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A shield against democracy

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How the Democracy Shield protects the EU from the electorate

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Executive Summary

The EU's proposed Democracy Shield, announced by Commission President Ursula von der Leyen in July 2024 and scheduled for implementation in late 2025, is presented as a defensive structure against 'foreign information manipulation and interference' (FIMI), disinformation and AI-driven election risks.

In reality, the Shield does not represent the defence of democracy, but its curation and containment. It is less a bulwark against hostile foreign actors than a fortress shielding the unelected European Commission from domestic dissent and political accountability.

At its core, the Democracy Shield institutionalises an Orwellian inversion of key democratic concepts. Terms like 'independence', 'pluralism', 'trust' and 'resilience' are stripped of their meaning and redeployed to justify censorship. 'Fact-checkers' and 'trusted flaggers', presented as neutral arbiters, are in fact EU-financed and politically aligned actors who, in the guise of countering FIMI and disinformation, police the boundaries of acceptable speech. The Commission has funded 45 such projects – involving hundreds of NGOs, universities and other organisations – to the tune of €101,803,847.

The Democracy Shield is better understood as a vertically integrated disinformation regime: a 'censorship operating system' that filters what Europeans can see, say and hear.

The Commission's claim that AI-driven disinformation poses an unprecedented threat to elections is asserted rather than proved. By exaggerating these dangers, the Commission shifts attention away from the real source

of instability: the growing domestic challenge posed by populist parties and widespread scepticism of EU authority. The FIMI narrative functions to securitise pluralism itself, casting dissent as an imported virus rather than a legitimate expression of the demos.

This securitisation has spawned an ecosystem of EU-funded NGOs, fact-checking consortia and trusted flaggers. Far from being independent, these bodies are structurally dependent on EU financing. From the European Digital Media Observatory (EDMO) to the European Fact-Checking Standards Network (EFCSN), the EU is financing unaccountable watchdogs of 'information integrity', acting as outsourced arms of Brussels's narrative control.

Even more troubling are the 'trusted flaggers' empowered under the Digital Services Act (DSA) to demand takedowns and downranking of online content. Thirteen of the 37 officially designated organisations – over one-third – have received over €8.7million in EU funding. Many of these 'independent', 'expert' organisations are engaged in ideological youth programming. Their dual role as educators and enforcers represents a profound conflict of interest: those teaching young Europeans what to think are also authorised to censor dissenting thought.

The most authoritarian development is the rise of prebunking: the use of predictive AI and educational interventions to inoculate citizens against narratives before they even surface. Projects like EFCSN's 'Prebunking at Scale', funded by Google, aim to create 'just in time' responses to anticipated dissent. This is predictive censorship dressed up as resilience, turning political disagreement into a pathology to be pre-emptively neutralised. It is not education but indoctrination, targeted at Europe's youth.

The recent elections in Romania, Moldova and Czechia demonstrate the Democracy Shield in practice. A centrally coordinated censorship

architecture that treats citizens as risks to be managed, rather than people to be represented, was calibrated in Romania, deployed in Moldova, and given a trial-run in Czechia – and is now ready to be tightened and repeated wherever the vote threatens the line. These recent examples clearly demonstrate that the Democracy Shield is not a defensive umbrella but an operating system for electoral-outcome control.

The Democracy Shield is a democratic deepfake. Instead of empowering citizens, it empowers technocrats; instead of fostering pluralism, it criminalises it. By outsourcing authority to NGOs and trusted flaggers financed by the Commission, the EU transforms dissent into disinformation and pluralism into polarisation. This is not democracy defended but democracy deflected, in order to shield the European elite from European electorates.

Introduction

This report focuses on the EU's proposed Democracy Shield: a bunker designed to insulate the Commission from the pluralism it purports to uphold. Presented as a shield against disinformation, it is a narrative chamber where uncomfortable truths and popular dissent that challenge technocratic legitimacy and authority are treated as incoming ballistic threats. By treating nonconformity, dissent and legitimate political polarisation as security threats, the EU has transformed pluralism into a vulnerability to be quarantined.

Our analysis finds that the Democracy Shield is not being put in place to protect European democracy, but rather to shield the Commission from democratic oversight and the popular will. It is a fortress to insulate the technocrats from the people and contain them as a contagion infecting the body politic.

The report is structured as follows.

- Part 1, *What is the Democracy Shield?*, presents a systematic overview of this still-emerging combination of new policies, rebadged existing initiatives and strengthened ongoing programmes.
- Part 2, *Who does the Shielding?*, focuses on the 'fact-checking' NGOs and the 'trusted flaggers' – the 'expert' organisations designated by EU Member State Digital Services Co-ordinators (DSCs)[1] under the Digital Services Act[2] – who have the power to demand the removal of online content or downranked algorithmically by social-media platforms. The

funding and content of the projects in which these 'shielders' are involved reveal an alarming truth: that they are far from independent, or benign, responsible civic-society watchdogs, but the Commission's attack dogs, armed to the teeth to enforce the Commission's anti-democratic narrative. Many police speech while being involved in projects aimed at young Europeans to educate them in the Commission's 'European values', resulting in a remarkable conflict of interest at the heart of the enforcement regime envisaged under the Democracy Shield.

- Part 3, *Who is being Shielded?*, shows that this conflict of interest is not a bug or oversight but represents the essence of the Democracy Shield. The role of the European Parliamentary Special Committee on the European Democracy Shield is highlighted as a particularly pernicious legitimising shield behind which the Commission is hiding the anti-democratic nature of the initiative.
- Part 4, *Democracy Shielding in practice*, shows how recent developments in Romania, Moldova and Czechia reveal worrying implications for elections across Europe.

Our analysis concludes that the main danger to the future of democracy in Europe derives less from foreign manipulators than from an unelected and unaccountable technocratic elite, working with and through an EU-financed network of non-governmental organisations (NGOs), to shield itself from the European demos. The Commission is attempting to resolve its legitimacy crisis by interfering with the core principles of democracy itself.

1 What is the Democracy Shield?

The European Democracy Shield is a new initiative introduced by the European Union to contain what it presents as growing threats to democracy across Europe.

It was first formally proposed by European Commission President Ursula von der Leyen on 18 July 2024, during a speech to the European Parliament, as part of her bid for a second term.[3] Claiming democracy to be 'our common treasure … the forum in which differences and disagreements can be voiced', she warned that democracy is fragile and should not be taken for granted. Hostile foreign powers – in particular Russian and Chinese state or proxy entities – have allegedly conducted hybrid attacks and disinformation campaigns to undermine Europe's democratic institutions and practices. Warning that the EU should not be 'democrats of comfort', von der Leyen proposed the Democracy Shield with a 'dedicated structure' as the antidote to foreign information manipulation and interference (FIMI) and disinformation.

The Democracy Shield should not be regarded merely as a rhetorical election slogan. Rather, it has become an important organising principle for the Commission, which will shape the EU and its institutions for the future.[4]

A 'dedicated structure' to counter FIMI and disinformation represents an 'all of society' approach, which 'joins the dots' between existing initiatives such as the European Democracy Action Plan (EDAP) of 2020[5] and the Defence of Democracy Package launched in late 2023.[6] The Democracy Shield will build on the European Media Freedom Act (2024) and the anti-SLAPP ('strategic lawsuits against public participation') directives –

that is, against strategic lawsuits that harass journalists[7] – which form part of the defence of an 'independent and pluralistic media landscape'. To enforce this, 'transparency and accountability' rules on digital 'gatekeeper' platforms – under the Digital Services Act and Digital Markets Act (both 2022) and including the powers of the Artificial Intelligence Act (2024) – will be strengthened to curb the spread of disinformation.[8] This involves promoting media literacy and 'prebunking' so that citizens can better recognise and resist false information.

Together with a considerable number of funded programmes that deal with FIMI and disinformation, examined in detail below, this represents the systematic mobilisation of the private sector (notably tech and social-media companies), independent regulators, academia, NGOs and citizens to play a role in reinforcing 'democratic resilience'. The Democracy Shield aims to bring coherence to what has been, until now, a disparate effort to control the political narrative.

The 'dedicated structure' is well underway. A special Commissioners' Project Group on Democracy has been established.[9] Chaired by Commissioner Michael McGrath, who holds the new portfolio for Democracy, Justice, Rule of Law and Consumer Protection,[10] the group will work in tandem with several other Commissioners. These include Henna Virkkunen – the executive vice-president for tech sovereignty, security and democracy, who oversees all digital platform regulation and anti-disinformation efforts – and Commissioner Kaja Kallas – the high representative for foreign affairs with responsibility for the Shield's external dimension, such as developing sanctions against 'hybrid threat actors' and strengthening EU-NATO cooperation on cyber and information security. The European Parliament has set up a Special Committee on the European Democracy Shield to

propose tangible solutions to strengthen EU resilience to 'hybrid threats' and to assess existing and planned EU laws.[11]

A shield against democracy

The Democracy Shield can be summarised as the European Union's new doctrine for responding to what it defines as growing threats to democracy. It consolidates existing measures while extending the EU's reach into multiple policy domains. Framed as a 'comprehensive, future-oriented' response to FIMI, hybrid attacks and disinformation, the Shield is intended to harden both institutions and societies against perceived disruption.

The initiative touches almost every area of EU governance. Its main pillars can be summarised as follows:

- Purpose and framing: The Shield is presented as a response to escalating external threats, justifying a broad and permanent set of instruments at EU level.
- New EU structure: A proposed 'independent' body would coordinate member states, the Commission and the European External Action Service (EEAS), evolving into a centre of excellence with common standards, interoperable tools and single national contact points.
- Digital regulation and enforcement: The Digital Services Act, Political Advertising Regulation, AI Act and the forthcoming Digital Fairness Act are positioned as the legislative backbone. Enforcement against major platforms such as TikTok and Telegram is emphasised, alongside a drive for 'digital sovereignty' through EU-based data infrastructure and even a potential EU social platform.
- Media and fact-checking: The Shield incorporates the European Media Freedom Act, anti-SLAPP rules, and media literacy funding. It formalises

networks such as the EDMO and the EFCSN, embedding them in DSA risk assessments and providing long-term financing.

