

European Democracy Shield

Assessing the Commission's Communication

KEY FINDINGS

Democracy under strain. Public concern about democracy is high and rising. Major threats include disinformation and foreign interference, cyberattacks on electoral infrastructure, misuse of generative AI, and growing societal polarisation. Elections are recurrent targets and risks peak in pre-electoral periods.

The European Democracy Shield. The Shield sets out a coordinated EU-level framework to enhance democratic resilience and scale up existing efforts. It is structured around three priority areas: safeguarding the information space; reinforcing institutions, electoral integrity and independent media; and boosting societal resilience and citizens' engagement.

New centre. A European Centre for Democratic Resilience will act as an operational hub: anticipating and detecting threats, issuing early warnings, coordinating rapid responses, and connecting EU bodies, Member States, fact-checkers, researchers and civil society through a dedicated Stakeholder Platform.

Key measures. Actions will strengthen the information space through platform compliance and transparency (e.g., recommender systems, demonetisation, labelling of manipulated and AI-generated material) and expanding fact-checking in all EU languages; consolidate electoral institutions with common electoral references, guidance on responsible AI use in campaigns, peer learning among authorities, and improved safety standards for political candidates and representatives; support independent media and journalists; build societal resilience and citizens' engagement through media-literacy, public awareness and initiatives of participatory democracy.

Implementation and work ahead. The approach prioritises enforcement and guidance over new legislation, and some components rely on voluntary participation. New dedicated programmes and funding will support independent journalism and media literacy. Stakeholders cautiously welcomed the initiative while calling for bolder measures and tangible progress on Europe's digital autonomy.

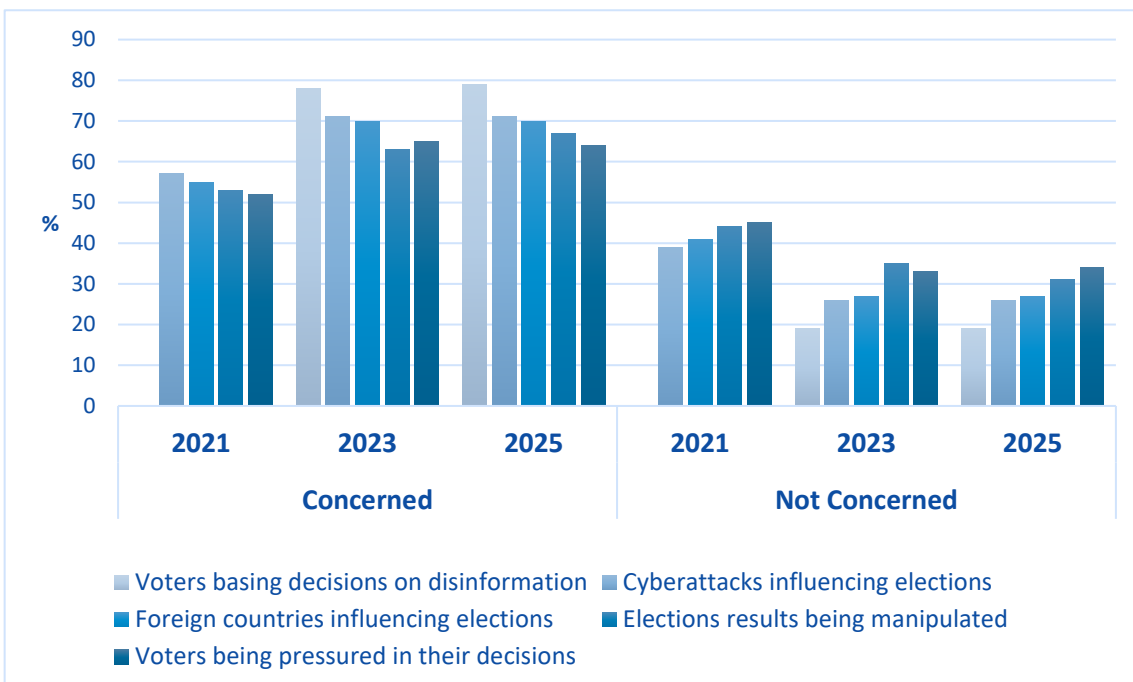


Context: Why a Democracy Shield?

