

Ministry of the Interior and Kingdom Relations

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Re Government-wide strategy for effectively tackling disinformation

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The free and open public debate is one of the foundations of our democratic rule of law. The purpose of debate is to allow people to make informed choices, whether these are everyday choices or political choices. By making informed choices, citizens also help to check, assess and possibly even improve democratic decision-making. That is why it is important that everyone in the Netherlands needs to be able to make personal, everyday choices as well as political choices based on the information available, without being manipulated or misled. Having said that, the dissemination of disinformation¹, both domestic and foreign, may disturb the public debate, cause unrest and uncertainty and may even have a disruptive effect on our society as a whole and on the lives of individual people in this society. An effective approach to tackling misinformation and disinformation calls for a government-wide strategy centred on the values and fundamental rights of our the rule of law, such as the freedom of speech and freedom of the press. The basic principle remains that qualifying disinformation as such and fact-checking are not primary duties for the government. However, where national security, public health or social and/or economic stability are at stake the government can act and debunk disinformation. Therefore, in this letter, we present – also on behalf the Minister of Justice and Security and the State Secretary for Culture and Media – a renewed government-wide strategy to protect the free and open public debate against disinformation.

This strategy elaborates on the actions announced in the outline letter of the Minister of the Interior and Kingdom Relations² and the Value-Driven Digitalisation Work Agenda of the Minister for Digitalisation.³ With this strategy we also execute the tasks from the coalition agreement to continue the fight against disinformation, and to pay more attention to the disruptive effect of disinformation,

¹ Regardless of the content, the producer/spreader or the dissemination method, disinformation is the deliberate, mostly covert, dissemination of misleading information with the aim of harming the public debate, democratic processes, the open and knowledge economy or public health. This means that it may affect national security. It is a form of harmful, but often legal, behaviour. Disinformation does not necessarily contain incorrect information. It may be a combination of factual, incorrect or partially incorrect information, but it is always intended to mislead people and to do harm.

² Parliamentary Documents II 2021/2022, 35925 VII, no. 129.

³ Parliamentary Documents II 2022/2023, 2022D45419.

the responsibility of large online platforms and efforts made at EU level and by the Organisation for Economic Co-operation and Development (OECD) in this area. This strategy is mainly focused on disinformation, which is characterised by the intention to cause societal harm. This is what distinguishes it from misinformation.⁴ However, depending on the content, misinformation may also have harmful effects on public debate, democratic processes, the open and knowledge economy or public health, thereby affecting people's lives. Stories may be intentionally created and subsequently widely disseminated without malicious intentions. Therefore, some actions intended to address disinformation also offer room to tackle misinformation that has a disruptive effect.

This policy letter to parliament explains 1) the need for renewing the government-wide approach to disinformation by means of an analysis of the issue. Then, it sets out 2) the new government-wide strategy and the roles of the various ministries in it.

1. Analysis of the issue

Why is disinformation a problem?

The main risk of disinformation is stated in the introduction to this letter: disinformation may disrupt the free and open public debate on the basis of which people make everyday and political choices. This risk may also have various secondary effects, depending on the content of the disinformation and the reasons why it is being disseminated. The dissemination of disinformation may be ideologically/politically and/or economically motivated,⁵ which means that disinformation may pose a problem in various ways.

Firstly, the content of disinformation may pertain to the policy areas of all Ministries in the Netherlands. In periods of crisis in particular, the dissemination of disinformation may cause unrest and uncertainty in society. Public support for effective government action may also be undermined if the resistance to policy is based on dis- and misinformation. That is why each Ministry must be able to respond effectively and appropriately when it faces disinformation affecting its own policy area. In doing so, the Ministries will keep fundamental rights in mind and are cautious about qualifying disinformation as such.

Depending on the content, disinformation may cause serious damage. It does so, for example, when the content is directed at vital aspects of a democracy, such as reliable and transparent elections. Disinformation about diseases or remedies may also pose a risk to public health. Misinformation and disinformation narratives were circulated about COVID-19, for example, including about the cause of the virus, about possible remedies and about the government's measures and intentions, carrying the risk of undermining the fight against the pandemic.⁶

⁴ Misinformation is false or misleading information that is shared without the intention to cause harm, but the effects of misinformation may still be harmful.

⁵ Disinformation may be used to gather political or ideological support, to harm other ideologies or to create distrust and polarisation. Disinformation may also be used to sell products or to make money out of selling advertisements shown alongside disinformation messages (clickbait). Alternatively, disinformation may be used to show competitors or their products in a bad light. Finally, the dissemination of disinformation may be a product of its own, for example when selling a bot network ('botnet') that can be used to disseminate disinformation.

⁶ [Nederlands trollenleger verspreidt en coördineert desinformatie over vaccin | KRO-NCRV](#) ('Dutch troll farm disseminating and coordinating vaccine disinformation').