- Civil society strategy: A European Civil Society Strategy is expected in 2025, linked to the Shield. This prioritises sustained financing and philanthropy for civil-society organisations (CSOs), while introducing transparency rules for foreign-linked NGOs – though formally resisting overt 'stigmatisation'.
- Cyber and critical infrastructure: Existing instruments (NIS2, Cyber Resilience and Cyber Solidarity Acts, ENISA, FDI screening) are folded into the Shield, with pressure on member states to accelerate transposition and implementation.
- Justice and Home Affairs: Proposals include extending Europol and Eurojust mandates to cover hybrid threats and FIMI, and enhancing Frontex's role in countering the 'instrumentalisation of migration'.
- External action: The Shield extends beyond EU borders, encompassing candidate countries, neighbourhood policy, EUvsDisinfo, and multilateral cooperation with NATO, G7 and the UN.
- Elections: The European Cooperation Network on Elections (ECNE) would be reinforced, digital election infrastructure designated 'essential', and measures against foreign funding and extremist party financing pursued.
- Sanctions and criminal law: The EU is urged to adopt a more offensive sanctions posture, including secondary sanctions, and to consider EU-level criminalisation of interference offences under Article 83(1) TFEU.
- Preparedness doctrine: A 'whole-of-society' model is envisaged, including apps, booklets and training, with resilience embedded across policy and deterrence anchored in Article 42(7) TEU.

The Democracy Shield represents both continuity and escalation. Existing structures are reinforced, but new enforcement powers are envisaged, particularly through the formalisation of fact-checking networks and the enhanced role of civil-society actors. While the institutional form matters, the real substance lies in the content of these projects – from prebunking campaigns to youth-focused initiatives – which reveal that the Shield is less a neutral defence of democracy than an attempt to insulate the Commission and its integrationist agenda from democratic challenge.

The foreign interference (FIMI) and disinformation narratives

The Democracy Shield is designed to 'protect' against two major 'threats' with which European elites have become obsessed. The first is the spectre of foreign interference, and the second is disinformation. These two narratives have become the major organising principles of von der Leyen's Democracy Shield Commission.

The roots of the FIMI and disinformation narratives can be traced back to 2014, following Russia's aggression in Ukraine, which prompted EU leaders to set up the East StratCom Task Force.[12] This established EUvsDisinfo in 2015 as part of the EU's diplomatic service: a flagship project that aimed to 'increase public awareness and understanding of the Kremlin's disinformation operations, and to help citizens in Europe and beyond develop resistance to digital information and media manipulation'.[13] However, after Brexit and the election of Donald Trump in 2016, this narrative rapidly morphed into one that lumped together external and internal 'threats' to the status quo.

A good example is the European Democracy Action Plan (EDAP) of 2020, which warned that democracy could not 'be taken for granted' and needed to be 'actively nurtured and defended'. It then noted that in recent times, while there was 'a resurgence of popular political engagement and

increased turnout in elections', democracy in the EU and member states was facing challenges from 'rising extremism and polarisation, as well as a perceived distance between people and their elected representatives'.[14] Shorn of the EU's newspeak, the focus of EDAP was the rise of populism.[15]

The conflation of 'rising extremism and polarisation' with foreign manipulation and intervention merged into a narrative that effectively securitised pluralism. By conflating dissent, protest and even scepticism with hostile foreign manipulation, legitimate political grievances were increasingly recast as primarily the product of Russian or Chinese propaganda, rather than as a genuine response to EU policies, laws and lived experiences. This has enabled the Commission to neutralise political opposition administratively rather than engage with it politically. The narrative delegitimises dissent, indeed pluralism itself, ensuring that democracy is hollowed out into a mono-political charade.

Protecting elections from the electorate

The Democracy Shield is presented as an initiative that embodies civic and democratic virtues and responsibilities. However, its claimed purpose – to protect elections from disinformation, AI manipulation and foreign exploitation of dissent and political polarisation – contains two disingenuous ruses.

The first is the assertion, rather than a proven claim, that AI-generated deepfakes and external information manipulation pose an unprecedented threat to electoral integrity. Analyses of deepfakes suggest that they have not had the impact that many observers anticipated. An article in *Time* magazine examining 'AI's underwhelming impact on the 2024 elections' suggested that 'many deepfakes reinforced rather than shaped the opinions of people who were already predisposed to believe their messaging'.[16] This even holds for Slovakia, which has been cited as the leading example of the dangers of AI deepfakes after a deepfake audio recording, which claimed to

be of Russian origin and targeted Michal Šimečka, leader of the pro-Western Progressive Slovakia party, went viral two days before the vote. Yet according to research, this 'did not decide the election'.[17]

Other studies have debunked assertions of the impact of AI and digital advertising on elections.[18] The use of AI for tailored political messages also appears to be ineffective and counterproductive.[19] Alleging the overblown significance of AI appears to be a means of avoiding the Commission's real concern: that the dissent of which it is so afraid already exists at a deeper level among Europe's electorate.

The second ruse emphasises that the source of threats is exogenous, stemming from foreign intervention and manipulation, and acting to polarise and foster extremism. However, this securitisation of legitimate and healthy internal political dissent serves to shield from view the Commission's anxiety about the growing threat to its legitimacy and authority from the expanding appeal of populist political parties across Europe. The FIMI and disinformation narrative disguises the fact that the real target is the rise in domestic homegrown dissent and polarisation – both an expression of the pluralism the EU is supposed to champion.

The FIMI narrative enables the 'ever-vigilant' Commission to legitimise its expansive counter-disinformation operation as a benign surveillance scheme, which requires millions of euros to be spent on unelected and unaccountable NGOs to police the digital public square. On the Commission's website, which proudly boasts of its cooperation with 'fact-checkers, civil society, media and academia' to enforce the FIMI and disinformation narrative,[20] a link to its Funding and Tenders portal reveals the Commission to have funded 45 such projects to the tune of €101,803,847.[21]

Unsurprisingly, a key plank of the Democracy Shield announcement involved a call for proposals to strengthen a 'European network of fact-checkers' under the EU's Digital Europe Programme, with promised

funding of €5million. It aims to 'strengthen the capacity of the fact-checking community across Europe, with the aim of ensuring availability in all EU member states and official languages'.[22] This network, backed by officially recognised 'trusted flaggers' under the Digital Services Act, will build on the existing but disparate European Digital Media Observatory (EDMO) network and the European Fact-Checking Standards Network (EFCSN), expanding coverage and creating new tools such as a cross-border repository of fact-checks and a rapid response system for misinformation crises.
Von der Leyen has also tasked Commissioner Michael McGrath to 'step up engagement with civil society on democracy, rule of law and related issues' and to create a 'Civil Society Platform' to 'support more systematic civil dialogue and work to strengthen protection of civil society, activists and human-rights defenders in their work.'[23]

In our previous reports – *Controlling the Narrative: The EU's attack on online speech*[24] and *Manufacturing Misinformation: The EU-funded propaganda war against free speech*[25] – we showed how the fear of open and unpredictable debate among the EU's fragile technocratic oligarchy raises fundamental questions about its legitimacy and right to rule. This has led to the establishment of an unaccountable 'censorship operating system' to police free speech and control the political narrative.

The Democracy Shield is a new and portentous stage in the evolution of this censorious anti-democratic dynamic. It is the EU's 'Ministry of Truth' on steroids. It will strengthen and extend the unelected and unaccountable NGO-civil society ecosystem to police speech and enforce the political narrative of the unelected and unaccountable Commission – all done, in true Orwellian style, in the name of strengthening 'democratic resilience'.

2 Who is doing the Shielding?

This section of the report exposes how the Democracy Shield is designed to hand power to an enormously powerful network of NGOs, almost all of whom are funded with EU money. Aside from allowing the EU to involve some of the most ideologically driven groups in Europe, the involvement of these NGOs fulfils three functions: 1) allowing the EU to claim the democratic credentials of involving 'civil society'; 2) allowing the EU to draw on the supposed 'expertise' of media-savvy organisations in identifying, removing and challenging online content; 3) providing the means of embedding EU narratives directly in wider society, including in education.

First, we need to understand the bewildering array of speech-policing organisations that are becoming a central part of the Democracy Shield initiative, and how they have, from the very beginning, both influenced the direction of EU policy and conveniently gained responsibility for carrying it out.

The convergence of NGOs and EU elites

Momentum for the idea of a Democracy Shield has been building since 2016. What gave it its final shape was the formation in 2024 of a Democratic Shield Task Force by 10 NGOs and one academic institute 'to safeguard the upcoming European elections'.[26] Without a hint of irony or self-awareness, these unelected and unaccountable NGOs, who describe themselves as 'specialising in democracy and technology', tasked themselves with protecting democracy in Europe. Democracy was apparently facing 'unprecedented

threats from malicious influences and the sophisticated use of artificial intelligence and algorithms to spread disinformation'.[27]

In the aftermath of the European elections, which saw a considerable increase in the success of populist political parties, the Democratic Shield Task Force focused its efforts on setting the Commission's priorities for the 2024-2029 EU mandate. Von der Leyen's Democracy Shield was the outcome.

Both the Democratic Shield Task Force and the Democracy Shield are the product of the intimate, symbiotic relationship nurtured by the Commission between itself and its 'civil society' NGO sphere. The NGOs involved, particularly the self-appointed 'independent', 'fact-checkers' and the appointed trusted flaggers, provide a public cover for a powerful authoritarian and anti-democratic elitist technocracy intent on protecting their unaccountability from the popular will.

The next few sections unpick a number of NGO-driven and EU-funded initiatives which form the cornerstone of the EU's speech-control initiatives as part of the Democracy Shield. These cover:

1 Fact-checkers: The EU-funded organisations that determine what is deemed as true or false.
2 Prebunking: A new algorithmically-driven approach to fact-checking online content before it is even published.
3 Digital astroturfing: The EU-funded NGO networks that offer the imprimatur of public support for these speech-control activities.
4 Trusted flaggers: The NGOs empowered by the EU and member states to monitor and report online content.

