



ANALYSIS AND STRATEGY FOR INCREASING RESILIENCE TO DISINFORMATION IN THE REPUBLIC OF MOLDOVA

The analysis and recommendations were developed within the framework of the project inforMD – against disinformation in the Republic of Moldova.

The opinions expressed in this paper are solely those of the authors

Chisinau
December 2021

supported by:



TABLE OF CONTENTS

Acknowledgements	2
About inforMD	2
Executive summary	4
1. Introduction	5
1.1. Why is disinformation so prevalent in the Republic of Moldova?	5
1.2. Political and geopolitical cleavages in the Republic of Moldova	5
1.3. Information space	7
2. Disinformation in the Republic of Moldova: trends and impact	9
2.1. Key trends	9
2.2. Types of disinformation, propaganda, fake news, and major stakeholders	15
2.3. Current practices in addressing disinformation	18
2.4. Media landscape	21
3. Legal and institutional framework in the field of disinformation resilience and information security	27
3.1. Legal framework to prevent and fight disinformation	27
3.2. Definition of disinformation	28
3.3. Sources of disinformation	29
3.4. The balance between access to information, freedom of expression, and ensuring the information security of the Republic of Moldova	29
3.5. Public authorities involved in the process of monitoring, preventing, and sanctioning disinformation actions	30
3.6. Institutional framework to ensure information security	32
3.7. Self-regulatory tools in preventing disinformation	33
4. Recommendations to improve legal and institutional framework	34
4.1. Strengthening the policy and regulatory framework against disinformation	34
4.2. Strengthen parliament's role in fighting disinformation and propaganda	35
4.3. Improve policies and strategic communication skills	36
4.4. Streamline the efforts of CSOs in combating disinformation	36
4.5. Strengthen the cooperation with social networks	37
5. Conclusions	38
Anexa 1. Further publications on disinformation in the Republic of Moldova	41

Acknowledgements

This study was developed with the contribution of Vadim Pistrinciuc, Executive Director of IPIS, Iulian Rusu, former Deputy Director of IPRE, and Valeriu Paşa, President of WatchDog.MD Community. The review process of the study was supported by Dominic Maugeais, Senior Project Manager at the Institut für Europäische Politik (IEP), and by media experts Liliana Vişu and Victor Gotişan.

This analysis has been carried out with the contribution of experts in the field and the inforMD project team. inforMD is implemented by the Institut für Europäische Politik (IEP) in partnership with the Institute for European Policies and Reforms (IPRE) and the Institute for Strategic Initiatives (IPIS), with the support of the German Federal Foreign Office.

About inforMD

inforMD aims at strengthening the resilience to disinformation in the Republic of Moldova by enhancing the capacities of civil society as well as through the exchange of experiences with Germany and other member states of the European Union as well as Eastern Partnership countries.

The overall objective of the project is to strengthen resilience to disinformation in the Republic of Moldova and thereby promote European values, democracy, and pluralism.

Specific objectives:

1. Promote the expertise of civil society actors, create networks, and develop a joint analysis and advocacy strategy to improve the regulatory framework against disinformation.
2. Develop students' skills in identifying and analysing disinformation and promote critical thinking.
3. Promote best practices by civil society actors in Germany and other EU member states as well as countries of the Eastern Partnership.

Implementing organisations:



Institut für Europäische Politik (IEP) has been active in the field of European integration since its establishment in 1959. With its work, IEP supports European Union (EU) candidate countries in their accession process to the EU and EU neighbourhood countries in strengthening their ties with the EU. IEP has been active for more than 15 years in the Republic of Moldova. Since 2015, IEP has supported the inter-ethnic dialogue and awareness-raising activities regarding the Association Agreement and has contributed to the project with expertise in fighting disinformation targeted at the European Union and its policies.



Institute for European Policies and Reforms (IPRE) was established in March 2015 as an independent, non-profit, and non-political think tank. IPRE's mission is to accelerate Moldova's European integration process by promoting systemic reforms, enhancing participatory democracy, and strengthening the role of citizens in national and local decision-making processes. IPRE is a member of the National Platform of the Eastern Partnership Civil Society Forum (www.eap-csf.eu) and co-initiator of the EaP Think Tank Forum, launched in 2017 in Chisinau.



Institute for Strategic Initiatives (IPIS) is an independent NGO, specialising in strategic analysis, good governance, public policies, inter-ethnic dialogue, and conflict mediation. IPIS contributed to the project implementation with its media expertise and via its information channels to population groups that are sceptical towards the EU and that are particularly affected by disinformation.

Executive summary

The inforMD project has developed a state-of-the-art analysis of disinformation as well as an awareness-raising strategy aimed at improving the Republic of Moldova's resistance to disinformation and developing further critical thinking among the broader civil society. This analysis has two main objectives. The first objective is to present an overview of the current impact and trends of disinformation as well as to analyse the existing legal and institutional framework against disinformation.

The second objective is to develop a list of recommendations for policy changes, legislative amendments, and institutional transformations to strengthen the resilience of the country and its society to disinformation. The paper also proposes a set of advocacy activities that will empower civil society organisations (CSOs), political actors, and other stakeholders to promote the necessary policies aimed at improving the country's resilience to disinformation.

The first chapter contains the introduction and background information about disinformation in the Republic of Moldova: Why is (political) propaganda so deeply rooted in the country? What are the underlying political and geopolitical cleavages?

The second chapter of the study reflects on the impact of disinformation in the Republic of Moldova and contains an analysis of data on disinformation trends. A classification of types of disinformation, propaganda, and fake news is made; current practices in dealing with disinformation – both positive and negative – are also indicated. This part also includes an analysis of the media landscape and the parties involved.

The third chapter contains an overview of the legal and institutional framework for resilience to disinformation and for the country's information security. In addition, this part includes an analysis of the general legislative framework, media legislation, the responsibility of institutions, as well as strategies and policy documents on combating disinformation.

The fourth chapter provides recommendations for improving the legal framework and concrete suggestions regarding the institutional framework, which, among other things, aims at increasing accountability and improving the efficiency of the Audiovisual Council, the autonomous public authority regulating the public and private audiovisual media in the Republic of Moldova. This chapter also includes recommendations for making CSOs' efforts to combat disinformation more efficient, including regarding the implementation of specific projects, best practices, and common activities of CSOs, government, parliament, and other relevant institutions.

The fifth chapter presents conclusions on the effectiveness of the existing instruments and policies in the field of countering disinformation. Weaknesses and strengths of information security are identified, and the impact of CSO efforts to combat disinformation is analysed.

1. Introduction

1.1. Why is disinformation so prevalent in the Republic of Moldova?

The Republic of Moldova continues to face challenges in its transition from a planned Soviet economy to a market democracy. Throughout the country's independence, several important achievements have been recorded. The Republic of Moldova has become a democracy. Moldovan elections that have been held during the 30 years since independence have been mainly free and fair, and the change of government has occurred via democratic processes. However, following the collapse of the Soviet Union, from the economic, demographic, and social perspectives, the state of affairs in the Republic of Moldova has not improved greatly. In the early 1990s, a conflict in the eastern part of the country led to the de facto separation from the rest of the state of the Transnistrian region, where the main industrial enterprises are located. GDP per capita remains the lowest in the region.

Since the early 1990s, Moldova's population has declined from 4.36 million to approximately 2.9 million. As economic opportunities have declined, people have sought more stable sources of income abroad. The poverty rate fell from 85% in early 2000 to 26.8% in 2020, but still remains high. Despite a decline in poverty, driven largely by the flow of remittances from its migrant workers, Moldova remains one of the poorest countries in Europe.

Moldova's economy is highly dependent on foreign markets and remittances, and has been very vulnerable to external shocks, such as the 1998 financial crisis in the Russian Federation and subsequent embargoes on Moldovan food products imposed by that country. However, Moldova's key problems are of a domestic nature. The country inherited a Soviet public administration system with institutional inefficiencies and excessive controls. The old public administration system has exhausted its lifespan and a new one has not been built to replace it. Also, according to observers, Moldova's history since independence has been characterised by the capture of public institutions, undermining public confidence in government.

One of the key problems inherited from the Soviet period is an education system that does not prioritise the development of critical and independent thinking skills. Moreover, the habit of depending on the authorities and on the state has remained very strong.

1.2. Political and geopolitical cleavages in the Republic of Moldova

The Republic of Moldova is a multi-ethnic state with numerous ethnic and identity cleavages among its population. The main ethno-political groups are Romanians/Moldovans, Ukrainians, Russians, Gagauz (an ethnic Turkic, Orthodox Christian, Russian-speaking group with a strong

pro-Russian orientation), Bulgarians, and Roma. The picture is further complicated by the fact that when it comes to political preferences and foreign policy, Moldovans/Romanians and Ukrainians are divided along different identity constructs even within these groups¹.