The General Intelligence and Security Service (AIVD) and the National Coordinator for Counterterrorism and Security (NCTV) have also pointed out the risks of certain conspiracy theories.⁷ Conspiracy theories may offer a sense of purpose and stability in a complex world, but may also result in fierce resistance to the establishment and ultimately inspire or lead to violence. Conspiracy theories can be disseminated more widely as they are easily linked to current events. These theories may become accepted if they are repeatedly voiced without criticism in the public and political domains. Conspiracy theories may pose a threat to the democratic rule of law, even if they are disseminated without the intention to cause harm. In some cases, conspiracy theories may prompt clear extremist actions such as sedition, home visits, threats, and even violence. Recent COVID-19 protests have shown that this threat is mainly visible on social media but may also spread to the physical space. What is more, the dissemination of conspiracy theories by anti-government extremists may impair public trust in the institutions of the democratic system (such as politics, the judicial system, the media and the academic world). Such impairment is not immediately visible, but manifests itself insidiously, like a gradual process of concrete degradation in the foundations of our democracy.⁸

Finally, disinformation does not respect borders. As a result, it is a risk not only for the Netherlands itself, but also for the stability and security of international organisations that the Netherlands is part of, such as the EU and NATO. The second state actors threat assessment shows that the international rule of law is increasingly under pressure⁹. Disinformation originating from state actors or actors affiliated with them, is a specific point of concern that poses a risk to national security. The European Union speaks of 'Foreign Information Manipulation and Interference' (FIMI) in this regard.¹⁰

Why is disinformation being disseminated, and by whom?

First of all, disinformation is disseminated with the aim of serving ideological or political interests. It may be used to gather political or ideological support, to harm other ideologies or to create distrust and polarisation.

Disinformation is also disseminated to promote economic interests. It may be used to sell products or to make money out of selling advertisements shown alongside disinformation messages (clickbait). Additionally, disinformation may be used to put competitors or their products in a bad light. Finally, the dissemination of disinformation may be a product of its own, for example when selling a bot network ('botnet') that can be used to disseminate disinformation.

In the past few years, we have seen state actors adopt an increasingly assertive attitude and increasingly use information operations and disinformation to serve political interests.¹¹ For example, the General Intelligence and Security Service confirmed in 2020 that Russian narratives were also shared in a number of Dutch-language social media groups. These narratives emphasised alleged European division and a lack of mutual solidarity between Western European countries in terms of

⁷ Conspiracy theories are a specific type of disinformation or misinformation, in which people are convinced that powerful groups with evil intentions have covertly manipulated certain events or situations behind the scenes. Although conspiracy theories often go hand in hand with distrust in the traditional media, the academic world and the authorities, the dissemination of conspiracy theories is often driven by concerns or questions rather than malicious intentions.

⁸ Parliamentary Documents II 2022-2023, 29754, no. 653.

⁹ Parliamentary Documents II 2022-2023, 2022Z23347.

¹⁰ This is the term used within the EU for undesirable foreign interference in the information space, a specific focus area within disinformation. A FIMI campaign is often part of a wider hybrid campaign.

¹¹ Parliamentary Documents II 2022-2023, 2022Z23347.

tackling COVID-19.¹² The Military Intelligence and Security Service (MIVD) also stated in its 2021 public annual report that state actors have a wide range of resources at their disposal, with disinformation and influencing being commonly used tools that are often applied as part of hybrid campaigns.¹³ The Russian invasion of Ukraine shows how disinformation may be an instrument of state actors and actors affiliated with them.

However, disinformation is not disseminated by state actors alone. The COVID-19 pandemic gave disinformation a more domestic dimension. The misleading narratives being disseminated about COVID-19 were often stories that combined misinformation and disinformation. In some cases, these were intentionally created and subsequently, sometimes without malicious intentions, widely disseminated. Research by Pointer, for example, revealed that a group of COVID sceptics in the Netherlands used coordinated tactics to disseminate disinformation about the COVID-19 vaccine¹⁴. They created fake accounts with the aim of making their view the prevailing view.

Finally, the General Intelligence and Security Service and the Coordinator for Counterterrorism and Security refer to domestic actors that use disinformation to reach their goals. They indicate that anti-institutional extremists deliberately use disinformation with stories that match their view of the world but that they know to be false.¹⁵

How is disinformation disseminated?

In recent years, we have seen technological developments contribute to the rapid dissemination of disinformation with a vast reach. The public debate is increasingly conducted on large and internationally operating platforms where more rapid and more targeted dissemination of disinformation is possible through the use of, for example, coordinated networks, bot accounts and fake accounts. Disinformation also easily spreads from one country to another due to the cross-border nature of these platforms. Disseminators of disinformation may also use targeted options for advertisements or other paid forms of content on the platforms to address their target groups. The Rathenau Instituut's report "Digital threats to democracy" states that amongst others, 'micro-targeting', chat apps and search engines will increasingly determine the dissemination of disinformation in the next few years.¹⁶ What is more, social media platforms apply a revenue model based on tailoring their services to individuals. The underlying recommender systems even work in such a way that disinformation is sometimes rewarded with a prominent place on the platform, with reliable information being pushed into the background.

It also becomes increasingly complicated to recognise disinformation. Photographs and videos can be edited using 'voice cloning' and 'deepfake' technology, with images being depicted differently or things even being said differently than what happened in reality.¹⁷

¹² Parliamentary Documents II 2019/2020, 30821, no. 112.

¹³ Parliamentary Document 30821, no. 125.

¹⁴ [Nederlands trollenleger verspreidt en coördineert desinformatie over vaccin | KRO-NCRV](#) ('Dutch troll farm disseminating and coordinating vaccine disinformation').

¹⁵ AIVD Annual Report 2021 [AIVD Annual Report 2021 | Annual Report | AIVD](#); Parliamentary Documents II 2022-2023, 29754, no. 653.

¹⁶ Rathenau Instituut (2020). *Digital threats to democracy – On new technology and disinformation*. The Hague (authors: Boheemen, P. van, G. Munnichs & E. Dujso).