2.1 Fact-checking the 'fact-checkers'

The most fantastic conceit of the EU-NGO complex, which itself amounts to a disinformation narrative, is the presentation of many of the NGOs as

'independent'. In practice, many are funded by the very institutions they claim to monitor, making them less watchdogs than lapdogs, acting as outsourced arms of the Commission while parading as neutral arbiters. They may be organisationally independent, but they are politically aligned and receive, in many cases, a significant bounty for their 'independence'.

The Commission is vocal about how important fact-checking is for the EU. 'Working with independent fact-checking organisations', states its website, 'is a crucial pillar of the EU's approach to information manipulation and foreign interference. Fact-checkers help assess and verify content to provide the public with independent, accurate and reliable information they can trust.'[28] The Commission proudly points to the European Digital Media Observatory (EDMO)[29] network and the European Fact-Checking Standards Network (EFCSN)[30] as proof of this commitment. Yet both these NGOs were initiated and funded by the Commission as 'independent' and reliable 'fact-checkers'.

The EDMO was initially launched in 2020 by the European University Institute, with an initial funding of €2.5million provided through the Commission's Connecting Europe Facility (CEF).[31] This was refinanced in 2022 under the Digital Europe Programme (DIGITAL) for €4million, and was further supplemented by €2.5million via DIGITAL in the 2025 Work Programme.[32] Its total budget, including regional and national hubs, is roughly €46.8million. During the 2024 EU Parliamentary Elections, the EDMO launched a media literacy campaign titled 'Be Elections Smart'[33] and, based on the results, established a dedicated task force to detect and warn about the spread of disinformation.

The EFCSN was launched in 2023, following a European Commission-funded project to write the European Code of Standards for

Independent Fact-Checking Organisations.[34] According to a briefing by the European Parliamentary Research Service (EPRS), the pilot/preparatory action under the EU's Communications Networks, Content and Technology programme, which was tasked with drafting the Code and launching the EFCSN, had a total budget of €900,000, with the Commission co-financing up to 75 per cent of the eligible costs.[35] Since then, the EFCSN has transformed itself into a membership organisation, which now comprises 61 fact-checking organisations from across Europe that pay membership fees. It also raises funds from external donors for specific projects.[36]

Although the EFCSN can claim some financial independence, it receives funds from the Commission through participation in EU projects. For example, one project recorded in 2024 on the EU Financial Transparency System, 'FactCRICIS – European Fact-Checking Response In Climate', shows that the EFCSN received €594,059, of which it spent €297,029.[37]

The EFCSN will coordinate the Fact-Checking Network being envisioned for the Democracy Shield. The proposed 'Framework Partnership with the European Fact-Checking Standards Network' has been registered on the EU Funding and Tenders Portal, although no funding has, at the time of writing, been specified.[38] The proposal trumpets the EFCSN's commitment to equity and transparency, virtues that 'directly contribute to the EU's vision of a resilient, informed and democratic society'. It 'ensures that the EFCSN and its members remain at the forefront of safeguarding information integrity and promoting democratic values in Europe'.[39]

When we look at some of the projects in which the EFCSN has been involved, some of which are still ongoing, we can readily understand just what is meant by 'safeguarding information integrity' and the promotion of 'democratic values in Europe'.

One project, mentioned above, is 'FactCRICIS: European Fact-Checking Response in Climate Crises'.[40] This aims to support fact-checkers in identifying and debunking disinformation campaigns related to climate change and other crises. In a similar manner to the prebunking project discussed below, the aim is to establish a comprehensive package of practical resources – combining cutting-edge AI tools with climate expertise – designed to enhance the preparedness of European fact-checkers to respond to climate disinformation within and across national borders.

This project transforms political disagreement about climate policy into a cognitive threat. It normalises the conflation of scientific consensus with political consensus, blurring the line between climate science and climate policy. The merging of AI surveillance with expert authority displaces democratic contestation with supranational technocratic coordination. Fact-checkers become de facto epistemic gatekeepers, insulated by EU funding.

All the projects that have been completed and are cited on EFCSN's website[41] follow the same pattern. These include 'Elections24Check' (supported by Google News) and 'AI@EUElections' (supported by Meta), which involved the training of 'fact-checkers' to spot AI-generated and digitally altered content and included a 'media literacy campaign to raise public awareness of how to spot this type of content'. Another initiative was a 'Fact-Checking Incubator',[42] which also provided networking opportunities to strengthen the 'cross-border connections between fact-checking organisations across Europe'.

As we see below, the technocratic arrogance represented by the EFCSN's self-styled position as gatekeeper to the truth is replicated in all the NGOs involved in the FIMI and disinformation narrative.

2.2 'Prebunking' – predictive censorship at scale

One remarkable ongoing project is titled 'Prebunking at Scale'.[43] This aims 'to enhance public resilience against dis- and misinformation by proactively addressing emerging false claims and narratives before they gain widespread traction'. By combining 'prebunking and debunking', the project develops 'a network-approved definition and methodology for prebunking, rooted in the experience of our journalists and fact-checkers and in academic research'. This will empower all the fact-checkers 'to produce highly effective prebunking materials adhering to industry-wide best practices', and entail an advanced, AI-powered, social and traditional media monitoring and analysis tool, which will 'predict in which language and about which topic misinformation *might* appear' (our emphasis).

Based on these predictive alerts, fact-checkers will be able to publish 'prebunking materials' just in time, before users are exposed to misinformation.

The goal here is to build an AI monitoring tool that serves as a predictive censorship engine of the digital public square so that when contested information appears, it is dismissed without evaluation. The reference to 'just in time' implies that speech should be treated like a manufacturing process, but which automates narrative control, providing a real-time response system: content moderation by anticipation.

It is notable that this project is funded by Google, one of the Big Tech platforms from which fact-checkers are supposed to be independent. The fact that Google, a distributor of information, is sponsoring a project to anticipate disinformation represents a profound conflict of interest that should be exposed.

Prebunking represents the prophylactic censorship of thought. It is a way to immunise society against dissent by seeding suspicion toward certain

narratives before they arise. If debunking is reactive fact-checking, prebunking is pre-emptive mind-framing.

The democratic implications are profound. Prebunking fundamentally erodes the principle of pluralism and the freedom of citizens to evaluate competing ideas and claims in an open marketplace of ideas. Contestation is transformed into a pathology, where demanding the right to question a prebunked narrative is seen as aligning oneself with disinformation. This entrenches the Commission as the sole epistemic authority, where the 'fact-checkers' of the EFCSN network, along with certain journalists and social-media platforms, collectively decide what is thinkable. Society is not only policed for what it says, but pre-policed for what it might say.

The prebunking initiatives resurrect the theory of psychological inoculation first developed by William J McGuire in the early 1960s as part of a pre-emptive propaganda war during the Cold War. McGuire borrowed the medical metaphor of vaccination: just as a weakened virus can trigger antibodies, exposing people to a 'weakened' form of an argument, and refuting it, could build 'resistance' to persuasion.[44] The use of AI to predict what narratives might emerge that need countering is an authoritarian ploy to immunise the electorate in advance. Prebunking is McGuire's inoculation theory in digital drag: an old Cold War persuasion tactic revived by EU-funded NGOs and tech companies to legitimise anticipatory censorship.

The metaphor of vaccination was used by Beth Goldberg, head of research at Google's internal Jigsaw unit, which is working with academics and civil-society organisations across the EU's 27 member states and funding the EFCSN's 'Prebunking at Scale' project. Prebunking 'works like a vaccine', she told *Time* magazine; it 'helps people to gain mental defences proactively'.[45] Concluding the article, the *Time* journalist notes that Google's prebunking campaign for the 2024 EU elections is its 'biggest and most

collaborative effort' to date, and that when 'hundreds of millions of voters go to the polls to elect what polls project could be the most far-right European Parliament today, the stakes couldn't be higher'.

This observation sums up the Democracy Shield's real intent: to shelter the Commission *from* the ideas and voices of 'hundreds of millions of voters'.

Predictably, the NGOs involved in these initiatives tout their expertise in using AI to control the narrative. The trusted flagger Debunk EU from Lithuania, and the projects in which it is involved, are particularly sinister. One, titled 'AI-CODE – AI services for COntinuous trust in emerging Digital Environments',[46] which began in 2023, focuses on governing speech at scale through the use of AI. The EU fully funds this for €4,969,471, and Debunk EU received €209,820 for its participation.

The main goal is presented as the evolution of a state-of-the-art research tool, technologies and know-how from EU-funded research projects focused on disinformation to create a 'novel ecosystem of services that will proactively support media professionals in trusted information production through AI'. The focus on 'coaching' media professionals in 'effective and credible' AI use is a soft-power mechanism to train journalists in the EU's preferred epistemic framework. This is a top-down approach to truth management in spaces that were once decentralised and open: a further attack on pluralism and free speech.

Another project, titled 'Secure Automated Unified Framework for Exchange (SAUFEX)',[47] began in 2024 and is fully funded by the EU for €2,998,565. From this, Debunk EU received €534,718 for its involvement. Like the EFCSN's 'Prebunking at Scale' project discussed above, SAUFEX aims to build structures and processes that can anticipate, detect and neutralise FIMI before it significantly impacts public opinion. The first part essentially outlines a full-spectrum capability: pre-emptive monitoring,

removal of undesirable narratives and restoration of the public sphere to a 'pre-impact' state, suggesting the desire is to reverse or overwrite the informational effects of what will be designated as 'disinformation'.

2.3 Digital astroturfing

One of the initiators of the Democracy Shield was Make.org,[48] which is paid by the Commission to be 'independent'. The Financial Transparency System (FTS) records that Make.org has been involved in four projects over the years, which had committed contracts amounting to €6.45million, of which Make.org consumed €1.3million.[49]

One such project, 'EU-CIEMBLY: Creating an Inclusive European Citizens' Assembly', began in early 2024. EU-CIEMBLY is an open controlled experiment with forms of engagement that supplement (or bypass) traditional democratic processes, such as elections and national parliaments. Make.org received €239,750 for this.[50]

A second is 'YouthDecide 2040: Visions of Democracy with and for Future Generations',[51] which frames ecological pressure as a reason to re-engineer democracy itself, by designing new institutions and participation mechanisms that align with EU policy priorities. The project is not about adapting democracy to challenges, but about adapting citizens, particularly youth, to accept a pre-scripted future in which contestation is displaced by managed consensus.