Moldovans/Romanians represent the majority in the Republic of Moldova. Most minority groups, however, continue to feel somewhat estranged from the state, which is why they often speak in favour of closer relations with the Russian Federation.

The majority of ethnic Russians in the Republic of Moldova feel a deep degree of affinity with the Russian Federation. Bulgarians tend to be friendly towards Bulgaria, but also prefer close relations with Russia and also often consume Russian TV. While Gagauz constitutes the official language within the autonomous region, about half of Gagauzians do not speak Gagauz as the language is not taught in the local kindergartens or schools. Consequently, many Gagauz people mostly speak the Russian language in their everyday life and, likewise, consume Russian media. While Gagauzians tend to look favourably towards both Turkey and Russia, in domestic politics they lean towards Russia and consume information that comes via Russian language channels (TV and radio stations, newspapers, and social media). Ukrainians living in Moldova are somewhat divided.

Although most Ukrainians in the Republic of Moldova tend to favour closer ties with Russia and have similar preferences to ethnic Russians when it comes to Moldovan domestic issues, this is not true of all Ukrainians. The ongoing Russian-Ukrainian tensions following the annexation of Crimea and the war in Donbass have also influenced the opinions and views on Moldovan-Russian relations and made people more critical of Russia's geopolitical aspirations. Nonetheless, a significant majority of ethnic Ukrainian Moldovans continue to sympathize with Russia rather than Ukraine.

Moldovans/Romanians in the Republic of Moldova are also a politically divided ethnic group. Romanian is also spoken by the individuals who identify as Moldovans. However, there are significant differences in the way Moldovans/Romanians view relations with neighbouring states. A significant share of Moldovan citizens shows a strong desire to unite or at least have closer relations with Romania. They identify themselves as Romanians. At the same time, many people within the group oppose a union or stronger ties with Romania. They often tend to identify themselves as Moldovans. There is another group of citizens, who have a Romanian identity (they speak Romanian and are affiliated with the Romanian nation and culture), but they want the Republic of Moldova to exist as a separate state.

1 National Bureau of Statistics: The population of the Republic of Moldova at the time of the Census is 2,998,235, at <https://statistica.gov.md/newsview.php?l=ro&id=5582&idc=30>

The political environment is highly polarized. In recent decades, the Moldovan political landscape has been divided into a large group of about 40% of voters who prefer parties friendly to the Russian Federation, and another group of 40% of voters, who are mostly pro-European. Among the pro-Europeans, there is, furthermore, a divide between those people favouring unification with Romania and those who oppose it. Over the years, these groups have remained, to a large extent, loyal in their voting patterns. Consequently, most of the election results were decided by the group of approximately 20% of “undecided” voters and how they were targeted or by the level of turnout of the two large blocs of voters (generally speaking, pro-European or pro-Russian). Since 1991 the two blocs have alternated in power.

The “geopolitical” split continues to be the main organisational principle in Moldovan politics. A party is considered to be right-wing or left-wing depending on its foreign policy orientation and not on the economic programmes or values it promotes (such as attitudes towards religion, abortion, human rights, etc.). Pro-Romanian/pro-European parties consider themselves to be right-wing (although some of them tend to have almost socialist economic programmes), while a pro-Russian orientation firmly characterises the Moldovan “left” of the political spectrum, even if some of these parties have sometimes implemented centrist or even right-wing economic policies and opted for extremely

conservative religious discourses. However, during the political history of the Republic of Moldova there have been periods that have been marked by exceptions in this respect. For instance, in 2008 when the Communist Party (PCRM) was in power, the idea of the European integration of the country was intensely promoted and was supported by more than 60% of the population.

1.3. Information space

The information space of the Republic of Moldova (info-media) is alarmingly exposed to external and internal disinformation activities. These activities are intensified, particularly during events of national interest, such as elections, and aim to influence the political decisions of the citizen, but also to polarise the information space in order to generate social discontent.

The Republic of Moldova is a constant target of disinformation activities from external sources. Russian media and entertainment programmes, rebroadcast in Moldova, are more popular than local TV channels. Given Russia’s strong information presence, it has managed to systematically manipulate public opinion and weaken social cohesion in the country. Traditionally, the Russian Federation promotes various manipulative narratives related to the Soviet past and, implicitly, the idea that the Republic of Moldova belongs to the so-called Russian world, the “Russkiy Mir”. Since 2014, in particular, when the Association Agreement with the EU was

concluded, Russia has also promoted narratives directed against Moldova's European aspirations.

Moldova's information space is also severely affected by domestic propaganda and disinformation activities, which are mainly promoted by politically-affiliated media with the aim of promoting particular (political, social, or economic) interests. The concentration of their ownership in the hands of a few political actors affects the space for independent, alternative media. This creates further social polarisation and mistrust between the citizens and authorities, and, consequently, undermines representative democratic

institutions. At present, the resources allocated by the various actors carrying out disinformation and propaganda activities far exceed the capacity of the Moldovan institutions to respond and combat this phenomenon.

To sum up, the precarious economic situation, continuing low levels of critical thinking skills, an increased degree of dependence on the authorities, ethnic cleavages, the "geopolitical" split, and an information space exposed to threats are the factors that create a situation whereby the Republic of Moldova is very vulnerable to disinformation and fake news.

2. Disinformation in the Republic of Moldova: trends and impact

This chapter provides an analysis of the impact of disinformation; identifies types of disinformation, propaganda, and fake news; analyses current practices in dealing with disinformation; gives an overview of the media landscape and a brief stakeholder analysis.

2.1. Key trends

According to the most common definitions, disinformation is the dissemination of obviously false or partially false information in order to confuse people about one's own positions or intentions. Disinformation is the technique of providing general misinformation to third parties, causing them to commit collective acts or disseminate judgements desired by the disinformers. While propaganda is aimed primarily at gaining emotional support, disinformation aims to manipulate audiences even on a rational level – either by discrediting information that contradicts itself or by supporting false conclusions.

The impact of disinformation is widespread in the Republic of Moldova. This is due to the difficult economic situation, a lack of critical thinking skills, and a traditionally high degree of dependence on the authorities. Moldova's overall level of resilience to disinformation remains, in 2021, quite limited, despite a number of legal and institutional changes in recent years. And

the task of combating disinformation and increasing media literacy is almost exclusively the responsibility of civil society organisations. At the same time, the impact of the phenomenon is very high. As proof of this, we need only look at the results of several public opinion studies, particularly from the pandemic period². Up to 50% of respondents believed, in May 2020, in various conspiracy theories and falsehoods related to the SARS-CoV-2 pandemic. The percentage of those who did not believe any of the pandemic-related theories and fake news included in the survey did not exceed 12%. This is the data from a first survey dedicated to the study of the phenomenon of disinformation in the Republic of Moldova, conducted on behalf of WatchDog.MD Community. Similar trends have been shown in other studies.

Internews Moldova has conducted several surveys on the general perception of disinformation. In 2018 and 2020, these surveys analysed public opinion on media, media literacy, and critical thinking skills. The results of the two

² WatchDog.MD. (2021). Socio-political trends and disinformation impact during the pandemic: <https://www.watchdog.md/2020/06/03/socio-political-trends-and-disinformation-impact-during-the-pandemic/>

surveys were compared.³ On the one hand, the number of those who say they know how to distinguish between fake and real news increased from 51% to 59%. On the other hand, only 30% and 31% respectively say that the general population can identify fake news. At the same time, only 9% were able to correctly assess whether five news headlines presented in the surveys were true or false. The same surveys showed that the EU media is considered trustworthy by most respondents (42%), followed by the Russian media (35%), and the Moldovan media (24%).

Another survey commissioned by the Independent Press Association's "StopFals" project found, however, different levels of trust in media outlets: The Moldovan press comes first (66.7%), followed by the European press (46.4%), the Romanian press (43.3%), and the Russian press (40.3%). These positive results are believed to be connected to the work of Moldovan debunking projects, which openly expose many disinformation and fake news cases by Russian media. Nonetheless, it is important to emphasise that methodological differences can account for the variations between the presented survey results. One of the important

findings of this study is that trust and popularity are not at all the same for consumers of information in the Republic of Moldova. Thus, the ranking of the most popular TV channels only partially overlaps with those that Moldovans say they trust.⁴

Audience measurements show the increasing popularity of TV channels broadcasting content from the Russian Federation. In May 2020, RTR Moldova, "First in Moldova", and NTV Moldova were the most popular channels both nationally and in the capital, Chisinau.⁵ In general, even if there is not yet a systematic collection of analytical material, the study and understanding of the phenomenon of disinformation and propaganda in the Republic of Moldova is based on quantitative data, which provides a good source for analysis. First of all, highly qualitative sociological data exists, including in evolution by years. The most important source is the multi-year research series, Barometer of Public Opinion.⁶ The data has been collected using the same methodology for more than 20 years, enabling the tracing of the dynamics of the development processes, which are extremely important in order to understand the disinformation and propagandaphenomenon – the popularity

3 Internews. (November 2020). Public perception of media and media skills in the Republic of Moldova. https://consulting.md/files/reports/46/INTERNEWS_Final_report_24.11.20_RO.pdf

4 Association of Independent Press. (2019). Study on the perception of the phenomenon of disinformation and manipulation by consumers of media products in rural areas: http://api.md/upload/Studiu_UE-final-web1.pdf

5 Nielsen. (May 2020). TV audience analysis: <http://media-azi.md/sites/default/files/Obzor-televizionnoj-auditorii-maj-2020.pdf>

6 Public Opinion Barometer of the Republic of Moldova. (2021): <http://bop.ipp.md/en>

of various sources of information (different types of news outlets in the country and abroad), the degree of trust in the media and in different statements of public actors, the geopolitical and political preferences, and the attitude towards certain important international events, etc.