¹⁷ Rathenau Instituut (2020). *Digital threats to democracy – On new technology and disinformation*. The Hague (authors: Boheemen, P. van, G. Munnichs & E. Dujso).

Despite the emergence of social media, the traditional media still occupy the most important position in the supply of information: 11 per cent of the Dutch people identify social media as the main type of news media, whereas 39 per cent identify TV and 11 per cent identify print media.¹⁸ They apply professional codes to guarantee the reliability of their reporting to the public, are accountable for errors and safeguard their independence with editorial charters. Having said that, the gatekeeper role in the information landscape that the traditional media fulfilled has come under pressure with the arrival of online platforms and new revenue models.

Who is impacted by disinformation?

Academic research has shown that people from all walks of life are prone to disinformation. The cause of their susceptibility is mainly found in their personal interest in a specific topic combined with a less critical stance.¹⁹ Moreover, disinformation may appeal to people's emotions by twisting facts or altering their context, or by leaving out the context altogether. Apart from anger or fear, such a story often also sparks interest. This means that the wide reach of disinformation calls for a wide range of solutions.

We are seeing concerns about disinformation increase among the Dutch population. The 2022 Digital News Report of the Dutch Media Authority shows that 35 per cent of respondents are concerned about what is real and what is fake on the internet.²⁰ In April and May 2022, the Coordinator for Counterterrorism and Security commissioned I&O Research to conduct a public survey on disinformation.²¹ This crisis barometer reveals that nearly half of respondents (47 per cent) are concerned, or very concerned, about the effects of disinformation. They stated as the main consequences – in response to a proposed list of potential consequences – confusion and unrest in society (55 per cent), larger differences between population groups in society (47 per cent), and a general increase in distrust (46 per cent). Although 81 per cent of respondents have much or a little confidence in messages from the Dutch government, one in five believe that the Dutch government itself is disseminating disinformation. A larger group of respondents, i.e. half of them, suspect that political parties are guilty of disseminating disinformation. Finally, four in ten respondents feel that the government is not taking adequate action to counteract disinformation.

2. Review of the government-wide strategy for tackling disinformation

In 2019, the first government-wide disinformation policy was presented, consisting of three action lines: prevention, strengthening the information position and possibly responding.²² The emphasis of policy was mainly preventive. However, the aforementioned analysis of the issue shows that the dissemination of both disinformation and misinformation has developed since 2019. This calls for a renewal of the government-wide strategy. This renewed government-wide strategy consists of two new tracks. What has not changed within these tracks is the basic principle that freedom of speech and freedom of the press must take centre stage and that qualifying disinformation as such and fact-checking are not primary government duties. The government can take action and contradict disinformation where national security, public health or social and/or economic stability are at stake.

¹⁸ [Digital-News-Report-Nederland-2022.pdf \(mediamonitor.nl\)](#)

¹⁹ Meyer, M. Alfano, M. & de Bruin, B. (2021a). The Development and Validation of the Epistemic Vice Scale. *Review of Philosophy and Psychology*.

²⁰ [Digital-News-Report-Nederland-2022.pdf \(mediamonitor.nl\)](#)

²¹ See [Risiko- en Crisisbarometer - Desinformatie voorjaar 2022 | Publicatie | Nationaal Coördinator Terrorismebestrijding en Veiligheid \(nctv.nl\)](#).

²² Parliamentary Documents II 2019/2020, 30821, no. 91.

Track 1: Strengthening the free and open public debate. The emphasis here is on retaining the pluralistic media landscape, strengthening citizens' resilience, and encouraging and using public alternatives to online platforms. These actions also help to reduce the influence that harmful misinformation and conspiracy theories have on the open public debate and ensure that citizens are able to actively participate in the public debate.

Track 2: Reducing the influence of disinformation. This track covers measures that depend on A) the content of disinformation, B) the producer or disseminator, C) the responsibilities of the traditional and social media, and D) knowledge development in general.

Track 1: Strengthening the public debate

A pluralistic media landscape is key to limiting the influence of disinformation. We are committed to retain the confidence in, and pluralism of, the Dutch free press. This contributes to limiting the breeding ground for the adverse impact that disinformation has on society. What is paramount here is that the government does not determine what is reliable and what is unreliable information. Citizens themselves bear primary responsibility in this regard; that is why we aim to reinforce citizens' resilience.

Retaining the pluralistic media landscape

The Netherlands has a high-quality and pluralistic news offering, although points of concern exist in terms of investigative journalism and regional and local journalism in particular. In the Media outline letter, the State Secretary for Culture and Media of the Ministry of Education, Culture and Science informed this House of the Cabinet's efforts towards strengthening local public broadcasters and investigative journalism.²³

As it is important for citizens to have access to reliable news online too. Therefore, it is positive that the Code of Practice on Disinformation clearly states that online platforms must support users in judging the reliability of information.²⁴ The European Media Freedom Act²⁵, explained below, includes a provision entailing that very large platforms cannot simply remove content from media organisations.

Steps are also being taken at the EU level to reinforce the independence and plurality of media professionals with the proposal for the European Media Freedom Act, which was published on 16 September.²⁶ The purpose of the proposal is to regulate the single market for media in such a way that the fundamental freedoms of freedom of the press and citizens' right to independent and pluralistic news and current affairs offering are supported. Protecting and retaining constitutional guarantees throughout the Union, as well as other essential components of democracy, is crucial here. The Cabinet is positive about the objectives of the proposal but does have doubts about its implementation in particular.²⁷

When drafting legislation and policy, the Dutch government is vigilant when it comes to protecting the freedom of the press. An example is the Safe Press (*Persveilig*) Protocol, which contains investigation and prosecution arrangements that the police and the Public Prosecution Service have

²³ Parliamentary Documents II 2021-2022, 32 827, no. 246.