Another NGO, Digital New Deal – a self-described 'Think-do-Tank'[52] – received €99,938 for its involvement in a project titled 'European Dataspace for Growth and Education – Skills', established in early 2024.[53] This is a public-private consortium-driven project creating a soft-tech surveillance architecture – a top-down digital infrastructure (cloud and edge computing) – which will track learners' data from cradle to career across all member states.

It is expected to impact five million learners, enabling the Commission to provide algorithmic guidance towards EU-favoured outcomes. The EU partially funds this project for €9.35million (out of a total budget of €18.7million). It is coordinated by PROMETHEUS-X, a French NGO[54] that has direct or indirect involvement with three EU Commission projects, with committed contacts worth €12.3million, of which it has consumed €9.88million;[55] it received €319,127 for its coordination role.

Another prominent partner in the Democratic Shield Task Force is the Foundation Robert Schuman, which has had a longstanding relationship with the Commission, having been involved in 13 projects since 2014, with direct or indirect control worth €4.21million, of which it has consumed €4.03million.[56]

Alliance4Europe is a non-profit organisation that provides 'digital intelligence for a stronger democracy in Europe' and is present in Germany, Belgium and Poland.[57] According to the EU FTS, Alliance4Europe has been involved in six projects with EU committed contracts worth €4million, of which it consumed €3.11million between 2022 and 2024.[58] These projects come from the Commission's anti-democracy playbook.

Take 'Citizen's Action for Democracy' (CitiDem),[59] which is intended as a cross-border initiative addressing the EU's political legitimacy crisis. It promises to 'relaunch trust in democracy and governance' by promoting 'citizen engagement'. However, its focus is on funding NGOs and aligned civil-society groups to be trained and resourced to *shape* public opinion. Nowhere does CitiDem ask why citizens have lost trust. Instead, it assumes the problem is informational: that citizens are disengaged because they lack the 'tools and knowledge' to participate appropriately. This recasts rebellion as ignorance – the kind of ignorance the upholders of the FIMI disinformation narrative believe can be easily manipulated.

The idea behind CitiDem is that, once trained in the correct values and procedures, people will return to the arms of EU governance properly informed, and will thus be less inclined to vote for alternatives. This does not 'bridge the gap' between citizens and EU institutions, but rather inserts an entire management class between them: facilitators, civil society NGOs, platform designers, metrics evaluators, communication officers and 'local champions of inclusion'. This is not participatory democracy, but bureaucratically mediated consent manufacturing – participatory containment – designed to simulate democratic legitimacy while insulating power from challenge. Alliance4Europe received €24,500 for its efforts in this subterfuge.

The project 'Attribution – Data-Analysis – Countermeasures – Interoperability (ADAC.IO)',[60] funded by the Commission under the Horizon Europe programme for over €2.5million (of which the Alliance4Europe received €688,710), is strategically sophisticated, centred on the fusion of security logic and information governance. ADAC.IO aims to construct a centralised, interoperable system for controlling the information environment, particularly during politically sensitive moments like elections or crises. The goal is to bring together intelligence agencies, researchers, media, civil society and EU institutions into a unified framework that can attribute, counter and respond to disinformation in real time.

In practice, this amounts to the outsourcing of narrative legitimacy to a technocratic layer of data analysts, attribution experts and institutional gatekeepers. While framed as protecting 'democratic resilience', this architecture institutionalises an unaccountable epistemic authority. Citizen dissent is often conflated with foreign interference, especially when it echoes talking points commonly found on social media. Questioning the status quo is cast as a suspicious act, and managing the information space takes precedence over

engaging the democratic will. The logic is anti-pluralist because only speech that aligns with the consensus is regarded as safe.

One final noteworthy project is 'Ideas for Europe (I4E)'.[61] Funded under the Citizens, Equality, Rights and Values Programme (CERV), for which Alliance4Europe received €23,570, I4E aims to increase political participation among citizens in peri-urban and rural areas of the EU, particularly where disenchantment with politics and feelings of being 'left behind' are pronounced. One five-day workshop organised as part of the 'deliverables' of the project, titled 'The Future of Democracy'[62] and hosted by the European Forum Alpbach (EFA),[63] repeatedly linked 'radicalisation', 'polarisation', 'extremism' and 'misinformation' with the digital public sphere in rural or disenfranchised communities. This discursive move subtly implies that critical views, particularly those diverging from EU orthodoxy, are precursors to extremism, and therefore must be pre-emptively addressed through intervention.

As in the EFCSN prebunking project, political dissent is recast as a cognitive vulnerability or an ideological pathology. The emphasis on cognitive security and misinformation suggests that political divergence is not something to be represented but corrected. The effect is to condition participants, particularly youth, to associate loyalty to EU values with intellectual maturity and civic responsibility. The manipulation of youth as the 'key to democratic renewal' is discussed in more detail below.

2.4 Fact-checking the trusted flaggers

The examples discussed above show how the EU's attempts to control the political narrative are enabled by an unofficial but funded 'fact-checking' network of NGOs. The role played by 'trusted flaggers' as the Commission's official enforcers gives even more grounds for concern.

The EU invites so-called expert organisations to identify and report illegal content on online platforms under the Digital Services Act.[64] These organisations are designated by EU member states' Digital Services Co-ordinators (DSCs)[65] to act as 'trusted flaggers' who identify and report (flag) dangerous or illegal online content.

The trusted flaggers are revered for being independent from online platforms, with a 'proven' commitment to diligent, accurate and objective reporting, which the Commission embraces as a key line of defence in implementing the DSA and policing online speech. Unlike the informal self-appointed 'fact-checking' NGOs, trusted flaggers have the power to force online platforms to prioritise and process notices they flag without undue delay or face draconian financial penalties. They have the power to have content removed or downranked on digital platforms.

Some trusted flaggers do seem to aspire to independence. For example, the French Association de Lutte contre la Piraterie Audiovisuelle (ALPA)[66] has been fighting counterfeiting and protecting intellectual property rights in the cinematographic and audiovisual sphere for over 30 years.

But this is not the case for 13 of the 37 trusted flaggers officially recognised to date. These may be independent of Big Tech, but they are neither financially nor politically independent of the EU Commission.

Below is a table drawn from the EU's Transparency Register and the Funding and Tenders Portal, which shows that 13 trusted flaggers (35 per cent) have received approximately €8,698,638 of EU funding for various projects derived from contracted projects, of which the Commission has funded €45,762,198.

Name of trusted flagger	Money € received for political type projects	Total in € of EU funding for these projects
Rat auf Draht gemeinnützige GmbH	191,944	2,542,439
ECPAT Sweden	826,048	2,363,910
Pelastakaa Lapset ry[67]	1,125,240	3,890,789
Österreichisches Institut für angewandte Telekommunikation[68]	949,876	1,727,935
Organizația Salvați Copiii[69]	139,491	592,846
e-Enfance	809,026	2,840,000
Debunk EU Lithuania	1,092,084	10,487,674
Red Barnet[70]	85,000	1,319,023
Foundation for Social Welfare Malta	19,931	376,775
Association nationale de prévention en alcoologie et addictologie (ANPAA)	290,000	926,261
Association Point de Contact	982,852	4,046,628
Central Bank of Ireland	2,110,248	11,192,333
Verbraucherzentrale Bundesverband (vzbv)	76,898	3,455,585
Totals	**€8,698,638**	**€45,762,198**

The fact that these organisations receive money from the EU raises fundamental questions about their independence, and thus their ability to judge 'disinformation' objectively.

Even those 'trusted flaggers' that do not receive funds directly from the EU can have concerningly close links. Hate Aid gGmbH is a German non-profit NGO founded in 2018 and headquartered in Berlin. As an advocate for 'human rights in the digital space', standing up against 'digital violence and its consequences at both social and political levels', this is an influential

organisation. Its support to people affected by online violence, in the form of counselling and litigation financing,[71] gave it the credentials to lobby the EU Commission in the run-up to the DSA and the AI Act.[72] Hate Aid provides 'expert' guidance to the German and EU authorities.

Hate Aid's involvement in a study titled 'Attacked and Abandoned: How Digital Violence Affects Political Engagement. A Situation Report', funded by the Bavarian Research Institute for Digital Transformation (bidt) of the Bavarian Academy of Sciences and Humanities,[73] demonstrates why it is an EU trusted flagger. This study subtly but powerfully erases the distinction between robust political contestation online and genuine political violence offline, creating a narrative environment in which *any* strongly expressed dissent risks being reclassified as a threat to democracy that must be prevented or punished. Terms like 'digital violence' are used to cover a spectrum ranging from genuine criminal threats (rape threats, death threats, stalking) to hostile or aggressive political criticism.

By grouping everything under one emotionally charged label, the study creates a continuum in which criticism of political positions is conceptually linked to physical assault. This sleight of hand is based on a cause-and-effect framing that confuses correlation with causation: because victims of digital abuse may *also* experience more physical attacks, controlling online speech is regarded as necessary to *reduce* real-world violence.

Those surveyed in this study were overwhelmingly individuals already in positions of public authority with some influence over public debate, including politicians, activists and journalists. Recasting them as 'vulnerable' serves to normalise the idea that political elites deserve special speech protections not afforded to ordinary citizens, and that platform-level enforcement under the Digital Services Act should become a condition

of 'democratic debate'. Indeed, one of the study's recommendations is the stricter enforcement of the DSA to 'minimise adverse impacts on social debate and electoral processes'. The most draconian proposal is the legitimisation of judicial follow-up without victim initiation: allowing state actors to pursue speech cases without a direct complainant, turning political speech disputes into prosecutable offences.

By blurring the line between political contestation and political violence, Hate Aid gGmbH is part of an initiative that justifies proactive censorship. If robust criticism can be classified as 'digital violence', which requires algorithmic downgrading, deletion or prosecution, citizens will have no option but to think twice before challenging politicians, particularly on contentious issues. The right to challenge politicians, to hold them to account – the bedrock of democracy – is now presented as a threat to democracy, with 'democratic resilience' achieved by narrowing the space for democratic debate.