Ahead of her second term in office at the helm of the European Commission, President von der Leyen’s political guidelines placed strong emphasis on democracy: “Europe’s future in a fractured world will depend on having a strong democracy [...] Our democratic systems are under attack. We have seen a rise in the number of threats from internal and foreign actors”.¹ Such words were echoed in her first State of the Union address to the European Parliament (EP), when she warned: “Our democracy is under attack. The rise in information manipulation and disinformation is dividing our societies. It is not only eroding trust in the truth – but also in democracy itself”.²

There is abundance of empirical evidence showing that these are particularly challenging times for democratic political systems. Global comparative assessments of democracies show similar trends: democracy and freedom are declining almost everywhere, including in some EU Member States. New challenges – triggered by digitalisation and the more unstable and unpredictable international context – enhance more long-standing problems – such as declining citizens’ participation in elections and democratic governance more generally, particularly by the younger generations.

Figure 1: Major concerns of EU citizens (% EU 27) regarding elections in Europe



Sources: Eurobarometers 507 (2021), 528 (2023) and 586 (2025)

Disinformation and Foreign Information Manipulation and Interference (FIMI) pose a particularly severe challenge to democracy. The World Economic Forum’s Global Risks Report ranks them as the major short-term risk.³ Special Eurobarometer 568 on “Protecting and promoting democracy” shows that a large majority of EU citizens are particularly concerned about voters basing their decisions on disinformation.⁴ Both the 3rd EEAS Report on FIMI Threats and the ENISA Threat Landscape acknowledge that elections are a key target of FIMI attacks, particularly through social media platforms, at the EU and Member State levels.⁵ On the eve of elections, disinformation and FIMI incidents peak. The final report of The European Digital Media

Observatory (EDMO) and its dedicated Task Force indicates that, in the final month before the June 2024 EP elections, EU-related disinformation reached “the highest level since the monitoring began”.⁶ As widely documented both in EU member countries and candidate countries, Russia and its proxies have frequently orchestrated disinformation campaigns to rig the elections.

Other significant challenges for democracy come from attacks on critical infrastructure, cyberattacks, covert third-country funding to political parties, candidates and interest groups, manipulation through generative Artificial Intelligence (AI) and societal polarisation. A comparison (Figure 1) of the most important concerns for EU citizens regarding elections over the last five years clearly shows that there are mounting concerns about the safety of elections, with a much larger share of Europeans concerned about different types of threats in 2025 than they were in 2021.

Background: The Road to the Shield

The path leading to the European Democracy Shield (EDS) had its beginnings shortly after the 2014 crisis in Ukraine and Russia’s illegal annexation of Crimea, which were accompanied by significant disruption in the information space. Russia’s purposeful use of disinformation served as a wake-up call for the EU to step up its actions on strategic communication.⁷ In March 2015, the European Council stressed “the need to challenge Russia’s ongoing disinformation campaigns”, inviting the High Representative to lay out an “action plan on strategic communication” by June 2015 in cooperation with the EU Member States and the EU Institutions. The European Council also referred to the establishment of a “communication team”, which would later become the East Stratcom Task Force within the European External Action Service (EEAS).⁸

In 2016, the UK’s decision to leave the EU, following the ‘Brexit’ referendum, and the US presidential elections drew public and political attention to the issue of electoral interference. Anti-disinformation measures rapidly increased worldwide, including notably in the EU. It became evident that disinformation not only represented an external threat, mainly affecting the EU’s (Eastern) neighbourhood, but was also a domestic issue. In April 2018, the European Commission released its communication on ‘Tackling online disinformation: a European approach’, which explicitly connected disinformation, democracy, and security:

*Disinformation is understood as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm. Public harm comprises threats to democratic political and policy-making processes as well as public goods such as the protection of EU citizens’ health, the environment or security.*⁹

The Code of Practice against Disinformation (CoP) represented the flagship project introduced by this communication. It was published in September 2018 and laid out several commitments to address the challenges posed by the dissemination of disinformation in online environments.

The second key policy document adopted in 2018 to counter disinformation was the Action Plan against Disinformation. Among its key initiatives, it led to the establishment of the Rapid Alert System (RAS) within the EEAS, enabling EU Member States – through designated national contact points – and EU institutions to share information and emit real-time alerts on disinformation campaigns.