²⁴ Parliamentary Documents II 2022-2023, 30 821, no. 169.

²⁵ [EUR-Lex - 52022PC0457 - EN - EUR-Lex \(europa.eu\)](#)

²⁶ [EUR-Lex - 52022PC0457 - EN - EUR-Lex \(europa.eu\)](#)

²⁷ Parliamentary Document 2022Z20238.

committed to applying in cases of aggression or violence against journalists. On 8 July, the government also submitted a bill to criminalise doxing and action has been taken to enable journalists who face threats to shield their address details in the register of the Chamber of Commerce.

Strengthening citizens' resilience

The Dutch government is guided by the value that freedom of speech and freedom of the press should take centre stage in tackling disinformation and does not regard qualifying disinformation as such or fact-checking as a primary government duty. That is why we have carried out various initiatives in the past few years to increase citizens' awareness of the existence of disinformation and to help them deal with this. Citizens' resilience may be strengthened in two ways: by making citizens media literate to allow them to recognise disinformation themselves, and by reducing the breeding ground for disinformation.

Communication to the public was, and is, key here. On websites such as Rijksoverheid.nl²⁸ and Crisis.nl²⁹ citizens can find information and tips on disinformation and fake news. Furthermore, the way in which institutions, including governmental institutions, communicate directly affects the increase in or elimination of distrust among citizens.³⁰ This means that proper communication can contribute to reducing the breeding ground for disinformation. The Ministry of the Interior and Kingdom Relations is therefore working towards an intensification of public communication about the existence of disinformation. For example, the various channels of communication of the national government may be used more often to share tips on recognising disinformation and the underlying technology, such as in the form of videos, infographics and Q&As. The national government may also use these channels to warn citizens about potential disinformation surrounding important events, such as elections.

Collaboration with the partners involved remains very important in this. In the 2023 budget of the Ministry of the Interior and Kingdom Relations a contribution to www.isdatechtzo.nl is therefore included.³¹ with the focus mainly being on increasing the website's reach. One measure to be taken here is promoting the website in libraries in order to increase name recognition among the widest possible audience. The number of website visits should then rise from 300,000 in 2022 to 475,000 in 2023.

Libraries, museums and other civil society organisations are also engaging in activities to make people more aware of how disinformation works and how they can recognise it. The Cabinet warmly welcomes initiatives as these, too, may contribute to reducing the breeding ground for disinformation among various groups in our society. In addition to efforts to raise awareness of disinformation, the State Secretary for Culture and Media is collaborating with the Dutch Media Literacy Network in setting up an awareness programme to increase knowledge and skills regarding the value of journalism in society.

Finally, stimulating the free and open public debate and reducing disinformation also helps to strengthen the resilience of the democratic rule of law. That is why the Cabinet believes it is important that the government starts discussions with various groups of citizens about

²⁸ See <https://www.rijksoverheid.nl/onderwerpen/desinformatie-nepnieuws>.

²⁹ See [Desinformatie en nepnieuws | Crisis.nl](https://www.crisis.nl/).

³⁰ Parliamentary Documents II 2022-2023, 29754, no. 653.

³¹ Parliamentary Documents II 2022/2023, 36200 VII, no. 1.

disinformation to identify opinions and needs in respect of disinformation. For this purpose, the Ministry of the Interior and Kingdom Relations will explore ways to strengthen the societal dialogue on this topic. In the spring, this House will also be informed of efforts made towards strengthening and protecting the democratic rule of law, including on the relationship between disinformation and social unrest. Knowledge about this relationship may also contribute to reducing the breeding ground for disinformation.

Stimulate and use public alternatives to online platforms

Conducting a proper online public debate calls for the development of alternatives to the existing large online platforms that people can choose. We encourage the development of these alternatives, such as PubHub and Pol.is. As the national government, we also have a driving and exemplary role to play by conducting our own public debates on these platforms. We also call on political parties to use these alternative platforms.

Track 2: Reducing the influence of disinformation

Despite a strong public debate with pluralistic media and resilient citizens, disinformation will continue to be a point of focus due to the constant development of online platforms and new technology. This means that we must continue our efforts to reduce the dissemination and influence of disinformation. These efforts depend on the content, the producer or disseminator, and the responsibilities of social or the traditional media, but also pertain to knowledge development in general.

A. Efforts depending on the content of disinformation

As stated earlier, every Ministry and the various authorities must be able to provide an appropriate response when disinformation affects their policy areas. This calls for awareness, as well as a clear framework for determining what is illegal and what is not.