Although the phenomenon of disinformation had been observed for a long time by some researchers, politicians, and civil society activists, it was not widely acknowledged in Moldovan society and politics. That is until 2014 when the term “hybrid war” rapidly gained recognition in Moldova, following events in Ukraine. The danger of propaganda and disinformation began to be recognised even in the Republic of Moldova. After 2016 – the time of the well-publicised Russian interference in the US elections – research, monitoring, and even countering disinformation in the Republic of Moldova became more widespread. This was also due to the decisive role that disinformation played in the Moldovan presidential elections that year.

In 2018, the prestigious British think tank Chatham House conducted a regional study that included the Republic of Moldova.⁷ It addressed several aspects of Moldova’s systemic vulnerability to hybrid challenges, with a major focus on the media component and the influence of Russian propaganda. Also in 2018, a very important regional study was carried out, the Disinformation Resilience Index.⁸ For the first time, it provided an overview of the Central and Eastern European region in terms of national vulnerabilities to propaganda and disinformation. A second edition of this study was carried out in 2021, albeit within a smaller geographical area – the Eastern Partnership and Visegrad countries.⁹

The study on the impact of Russian media influence on public opinion in the Republic of Moldova, published by WatchDog.MD Community, showed the effect of the portrayal of international political leaders in news broadcasts on their perception among Moldovan citizens.¹⁰ According to the study, the complete domination of the Kremlin-

7 Boulège, M., Lutsevych, O. & Marin, A. (2018). Civil society under Russia’s threat: Building resilience in Ukraine, Belarus and Moldova. Chatham House: <https://www.chathamhouse.org/2018/11/civil-society-under-russias-threat-building-resilience-ukraine-belarus-and-moldova-0/4>

8 Disinformation Resilience Index. (2018). Disinformation Resilience in Central and Eastern Europe: http://prismua.org/wp-content/uploads/2018/06/DRI_CEE_2018.pdf

9 East Center. (2021). Disinformation Resilience Index in Central and Eastern Europe in 2021: <https://east-center.org/disinformation-resilience-index-in-central-and-eastern-europe-in-2021/>

10 «The content of the televised information space in the Republic of Moldova and how it shapes electoral behaviour with an assessment of Russian influence on geopolitical choices.» WatchDog.MD. (February 2018). CONȚINUTUL SPAȚIULUI INFORMAȚIONAL TELEVIZAT DIN REPUBLICA MOLDOVA ȘI FELUL ÎN CARE ACESTA MODELEAZĂ COMPORTAMENTE ELECTORALE. CU O EVALUARE A INFLUENȚEI RUSE ASUPRA OPȚIUNILOR GEO-POLITICE: https://watchdog.md/wp-content/uploads/2018/02/Studiu-WATCHDOG_propaganda-rusa-la-TV-2018.pdf

controlled media has led to the imposition of its narratives on perceptions of political leaders such as Vladimir Putin, Angela Merkel, and Petro Poroshenko. The lack of objective information about the socioeconomic and political realities in the Russian Federation has resulted in Russian President Vladimir Putin being considered the most trusted politician among respondents in the Republic of Moldova for many years. The almost exclusive presentation of negative news about Western leaders in the Russian press has created a widely negative image of them.¹¹

In 2019, the Institute for Public Policy conducted an analysis of how the Kremlin and various Kremlin-controlled actors use the social network Odnoklassniki.ru¹² to influence elections. Similarly, in 2019 the analysis “Ask Dodon” – Why Is Russia Meddling in Moldova’s 2019 Elections?¹³ was published by WatchDog. MD Community, which reviewed the Kremlin’s subversive actions to meddle in Moldova’s elections after 2001. The study reached conclusions about

the effectiveness or failures of the hybrid tactics applied by the Kremlin. Another component of the study is the systematisation and analysis of the evidence of the Russian Federation’s interference in the 2019 parliamentary elections.

The “StopFals” project of the Independent Press Association analysed the work of the Audiovisual Council, the authority that regulates the public and private audiovisual media, from the perspective of combating disinformation.¹⁴ The findings revealed the current realities and need for systematic (re)action by the AC to disinformation. The authors found that not only does the Council not fight fake news and Russian propaganda, it even protects and encourages the phenomenon, including by refusing to punish some Russian-affiliated media outlets that violated the licensing regime or other legal rules. A relevant example is how Radio Sputnik, without holding a licence, was able to broadcast on the airwaves of many other radio stations.

11 «The content of the televised information space in the Republic of Moldova and how it shapes electoral behaviour with an assessment of Russian influence on geopolitical choices.» WatchDog.MD. (February 2018). CONȚINUTUL SPAȚIULUI INFORMAȚIONAL TELEVIZAT DIN REPUBLICA MOLDOVA ȘI FELUL ÎN CARE ACESTA MODELEAZĂ COMPORTAMENTE ELECTORALE. CU O EVALUARE A INFLUENȚEI RUSE ASUPRA OPȚIUNILOR GEO-POLITICE: https://watchdog.md/wp-content/uploads/2018/02/Studiu-WATCHDOG_propaganda-rusa-la-TV-2018.pdf

12 Institutul de Politici Publice. (2019). Odnoklassniki and parliamentary elections in the Republic of Moldova. <https://ipp.md/en/2019-07/odnoklassniki-and-parliamentary-elections-in-the-republic-of-moldova/>

13 Pașa. V. (2019). “Ask Dodon” - Why is Russia Meddling in Moldova’s 2019 Elections? WatchDog. MD: <https://watchdog.md/wp-content/uploads/2019/02/Why-is-Russian-meddling-Modova-2019-elections.pdf>

14 StopFals. (2020). The phenomenon of fake news in the Republic of Moldova and (in)actions of the broadcasting regulatory authority to combat this phenomenon. https://stopfals.md/dashboard/uploads/upload_6281d98ef8f4961f3e2963b67e4fc876.pdf

The Independent Journalism Center's State of the Press Index 2020¹⁵ draws attention to "blatantly toxic" media outlets that continue to be highly influential, undermining the country's information security. Special attention is paid to the fact that state institutions continue to provide these media, which undermine national security, with broadcasting frequencies.

Apart from analytical studies, several projects have been launched in the Republic of Moldova to debunk fake news. The most relevant effort was carried out by the "StopFals" project of the Independent Press Association.¹⁶ There have, however, been several media institutions that have worked hard at countering the disinformation phenomenon. Examples worth mentioning are "Ziarul de Gardă" and NewsMaker.MD. A wide-ranging programme of analysis, explanation, and counteraction was carried out by WatchDog.MD Community, i.e., in the form of explanatory debunking videos that are actively promoted on social networks.¹⁷ In addition to external propaganda, these analyses focused on

the manipulations and disinformation launched by kleptocratic groups inside the country with the aim of influencing the elections. Nonetheless, it is important to emphasise that many debunking projects in the Republic of Moldova have a problem when it comes to sustainability. Several projects have disappeared once the, often international, funding behind them has ended. Another problem is the relatively low impact of many fact-checking efforts. Often, they are simply not granted sufficient media coverage and the mainstream media, especially TV, pay very limited attention to disinformation and debunking analysis.

Due to the wide use of disinformation related to the COVID-19 pandemic, there is now more interest in and awareness of the phenomenon. Several surveys commissioned by Watchdog.MD have revealed the extremely high impact of disinformation about the treatment for COVID-19, and how the disease emerged and is spreading. For example, 37.8% of respondents said they believed the virus was created by Bill Gates. Three similar surveys¹⁸ have already been conducted

15 Raileanu, D. (2021). Situația presei în 2020, cea mai gravă din ultimii cinci ani. Radio Europa / Libera Moldova. <https://moldova.europalibera.org/a/situa%C8%9Bia-presei-%C3%AEn-2020-cea-mai-grav%C4%83-din-ultimii-cinci-ani/31106067.html>

16 StopFals. (2021): <https://stopfals.md/>

17 WatchDog.MD. (2021): https://www.facebook.com/watchdogmd/videos/?ref=page_internal

18 1. WatchDog.MD. (June 2020). Socio-political trends and disinformation impact during the pandemic: <https://www.watchdog.md/2020/06/03/socio-political-trends-and-disinformation-impact-during-the-pandemic/>;

2. WatchDog.MD. (October 2020). Survey: Evolution in perceptions of COVID-19 pandemic misinformation and population's political preferences: <https://www.watchdog.md/2020/10/23/survey-evolution-in-perceptions-of-covid-19-pandemic-misinformation-and-populations-political-preferences/>;

3. IPN. (June 2021). AfterPoll2021: https://www.ipn.md/storage/ckfinder/files/PP_AfterPoll_lunie%202021.pdf

since the start of the pandemic.