From content moderation to narrative enforcers

We have seen that the EU is assembling an enormous apparatus of NGO-operated narrative-control tools. Thus far, we have shown how they focus on fact-checking and flagging so-called disinformation and policing speech crimes.

But the problem goes much deeper than this. Many of the projects these organisations participate in involve going beyond responding to existing political messaging to consciously shaping political narratives, especially among youth. While publicly framed as neutral guardians of online safety, their growing integration into education, activism and ideological programming reveals their true function: enforcing consensus through

a multi-channel apparatus that blends content control with behavioural influence.

In the following sections, we first expose how the EU aims to indoctrinate a new generation in the name of EU democracy. We then demonstrate how concerns about internet safety became a tool for curating the narrative.

2.5 Indoctrinating young people

The project 'Make it clear – educating young people against disinformation online', begun in 2022,[74] claims to develop 'information competences' and critical thinking regarding fake news, manipulation techniques and propaganda among youth aged 11–17, as well as parents and teachers. It includes curriculum development, teacher training, awareness campaigns and social media outreach, with materials translated into multiple languages, including Ukrainian, to reach over 1.5million young people.

'Make it clear' has been funded by the EU to the tune of €442,847. One trusted flagger, Organizația Salvați Copiii (Save the Children Romania) received €114,000 for its participation.

Beneath the educational veneer, this initiative exemplifies a dangerous convergence. The same organisation that is funded to teach children what counts as disinformation also has the power to censor or deplatform those who challenge that definition. This means that this trusted flagger is not a passive participant in the information ecosystem, but a gatekeeper used to shape the ideological foundations of what is considered 'truthful' through youth education, and to enforce those standards through privileged access to digital platform moderation tools.

Under the guise of being taught 'media literacy', children are socialised into a specific worldview, curated by organisations with a mandate to

suppress dissenting interpretations. Meanwhile, teachers and parents are trained to replicate these frameworks, creating a distributed enforcement mechanism that operates across classrooms, homes and digital spaces. This project does not defend democracy so much as redefine it as ideological alignment, policed by actors who educate, influence and censor all at once.

A project involving two other trusted flaggers, Pelastakaa Lapset ry (Finnish Save the Children)[75] and Red Barnet (Save the Children Denmark),[76] is titled the 'Inclusive Child Participation Networks' (ICPNs).[77] This began in January 2025 and will run to 2027 and has been fully funded by the Commission to the amount of €1,319,023, of which Red Barnet received €85,900 and Pelastakaa Lapset ry €137,753 for their participation.

ICPNs are presented as a democratic empowerment initiative, a bold effort to 'strengthen, innovate and mainstream' children's voices in decision-making at national, local and EU levels. On paper, this project appears to be a training ground for the next generation of engaged citizens, steeped in democratic values and confident in their ability to influence policy. However, its design and governance mechanisms represent a calculated attempt to construct a permanent, EU-aligned youth-governance infrastructure, which serves as a pipeline for producing young advocates already aligned with the European Commission's policy priorities and ideological framing.

The process is subtle, but tightly controlled. 'Participation' is mediated through competence centres, 'child-led' groups co-designed by adult-run NGOs, and coordination platforms directly integrated into EU structures, such as the EU Children's Participation Platform.[78]

The involvement of advocacy NGOs such as IGLYO (LGBTQI), ERGO (Roma rights), and Plan International (with a focus on gender and social justice) clearly signals which 'European values' are being prioritised. One

of the deliverables of the project, a 'Youth Panel report',[79] specifies that all communication and web content are required to use 'diversity-sensitive language that takes into account different gender identities and expressions (eg, texts, images and terms related to sexuality, gender, relationships and family relations)'. This embeds contested identity politics into materials aimed at children, bypassing parental input and national cultural norms, and effectively using children as conduits to institutionalise ideological conformity.

Publicly, the initiative promises grassroots democratic engagement; structurally, it channels the voices of indoctrinated children upward through organisations such as Save the Children and SOS Children's Villages. It is political grooming through value-alignment training, which amplifies the voice of the EU elite – all under the unassailable banner of youth 'empowerment'.

One final youth-oriented project worth noting is 'Youth On A Caravan – A Journey Through Political Participation (YOAC)',[80] which the EU funded in 2022 for €149,999, of which the Romanian trusted flagger Organizatia Salvati Copiii received €25,344 for its participation.

YOAC presents itself as a grassroots initiative to boost youth political participation in Italy, Croatia, Spain, Lithuania and Romania. Closer examination reveals a pattern of experiential ideological formation, soft mobilisation and NGO-driven narrative shaping.

The project defines 'youth' as 18- to 29-year-olds. The organised 'roundtables' – the 'partnership' between NGOs and public authorities – allows participants an institutionalised access to power through their ideological alignment, which is designed to bypass party politics, democratic representation or electoral accountability. This model trains and deploys

political actors under the veneer of youth dialogue, while formalising NGO influence in policymaking. This is not civic empowerment but civic conditioning, structured to reinforce a narrow ideological consensus while embedding activist intermediaries between citizens and power.

The involvement of trusted flaggers raises serious questions: when such gatekeepers are also shaping the political voice of the next generation, 'participation' risks becoming indistinguishable from pre-emptive content moderation, achieved at the level of thought formation and civic identity. By embedding children early in governance structures that present a single, sanctioned worldview as the natural and legitimate one, the EU seeks to avoid the messiness of dissent *before it even emerges*.

These projects aim to cultivate a junior citizen corps loyal to the project of European integration, carry that alignment forward into civic life and preserve the outward forms of democratic debate – all while narrowing the range of what can be legitimately debated. The EU's insurance policy is that the same organisations involved in promoting this outlook will be on hand to censor views that might question raise questions about it.

2.6 A 'Safer Internet'

A further example of this narrative-shaping approach is provided by the five trusted flaggers involved in projects relating to the fostering of a 'Safer Internet'.

The Finnish Save the Children Fund, Pelastakaa Lapset ry, received €304,150 out of an EU contribution of €802,862 for its participation in the 'Finnish Safer Internet Centre 2022–2024' initiative.[81] The Austrian trusted flagger, Rat auf Draht gemeinnützige GmbH, received €30,361 in 2019, €36,754 in 2022 and € 33,812 in 2024 – out of an EU contribution of €601,312, €734,028 and €675,250, respectively – for participation in 'Safer Internet

Centre Austria: Saferinternet.at, Stopline and Rat auf Draht' in those years.[82] [83] [84] The Swedish trusted flagger, ECPAT Sweden, received €326,216 out of an EU contribution of €864,526 for participation in 'Safer Internet Centre Sweden' (SIC SWEDEN).[85] Two French trusted flaggers, e-Enfance and Association Point de Contact, received €424,326 and €402,613, respectively, out of an EU contribution of €1,499,599 for their participation in the 'Safer Internet France' initiative.[86]

Under the guise of 'raising awareness among children, parents, teachers and other professionals working with children about risks they may encounter via online related activities', these projects use the language of safety to shape what they term 'digital citizenship, resilience and participation'. Good citizenship is extended to the securitising of speech, where children (and adults) are encouraged to identify disinformation in the media as part of a 'safety protocol'. Media literacy is regarded as a tool to 'strengthen minors against harmful influences'. The Safer Internet project also references the use of 'relevant data' to 'identify vulnerable groups' and understand children's behaviour. The overlap between safeguarding and ideological influence is seamlessly interwoven, with little scope for public scrutiny or debate.

Speech police in the digital age

The blatant clash of interests at play in the operation of the Democracy Shield is not a bug or an oversight, but its entire modus operandi. By involving these 'fact-checkers' and 'trusted flaggers' in monitoring and policing content, lobbying the EU and national governments, and funding educational programmes, the loop between thought formation and speech control is closed.

The desired outcome is not an informed citizenry that can resist encroachments on democracy. Rather, it is a citizenry, trained from adolescence to internalise the categories and judgements of the EU's technocratic ideological gatekeepers, and thus, the extension of the reach of EU-endorsed narratives from platform algorithms into the minds of the next generation.

This raises the question of who Democracy Shield is protecting.

3 Who is being Shielded?

The Democracy Shield is, at base, a protection racket for the European Commission. As we have seen, far from representing the defence of democracy, it formalises an echo chamber that protects the Commission from democracy, from political accountability, and from the will of European citizens.

The role played by the European Parliament's Special Committee on the Democracy Shield is instructive here. As the only elected body in the EU's federal 'democracy', the Parliament's mandate to monitor and scrutinise the proposed Democracy Shield holds out some hope of holding the unelected Commission accountable for its proposal. The Committee's recent publication, a 'Working document on protecting European democracy' provided by Rapporteur Tomas Tobé, demonstrates that it has seriously failed to do so, and instead is providing the Commission with a much-needed legitimising fig leaf.[87]

Strip away the soothing euphemistic language of 'resilience', 'preparedness' and 'independent structures' and the document is clearly endorsing the draconian architecture of a centralised command-and-control regime for information and elections, with unelected EU bodies and EU-funded NGOs deputised as guardians of 'integrity'.

The proposed EU-level 'independent' FIMI structure is embraced, especially for its setting of 'common definitions', 'standards' and enforcing 'interoperability' via single national contact points. This rubberstamps the harmonisation of what constitutes 'interference', 'manipulation' and 'disinformation' at an EU level, where contesting those definitions becomes harder at national levels, particularly when the sanctions, criminal law and platform enforcement are also chained to this consensus.

The DSA, political advertising rules and AI labelling are recast as risk-mitigation levers which the Committee wants to apply pressure to fill 'remaining legal gaps'. Platforms are warned that enforcement must be 'swift'. The Committee goes even further here, heady on their own importance, to propose that in the EU's industrial policy, the role of 'digital sovereignty' (EU cloud and data centre infrastructure with even the possibility of 'an EU social network') should be brought into the same regulatory regime so that the referee also becomes the market architect.

The EP's Special Committee report endorses the media and 'information integrity', which the Democracy Shield will operationalise through 'civil society'. The fact-checking networks (EDMO, EFCSN and the new EU network) are endorsed as quasi-regulators who will help define the risks, provide evidence and legitimise takedowns and downranking, all while being financed by the same institutions whose legitimacy they certify. A 2025 Civil Society Strategy, integrated into the Shield, promises sustained financing and incentives for philanthropy. What this means in practice is that the more the Commission outsources norm-setting to 'stakeholders', the more democratic accountability thins: voters can remove politicians, not foundations or fact-checking consortia.