Raising awareness in (governmental) organisations about disinformation

It is paramount that all Ministries and the various levels of government are aware of the risks of disinformation and how they can deal with it. Issuing warnings against disinformation ('prebunking') and actively contradicting disinformation ('debunking') are important measures in this respect. That is why the Ministry of the Interior and Kingdom Relations encourages the active exchange of knowledge in this area, including within a knowledge network consisting of communication professionals. Furthermore, efforts are also being made towards a way to consistently take into account the topics of misinformation and disinformation in study programmes and training courses provided to communication professionals within the national government. In order to make municipal authorities more aware of disinformation and possible responses, the Ministry of the Interior and Kingdom Relations started a collaboration with the Association of Netherlands Municipalities (*Vereniging Nederlandse Gemeenten*; VNG).³²

When increasing awareness, attention is also needed for the legal frameworks. A lack of clarity existed both in the national government and among municipal authorities about the GDPR and data processing frameworks. The Ministry of the Interior and Kingdom Relations and the Ministry of Justice and Security are currently working on the further clarification of the uncertainty experienced

³² See, for example, <https://www.weerbaarbestuur.nl/index.php/producten-en-diensten/desinformatie>.

with the legal framework³³ for online monitoring by municipal authorities as part of public security and law and order.³⁴

Furthermore, work is also being done on tools for dealing with disinformation with specific content. For instance, the Ministry of the Interior and Kingdom Relations and the Coordinator for Counterterrorism and Security are organising webinars for municipal officers in the context of the 2023 Provincial Council and Water Board elections and the elections to the European Parliament in 2024. In the run-up to the 2023 Provincial Council and Water Board elections, the Ministry of the Interior and Kingdom Relations will also organise an exercise to help other Ministries prepare for a rapid and proportionate response to disinformation campaigns. Moreover, in future cases it may be considered whether raising awareness among specific groups of professionals outside the government is necessary, as the Ministry of Health, Welfare and Sport has done previously for healthcare professionals.³⁵

Finally, depending on the content, disinformation may have even more impact during crises or important events, such as elections. This is why the Coordinator for Counterterrorism and Security will focus on developing expertise in the area of communication on disinformation in relation to crisis communication and national security.

National and international standards

Disinformation is part of the freedom of speech, but this freedom is not unlimited. It is important that as a society we determine these limits and create norms where necessary, which will allow us to act on the basis of predefined values. Therefore, the Ministry of the Interior and Kingdom Relations sees a role for itself in driving the public debate on the moral, ethical and societal limits of disinformation on online platforms and how to ensure that these limits are not exceeded. The aim is not only to discuss with citizens, experts, politicians and other parties where these limits are, but also to determine what action needs to be taken if these limits are overstepped. This is why we are organising a broad public debate on this issue. As indicated in the Value-Driven Digitalisation Work Agenda,³⁶ the Ministry of the Interior and Kingdom Relations will conduct part of this debate on one of the public alternatives to online platforms.

The Netherlands also promotes its norms and values through multilateral institutions. European instruments such as the DSA and the Code of Practice help the Netherlands to do this by indicating that platform regulation protecting fundamental rights is a feasible option for addressing disinformation. The Netherlands will promote this option in an active and attractive manner, especially among countries that face the challenges associated with digitalisation. The Netherlands advocates an alternative to content control that safeguards human rights and effectively counteracts disinformation campaigns. Pooling resources with like-minded countries, the Netherlands will work towards internationally shared standards for tackling disinformation and recognises that the EU has a normative role in this regard. Online platforms will be regulated in such a way that disinformation campaigns are counteracted without impacting the freedom of speech of individual citizens.

³³ Relevant are, for example, Article 8 ECHR, Article 10 of the Constitution, Article 172 of the Municipalities Act (*Gemeentewet*), the Police Data Act (*Wet politiegegevens*), the Police Act (*Politiewet*) and the GDPR.

³⁴ Parliamentary Documents II 2021/2022, 32761, no. 224.

³⁵ See <https://www.rijksoverheid.nl/onderwerpen/coronavirus-vaccinatie/documenten/brochures/2021/12/02/handreiking-desinformatie-voor-zorgprofessionals-in-coronatijd>.

³⁶ Parliamentary Documents II 2022/2023, 2022D45419.

Finally, more clarity is needed on the government's role in respect of illegal and harmful material. A wide range of interventions under criminal law, civil law and administrative law are available to address illegal and unlawful types of online material by legal means.³⁷ Therefore, the Ministry of Justice and Security takes the lead in the development of an integrated assessment framework for the government's role in illegal and harmful material to create clarity for both the government (at the national *and* regional levels) and citizens and the IT industry. Disinformation is one of the types of online content that will be considered in this regard. The Coordinator for Counterterrorism and Security is also setting up the Authority for Online Terrorist and Child Pornography Material (*Autoriteit Online Terroristisch en Kinderpornografisch Materiaal*; ATKM), which will send removal requests to internet companies where terrorist material is found on their platforms.³⁸ This may also cover disinformation containing terrorist material. The Coordinator is presently considering whether additional policy measures are needed to further reinforce the approach to tackling online extremism and terrorism, including the driving role of the internet in disseminating this type of message.³⁹

B. Efforts depending on disseminator or producer of disinformation

Disinformation produced or disseminated by foreign actors or actors affiliated with them is a specific point of concern in the approach to address disinformation. The European Union is also reflecting on this issue and speaks of 'FIMI' in this regard. The approach to addressing FIMI fits within the broader approach to address hybrid threats. The Netherlands is therefore, committed to developing an effective response, where possible in collaboration with national and international partners. The letter on the Approach to State Threats of 28 November 2022 informed this House of the development of a Government-Wide Response Framework against state threats that can be used to counteract FIMI.⁴⁰

In the European Democracy Action Plan, the EU announced that it will develop a toolbox that can be used in tackling FIMI. The FIMI toolbox has also been announced in the EU Strategic Compass.⁴¹ The approach to tackling FIMI thus fits within the wider European Common Security and Defence Policy (CSDP). Counteracting hybrid threats is a key component of this policy. The European Commission has also announced that CSDP missions and operations must be provided with resources and means to use the relevant instruments of the FIMI toolbox no later than 2024.