With the 2019 European elections approaching, and a broader focus on safeguarding the integrity of elections in Europe, in September 2018 the Commission also published a Secure and Free Elections package. Among other measures, it led to the establishment of a European Cooperation Network on Elections (ECNE) composed of national contact points to exchange information, issue alerts and share best practices.

2020 was the year of the pandemic and, according to some observers, the related “infodemic”.¹⁰ In June 2020, the joint communication on Tackling COVID-19 disinformation – Getting the facts right led to several initiatives, including the establishment of the European Digital Media Observatory (EDMO), a network of regional and national hubs for disinformation research. The COVID-19 ‘infodemic’ also made evident the intrinsic limitations of the self-regulatory approach of the Code of Practice, leading to its reform. The strengthened Code of Practice on Disinformation was published in July 2022 and was later incorporated into a broader regulatory framework, becoming a Code of Conduct under the Digital Services Act (DSA).

In December 2020, the European Commission also published a communication on a European Democracy Action Plan (EDAP) to protect democratic integrity within the EU, in light of the challenges posed by the digital transformation. The importance of countering disinformation took centre stage, alongside the need to protect election integrity and promote media freedom and pluralism.

Following Russia’s war of aggression against Ukraine, the EEAS consolidated the use of the term FIMI and the 2022 Strategic Compass, articulating the EU’s ambition in security and defence, urged the EU to step up action. In June 2022, the Council explicitly published conclusions on FIMI, calling for strengthened action at the internal and external levels on the topic.¹¹ This entailed working on a ‘FIMI Toolbox’ laying down all the instruments at the Union’s disposal to tackle this threat, which the European Council endorsed in 2023.

In the run-up to the 2024 EP elections, the European Commission delivered a communication on the Defence of Democracy (DoD), presenting its view the protection of democracy in an increasingly complex international environment. It was accompanied by a proposal for a directive on the regulation of the representation of interests on behalf of third countries and two recommendations on, respectively, an inclusive and resilient electoral process and the engagement and effective participation of EU citizens.

The EP elections did not interrupt the EU’s work on safeguarding democracy. Speaking before the EP’s plenary ahead of her re-election as President of the European Commission, von der Leyen introduced her plan for the period 2024-2029:

If you lend me your confidence today, the Commission will propose a European Democracy Shield. The EU needs its own dedicated structure for countering foreign information manipulation and interference. It will pool all expertise and link up and coordinate with existing national agencies. Intelligence and detection capabilities must be bolstered, together with the ability to act and impose sanctions. [...] There is an urgent need to provide the European Union with powerful cyber-defence tools, to impose transparency on foreign funding of our public life as a common rule, but also to guarantee a reliable information framework. For this, the EU must support an independent press, continue to ensure rules are observed by digital giants, and further encourage media literacy programmes.¹²

In her Political Guidelines, she spelt out actions to counter FIMI online (with reference to national agencies such as the French Viginum and the Swedish Psychological Defence Agency), the creation of a European network of fact-checkers, the implementation and enforcement of the DSA and the AI Act.¹³

The allocation of policy portfolios in the new European Commission – voted in office on 27 November 2024 – reflects the comprehensive approach in the preparation and implementation of the EDS.

Michael McGrath – Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection – was entrusted to lead work on the protection of European democracy. He was asked to coordinate actions on the fight against disinformation and step up work on digital and media literacy; oversee work to preserve the fairness and integrity of elections moving forward negotiations on outstanding legislation; focus on the implementation of the EMFA and present proposals for the further protection of journalists and independent media.¹⁴

Henna Virkunnen – Executive Vice-President for Tech Sovereignty, Security and Democracy – was tasked to oversee the EDS and contribute to work on fighting disinformation. Given her responsibility for the Digital and Frontier Technologies portfolio, she was expected to lead work on AI, including on the risks for cybersecurity and ensure that the Commission “takes rapid and effective enforcement actions under the DSA and the DMA whenever necessary”.¹⁵

The fight against disinformation was also part of the mandate of the High Representative/Vice President of the Commission for Foreign Affairs and Security Policy Kaja Kallas, who was given the task to ensure that the EU could react flexibly to new and hybrid threats and work to create a better link between internal and external EU policies, including in the digital domain.