In summary, the Parliamentary Committee tasked with holding the Commission to account ends up endorsing the further interlocking of EU agencies and EU-funded civil society, policed by platform obligations and backed by sanctions, to protect the EU's political elite from the demos. It has not once questioned the educational initiatives that aim to indoctrinate European youth, or the trusted flaggers and their conflict of interest. Instead, its deliberations show a greater concern about the rise of populism than with holding any of the shady Commission-initiated funding programmes to account.

4 Democracy Shielding in practice: three case studies

As we will show, there is a playbook being developed and refined. This involves EU laws, especially the Digital Services Act, local security institutions and the network of 'fact-checking' NGOs in a coordinated effort around electoral interventions to ensure the 'right' outcome. It is also clear that the fine-tuning of this playbook is very consciously being deployed in preparation for the Hungarian elections scheduled for June 2026. The removal of the current prime minister, Viktor Orbán, from power has clearly been an EU priority for years. The 'wrong' result in Czechia makes this now an even more pressing priority.

4.1 Romania: FIMI and the EU's democracy correction mechanism

When Romanian voters in 2024 sinned by voting for Călin Georgescu, an independent 'far-right' populist outsider who had the temerity to win the first round of the presidential elections, and seemed poised to take the second round, the election was promptly annulled by the Country's Constitutional Court due to 'foreign interference'. The Court alleged that around 25,000 TikTok accounts, possibly using 'bot farms', were used to increase Georgescu's popularity. No evidence was forthcoming then, nor has there been since, to prove this. What else could account for such behaviour if not foreign interference and manipulation? The published reports did not demonstrate fraud, let alone actual massive Russian influence capable of 'converting' millions. Yet the Constitutional Court annulled an election it had already validated.

The outcome of the election rerun in May 2025 was the 'right' result: Georgescu was struck off the ballot 'for procedural reasons', which meant that the pro-EU-centrist candidate, Nicușor Dan, won with 53.6 per cent against George Simion, the designated 'extremist' who replaced Georgescu. The EU's faith in Romania's 'resilient democratic institutions' was solemnly restored. Not even Romania's downgrade from 'Flawed Democracy' to 'Hybrid Regime' in the Economist Democracy Index[88] could deter the delight in Brussels.

Romania was not an aberration – it was a live experiment in social and political manipulation. It shows how far the EU's political elite are willing to go to preserve its authority. When voters delivered the 'wrong' result, the machinery of 'resilience' was activated to correct it.

The Romanian experiment demonstrates the vital importance of the FIMI narrative to the operation of the envisioned Democracy Shield. The investigation by French investigative journalist Stéphan Luçon and Romanian journalist Patrick de Hillerin into 'DSA: Europe's Injustice System', shows in detail how the EU's Digital Services Act 'empowered an opaque web of government agencies, NGOs and foreign actors to censor critical voices – without checks, transparency or recourse'.[89]

In the name of protecting Romania's 'democratic resilience' against foreign intervention, the same actors acted as judges, prosecutors and informants. NGOs that create content also flagged competitors. Trusted flaggers and fact-checkers blurred into the same entities, without any accountability. The electorate were treated as subjects to be re-educated, not citizens to be represented. The Romanian experiment demonstrated that, in the new European order, elections are free and fair only until they threaten to undermine power.

In Romania, the DSA has been formally transposed into national law, meaning that the framework has been embedded in domestic legislation, empowering Romanian institutions (notably ANCOM, the National

Authority for Management and Regulation in Communications) to act as the Digital Services Coordinator and enforce DSA provisions directly. This allowed the Romanian authorities to expand their powers – extending DSA-style 'content moderation' oversight to NGOs, the audiovisual regulator (CNA) and even intelligence-linked agencies – in ways that transformed the DSA's architecture into a legal censorship framework. The Brussels digital rule book was repurposed for national control over speech and information.

The example of CNA demonstrates this clearly. Its historical focus on regulated media (TV, radio) was extended, empowering it to regulate all video content with sanctioning authority. This meant it could flag online material, including comments, and submit formal takedown requests to Very Large Online Platforms (VLOPs). During the 12-month period, CNA made over 374 decisions, which directly contradicted Article 30 of the Romanian Constitution, which clearly states that censorship of any kind is prohibited.

A key point about the Romanian experiment was the manner in which the EU's Rapid Response System was activated. Before these elections, there was a distinction between the Rapid Alert System (RAS) and the Rapid Response System (RRS). The RAS was established in 2019 under the EU Action Plan Against Disinformation, which aims to share information and alerts about foreign disinformation campaigns among EU institutions and member states. This was about sharing intelligence. The RRS, however, was part of the 2022 Code of Practice on Disinformation, which was integrated into the Digital Services Act ecosystem to enable trusted flaggers, fact-checkers and NGOs to act swiftly during elections or 'crises', reporting or escalating content directly to platforms for fast-track moderation. In short, the RRS is about executing narrative control.

In Romania, this distinction disappeared, as the RAS and RRS effectively merged into one operational pipeline. Trusted flagger and fact-checker NGOs

were given flagging powers, which meant they could all identify, flag, remove and justify actions against 'disinformation.'

The activation of the RRS in Romania was a key point in the escalation of narrative control. For example, the Expert Forum (EFOR)[90] NGO was granted priority flagging status in 2025, effectively receiving a temporary 'super-flagger' power during the campaign. This elevated role gave the organisation a privileged channel to influence content moderation at speed and scale.

True to form for EU transparency rules, no information is yet available about the content they flagged. However, this is an organisation that, according to the EU Financial Transparency System, has been involved in five projects funded by the Commission, totalling €1,516,742, of which it received €183,912.[91] It received an EU grant of €47,939 under OLAF's Hercule III programme for the project 'Money and politics – linking EU funds to political parties' (Romania/Croatia).[92] The Commission's 2025 'Rule of Law Report – Romania', cites 'Contribution from the Expert Forum' among inputs used by the Commission.[93] The EFOR has clearly earned Brussels's trust; and it was its influential reports, together with Romania's intelligence services (which, as noted above, failed to demonstrate fraud or Russian interference),[94] that influenced the Romanian election annulment in 2024.

The granting of priority flagging status to the Expert Forum emboldened it to take on the mantle of a flagger in the Moldovan elections, for which it produced a monitoring report titled 'Analysis of Coordinated Inauthentic Behavior in Moldova: 23 Days Before the Elections'.[95] As we discuss below, this provides a template for how to turn elections from a contest of ideas into a managed space policed by security logic. The focus on 'Coordinated Inauthentic Behaviour' (another EU newspeak code for 'Russian interference') treats dissent as a hostile act, justifying the Orwellian inversion that

freedom from speech is now an essential component of the defence of democracy.

Another NGO, Freedom House Romania,[96] is not an accredited or independent fact-checking organisation under the International Fact-Checking Network (IFCN) or the European Fact-Checking Standards Network (EFCSN). However, under the European Digital Media Observatory (EDMO), Freedom House Romania is *listed* as a fact-checking partner. This listing grants it access to the same coordination channels as recognised fact-checkers and, crucially, to DSA-related frameworks, such as the Code of Practice on Disinformation and the Rapid Response System. Through its platform PressHub.ro, it publishes 'counter-disinformation' content – effectively, editorialised rebuttals to narratives that the EU classifies as harmful – without applying any transparent methodology or correction mechanism typical of fact-checking bodies.

According to EU grant data obtained through Patriots for Europe's FOI request to the Commission and published online, Freedom House has directly received over €800,000 from the EU over the last few years, within projects totalling more than €8million.[97] The significance lies in both the direct sum and the organisation's ability to coordinate and distribute large projects, creating networks of partners and dependencies.

The nature of these projects speaks for itself. For example, 'Fostering Artificial Intelligence Trust for Humans towards the optimisation of trustworthiness through large-scale pilots in critical domains',[98] aims to justify a new regulatory and funding framework for AI, which transforms regulatory capture into a moral imperative. This project was funded by the EU for €7,455,585, of which Freedom House received €179,690.

'Whos and hows: countering disinformation that pushes citizens away from the European project',[99] for which Freedom House received €45,843,

pathologises dissent and Euroscepticism as threats to democracy. By pledging to 'map and expose' narratives undermining trust in EU policies, the project openly conflates criticism with disinformation. The talk of inclusion and bottom-up engagement masks a top-down strategy to replace unwanted narratives with EU-approved counter-narratives. In effect, it is about controlling the information space to secure political legitimacy, not empowering citizens.

These are NGOs whose flagging status elevation through the RRS gave them deliberate and unaccountable powers to manage Romania's election. As we saw above, when discussing the trusted flagger, Organizația Salvați Copiii, this all adds up to a censorship regime with immense powers and little oversight.

The effortless extension of unconstitutional and censorship powers to unaccountable official and unofficial organisations has normalised censorship and the banning of oppositional politicians. It has established a clear precedent which, under the rubric of a 'Permanent Task Force', will be institutionalised as the Democratic Shield in the coming months. The following quote, solicited from ANCOM by Luçon and de Hillerin, spells this out:

> *The Task Force is chaired by the European Commission and includes the signatories of the Code of Practice on Disinformation, as well as representatives of the European Digital Media Observatory (EDMO) – that is, fact-checkers – the European External Action Service (EEAS) – that is, diplomats – and the European Regulators Group for Audio-visual Media Services (ERGA) – that is, media regulatory institutions. The Task Force has been entrusted with specific responsibilities such as the establishment of a Rapid Response System during election periods and crises.*[100]

In short, the 'Permanent Task Force' is a centralised hub for electoral censorship. Chaired by the European Commission, it fuses fact-checkers, state diplomats and media regulators under one roof, with the explicit mandate to control online narratives during elections and crises. The Rapid Response System provides a fast-track channel for political authorities and their NGO proxies to pressure platforms and silence inconvenient voices. It is a closed loop of state power, regulators and Commission-funded NGOs acting as judge, jury and executioner in the digital public square.