In addition to identifying and listing existing instruments, the further development of the FIMI instruments in the EU context also includes an assessment of whether new instruments should be added to the toolbox. If new instruments are developed, safeguarding fundamental rights is always of paramount importance to the Cabinet.

C. Focus on the responsibilities of traditional media and online platforms

All information, including disinformation, may be disseminated through online platforms, as well as through traditional media. Both parties are therefore responsible for preventing the dissemination of disinformation through their channels. The government may collaborate with these parties to counteract the offline and online dissemination of disinformation, but may also impose these

³⁷ Van Hoboken et al. (2019). De verspreiding van desinformatie via internetdiensten en de regulering van politieke advertenties. Institute for Information Law (IViR), Amsterdam Law School, University of Amsterdam.

³⁸ Parliamentary Documents II 2021-2022, 36 138, no. 2.

³⁹ Parliamentary Documents II 2022-2023, 29 754, no. 654.

⁴⁰ Parliamentary Documents II 2022-2023, 2022Z233347.

⁴¹ Parliamentary Documents II 2021/2022, 21501-02, no. 2474.

responsibilities on them by means of regulation. Freedom of speech and freedom of the press always take centre stage in this regard.

Traditional media

A pluralistic news and information offering is indispensable to democratic citizenship. Globally, the Netherlands is one of the countries with the highest level of confidence in the news. In Europe, confidence is only higher in Finland and Portugal.⁴² For the trust of citizens in the news, it is necessary that it is produced independently, while adhering to sound principles of journalism. The developments described in this letter stress the importance of this fact.

The Netherlands has a strong tradition of self-regulation in journalism. The quality of publications is guaranteed by the Code for Journalism of the *Genootschap van Hoofdredacteuren (Association of Editors)* and by the *Raad voor de Journalistiek (Press Council)*. Both public and commercial news organisations have joined these initiatives. These parties do not receive financial support of the government for this. The Media Act (*Mediawet*) prescribes that the public media offering must meet high journalistic and professional quality requirements. All journalism editorial teams at public broadcasters are subject to NPO's journalism code. If a public broadcaster fails to comply with this code, the public may file a complaint with the NPO Ombudsman. It is then up to the NPO Ombudsman to assess the broadcaster's programming against the code.

The Media Act requires both commercial and public audiovisual media services to have editorial charters in place to ensure editorial independence. Such a rule does not exist for the written press. It has been agreed in the Collective Labour Agreement for the Publishing Industry that publishers will apply the model editorial charter of the *Nederlandse Vereniging van Journalisten (Dutch Association of Journalists)*.

Online platforms

As agreed in the coalition agreement, large online platforms must become responsible for addressing disinformation on their platforms. The disinformation problem is a cross-border issue and the online platforms whose services are used to disseminate disinformation mostly operate in multiple or in all Member States. That is why the EU level is the most effective place for regulating these platforms. In this respect, freedom of speech and media independence are of paramount importance to the Cabinet. Efforts are made towards addressing disinformation that undermines the democratic rule of law. Furthermore, the Cabinet itself also calls on the online platforms to shoulder their responsibilities in this area.

Measures that online platforms are already taking within the EU and the Netherlands range from transparency about political advertisements and collaborations with independent fact-checkers to tracing coordinated networks of fake accounts. In June 2022, 34 participating organisations⁴³ laid down these measures more clearly by committing themselves to the new Code of Practice on Disinformation. The Cabinet supports the substance of the commitments made in the Code of Practice, but will continue to closely monitor its implementation. For instance, commitments are made in the field of transparency about political advertising. Within the EU, negotiations are currently ongoing about this topic in the context of the regulation on the transparency and targeting of political advertising. Increasing the transparency of political advertising is important to the

⁴² [Digital-News-Report-Nederland-2022.pdf \(mediamonitor.nl\)](#)

⁴³ Large online platforms such as Google, Twitter, TikTok and Meta, as well as smaller platforms, online advertisers and fact-checking organisations.

Cabinet. Transparency may help to provide insight into potential disruption of the public debate and is at the same time a substantively neutral measure.⁴⁴

As stated above, the dissemination of disinformation may be motivated by economic interests. Online platforms apply a revenue model based on tailoring their services to individuals, for example by means of advertisements. The Code of Practice on Disinformation, the DSA and the DMA contain measures to address this revenue model, with the Cabinet monitoring their implementation. The use of public alternatives to online platforms and services in public institutions that respect public values will also contribute to limiting the revenue model.

In addition to the above, the Ministry of the Interior and Kingdom Relations is considering together with the Ministry of Justice and Security whether any additional steps are necessary in view of the role that online disinformation may play in driving extremist behaviour.

Being the government, we ourselves should lead by example when it comes to the responsible use of social media. The DPIA and HRIA assessments of Facebook Pages reveal that one of the high risks is insufficient transparency about the impact that algorithmic data processing has on fundamental rights. It is also insufficiently clear how and why platforms recommend certain information to citizens searching for government information. It is important that online platforms openly answer for their methods to citizens, researchers and society.