In order to ensure a better coordination between the different commissioners in charge of the different aspects of the EDS, the new Commissioners’ Project Group on Democracy, chaired by Commissioner McGrath and including seven other members, was expected to “support the preparation of a new European Democracy Shield”; “develop a whole-of-society approach that strengthens the resilience and protection of democracy”; “develop EU actions to preserve the fairness and integrity of elections across Europe, including by promoting high standards in democratic infrastructure and practice” and “ensure a fair and open online platform environment, prevent dissemination of mis-/disinformation and deepfakes”.¹⁶

In February 2025, the EDS was included in the annual Work Programme of the European Commission and expected in the third quarter of the year. On 31 March, the Commission opened a public consultation, which was concluded about two months later. In the ‘call for evidence’, the key issues that the EDS would address were grouped around four themes, including both an internal and an external dimension: (1) countering disinformation and foreign information manipulation and interference; (2) ensuring the fairness and integrity of electoral processes and strengthening democratic frameworks; (3) enhancing societal resilience and preparedness; and (4) fostering citizens’ participation and engagement.¹⁷ Finally, in her latest State of the Union address von der Leyen revealed the Commission’s plan to establish a European Centre for Democratic Resilience and a Media Resilience Programme.

On the EP’s side, two special committees on Foreign Interferences in all Democratic Processes in the European Union, including Disinformation – the INGE committee and its successor, the ING2 committee – were established in the 9th legislature. At the start of the 10th legislature, noting that “foreign interference, disinformation, and numerous attacks on and threats against democracy are expected to continue in ever-greater numbers and more sophisticated ways”, the Special Committee on the Democracy Shield (EUDS)

was established to assess and contribute to developing actions and policies to protect democracy.¹⁸ After an extension of six-months, the mandate of the EUDS will terminate in August 2026.

The Communication on the European Democracy Shield

The European Centre for Democratic Resilience

The communication on the EDS¹⁹ identifies three priority areas for action: 1) reinforcing situational awareness and support response capacity to safeguard the integrity of the information space; 2) strengthening democratic institutions, free and fair elections and free and independent media and 3) boosting societal resilience and citizens' engagement. The four themes identified by the 'call for evidence' are therefore reduced to three, but this is merely a formal rather than substantive change.

The most important institutional innovation proposed by the Shield is the European Centre for Democratic Resilience, whose competences cut across all three priority areas. The key aim of the new Centre is to facilitate information sharing and support operational cooperation and capacity building to withstand evolving common threats, in particular FIMI and disinformation. It should work as a dedicated hub for exchange and operational cooperation among EU institutions and Member States, linking together existing networks and structures; it will be supported and will work in close cooperation with the RAS. More generally, it will be complementary to, and operate in synergy with, existing measures to protect the integrity of the information space, elections, media pluralism and overall societal resilience.

More specifically, the Centre will:

- improve situational awareness and the capacity to anticipate and detect threats,
- develop a robust and coordinated early warning system,
- support rapid response capacity,
- raise awareness to prepare and empower societies and institutions,
- support training and capacity building activities,
- consolidate the EU's whole of society approach and build democratic resilience.

The Centre will be enhanced by a Stakeholder Platform, to be used by independent non-institutional stakeholders, to enable contributions and facilitate the exchange of information. The Centre will gradually build on existing communities – such as EDMO – and new communities, such as the European Network of Fact Checkers.

The Commission will manage the Centre. According to press reports, the Centre was initially designed to be under the direct control of the President of the Commission,²⁰ but it was later confirmed that Commissioner McGrath will have responsibility for it.²¹

Participation by Member States is voluntary and it is open to associate EU candidate and potential candidate countries, also in cooperation with like-minded partners. The implementation of the Centre will be rolled out progressively and based on the Member States' input and needs for support.

