EDMO structural indicators say, data collection must be **multi-layered and standardised** to ensure comparability across platforms and regions. This involves:

Data Sources	Data Collection Tools	Analysis Framework
- Platform Transparency Reports. - Meta Ad Library and Google Ads repositories (baseline: EDMO Electoral Advertising Analysis). - National regulator reports and civil society audits. - Networking events of the 3B DSA Coordinators and stakeholders conducted under T6.2.	- Joint survey instrument development in collaboration with the EDMO Policy WG. - API-based data extraction for structural indicators. - New AI or verification tools discovered, screened and tested for possible adoption under T3.3. - Evaluation templates for new tools developed under D3.2.	- Qualitative assessments (policy gaps and systematic risk mitigation strategies effectiveness of collaboration, governance quality and compliance). - Quantitative metrics (prevalence of disinformation/reach, engagement, ad transparency, investment into CoPD, enforcement rates for removal, labelling, demotion).

Additionally, comparative benchmarking will be used on EDMO's EU-wide datasets to identify regional deviations and best practices. Structural indicators will be monitored over time to assess trends in compliance and effectiveness, which will inform annual reports and joint investigations.

MONITORING PILLARS

A. STRUCTURAL INDICATORS (BASELINE: EDMO STRUCTURAL INDICATORS REPORTS)

When and if Suitable: Prevalence of Disinformation	<i>Share of disinformation content in random samples of public posts, weighted by views.</i> <i>Enforcement metrics: removal, labelling, demotion actions.</i>
Sources of Disinformation	- Characteristics of originating sources and superspreaders (reach, engagement, network size). - Detection of coordinated inauthentic behaviour.
Audience Exposure and Engagement	- Aggregated socio-demographic profiles of audiences exposed to or engaging with disinformation (based on work of FC-ers of BECID and the EDMO network). - Comparative analysis with audiences of trusted news brands.
Demonetisation of Disinformation	- Share of monetised disinformation content and associated revenues. - Assessment of platform measures to demonetise harmful actors.

Collaboration and Investment in Fact-Checking	• Funding flows and partnerships with fact-checking organisations. • Reach and engagement with fact-checked content.
Investments in Code Implementation	• Financial and human resources allocated by platforms to meet commitments under the Code.

B. SERVICE-LEVEL INDICATORS (BASELINE: EDMO CODE OF PRACTICE REPORT)

Monitor compliance with CoPD commitments on:	• Data Access for Researchers (Commitment 26). • Governance for Sensitive Data (Commitment 27). • Cooperation with Fact-Checkers (Commitments 30–32).
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DATA ACCESS AND RESEARCH

Monitoring compliance with the DSA and the Code of Practice on Disinformation is not just about collecting public-facing metrics; it hinges on deep access to platform data for vetted researchers. Without this, systemic risk assessments remain superficial, and policy enforcement lacks a solid evidence base. EDMO's DSA Data Access Pilot makes this clear: data provision processes are as critical as the data itself. In other words, transparency is not a gift, but it is an infrastructure. Drawing on lessons from the EDMO DSA Data Access Pilot, the framework mandates:

- Map out the current state of play when it comes to the Baltic states by drawing up country profiles on the DSA and CoPD based on the same questionnaire as has been used by other countries in the EDMO network to verify whether any researchers in the Baltics enjoy data access and how the Article 40 process to get there.
- Test new tools for data access within the EDMO network and further as a part of T3.3 and D3.2.
- Support the EDMO network's long-term objective of advocating for independent, transparent, GDPR-compliant centralised interfaces, and to avoid platform-controlled "black boxes".
- Publish all reports and conclusions publicly, as well as deliver findings directly to stakeholder events and meetings as keynote speakers.

The operational vagueness in this section is due to EDMO EUI and several other EDMO hubs being on break between the second and third phases of funding. This allows us an additional six months from the publication of this framework to develop an operational plan, identify key personnel, and establish deadlines once the pan-EDMO collaboration commences.

EVALUATION AND IMPROVEMENT

A monitoring framework without evaluation is like a compass without calibration: it points somewhere, but you cannot trust the direction it provides. Evaluation ensures that the framework not only collects data but also translates it into actionable insights, and that its own processes remain fit for purpose as the regulatory and technological landscape evolves.

Continuous improvement within the Baltic Policy Monitoring Framework is conceived as a dynamic cycle. **After each reporting period, the framework enters a reflective phase**, during which partners critically examine the performance of indicators and methodologies. This is not a perfunctory review, but a deliberate recalibration: which indicators truly capture the complexity of platform behaviour, and which fall short? This feedback is essential for the shared structural indicators with all of the other EDMO hubs.

Adaptation is **reinforced through benchmarking against EDMO's evolving standards**. As EDMO refines its structural and service-level indicators, the Baltic framework integrates these updates to maintain methodological harmony with EU-wide practices.

Capacity building forms another pillar of improvement. Regular training sessions by EDMO and the EC for the BECID team and Digital Services Coordinators keep stakeholders informed about new analytical tools, secure data handling protocols, and the latest interpretations of DSA obligations.

Finally, **transparency** underpins the entire process. Methodological updates and revised indicators are published openly, inviting scrutiny and fostering trust among stakeholders. In this way, continuous improvement becomes a living principle rather than a static appendix at the end of a report.

VISUAL SUMMARY