The 2020 presidential and 2021 parliamentary elections provided a unique opportunity to get to the core of Russian election influence operations – including understanding the logistics, decision-making process, and funding mechanisms of Kremlin disinformation in Moldova. We refer to a whole series of journalistic investigations and revelations about the work of the “Chernov Directorate” and its exponents. First of all, a series of joint investigations were carried out by the “Dossier Center”¹⁹ and RISE Moldova.²⁰ These were supplemented by the leak of information via the German tabloid “Bild,” which published documents that effectively attest to the financing of disinformation with the aim of influencing the 2020 presidential elections²¹. In the summer of 2021, the EUReporter portal published an investigation into the Kremlin’s extensive operation to influence and falsify the July 11 parliamentary elections.²²

Moreover, it is worth mentioning that the primitive narratives, spread by the Socialist Party, related to migrants (President Maia Sandu will bring 30,000 Syrians), external danger (George Soros and his network of agents), human rights (the traditional Christian family versus

gender equality or non-discrimination on the basis of sex), the status of women (President Maia Sandu has no family and no children) actually backfired. These narratives determined, to a significant extent, the electoral losses of the Socialists in both elections. This indicates that there is a level of critical thinking and analysis among citizens, and that this base needs to be deepened and developed so that media education reaches as many people as possible.

The presented studies show that the phenomenon of disinformation in the Republic of Moldova has been fairly well documented. There are sufficient available sources for a thorough research into and understanding of how the network of malign actors producing and spreading disinformation is organised, operated, and financed. The aims, means, media institutions, strategies, and tactics of disinformation are understood. Moreover, it attests to that rare situation where there is a factual basis linking specific cases of disinformation to external or internal sponsors.

19 Dossier Center. (2021): <https://dossier.center/mld/>

20 Rise Moldova. (2021). #Kremlinovici: <https://www.rise.md/investigatie/kremlinovici/>

21 Dulgher, M. (2021). Bild: “Kremlin invested almost 11.5 million euros to make Igor Dodon the president of Moldova.” The Socialists denied the accusations. Moldova.org: <https://www.moldova.org/en/bild-kremlin-invested-almost-11-5-million-euros-to-make-igor-dodon-the-president-of-moldova-socialists-denied-the-accusations/>

22 St. George, H. (2021). #OperationMorkovka: Moscow finances pro-Russian parties in Moldova. EUReporter: <https://www.eureporter.co/world/moldova/2021/07/08/operationmorkovka-moscow-finances-pro-russian-parties-in-moldova/?fbclid=IwAR03tmMK-pGNPnG-fJ47WXob2hSvenbKeAkwbopewDFnNXTovi9W3koyhJQ>

2.2. Types of disinformation, propaganda, fake news, and major stakeholders

At this stage, based on the results presented above, it is possible to define two broad areas of disinformation and propaganda application in the Republic of Moldova:

- External sources influencing Moldovans' geopolitical preferences;
- Internal sources undermining the Moldovan state.

They are strongly intertwined and mutually reinforcing, and the actors promoting them often work along both lines, even if the groups that sponsor and run the broadcasters of fake news, conspiracies, and media manipulations may have some divergent interests.

In the first area of application, influencing geopolitical preferences, the Kremlin and its proxies in the Republic of Moldova constitute the main actors. This type of disinformation and propaganda is mainly promoted through the Kremlin-controlled media and is facilitated by the fact that the majority of Moldovan citizens understand the Russian language. In essence, in the case of the Republic of Moldova – as in that of Belarus, most Central Asian countries, and Russian speakers in the Baltic states – there is an export of propaganda content produced for the domestic audience of the Russian Federation, but also for an international audience. In addition to the Russian press and opinion leaders, this type of propaganda is produced and

amplified by Kremlin-affiliated actors inside the Republic of Moldova. We are referring to media institutions such as Sputnik.MD, but also to various public associations and opinion leaders who promote the Kremlin agenda. In this regard, it is necessary to underline the role of the Moldovan Orthodox Church (Metropolitan Church of Moldova) both as an institution (dominant in the religious space of the country) and through some priests and church communities that act individually, sometimes even contrary to the official position of the Orthodox Church.

Another very important group of influence is the Socialist Party of the Republic of Moldova (PSRM), the massive media trust it controls and/or sponsors, and the opinion makers affiliated to (or sponsored by) it. Between six and seven TV stations (the most important ones – NTV Moldova, Primul in Moldova, Accent TV, Ren TV Moldova), several dozen news portals, dozens of political commentators (many of whom were taken over from the group previously affiliated with the oligarch Vladimir Plahotniuc), dozens of channels on the Telegram network, satire projects, and several printed newspapers that are directly or indirectly controlled by the Socialist Party. It is also worth mentioning the party's own exponents, who are very active in the media space, as well as an extensive network of local party activists. This entire conglomerate is by far the most important media power in the Republic of Moldova today.

Russian propaganda (directly or through its proxy agents in the country) plays an important role in the area of messages

aimed at weakening the Moldovan state. These messages all have the same goals – undermining the rule of law, the security sector, the resilience, and the economic potential of the Republic of Moldova. For example, any defence cooperation with NATO, the United States, and European countries immediately becomes the target of media attacks. The idea is propagated that the Republic of Moldova is being drawn into a conflict with Russia. Assistance in the area of reforms, especially in the justice and security sectors, is approached in the same way – the idea is propagated that state institutions are being subordinated to the US, the EU, Germany, Romania, Ukraine, etc.

Another example of disinformation undermining the functioning and authority of the state is related to the COVID-19 pandemic. Both through the Russian media presence and local or regional proxy agents, the vaccination process has been discredited, and conspiracy theories spread. This effort can be loosely classified as a tool of hybrid warfare carried out by Russian actors. Consequently, the enormous negative economic effects created by the pandemic are prolonged, the government's ability to focus on crucial reforms (i.e., justice reforms or anti-corruption efforts) are undermined, societal tensions are increased, and potential political instability is further facilitated.

This kind of propaganda is also aimed at discrediting the idea of the European or Western integration of the Republic

of Moldova and liberal, democratic, and progressive values. We are witnessing the de facto relativisation of reality and the upheaval of citizens – in other words, the full set of narratives and messages spread by the Kremlin both inside Russia and elsewhere in the world. In the specific case of the Republic of Moldova, the Kremlin is pursuing its strategic goal of not accepting the advancement of the country's integration into the Western community. For the Russian Federation it is important to keep the Republic of Moldova in the grey zone for the time being (i.e., neither in the EU nor in the full Moscow control zone). In the context of the pandemic, this initially undermined the international efforts to prevent the spread of the virus, and later counteracted the measures to encourage vaccination.

While these narratives are employed in other Eastern Partnership countries, such as Ukraine, there are certain narratives that can be considered unique to the Republic of Moldova. Through the media and Kremlin-affiliated opinion formers, Moldovan citizens are presented with the idea that Chisinau was the aggressor in the 1990-1992 Transnistria war, and attempts are being made to legitimise the Russian military presence on the left bank of River Dniester (contrary to international commitments) and to promote the idea that the Russian Federation is the guarantor of peace and stability. Complementing this message is the propaganda instrumentation of the Kremlin's economic influence. This message tries to convince Moldovans that the Republic of Moldova has to make

unilateral concessions and take Russia's interests into account in foreign and even domestic policy decisions, otherwise it will remain without access to energy resources and the Russian market. In essence, it is propagating the partial surrender of sovereignty of the Republic of Moldova to the Kremlin. This approach also includes efforts to sabotage good bilateral relations with Ukraine, Romania, the US, and the EU by exaggerating the problematic points or even by inventing and spreading falsehoods about the risks involved in these relations.

The gas crisis of autumn 2021 is the latest evidence of how the Russian Federation's media tool of manipulation and pressure is being put to work – including military commentators who have indulged in open attacks and blackmail, misplaced Russian media emphasis, narratives taken over by the local opposition, etc.