4.2 Moldova: Putting the lessons from Romania into practice

When Romanian Interior Minister and Deputy Prime Minister Cătălin Predoiu stated on TV that intelligence services across the Western world were analysing the Romanian case as something admirable,[101] the implications were made clear around Moldova's elections of September 2025. Moldova is not yet an EU member, and the DSA could not be applied in the same way. But when it comes to the EU elite's protection of its own interests, where there's a will, there is always a way.

The first sign of the Romanian playbook being applied was an ominous warning from Kaja Kallis – the EU high representative for foreign affairs and security policy, and vice-president of the European Commission – in June 2025 that Moldova was facing hybrid threats ahead of its elections. Kallis stated that 'Russia is likely to use cash, content and coercion to meddle. Let there be no doubt: only the people of Moldova should decide their future'. She continued:

> *The Moldovan people have the right to choose their own future free from interference. That is why we are extending the scale and scope of the EU's partnership mission to bolster Moldova's resilience. We have a specialist team on the ground now supporting Moldova to address illicit*

> *financing around the elections. And we recently deployed a group of experts, a hybrid rapid response team, to support Moldova against the foreign interference.*[102]

Citing Russian interference following the FIMI script, Kallis signalled the green light to EU intervention to ensure the Moldovan people exercised their right to a future determined by Brussels. The deployment of another RRS soon followed.

That same month, the Commission participated in a 'stress test' alongside Meta, Google, TikTok and Microsoft, along with civil society and Moldovan authorities, to evaluate whether safeguards against Kremlin bots were adequate.[103] By August, platforms that signed the EU Code of Practice on Disinformation began coordinating with fact-checkers and NGOs in Moldova.[104] Although not enforced by Moldova's DSC, the censorship hub was in place.

At Moldova's Independence Day concert at the end of August, French President Emmanuel Macron, German Chancellor Friedrich Merz and Polish Prime Minister Donald Tusk openly campaigned for President Maria Sandu and her Party of Action and Solidarity (PAS). In a passionate speech, Macron declared that Moldova's future lay in Europe and affirmed that the EU's political elite was committed to Moldova's independence, sovereignty and EU accession, stressing unity in the face of Russian aggression.[105]

As Italian journalist Thomas Fazi notes, the EU elite was quite willing to overlook the broader trend of the Sandu government's systematic suppression of the opposition. For example, in 2022, Igor Dodon – Moldova's president from 2016 to 2020 and one of Sandu's most prominent critics – was arrested on charges of corruption, illegal financing of a political party by a criminal organisation, illicit enrichment and even high treason. Dodon insists the charges are fabricated.[106]

In May 2024, PAS lawmakers amended the Criminal Code, expanding the definition of 'high treason' to include peacetime actions and so-called 'disinformation campaigns', even without proof of harm. Signed into law by Sandu on 10 June, the measure carries penalties of up to 20 years in prison. Even Amnesty International condemned the law as 'vague and open to abuse', warning that it poses a grave threat to freedom of expression.[107] The same year, Moldova's Intelligence and Security Service (SIS) blocked seven news websites for allegedly containing Russian-linked content, again without judicial oversight, raising further concerns about censorship.

The EU elite was also willing to ignore the fact that the PAS government had not hesitated to cancel elections when results looked unfavourable. In December 2021, for example, during local elections in Bălți, a leading candidate was excluded just three days before the vote, and the entire election was abruptly cancelled half an hour before polling stations were set to open.

Yet rather than raising concerns about the integrity and future of democracy in Moldova, the EU went out of its way to prop up Sandu's government. In early September, it delivered an additional €18.9million to Moldova, issuing a call for business to invest in the country.[108] This was disbursed under the Reform and Growth Facility, reaffirming the EU's steadfast support for the country's reform path and its road to EU membership. The €18.9million comes in addition to the €270million in pre-financing already provided this year. Moldova is set to receive up to €1.9 billion in grants and loans under the Facility for 2025-2027. That's about 10.3 per cent of Moldova's GDP.

If money spent were a measure of intervention, the EU outspent the Russians tenfold. Yet all concerns were focused on Russian money. Sandu warned MEPs that Russia was spending 'the equivalent of one per cent of Moldova's GDP to influence the 2024 elections', without presenting any

proof.[109] On 25 September, Prime Minister Dorin Recean accused Russia of trying to take power by pouring millions of euros into Moldova to buy votes and foment disorder. 'The Kremlin is also in the midst of this election campaign to gain power over Moldova by circumventing its sovereign choice', Recean said in an address after a cabinet meeting.[110]

The Central Electoral Commission (CEC) launched a '7 Ways to Recognise Disinformation' campaign a week before the election, because 'false information is circulating more and more intensely'.[111] And just for good measure, just days before the vote, the CEC barred two pro-Russian parties – Heart of Moldova and Greater Moldova – from competing, citing allegations of illicit financing, voter bribery and undeclared foreign funds. Both parties had campaigned on strengthening ties with Moscow and directly challenged the pro-Western government. The CEC also struck all Heart of Moldova candidates from the Patriotic Electoral Bloc, PAS's main rival, giving it just 24 hours to reconfigure its candidate lists.

With the manipulation of Moldova's diaspora voters, the election result was a foregone conclusion. Sandu's PAS won a clear majority with about 50.1 per cent of the vote, securing 55 out of 101 seats in Parliament.[112] This was an outcome scripted in Brussels and ensured by the censorship architecture put in place before and during the election.

An essential part of this story is about how the EU's NGO network operates within the hybrid enforcement shield designed in Brussels. The above-mentioned report by the Romanian NGO Expert Forum (EFOR), on 'Coordinated Inauthentic Behavior in Moldova',[113] is an EU FIMI disinformation template. It claims that a small cluster of inauthentic accounts, duplicate comments and AI-generated personas constitutes an information warfare campaign that threatens national security. The goal is simple: to transform Moldova's electoral contest into a securitised space, where political

opposition can be suppressed under the banner of resilience and democracy protection.

The table below sets out the report's key claims, alongside our critical assessment of these claims:

Report claim / evidence	Critical interpretation
100 inauthentic accounts were identified out of 469 monitored hashtags, 87 with political content.	Numerically trivial compared to Moldova's 2.14million internet users, with 1.4million on social media. A handful of accounts is inflated into proof of systemic 'hybrid warfare.'
36,338 comments reviewed; 10,196 duplicates identified.	Duplicates are mostly emoji spam, a banal feature of online discourse. Treating this as 'coordinated warfare' conflates trolling with military subversion.
'jos PAS' ('down with PAS') appears 213 times.	A modest volume of anti-government slogans is framed as a form of destabilisation. Political criticism is reframed as hostile activity.
Emoji spam (860, 809, 776 repeats) highlighted as manipulation.	Emojis are cast as evidence of coordination. Ordinary online repetition is securitised, trivialising the concept of information warfare.
AI 'Lover Woman' avatars used to spread political messages.	A familiar marketing trope rebranded as 'hybrid warfare'. The emphasis on gendered personas dramatises old tactics to justify surveillance.
'Aunt with flowers' persona accounts.	Stock images used to create familiarity are treated as evidence of an attack. Commercial influence techniques are recast as military weapons.
Small accounts with 30,000+ views on TikTok.	Viral anomalies are assumed to be a form of manipulation. Lack of technical clarity is presented as proof of sinister intent.
Narratives: anti-Sandu, criticism of PAS, ethnic tensions in Gagauzia.	Legitimate opposition narratives are conflated with inauthentic behaviour, delegitimising dissent as foreign-controlled propaganda.
Conclusion: 'The paradigm must change radically. Urgent intervention must target amplification infrastructure.'	Explicit call for censorship: platforms urged to override free-speech protections and neutralise flagged accounts.

The EFOR report builds its argument not on evidence of systemic manipulation, but on the reclassification of small-scale digital behaviour as threats to national security. How 100 flagged accounts and repetitive slogans can destabilise an electorate of millions is just not credible. Dissent is delegitimised as inauthentic by default.

The report's framing transforms Moldova's digital political environment into a security battleground. Modest findings are elevated into evidence of a coordinated assault on the nation. By invoking AI, bots and 'hybrid warfare', the report constructs a narrative in which dissent is indistinguishable from foreign subversion. The danger is clear: once politics is recoded in warlike terms, censorship becomes not only permissible but obligatory. The intervention in the Moldovan elections in this manner transformed the political opposition into a threat, and the protection of democracy was redefined as the suppression of political speech.

This message was bolstered further by the Bulgarian-Romanian Observatory of Digital Media (BROD),[114] which claimed, again with little evidence, that the scale of the Russian campaign meant that Moldova was 'facing an unprecedented foreign interference operation'.[115] BROD is an EU-supported initiative under the EU's Digital Europe Programme.[116] A project titled 'Bulgarian Romanian Observatory of Digital Media',[117] towards which the EU paid €1,299,987, frames Moldova's EU candidate status not as a democratic choice of its people, but as a reason to subject it to intensified 'disinformation management'. Moldova is portrayed as inherently *vulnerable*, a passive space requiring EU-led 'resilience' rather than self-determination.

The inclusion of Moldova into BROD is less about empowering Moldovans and more about extending the EU's Digital Media Observatory network into its neighbourhood, making it a frontline laboratory for testing disinformation frameworks. Research, 'actionable insights', and 'targeted

interventions' amount to external oversight of Moldova's public sphere, presented as media literacy and civic empowerment.

There is no doubt that Russia sought to influence events in Moldova – history and geography almost guarantee it. However, the more insidious form of interference came not from the East, but from Brussels. The EU's deployment of the 'Romanian model' – a fusion of censorship powers, unaccountable NGOs and Commission-directed 'rapid response' mechanisms – turned Moldova's election into a controlled experiment in narrative management. Under the pretext of defending democracy from foreign manipulation, the EU imported the very tools of soft authoritarianism it claims to oppose. If any resilience was demonstrated, it was that of the EU's narrative and democracy-correction machinery.

4.3 Prague springs a Brussels panic

As in the first ballot in Romania, voters in Czechia defied the Brussels script and voted the 'wrong' way. In October 2025, Andrej Babiš's ANO Eurosceptic party won 34.5 per cent of the vote and 80 seats in the 200-seat Chamber of Deputies.[118] These results demonstrate a rejection of the kind of managed political ordering that Brussels intended. Nonetheless, we should not underestimate the extent to which Brussels attempted to apply the Romanian model in Czechia too.