Table 1. The European Centre for Democratic Resilience compared to existing institutions

	RAS	ECNE	FIMI-ISAC	EDMO
Creation	2019	2019	2023	2020
Key references	Action Plan Against Disinformation (2018)	Communication on security free and fair elections (2018) Recommendation on election cooperation networks (2018)	1 st EEAS Report on Foreign Information Manipulation and Interference Threats	Action Plan Against Disinformation (2018)
General aim	Sharing of insights related to FIMI campaigns and coordination of responses	Supporting the exchange of information and good practices in electoral contexts	Through stakeholders’ collaboration, detecting, analysing and countering FIMI more rapidly and effectively	Strengthening and enabling collaboration among a multidisciplinary community of stakeholders tackling online disinformation
Specific functions	Sharing instances of FIMI campaigns (alerts) Sharing of analyses, trends and reports Coordinated responses Discussing best practices	Identification of awareness raising activities aimed at increasing transparency Assessment of risks and identification of cyber threats Exchange of information on FIMI campaigns	Building shared taxonomies and frameworks Develop networks and collaborations	Promoting scientific knowledge on online disinformation Advancing the development of fact-checking activities Supporting media literacy programmes.
Managing EU institution	EEAS closely cooperating with the Commission	European Commission	EEAS	Independent (EU-funded)
Participant institutions	EU institutions and EU Member States	Commission and EU Member States		
Operational actors	‘Points of contact’ working on addressing disinformation from all the above institutions	One ‘point of contact’ per Member State; additional experts could be invited to participate as needed	Like-minded organisations engaging in protecting democratic societies and institutions from external manipulation and harm	European University Institute and partner organisations

The Centre joins several other institutions and networks with partly overlapping mandates on countering FIMI and safeguarding election integrity (Table 1). The EEAS-run RAS and FIMI-ISAC, the Commission-run ECNE and the independent EDMO have all been recently set up – from 2019 onwards – to enhance coordination among the EU institutions, Member States and stakeholders, build situational awareness, share

and disseminate information on FIMI and other threats to democracy and develop rapid responses. The communication on the EDS acknowledges that “a great deal of work has already been done to address these challenges, with tools and structures emerging at both national and European levels”.²² However, it also identifies limitations in the existing structures, such as their selective focus on specific areas and communities, their use of different methodologies, their limited response capacity and the limited links to the work of competent authorities.

The creation of the Centre responds to the request to increase coherence and limit segmentation in the approach towards FIMI and disinformation.²³ However, the Commission itself had previously indicated that different institutions are already active in this field and duplication should be avoided.²⁴ The EDS should therefore be seen as an opportunity to clarify their mandates and ensure that the new Centre provides clear added value.

Key policies and actions

In the first priority area – “safeguarding the integrity of the information space” – the EDS significantly builds on the existing regulatory framework, particularly the Digital Services Act (DSA) and the Artificial Intelligence (AI) Act. It calls for the implementation and enforcement of the existing legislation, stressing particularly the importance that Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) upheld the obligations under the DSA. Together with the European Board for Digital Services, the Commission commits to preparing a DSA incidents and crisis protocol to address major incidents in the information environment.

The Code of Conduct on Disinformation will be enhanced, based on exchanges of views and regulatory dialogues with stakeholders, with the Commission exploring further actions on the transparency of recommender systems, the demonetisation of information, the detection and labelling of AI-generated and manipulated content and voluntary user verification tools, among others.

Several initiatives are planned in support of domestic actors, from the new blueprint for countering FIMI and disinformation to anticipate, detect and respond to FIMI threats and enhance national capacity building to the preparation of a list of common criteria to guide national media regulators in protecting the EU information space from non-EU rogue media services. Additionally, measures for candidate and potential candidate countries, including through EU Delegations and CSDP missions, will be reinforced and collective action with international partners will be strengthened by leveraging existing cooperation fora, ranging from G7 and NATO to the newly established Security and Defence Partnerships.

Some institutional innovations are also introduced. A new independent network of fact-checkers operating in the EU, candidate, potential candidate and partner countries will be established – the related call for proposals under the Digital Europe Programme worth €5 million closed on 2 September 2025 – to conduct fact-checking activities in all EU languages and manage an independent repository for fact-checking. The Florence-based EDMO, working under an extended mandate, will develop new analytical capabilities and will expand its reach, for instance through the new regional hub on Moldova and Ukraine. A common research support framework for researchers and the academic community (e.g., giving them access to shared cloud services and software) will also be established. The planned revisions of the mandates of EUROPOL and

EUROJUST – under the ordinary legislative procedure – will reinforce cooperation in criminal law, with potential implications for the fight against FIMI and disinformation.