Undermining the state of the Republic of Moldova is the second major area of disinformation. The main actors in this category are local kleptocratic groups. They are natural allies for the Kremlin's interests, which partly overlap through the Socialist Party (PSRM). The aim pursued by these groups is to avoid strengthening the rule of law or an independent and honest judiciary, and to avoid accountability for the systemic corruption and organised crime that their exponents have been involved in, all of which will ultimately lead to the weakening of the position of the president and the ruling PAS party, which came to power on a strong anti-

corruption mandate. Moreover, this is the first time in the 30 years since independence that a pro-European party has won power in the state, not for predominantly geopolitical reasons, but on the basis of a drive to clean up the judicial system and fight corruption. At the present time, these actors appear relatively reluctant and defensive, but in the medium and long term they are clearly seeking not only impunity for past crimes but also a return to full control of the state's political and legal institutions. An important propaganda battle at this stage is to keep the exponents of kleptocratic groups in as many important public positions as possible and to infiltrate new appointments.

There are many narratives promoted in this area. However, these can be clustered into a few "packages" that emerge from the opinions they try to inoculate. The primary goal is to discredit the current PAS government and the president of the country, Maia Sandu. The idea is promoted that the new leadership is as corrupt as the previous ones, that it is incompetent, that the state of endemic corruption is a norm, or that there have not been many crimes that have upset Moldovan political life in recent years. All these messages are proliferated mainly through anonymous Telegram channels, without references to documents, investigations, opinions, or any single piece of evidence. An important goal at this stage is to create, first of all, high political costs for any justice sector reform. The aim is probably to decrease popular support for justice reform and for

stepping up the fight against corruption, or to preserve the current status quo.

Moreover, it is worth mentioning the narrative that presents the Christian-Orthodox faith of the vast majority of Moldovans as somehow antagonistic to EU values. In this context, an important role is played by the Orthodox Church (Metropolitan Church of Moldova, subordinated to the Russian Patriarchy) and its clergy.

Time will tell how effective these actions will be. But it can already be concluded that the new government has not yet been able to develop an effective mechanism to deal with these campaigns of disinformation and manipulation of public opinion. Moreover, after its first 100 days in power, most independent observers agree that the main deficit of the new government is its late and defensive communication.

2.3. Current practices in addressing disinformation

The amendment to the Audiovisual Code, also known as the “anti-propaganda law”, came into force in February 2018.²³ According to this law, it is prohibited to rebroadcast news, talk shows, and other media products from the Russian Federation in the Republic of Moldova. The fact that Russia has not ratified the European Convention on Transfrontier Television was used as an official reason. In December 2020, the parliamentary majority formed by the Socialists and the Sor Party cancelled the law, and in doing so also cancelled the ban on broadcasting information and military analysis programs from Russia within the territory of the Republic of Moldova.

Since the start, the law was not regarded as a sustainable solution and certainly was not a law that complied with democratic principles. Moreover, the Kremlin-affiliated media adapted quickly, for example, the role of Sputnik Moldova grew and thus, the positive impact of the law was limited.

However, this was not the policy instrument intended to counter disinformation. The National Information Security Strategy was approved in 2018,²⁴ which provided certain legislative innovations. For the first time terms such as information security, hybrid

23 Parliament of the Republic of Moldova. (2017). Law on supplementing the Audiovisual Code of the Republic of Moldova: https://www.legis.md/cautare/getResults?doc_id=105636&lang=ro

24 Parliament of the Republic of Moldova. (2019). Decision on the approval of the Information Security Strategy of the Republic of Moldova for the years 2019-2024 and the Action Plan for its implementation: https://www.legis.md/cautare/getResults?doc_id=111979&lang=ro

war, etc. were employed in a policy document voted on by the parliament. In a fairly transparent way, the direct basic source of information warfare was also identified – without being named directly. The solutions proposed in the Strategy referred to the creation of mechanisms and expert groups to act in crisis situations, provide policy and legislative amendment solutions, as well as platforms for open cooperation with the media and civil society.

However, the implementation of the Strategy so far can be described as poor. The media component of the Strategy was implemented in a very limited way. In 2019, after the inauguration of the government led by President Maia Sandu, consultations were held with civil society to establish a permanent mechanism for coordinating responses to information incidents (disinformation campaigns with an impact on the state's security). In 2020, a draft government decision was finalized to establish an Information Security Advisory Council, but the process stalled when the former President Igor Dodon tried to take control of the process and subordinate the Council to opinion leaders affiliated with the Kremlin (one of the main sources of disinformation). Currently, there is a unique opportunity to institutionalise the Council and to gradually recover from

delayed implementation of the Strategy.

At the end of 2018 parliament adopted the new Code of Audiovisual Media Services.²⁵ It was aimed at bringing more transparency, fairness, and independence to the media in line with EU best practices. However, as is very common in the Republic of Moldova, the way it was implemented was actually diametrically opposed to the announced goals. By in essence manipulating the legal provisions, the then ruling party, Vladimir Plahotniuc's Democratic Party of Moldova (PDM), appointed new docile members to the Audiovisual Council based on the old legislation before the new draft law came into force. Hence, instead of defending the free press, the Audiovisual Council exerted political pressure and exempted the propaganda affiliated with the ruling parties (initially the PDM, then the PSRM) from any liability. It was only in November 2021 that the new government amended the law and dismissed the entire AC staff.²⁶

In conclusion, all the official state attempts to fight disinformation appear to have failed to achieve the promised changes. However, two small but effective cases should be highlighted where the Security and Intelligence Service (SIS) did manage to intervene. In 2020 after the institution of the state of emergency, the SIS blocked access to a

25 Audiovisual Council of the Republic of Moldova. (2018). Code of Audiovisual Media Services of the Republic of Moldova: <http://www.audiovizual.md/files/Codul%20serviciilor%20media%20audiovizuale.pdf>

26 Jurnal. (2021). Ultima oră! Parlamentul a demis membrii Consiliului Audiovizualului: <https://www.jurnal.md/ro/news/8180581551121b58/ultima-ora-parlamentul-a-demis-membrii-consiliului-audiovizualului.html>

list of sites that were spreading clickbait disinformation about the pandemic. The list was provided by the Independent Press Association.²⁷ However, the fact that the intervention was only carried out against one list of anonymous sites with a limited audience, while important portals such as NOI.MD that broadcast fake news about the pandemic with much greater impact were not even warned, reveals a rather artificial action by the SIS for the sake of ticking a box. Later on, during the parliamentary election campaign in 2021, it was the SIS that de-conspired and blocked the activity of a “troll factory” sponsored by political actors.²⁸

When referring to good practices in the combat against disinformation and propaganda in the Republic of Moldova, these mostly relate to the activities of civil society and independent media. These include the introduction of an optional course on media education in schools, carried out by the Center for Independent Journalism.²⁹ The most famous debunking project, StopFals.

MD, has been going for several years and has been implemented by the team of the Independent Press Association.³⁰ Supported by European and American partners, several NGOs carried out studies, and organised events and practical activities to educate, detect, and combat fake news and disinformation. Several media institutions are constantly broadcasting, carrying out investigations, and debunking fake news, conspiracies, and media manipulation. These include Jurnal TV, TV8, Europa Liberă, Ziarul de Gardă, NewsMaker.MD, NordNews.MD, Nokta.MD, and Moldova.ORG.

There are a number of projects carried out by the Center for Independent Journalism: Mediacritica, media monitoring reports (particularly relevant during the electoral period, etc.), as well as media projects administrated by NGOs, such as “DeFacto – we defend ourselves from propaganda”³¹ and video analyses made by the WatchDog.MD team.³² As with the fact-checking projects, their problem is sustainability as they are reliant on dedicated initiatives funded by

27 Radio Europa / Libera Moldova. (2020). SIS a blocat peste 50 de site-uri care furnizează știri false în condițiile stării de urgență. <https://moldova.europalibera.org/a/sis-a-blocat-pest-50-de-site-uri-care-furnizeaz%C4%83-%C8%99tiri-false-%C3%AEn-condi%C8%9Biile-st%C4%83rii-de-urgen%C8%9B%C4%83/30499421.html>

28 Radio Europa / Libera Moldova. (2021). SIS a deconspirat o „fermă de trolli” care ar promova imaginea lui Veaceslav Platon (Deschide.md): <https://moldova.europalibera.org/a/sis-deconspira-troli-platon/31350901.html>

29 Educatia Mediatica. (2018). (Curriculum pentru gimnaziu) Educație pentru media (clasele VII-VIII): <https://educatia.mediacritica.md/ro/2018/03/09/curriculum-pentru-disciplina-optionala-educatie-pentru-media-clasele-vii-viii/>

30 StopFals. (2021): <https://stopfals.md/>

31 De facto: Ne apărăm de propagandă. (2021). Facebook Page: <https://www.facebook.com/neaparamdepropaganda>

32 WatchDog.MD. (2021). Videos on Facebook: <https://www.facebook.com/watchdogmd/videos/>

external sources. Such projects could become sustainable if they entered the “basic menu” of some television and information portals.