D. Knowledge development

Finally, the phenomenon of disinformation, the technology used and the associated risks are constantly evolving. To ensure that the national government's policy is in line with these developments, it is important to constantly improve the information position of the government and civil society. That is why in the Netherlands the involved ministries (and intelligence and security services) are constantly in close contact with each other to share information on and any signs of potential disinformation activities, to interpret them and to take action if necessary. In this respect, specific attention must be paid to safeguarding citizens' privacy and respecting the General Data Protection Regulation (GDPR). Clarifying the perceived lack of clarity on the legal framework for online monitoring by municipalities in the context of public order and safety also contributes to this. Knowledge development within all authorities is another point of focus.

In view of the cross-border nature of disinformation, the Netherlands is also collaborating with other governmental organisations, in, amongst others, the EU, G7, NATO and the OECD. Best practices here are the European Rapid Alert System, the Hybrid Centre of Excellence and the NATO StratCom Centre of Excellence. These bodies exchange information such as signs of disinformation, measures for dealing with it and the latest academic knowledge.

Independent media, the academia and civil society also have a role to play in addressing disinformation. A case in point is BENEDMO, the Flemish-Dutch collaboration against disinformation, by and for fact-checkers, media companies, scientists and other experts.⁴⁵ Coordinated by the Netherlands Institute for Sound and Vision (*Instituut voor Beeld & Geluid*), they work in a consortium of eight partners to trace disinformation, make fact-checks and conduct research. The Cabinet welcomes this initiative, which receives support from the European Commission. To promote the

⁴⁴ Parliamentary Documents II 2021/2022, 36013, no. 2.

⁴⁵ See <https://benedmo.eu/>.

exchange of knowledge within the network of parties involved in the Netherlands, the Ministry of the Interior and Kingdom Relations has given the Netherlands Institute for Sound and Vision a subsidy. With this, the Institute can organise a couple of roundtable meetings on the theme of disinformation in 2022 and 2023. By bringing together a multi-disciplinary and independent group of Dutch disinformation experts, we stimulate the development and exchange of knowledge on this issue. .

Furthermore, various Dutch universities of applied sciences and research universities conduct research on disinformation. The Cabinet wholeheartedly supports this type of knowledge development, too. The Ministry of the Interior and Kingdom Relations is one the partners collaborating in the AI, Media and Democracy lab, an alliance between the University of Amsterdam, the Amsterdam University of Applied Sciences and the Research institute for mathematics & computer science in the Netherlands.⁴⁶ However, researchers have little, if any, access, to relevant data of online platforms to conduct research on disinformation. The Code of Practice on Disinformation does provide a framework for accessing platform data for academic research and fact-checkers.⁴⁷ The Ministry will also set up a pilot project for the responsible exchange of data of an online platform with researchers in order to gain an understanding of the phenomenon of disinformation. Privacy protection and responsible data sharing are always paramount in this regard.

Roles and responsibilities in respect of concrete results

The Minister of the Interior and Kingdom Relations has a coordinating responsibility for the policy against disinformation. She does so by acting as the primary point of contact for the policy against disinformation within the national government and towards municipal and provincial authorities, by promoting collaboration between authorities in this area, and by fulfilling a knowledge function. She also raises awareness of disinformation among government organisations and citizens. In this respect, the Minister of the Interior and Kingdom Relations works closely with the Minister for Digitalisation, who is responsible for the standardisation of policy for digitalisation and disinformation and, as a consequence, for tackling the online dissemination of disinformation, including through the Value-Driven Digitalisation Work Agenda.

The State Secretary for Culture and Media is responsible for media policy and, as a result, for safeguarding the quality and independence of journalism based on the Media Act. The State Secretary for Culture and Media and the Minister for Digitalisation share responsibility for encouraging media literacy, which will make citizens more resilient to disinformation.

Besides this, every governmental organisation also has its own responsibility for drafting an effective and appropriate response to disinformation whose contents affect the organisation's own policy area. Having said that, the Coordinator for Counterterrorism and Security is involved in tackling disinformation when its contents affect national security. If state actors produce or disseminate disinformation, the Ministry of Justice and Security (in the form of the Coordinator for Counterterrorism and Security), the Ministry of Foreign Affairs and, in the event of military actors, the Ministry of Defence are also involved.

Concrete actions, results and Ministries involved

The following Ministries are responsible for the joint execution of the action items in this letter and the results to be achieved with them:

⁴⁶ See <https://www.aim4dem.nl>

⁴⁷ Parliamentary Documents II 2021/2022, 36013, no. 2.

Action	Results up to and including 2025	Execution primarily by	Involved in execution	Already ongoing or new action
Track I: Strengthening the public debate				
Retaining the pluralistic media landscape	Investments in increasing the professionalism of local broadcasters	Education, Culture and Science		Ongoing
	Exploring how support for investigative journalism can be expanded	Education, Culture and Science		New
	Harmonised regulations on media freedom in EU Member States in MFA, making the media more resilient against hybrid conflicts and the dissemination of disinformation.	Education, Culture and Science		New
Strengthening citizens' resilience	More citizens visit isdatechtzo.nl for tips & tricks on how to recognise disinformation.	Interior and Kingdom Relations, Education, Culture and Science	All Ministries	Ongoing
	An awareness programme to increase knowledge and skills regarding the value of journalism in society has been set up and completed.	Education, Culture and Science		New
	Regular use of the national government's channels of communication to share tips on recognising disinformation or warn citizens about potential disinformation surrounding important events.	Interior and Kingdom Relations	All Ministries	New