The second priority area is “Strengthening our institutions, free and fair elections, and free and independent media”. Starting with election integrity, the Commission endeavours to enhance cooperation with the Member States through the ECNE, more closely associating candidate and potential candidate countries and introducing short-term exchanges of national experts.

Several instruments of ‘soft law’ are being developed by the Commission: from a repository of common references and standards for electoral processes to guidance on the use of AI in electoral processes for European and national political parties, from an update of the DSA election toolkit to new recommendations on safety in politics, complemented by a dedicated guide of best practices. The Commission will also support the establishment of a voluntary network of influencers to increase public awareness of the EU rules in the digital domain.

On the media system, the starting point is the existing legal framework, to be effectively implemented (i.e., the European Media Freedom Act, the EU Merger Regulation) or revised (i.e., the Digital Markets Act, the Audiovisual Media Services Directive, the Directive on Copyright in the Digital Single Market). Guidelines on the implementation of legislation on journalists’ protection (anti-SLAPPs) are also announced, together with updated recommendations on their safety.

Strong emphasis is given to financial tools to support the media system in the EU and beyond. The Media Resilience Programme, which is designed to support independent journalism and media literacy, is expected to bridge current support to the media with funding programmes in the new Multiannual Financial Framework (MFF), such as most prominently AgoraEU. Funding to local media comes through Creative Europe, while Horizon Europe supports the digital transformation of the media industry. The new MFF Global Freedom supports media freedom beyond the EU borders. The Commission endorses the development of the EU digital sovereignty, but the Shield does not provide specific information on the point (“the Commission will explore future pathways for the EU’s tech environment”).²⁵

Finally, the third priority is “boosting societal resilience and citizens’ engagement”. Starting with education, the Commission proposes, as part of its 2026 Education package, a Basic Skills Support Scheme for schools targeting children and young people and enhancing their digital and citizenship skills. This is accompanied by guidelines for teachers and educators on tackling disinformation, covering the newest technological developments, and guidelines to strengthen citizenship education in schools.

Beyond education, the Media Resilience Programme includes new actions to support media literacy across all age cohorts. Institutionally, the Commission commits to support Member States in developing or implementing national or regional plans on media literacy, strengthen the Media Literacy Expert Group (MLEG) with an expanded mandate including resilience and preparedness and create a new independent expert network on media literacy.

On democratic participation, the Commission proposes several new initiatives – from a European Citizens’ Panel on democratic resilience to Youth Policy Dialogues on the implementation of the EDS – together with bettered strategic communication (i.e., an awareness raising campaign on why democracy matters, a new

multilingual portal and an EU democracy guide for citizens) and some institutional upgrades, such as reinforcing a network of national authorities on citizens' participation.

Table 2. The EDS: key elements

	PRIORITY 1 Safeguarding the integrity of the information space	PRIORITY 2 Strengthening our institutions, fair and free elections, and free and independent media	PRIORITY 3 Boosting societal resilience and citizens' engagement
Revised legislation	Revision of the mandates of Europol and Eurojust	Digital Markets Act Audiovisual Media Service Directive Directive on Copyright in the Digital Single Market	Audiovisual Media Service Directive (review)
Recommendations		Recommendation on safety in politics Recommendation on the safety of journalists (update) Anti-SLAPP recommendations (review)	Recommendations and guidelines for school leaders and policy-makers Recommendation on supporting scientific evidence and its use in public policymaking
Implementation and enforcement of legislation	DSA Code of conduct on disinformation (enhanced) EMFA AI Act	DSA election toolkit (update) Code of conduct on disinformation EMFA Antitrust rules (including the revised Merger Guidelines)	
New tools	DSA incidents and crisis protocol Blueprint for countering FIMI and Disinformation Repository of fact-checking Protection scheme for fact-checkers	Repository of common references and standards for electoral processes Guidance on the fair, transparent, human-centred and responsible use of AI in elections Short-term exchanges of national experts	EU democracy guide for citizens European Citizens' Panels on Democratic Resilience Training package on citizens' participation Youth Policy Dialogues Voices of the Future initiative High-level event on democracy Annual award for democratic innovation
New institutions or networks	European Network of Fact Checkers	Voluntary network of influencers	Independent network for media literacy Network of national authorities on citizens' participation Business coalition for democracy European Centre of Expertise on Research Security
Extended or reinforced mandates	EDMO	ECNE	Media literacy expert group
Main sources of funding	Digital European Programme Defence spending	Media Resilience Programme, Creative Europe (expanded), Horizon Europe, Global Europe, defence spending	Media Resilience Programme Erasmus+ CERV Programme AgoraEU