Even if the efforts to counter disinformation and the manipulation of public opinion come almost exclusively from the independent press and civil society, we can still see some progress. It is sufficient to compare the results of different opinion polls. For example, the survey commissioned by the WatchDog.MD Community in the fall of 2020 indicates that the majority of respondents did not believe in the fake news and propaganda narratives launched at that time in the context of the presidential elections.³³ Clearly, this data depicts opinion at a specific point in time, but it hints at the possible positive effects of an increase in education and cultivation of critical thinking together with the proactive fight against disinformation. This is also proven by the results of the recent elections.

2.4. Media landscape

Television is still the most popular and important source of information in the Republic of Moldova, although it is slowly but surely losing ground as the internet becomes an increasingly powerful source of information. Surveys show that during the COVID-19 pandemic, the consumption of information by the population both through television and the internet increased.

Data from Freedom House shows that in 2021, the overall score of the Republic of Moldova was identical to that of the 2018 edition: 61 out of 100 points.³⁴ This means that no significant progress has been made. More specifically, in terms of press freedom, the Republic of Moldova received two points out of a possible four. The political control of press institutions, insufficient transparency of the government and other state institutions, but also various kinds of pressure on journalists are the problems outlined in the report.

According to the World Press Freedom Index produced every year by Reporters Without Borders,³⁵ Moldova’s score decreased from 30.01 in 2018 (81st in the world) to 31.61 in 2021 (89th). This report emphasises the same problems as the Freedom House study, but also

33 WatchDog.MD. (2020). Sondaj sociologic: Evoluția percepțiilor privind dezinformarea în contextul pandemiei COVID-19 și preferințe politice: <https://www.watchdog.md/2020/10/19/sondaj-sociologic-evolutia-perceptiilor-privind-dezinformarea-in-contextul-pandemiei-covid-19-si-preferinte-politice/>

34 Freedom House. (2018). Freedom in the World 2018. Republic of Moldova Country Report: <https://freedomhouse.org/country/moldova/freedom-world/2018>

35 Reporters Without Border. (2021). World Press Freedom Index – Republic of Moldova: <https://rsf.org/en/moldova>

draws special attention to the political control over the Audiovisual Council.

Television is considered “the most reliable source of information” among Moldovans, even though its relative impact has steadily declined in recent years. According to the Public Opinion Barometer (POB), 28.7% of respondents declared in February 2021 that TV stations were the most reliable sources of information for them.³⁶

By contrast, confidence in online information sources is growing. In the same survey, 23.6% stated that the internet was the most reliable source of news. This trend has already been in evidence for many years and it is likely that within a maximum of five years, the internet will rank first in the list of reliable sources of information among the media consumers in the Republic of Moldova.

In 2021, Russian TV stations remain the most popular sources of consumption. The Barometer of Public Opinion indicates that the most popular are the rebroadcasted products of “Perviy Kanal” in Russia, and as for local stations, only the output of Jurnal TV can compete in popularity in the last two years. This situation has been constant for more than 20 years. After the oligarch Vladimir Plahotniuc fled the country, the management of the Russian station approved the transfer of the

rebroadcasting rights to a local station (“Primul în Moldova”), controlled by the Socialist Party and the Russian oligarch, Igor Ceaika.³⁷

In accordance with the sociological studies mentioned above, the Russian TV and press remained the most influential: 42.5% of POB respondents in 2021 had a lot or some confidence in the Russian media. Nonetheless, the share of those who trusted the European press has increased to 39.7%.

The process of changing political camp does not just involve rebroadcasting the Russian station “Perviy Kanal.” A hard-to-estimate number of news sites also shifted to the Socialist camp and now actively promote the pro-Russian agenda and narrative. New radio (Drive FM) and TV stations (3,14 TV and TV9) run by Kremlin loyalists are expected to be launched in the near future.

When showing the structure of the media space according to the owners/sponsors, as shown in the previous sub-chapters, several groups can be clearly delineated. First, the state media (public television and radio) with an agenda that oscillates between neutral and partisan in favour of the respective government, but with little public impact and influence.

Second, the media group (about nine television stations, several dozen news

36 Institute for Public Policy. (2021). Public Opinion Barometer February 2021: https://ipp.md/wp-content/uploads/2021/02/BOP_02.2021.pdf

37 Media AZI. (2019). Accent TV a devenit „Primul în Moldova”. CA a aprobat solicitarea postului de a-și schimba denumirea și de a retransmite conținutul „Pervii Kanal”: <http://media-azi.md/ro/stiri/accent-tv-devenit-%E2%80%9Eprimul-%C3%AEn-moldova%E2%80%9D-ca-aprobat-solicitatea-postului-de-%C8%99i-schimba-denumirea>

sites, 10 radio stations and several newspapers) affiliated with the Kremlin either via ownership or sponsorship (most of the institutions are nominally controlled by close associates of PSRM or other party leaders, or by some local journalists). This group is certainly the most trusted by Moldovans and is, therefore, the most influential part of the landscape.

Third, the “General Media Group,” which is still owned by Plahotiuc (four TV stations, two radio stations, plus a few radio stations being launched), and is what remains of the media empire controlled by the former leader of the Democratic Party. Even if the impact is lower now, it remains the second most influential press group.

Fourth, we can conventionally group some TV stations, news portals, and newspapers that can be considered independent in terms of their editorial policy, with a general pro-European agenda and a major cumulative impact. The difference between this group and the other groups is that its media institutions are not coordinated at the central level, do not have a common editorial policy, etc. These are financed, in part, through advertising, but most of them depend overwhelmingly on the support of Western donors. The cumulative influence of these media institutions is considerable, especially if we also take into account their popularity among the Diaspora in the West.

Fifth, there is a smaller press group, controlled by Ilan Sor (two TV stations).

Finally, there are also numerous small, private, nominally independent media actors, some actively involved in promoting disinformation and manipulation campaigns by offering a platform (most often for a payment or other benefits). Most often these institutions are owned by businesspeople who want to protect themselves or provide access to policymakers (sometimes by triggering discrediting campaigns against them) or to settle scores.

Very few news portals and absolutely no television stations in the Republic of Moldova are economically sustainable. The classic advertising market is quite small and unevenly distributed, and the pandemic has further reduced the budgets allocated for advertising, emphasizing their redistribution to social networks.

First of all, we should mention that the advertising market is affected by non-competitive practices. On the one hand, cartel deals play a major role. The most important one took place in 2017 and involved the largest advertising houses – “Media House” controlled by Plahotniuc and “Exclusive Sales House” affiliated with the Socialist Party. These two companies had exclusivity for placing advertising on all TV stations owned by Plahotniuc or those affiliated with the Socialist Party. And the advertising was sold as a “package” with very large discounts.

In other words, if a buyer of advertising space decides to place an ad with one of the television or radio stations included in

the cartel, they receive the low-price offer for other television stations and some advertisers (at least in the past) were sold advertising space on condition that they only bought in the group included in the cartel. These cartel deals mostly affected independent TV stations. In addition to the cartel, some economic agents who decided to advertise in the independent press, which was essentially in opposition to Plahotniuc's kleptocratic regime, became the target of administrative pressure, including the fabrication of criminal cases against them.

Another factor that strongly distorted the fair distribution of TV advertising proceeds was the distribution of content produced outside the country – first of all, that offered by Russian TV stations. For more than 20 years local TV stations were granted contracts to rebroadcast the content produced by Perviy Kanal, NTV, Rossia 1, TNT, and other major Russian TV channels. All of these TV stations were directly or indirectly, through intermediary companies, owned by the government of the Russian Federation. Moldovan TV stations have the right to rebroadcast content such as movies, series, entertainment shows, news, analytical shows, etc., for a small sum, but essentially free of charge.

Through these contracts, the Kremlin is following a clear strategic goal – to expand the influence of propaganda produced for the internal Russian market in the Republic of Moldova. But that is not the only impact of this practice. The holders of rebroadcasting rights enjoy favourable

rankings in the audience ratings without actually making any investment. Meaning that the content made available by the Kremlin – a qualitative and expensive one – attracts significant rates on the TV advertising market. For comparison, other broadcasters are forced to invest a lot in their own quality production or to procure this content at market prices, which greatly decreases the feasibility of the effort. Although the Moldovan legislation on the protection of competition is quite good, the political control of the Competition Council led to the perpetuation and protection of some monopoly schemes that have seriously affected the national media market.

The advertising market is not the only problem. Since advertising proceeds cover only some of the running costs of the press in the Republic of Moldova (it is impossible to estimate how much, probably not more than 25%), the media depends on alternative revenues. And these are unstable, not always transparent, and can hide different interests. An important source is non-reimbursable funding (grants) provided by external partners – in particular the US, the UK, the EU, EU member states, and various international foundations. The list of beneficiaries of this support includes media institutions that are able to demonstrate editorial independence and adherence to democratic values, as well as an organisational structure that includes professional business practices and sustainable financial planning. However, this funding model does not work flawlessly. For instance,

funding was granted by the Romanian Foreign Ministry to media institutions that promoted the agenda of kleptocratic groups, and even adhered to an anti-Western agenda.