	Internet users are more aware and more resilient regarding posting and consulting online material.	Interior and Kingdom Relations, Education, Culture and Science	All Ministries	Ongoing
	The efforts made towards strengthening and protecting the democratic rule of law include attention for the relationship between disinformation and social unrest.	Interior and Kingdom Relations		New
Stimulate and use public alternatives to online platforms	In collaboration with Public Spaces, the first Pubhubs have been set up and support is provided to public organisations in developing alternatives.	Interior and Kingdom Relations		New
	Pol.is netwerkdemocratie has been applied to 3 cases for the national government and for new developments covered by the Value-Driven Digitalisation Work Agenda.	Interior and Kingdom Relations		New
Track II: Reducing the influence of disinformation				
A. Efforts depending on the content of disinformation				
Increasing awareness in (governmental) organisations about disinformation	Misinformation and disinformation are consistently addressed in study programmes and training courses provided to communication professionals in the national government.	Interior and Kingdom Relations	All Ministries	Ongoing
	Local and regional governments know how to respond to disinformation in election time.	Interior and Kingdom Relations, Justice and Security	All Ministries	Ongoing

	The expertise regarding communication in relation to crises and national security has been expanded.	Justice and Security	All Ministries	New
	A guideline has been drafted for municipal authorities for using online monitoring tools to guarantee public order and safety.	Interior and Kingdom Relations, Justice and Security		New
	Prior to the 2023 Provincial Council and Water Board elections, how government organisations can provide a rapid and proportionate response to disinformation has been practiced in a simulation. The simulation has also been evaluated.	Interior and Kingdom Relations	All Ministries	New
	An integrated assessment framework has been developed for the government's role in illegal and harmful material.	Justice and Security	Interior and Kingdom Relations; Economic Affairs and Climate Policy	New
National and international standards	In a still to be developed extremism strategy, there will be attention for promoters and spreaders of extremist messages, including extremist conspiracy theories.	Justice and Security	Interior and Kingdom Relations; Social Affairs and Employment, Defence	New
	Internet users are more aware and more resilient regarding posting and consulting online material.	Interior and Kingdom Relations, Justice and Security		New

	The first debates have been conducted on an alternative platform that endorses public values.	Interior and Kingdom Relations, Justice and Security		New
B. Efforts depending on the disseminator or producer of disinformation				
	The negotiations for an effective FIMI toolbox have been completed and implemented, safeguarding fundamental rights	Foreign Affairs, Interior and Kingdom Relations, Defence, Justice and Security		New
	A Government-Wide Response Framework against state threats has been developed.	Justice and Security, Foreign Affairs, Defence	Interior and Kingdom Relations	Ongoing
	An EU Rapid Alert System is in place as a tool of the FIMI toolbox.	Justice and Security	Foreign Affairs; Interior and Kingdom Relations	Ongoing
C. Commitment to the responsibility of traditional media and online platforms				
Traditional media	Quality assurance in journalism (self-regulation/Media Act)	Education, Culture and Science		Ongoing
Social media platforms	Stimulating initiatives to make reliable content more visible and guaranteeing authenticity.	Interior and Kingdom Relations	Economic Affairs and Climate Policy; Justice and Security; Education, Culture and Science	Ongoing
	Online platforms are held accountable for compliance with the DSA and the Code of Practice on Disinformation.	Interior and Kingdom Relations		New
	Reducing the impact of negative deepfakes, collaboration with fact-checkers, transparency about	Interior and Kingdom Relations	Economic Affairs and Climate Policy; Justice and	Ongoing

	political advertisements and tracing botnets through the EU Code of Practice on Disinformation.		Security; Education, Culture and Science	
	The government has contributed to effective supervision of the DSA.	Economic Affairs and Climate Policy	Interior and Kingdom Relations	New
	A central reporting centre or knowledge centre is easily accessible to citizens where they can report unlawful online material and have it assessed.	Interior and Kingdom Relations		New
	Permanent funding of DSA supervision and enforcement has been arranged.	Economic Affairs and Climate Policy	Interior and Kingdom Relations; Justice and Security	New
	The implementing legislation required for DSA supervision and enforcement has been made.	Economic Affairs and Climate Policy,	Interior and Kingdom Relations; Justice and Security	New
D. Knowledge development				
	The local impact and nature of disinformation and conspiracy theories has been identified.	Interior and Kingdom Relations, Association of Netherlands Municipalities		Ongoing
	The pilot project for responsible data sharing with researchers to gain an understanding of the dissemination and extent of disinformation has been set up and completed.	Interior and Kingdom Relations	Economic Affairs and Climate Policy; Justice and Security; Education, Culture and Science	Ongoing
	Researchers have access to online platform data.	Interior and Kingdom Relations	Economic Affairs and Climate	Ongoing

			Policy; Justice and Security; Education Culture and Science	
	Permanent exchange of information on disinformation with European and international partners.	Foreign Affairs, Interior and Kingdom Relations, Defence, Justice and Security		Ongoing
	Independent media, the academia and civil society have taken on a role in addressing disinformation.	Interior and Kingdom Relations	Health, Welfare and Sport; Education, Culture and Science	Ongoing
	The roundtable meetings of the Netherlands Institute for Sound and Vision have resulted in a network of independent experts and knowledge exchange.	Interior and Kingdom Relations	Health, Welfare and Sport; Education, Culture and Science	Ongoing

Follow-up

This new policy framework provides the outlines for the national government’s actions to address disinformation. In late 2023, we will inform this House of the progress made with the implementation of this letter.

The Minister of the Interior and Kingdom Relations,

Hanke Bruins Slot

The Minister for Digitalisation

Alexandra C. van Huffelen