The Shield: Content vs Expectations

The Working Document (WD) of the EUDS Special Committee on ‘Protecting European Democracy and Our Values’ presents a map of policy actions that, according to its rapporteur, MEP Tomas Tobé, should be pursued by the EU to tackle foreign interferences and strengthen democratic resilience.²⁶ It therefore constitutes a useful reference point to assess the ambition of the Shield presented by the Commission.

A key point of the WD is the establishment of a new independent structure at the EU level dedicated to combating FIMI, building on existing work by the EU institutions and gradually becoming operational. Yet, it also adds that “avoiding possible fragmentation and duplication of capabilities will be a key objective in this exercise”.²⁷ This is an important warning as the new European Centre for Democratic Resilience is being designed.

The WD stresses the importance of timely implementation of the EU’s digital acquis, and the enforcement of the provisions of the DSA for the Big Tech companies (VLOPs and VLOSEs according to the DSA). The EDS, and the recent actions by the Commission, equally push in that direction.²⁸

The development of an EU digital sovereignty is identified as the key objective to strategically counterbalance the influence of tech giants based in third countries, particularly the US and China, and technological innovation in areas of critical dependencies, such as data centres and cloud services, should be supported. The EDS embraces a similar approach, but it does not present detailed policy actions.

On media freedom and information integrity, several points in the WD are mirrored in the EDS: from the implementation of the EMFA to the updating of the recommendation on the safety of journalists, from the European Network of Fact Checkers to the funding of media literacy programmes. On election integrity, the EDS also commits to strengthening the ECNE and the protection of candidates and political representatives, but it does not mention the explicit inclusion of (digital) election infrastructure in the list of essential entities or services. Enhanced cooperation with candidates and potential candidate countries is a priority in both the WD and the EDS.

There are also policy areas where the EDS is less ambitious than the WD. This is, for instance, the case for cybersecurity, where the WD mentions several action points – such as the effective transposition of the NIS-2 Directive, a revision of the Cybersecurity Act and a reassessment of the mandate of ENISA – which are not touched upon in the EDS. The WD also suggests introducing a regulatory framework to develop minimum standards (e.g., common definitions, standardisation, etc.) for the Member States’ actions against FIMI.

According to some stakeholders, the Shield would lack sufficient ambition,²⁹ while others see it only as a “first step” in the path to protect democracy.³⁰ In general, in the EDS the Commission prioritises soft-law instruments. The communication does not explicitly introduce new legislative initiatives, although it commits to assessing and revising several existing regulations and fully implementing the acquis. Across the three pillars, a wealth of non-binding instruments, such as blueprints, guidelines, recommendations and toolkits, are introduced. Participation in the Centre for Democratic Resilience by Member States is also voluntary, as is involvement in the network of influencers. Not only the national parties, but also the EU-level parties will only be asked to make voluntary commitments on the responsible use of new technologies, notably AI.

On the other hand, however, the Shield – which is the third plan on the protection of democracy in the last five years, following the European Democracy Action Plan and the Defence of Democracy package – can only build on an already well-developed regulatory framework, which requires first and foremost effective implementation and enforcement. In its communication, the Commission also advances some preliminary ideas, which could be pursued further by other EU institutions. This is the case for the association between defence spending and democratic resilience that, even if it will spur some controversy, may significantly enhance investments in areas such as cybersecurity or the protection of critical infrastructure. Finally, the EDS is complemented by the EU Strategy for Civil Society, setting out concrete actions for the engagement, protection and funding of civil society organisations.³¹

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