Another important source of media funding is the Russian government. This funding is almost never granted officially. Television stations, portals, and other media outlets that promote the Kremlin's agenda are financed through parties (in particular the PSRM, which is in turn financed by Russia) and various business structures that obtain preferential rent from the Russian government. Payments rarely happen through transfers and informal cash payments are usually made. While in the case of Western grants there is a fairly high degree of transparency and control, it is impossible to quantify the volume of funds granted directly and indirectly by the Russian Federation. This illegal financing is a topic of pro-Russian propaganda in the Republic of Moldova. Thus, the opinion leaders affiliated with the Kremlin are trying to plant the idea that Western grants and "grey" funds from Russia are the same.

One last important source of media financing in the Republic of Moldova is unofficial advertising. Political parties, interest groups, and sometimes companies sponsor campaigns or the activity of press institutions to promote or defend their interests. In some cases, these campaigns include several media institutions and are brokered by PR companies. Even if the law says that such news and reports must be properly labelled and must notify the public that

they represent advertising, this does not usually happen – especially when it comes to political interests. Such models are often functional during political crises and electoral periods. In addition to official advertising contracts, some politicians offer unofficial amounts to television or other media institutions.

The unofficial payment of salaries in cash or through tax optimisation schemes is a phenomenon still widespread in the media of the Republic of Moldova, including among some press institutions that are regarded as independent and fair from the point of view of editorial policy. In essence, it is a model of press corruption because some institutions are founded deliberately for such a "business model", while others simply cannot resist such "advances".

The lack of state pressure regarding fiscal integrity, transparency, and the fairness of the financial administration of the press has allowed the establishment and entrenchment of a media landscape that consumes disproportionate resources compared to the general economic potential of the country. The enormous gap between advertising costs and proceeds (which are distributed unevenly) is covered only partially by transparent grants offered from the outside, while most of these differences come from dark, corrupt, criminal and/or Kremlin-controlled sources. As long as this model remains in place, the Republic of Moldova will continue to face disinformation campaigns and the mass manipulation of public opinion. Apart from content and journalistic

activity regulation, the elimination of non-competitive practices and drastic fiscal control, perhaps even equating media corruption with the corruption of dignitaries, as well as ensuring

the effective transparency of media ownership and funding sources are vital to solving the problem of disinformation in the Republic of Moldova.

3. Legal and institutional framework in the field of disinformation resilience and information security

An analysis of the legal framework (laws, articles, government decisions, etc.) in the field of information security and disinformation resilience was conducted, which also provides an overview of the legislation intended to fight disinformation. It also includes an overview of institutional accountability and a brief review of strategies and policy documents aimed at fighting disinformation.

3.1. Legal framework to prevent and fight disinformation

The main objectives and priorities of the national policy of the Republic of Moldova in the field of combating disinformation and propaganda are described in the Information Security Strategy (2019-2024).³⁸ The Strategy was adopted in 2018 by parliament in accordance with the objectives established by the information security concept of the Republic of Moldova (2017).³⁹ The National Security Strategy (2011)⁴⁰ of the Republic of Moldova stipulates that the information security of the state must be ensured, including by addressing disinformation and propaganda activities in the media landscape.

The Information Security Strategy has the objective of harmonising and integrating the institutional and regulatory framework at the national level by strengthening cyber resilience, the security of the info-media landscape, multimedia pluralism, and the strategic and operational capacities of state institutions, including by ensuring effective mechanisms for national coordination and international cooperation in the field of information security. Two reports on the implementation of the Information Security Strategy in 2019⁴¹ and 2020 were presented to parliament by the Security and Intelligence Service (SIS). Although presented to parliament, the later report has not yet been published.

38 Parliament of the Republic of Moldova. (2019). Decision on the approval of the Information Security Strategy of the Republic of Moldova for the years 2019-2024 and the Action Plan for its implementation: https://www.legis.md/cautare/getResults?doc_id=111979&lang=ro

39 Parliament of the Republic of Moldova. (2018). Law on the approval of the Information Security Concept of the Republic of Moldova: https://www.legis.md/cautare/getResults?doc_id=105660&lang=ro

40 Parliament of the Republic of Moldova. (2011). Decision on the approval of the National Security Strategy of the Republic of Moldova: https://www.legis.md/cautare/getResults?doc_id=17629&lang=ro

41 Intelligence and Security Service of the Republic of Moldova. (2019). Report: monitoring and evaluation of implementation Information Security Strategy of the Republic of Moldova for 2019-2024: <https://sis.md/sites/default/files/transparenta/Raport%20realizari%202019%20SSIfinal.pdf>

The National Media Development Concept was adopted in 2018.⁴² It identifies the main challenges and outlines policy priorities focused on improving the regulatory and activity framework of the media, and also sets objectives to reduce the negative impact of propaganda and disinformation in the media landscape. In addition, a new policy document – the National Media Development Programme in the Republic of Moldova – is currently being developed.

The main legal framework that regulates the field of preventing and combating disinformation and propaganda in the Republic of Moldova consists of:

1. Code of Audiovisual Media Services of the Republic of Moldova, adopted by Law No. 174/2018⁴³
2. Law No. 64/2010 on the freedom of expression⁴⁴
3. Law No. 753/1999 on the Security and Intelligence Service of the Republic of Moldova⁴⁵
4. Criminal Code of the Republic of Moldova, adopted by Law No. 985/2002⁴⁶

3.2. Definition of disinformation

The term disinformation is not defined in the Republic of Moldova's national law. Disinformation is seen as a tool to achieve objectives that contravene national security and public order.

The Information Security Concept of the Republic of Moldova (ISCRM) uses the term disinformation to define the term information warfare – a set of actions carried out by state or non-state entities in the information space through propaganda, media aggression, manipulation, and disinformation, which include digital, cyber, and psychological operations for the purpose of undermining the sovereignty, independence, and territorial integrity of a state.

The regulation of disinformation is one of the actions established in the Action Plan for the implementation of the Information Security Strategy of the Republic of Moldova for 2019-2024, mentioned above.

At the same time, the Code of Audiovisual Media Services of the Republic of Moldova uses the term disinformation in the context of defining information

42 Parliament of the Republic of Moldova. (2018). Law on the approval of the National Development Concept for the Republic of Moldova: https://www.legis.md/cautare/getResults?doc_id=105449&lang=ro

43 Parliament of the Republic of Moldova. (2018). Audiovisual Media Service Code of the Republic of Moldova: https://www.legis.md/cautare/getResults?doc_id=125226&lang=ro

44 Parliament of the Republic of Moldova. (2010). Law on the freedom of expression: https://www.legis.md/cautare/getResults?doc_id=126675&lang=ro

45 Parliament of the Republic of Moldova. (1999). Law on the Intelligence and Security Service of the Republic of Moldova https://www.legis.md/cautare/getResults?doc_id=121235&lang=ro

46 Parliament of the Republic of Moldova. (2009). Penal Code of the Republic of Moldova: https://www.legis.md/cautare/getResults?doc_id=126674&lang=ro

security – the protection of information resources, persons, society and the state, including a set of measures to ensure the protection of the person, society, and the state from possible attempts at disinformation and/or manipulative information from the outside and for the non-acceptance of media aggression directed against the Republic of Moldova.

3.3. Sources of disinformation

From a functional point of view, the field of preventing and combating disinformation is focused on the information sources existing in the Republic of Moldova, as well as on those that are not managed in the country but can be accessed as part of the exploitation by individuals of the freedom of access to information. In this regard, the sources of information consist of:

- a. audiovisual service providers;
- b. printed media, including electronic;
- c. social media.

The Information Security Strategy highlights the increased risks in the context of hybrid threats and information warfare, in particular, in the case of the electronic media and social networks (para. 55, 74 of the ISS). At the same time, its Action Plan (AP) stipulates actions to monitor and prevent disinformation such as:

- a. design strategic communication information resources (objective 12, action 3 of the AP);

- b. deliver courses on disinformation techniques (objective 13, action 4 of the AP);
- c. develop criteria to classify the information as a product of disinformation (objective 15, action 1 of the AP);
- d. adjust the legal framework to streamline the data collection process in order to identify the origin of funds and the subjects involved in disinformation actions.

3.4. The balance between access to information, freedom of expression, and ensuring the information security of the Republic of Moldova

The strategic vision enshrined in the Information Security Strategy stipulates that the Republic of Moldova shall ensure a secure information landscape using anti-disinformation assets and efficient policies for all national, state, and non-state entities, ensuring at the same time the protection of human rights and fundamental freedoms in accordance with the principles of democracy and the rule of law, and in particular, access to information and freedom of expression.

At the same time, the current legal framework establishes that neither freedom of expression nor access to information or ensuring the information security of the Republic of Moldova are fundamental rights or absolute objectives, both being mutually limited in exercising other national priorities

(ensuring a fundamental right or national security).