Unlike Romania, the DSA has not yet been transposed into law in Czechia, so the EU's censorship architecture functions as soft enforcement: influence without legislation. NGOs and state-aligned actors participate in the EU's Code of Practice on Disinformation and the Rapid Response System, but their powers rest on EU coordination, funding and 'voluntary' cooperation from platforms, rather than statutory authority. The hybrid

enforcement mechanisms used in Czechia followed the same FIMI modus operandi.

The Czech intelligence agency claimed that almost 1,000 accounts on TikTok were promoting pro-Russian narratives in support of 'extremist' parties ahead of the elections.[119] *Deník N*, an independent Czech online newspaper and one of the most influential liberal-leaning media outlets in the country, confirmed that the TikTok accounts appeared 'to be attempting to interfere in the elections in favour of anti-system parties'.[120] Michael Shellenberger's *Public*[121] notes that a group of analysts, who identify as the 'Center for Online Risk Research', also backed this claim.[122] Some Czech news media speculated that Russia may have been behind the accounts as well.[123]

The Czech Telecommunication Office (ČTÚ) – the Czech government's Digital Coordinator under the DSA legislation, but without national enforcement capabilities – meant that the investigation and enforcement of DSA obligations towards TikTok would fall to the European Commission. The ČTÚ later confirmed that it had been involved in a meeting attended by the European Commission, Google, Meta, Microsoft, TikTok and X to address potential systemic risks related to the parliamentary elections. As in Romania and Moldova, an EU RRS was quietly activated and operated throughout the election, which Stéphan Luçon brought to the public's attention.[124]

When prompted, Brussels admitted that the RRS participants are signatories to the Code of Practice against Disinformation – but avoided specifying which specific organisations were actively reporting content in the Czech information space before and during the election.[125] Not surprisingly, one of the signatories is Demagog.cz, a Czech fact-checking NGO which is a member of the European Digital Media Observatory (EDMO) and a key partner in the CEDMO hub (Central European Digital Media Observatory).

Like the Expert Forum in Romania, it operates in the grey area between journalism, activism and regulation – wielding de facto power over what constitutes 'truth' during elections and primary political debates.

Demagg.cz receives EU and foundation funding, including support through Horizon Europe and Google's Digital News Initiative. Its involvement in the EU project 'Central European Digital Media Observatory 2.0',[126] to the tune of €90,301, is telling. This project constructs Central Europe not as a region of democratic contestation but as a zone of disorder, 'suffering' from disinformation and 'technological uncertainty', thus justifying the need for permanent expert intervention.

The project's true purpose is not to understand information pluralism but to discipline it – to align the public sphere of Czechia, Poland and Slovakia with Brussels's sanctioned version of truth under the reassuring jargon of 'multidisciplinarity', 'robust networks' and 'community of practice'. One of the deliverables of this project – an annual report titled '451 Degrees of Disinformation fact-checking, media literacy and AI regulation in a post-truth era'[127] – specifically focuses on 'the narratives of right-wing populist anti-establishment movements on social media'.

There is no doubt that the Czech election results are a setback for the European Union. Czechia is not Romania or Moldova. The reaction to the Romanian annulment from within Europe's conservative forces, and the US administration's intense criticism, created an awareness and sensitivity to any signals of repetition. Within Czechia, the non-profit think tank/institute, Společnost pro obranu svobody projevu (Society for the Defence of Free Speech),[128] whose stated mission is the protection of freedom of expression, played an important role in challenging the TikTok allegations and publicly highlighting the dangers of the DSA and the RRS. With every poll predicting

that the opposition would win, which meant the debate was about by how much, it was clear the EU had a lot less room for its shenanigans.

However, the impact extends far beyond Czechia. The election of Andrej Babiš has strengthened the Patriot Groups within the EU and thus presents a growing threat to the EU elite. This is why next year's Hungarian election has taken on an even greater urgency. It is the reason why the Romanian model, and the hybrid narrative-control mechanisms deployed in Moldova and Czechia, will be refined and mobilised to the full extent.

The European elite's fight for survival

The Romanian, Moldovan and Czech elections reveal the desperation of an embattled European elite fighting to preserve its own legitimacy. These are not isolated events, but stages in the same drama – the EU's attempt to hardwire political control into the very heart of the democratic process.

In Romania, the annulment of an election and the weaponisation of the DSA exposed how far Brussels is willing to go when voters defy instructions. In Moldova, the same machinery was exported and refined: the language of 'resilience' and 'foreign interference' masking the systematic silencing of opposition and the manipulation of electoral conditions to guarantee the right outcome. In Czechia, where the system could operate only through 'soft enforcement', the same pattern persisted: NGOs, fact-checkers and Commission-coordinated networks policing narratives to try to ensure the electorate stayed within acceptable boundaries.

This is the behaviour of a political class in existential panic: confronted with a rising tide of democratic rebellion, it retreats behind technocratic fortifications and information controls. By blurring the line between 'security' and politics, the EU has created a mechanism to neutralise dissent while

maintaining the ritual of elections. The language of 'resilience', 'trust' and 'integrity' has become the propaganda camouflage of a system that no longer trusts the people it governs. What is being defended is not democracy, but the continuity of the status quo, the insulation of power from the risk of popular will.

Conclusion: the Democracy Shield as a fortress against democracy

Our analysis reveals that the Democracy Shield, far from being a mechanism to defend democracy, is a protection racket for the European Commission. Its very architecture aims to protect the EU elite accountability to its citizens. What is presented as a noble response to 'foreign information manipulation' is, in fact, an elaborate bureaucratic project designed to insulate the Commission from political contestation, popular dissent and democratic scrutiny.

The inversion at the heart of the Democracy Shield is Orwellian. Words are stripped of meaning and redeployed to signify their opposites. 'Independence' now describes NGOs bankrolled by the Commission; 'fact-checking' becomes the re-labelling of censorship; 'trusted flaggers' are unelected, EU-funded enforcers of orthodoxy. This sleight of hand creates the illusion of neutrality while concentrating the power to define truth, error or interference in the hands of a narrow, unaccountable technocratic bureaucracy. The result is not an open marketplace of ideas but an authoritarian system of epistemic gatekeeping that determines in advance what citizens may see, say or hear.

The complicity of the European Parliament's Special Committee on the Democracy Shield compounds the problem. As the only directly elected institution in the EU, its task should have been to hold the Commission to account. Instead, it has embraced the Shield's logic wholesale. Its 'Working Document on Protecting European Democracy' functions not as oversight but as legitimation, draping the Commission's censorship architecture in

the language of resilience, preparedness and integrity. The Committee goes further, proposing the integration of industrial policy, platform regulation and civil-society financing into the same centralised system of control. Oversight becomes advocacy for ever-tighter interlocking of unelected bureaucracies and EU-funded NGOs.

The weaponisation of civil society is perhaps the most dangerous element of this process. Fact-checking networks such as EDMO and EFCSN are granted a quasi-regulatory role, supported by long-term EU financing. These groups, while styled as 'independent', are effectively co-opted into the enforcement regime, tasked with risk assessments, evidence-gathering and legitimising content takedowns. The conflict of interests between advocating educational narratives while having the power to police dissenting narratives is not a bug but the defining feature of the Shield. Citizens cannot vote out foundations or networks, yet these are the bodies increasingly empowered to decide what counts as truth and integrity. This is not democratic accountability, but cynical manipulation.

An extremely troubling development is the rise of prebunking – the attempt to inoculate populations against dissent before it even arises. By funding anticipatory interventions, often AI-driven, to predict and neutralise narratives judged problematic, the Commission has resurrected Cold War propaganda strategies in digital form. Prebunking is nothing less than epistemic conditioning, especially of the young, to think only within authorised boundaries.

The Democracy Shield exposes the legitimacy crisis at the heart of the EU. This only draws attention to the weakness of the Commission's authority, and its desperation to legitimise the EU project in the face of rising populist scepticism. The recent elections in Romania, Moldova and Czechia demonstrate what the Democracy Shield will be in practice: a centrally

coordinated censorship architecture that treats citizens as risks to be managed, not principals to be represented. It is not the defensive umbrella it purports to be, but an operating system for controlling electoral outcomes.

Taken together, the Democracy Shield represents a new phase in the EU's democratic deficit: the transformation of information governance into a command-and-control system, where unelected officials, subsidised NGOs and compliant platforms combine to suppress the pluralism to which the EU pays lip service. The modus operandi is disingenuous in the extreme: through funded programmes run by unelected NGOs, dissent is reframed as disruption, and pluralism as 'polarisation.' Under the banner of 'resilience', the EU aims to build a society that no longer tolerates democratic uncertainty, utilising its vast civic ecosystem to domesticate the public and pre-empt the politics of unpredictability.

The Democracy Shield does not guard democracy – it shields the European Commission from it.

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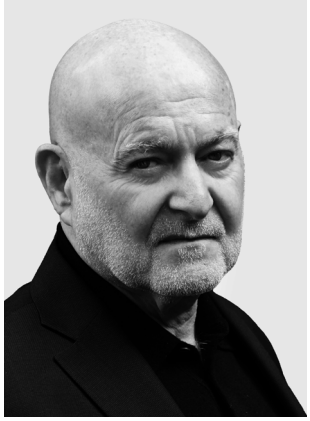

Dr Norman Lewis is a writer, speaker and consultant on innovation and technology. He is recognised worldwide as an expert on future trends and user behaviours regarding technology innovation and adoption. Norman was formerly a Director at PwC, responsible for running its crowdsourced innovation programme. Prior to this, he was the Director of Technology Research at Orange. He is an Advisory Board Member of Bubbletone Blockchain in Telecom – the world's first decentralised mobile roaming service.

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But this is not all. The Shield brings together EU-funded NGOs, 'fact-checkers', and 'trusted flaggers' to act as outsourced arms of Brussels's narrative control. It employs 'prebunking': the use of predictive AI and educational interventions to inoculate citizens against narratives before they even surface. And it is a whole playbook for intervening in elections across the continent to ensure the 'right' outcome.

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