In this regard, it is essential for the authorities to provide the necessary balance between access to information and freedom of expression, on the one hand, and ensuring the information security of the Republic of Moldova, on the other hand.

Freedom of expression is limited by the protection of national interests necessary in a democratic society, such as national security, territorial integrity, and public safety, the defence of public order and prevention of crime, protection of health and morals, reputation or rights of others, non-disclosure of confidential information, and the guarantee of the authority and impartiality of the judiciary.

At the same time, the press is free to expose the facts provided that these are not distorted and that censorship is not allowed within the editorial policy of media entities.⁴⁷

3.5. Public authorities involved in the process of monitoring, preventing, and sanctioning disinformation actions

Two key authorities are engaged in the process of monitoring the disinformation actions: the Audiovisual Council (CA) and the Security and Intelligence Service (SIS).

The Audiovisual Council is directly responsible for monitoring and sanctioning TV stations in the Republic of Moldova for actions associated with disinformation and propaganda, in accordance with the provisions of the Code of Audiovisual Media Services (new edition)⁴⁸ and with the objectives set forth in the Information Security Strategy. Thus, the AC has the legal obligation to ban the dissemination of foreign TV channels that broadcast disinformation and propaganda by prohibiting the journalistic activity of foreign citizens and stateless persons within the territory of the Republic of Moldova. In this regard, the Audiovisual Council is the authority responsible for monitoring and sanctioning broadcasting companies for promoting disinformation and propaganda, and applying the monitoring methodology to service providers under the jurisdiction of the Republic of

47 Article 4 and 5 of Law No. 64/2010 on the freedom of expression. Parliament of the Republic of Moldova. (2010). Law on the freedom of expression: https://www.legis.md/cautare/getResults?doc_id=126675&lang=ro

48 Parliament of the Republic of Moldova. (2018). Audiovisual Media Service Code of the Republic of Moldova: https://www.legis.md/cautare/getResults?doc_id=125226&lang=ro

Moldova.⁴⁹ The main approach used by the Audiovisual Council is to monitor the selected speech, which can be used to disseminate disinformation. This method identifies a number of selected “speeches” as deliberately expressed opinions on a particular issue and determines how often they appear in broadcasted program.

Audiovisual broadcasting licenses may also include the broadcast of programmes from third countries, provided that they comply with the provisions of the Information Security Strategy (ISS). But the ISS only sets objectives to be accomplished, while the AP of the ISS describes the actions to be taken to ensure the information security of the Republic of Moldova with the range of actions being rather broad and extending to 2024. Moreover, when the Audiovisual Council applies the methodology for monitoring service providers, it is not clear how it determines whether or not the broadcast information products meet the objectives of the ISS, including from the perspective of preventing disinformation. Also, it is not clear how the broadcasters’ material is monitored and whether it includes the use of information technologies to detect cases of violation of the information security interests of the Republic of Moldova. The main problem, however, is that the indicators in the monitoring methodology are not clearly defined.

A much more complex task, in the sense of monitoring the activity of other participants in the exercise of freedom of expression – in particular, the electronic media and social networks – lies with the Security and Intelligence Service. Unlike broadcasters, which are subject to licensing rules, such requirements do not exist in the case of the electronic written press and social media and there is limited data about such participants. According to Law No. 753/1999 and the ISS, the Security and Intelligence Service is the coordinating authority for the implementation of the ISS and its AP, as well as a coordinating authority of the activity of the Coordinating Council for ensuring information security.

In this regard, the interest of SIS as the coordinator of the implementation of the ISS lies, above all, in ensuring transparency in the process of forming public opinion by relevant actors – the electronic written press and participants in social media. This transparency would be linked as a matter of priority to the funding sources of the participants in the formation of public opinion, as well as to the analysis of messages that are broadcast publicly and, subsequently, shared through available electronic channels.

If such actions are detected that, coupled with the disinformation tool, constitute a crime then the Prosecutor’s Office joins the Audiovisual Council and the SIS in the criminal prosecution process. In

49 Audiovisual Coordination Council. (2018). Decision on the approval of the methodology for monitoring broadcasters under the jurisdiction of the Republic of Moldova: https://www.legis.md/cautare/getResults?doc_id=111528&lang=ro

accordance with the Criminal Code, the actual disinformation and presentation of false information in the public space does not constitute a criminal offense, but it can be an instrument in a set of more complex actions, including those that could be directed against the constitutional order of the Republic of Moldova, the organisation of diversions, and mass disorder.

It is often difficult to prevent disinformation. If there is operative information, which becomes known during other activities of the SIS, the spreading of false information can be prevented. However, it is possible to prevent the spread of false information if the following are applied:

- a. detect the information that meets the criteria of false or distorted information; and
- b. block access to information broadcast publicly or users who promote false information.
- c. To implement such actions, both automated monitoring tools and prompt actions to identify the promoters of false information are required.

Furthermore, prosecution bodies (General Prosecutor's Office) participate in the investigation and prosecution of information security violations and related crimes. However, the Criminal Code does not stipulate directly criminal liability for the act of disinformation and

the presentation of false information in the public space, unless disinformation activities are used or are related to a more complex set of crimes, including those directed against the constitutional order in the Republic of Moldova, national security, or public order, namely, the organisation of mass diversions and disturbances.

3.6. Institutional framework to ensure information security

One of the key objectives of the Information Security Strategy is to strengthen the national regulatory and institutional framework, with the participation of various stakeholders, including governmental and non-governmental actors, national and international media, as well as private actors. This would increase public awareness of online safety, and strengthen media and online education in the Republic of Moldova, which would allow citizens to critically analyse media content to identify disinformation and propaganda cases. In 2020, a government decision was drafted to create the Coordinating Council for ensuring information security,⁵⁰ which was about to become operational by the end of 2021. The Security and Intelligence Service will become the secretariat of this Council, which will act as an advisory and coordinating entity with many stakeholders and will manage its activity.

50 Government of the Republic of Moldova. (2020). Decision on the creation of the Coordinating Council for Information Security Assurance: <https://cancelaria.gov.md/sites/default/files/document/attachments/intr259.pdf>

The main function of the Council is to monitor information security incidents. This requires the creation of an integrated national coordination mechanism between different stakeholders to assess information and cyber security risks, to implement response actions, and to ensure early information/alerting – implicitly a rapid response – in order to prevent, combat, and address the consequences of information security breaches.

The coordination and monitoring of the Council activity will be done at four levels:

- a. the cyber security level,
- b. the operational level in the field of defence, intelligence, counterintelligence, investigation, and sanctioning of information security violations;
- c. the info-media level, represented by traditional public and private media sources and online media sources, and
- d. the civic-private level, where civil society organizations, representatives of the public and private ICT sector, and international experts will be invited to monitor and provide policy assessments and recommendations on strengthening cyber and information security.

3.7. Self-regulatory tools in preventing disinformation

In addition to the legal provisions related to freedom of expression and access to information, but also those related to ensuring information security, the current framework also provides guidelines for professional organisations, such as the Code of Ethics of Journalists of the Republic of Moldova.⁵¹

The Code's main priorities are to combat disinformation, and the commitments assumed by journalists by signing the Code include:

- a. to collect information from credible and quotable sources,
- b. to ensure pluralism of opinion, including by collecting opinions with which the journalist does not necessarily agree,
- c. to check the facts from different sources.

At the same time, the compliance with the provisions of the Code of Ethics of Journalists is the responsibility of each journalist, and the Press Council monitors and issues recommendations and findings of violation of this Code. The Press Council is a member of the media self-regulatory organisations network in the Eastern Partnership countries and in the Russian Federation, and is also a member of the Alliance of Independent Press Councils of Europe (AIPCE).

⁵¹ <https://www.consiliuldepresa.md/ro/page/codul-deontologic-al-jurnalistului-din-r-moldova>

4. Recommendations to improve legal and institutional framework

This chapter provides key recommendations to further strengthen the state's resilience to disinformation.

4.1. Strengthening the policy and regulatory framework against disinformation

To strengthen the political and regulatory framework, first of all, it is necessary that the National Media Development Programme in the Republic of Moldova be adopted. Second, an offline platform should be set up, bringing together all the parties and actors involved or those who may be involved in addressing the issue of information/media security, which will also openly and directly discuss the subject.

An important recommendation is to update the national regulatory framework in the field of combating disinformation and propaganda to include the following actions:

- a. provision of effective tools to prevent and combat disinformation and internal and external propaganda in audiovisual media, traditional and online media in the Republic of Moldova, including by amending the Code of Audiovisual Media Services;
- b. introduce clear legal definitions of disinformation, fake news, and propaganda into the national legal framework; the definitions in question should derive from those recognised and observed at the international level;

- c. promote transparency of ownership and funding sources for online media sources;
- d. establish a mechanism to monitor, identify, and sanction entities that promote and conduct disinformation activities in online media sources.

The authors of this study recommend that the AC and SIS implement tools for the automated electronic analysis of information materials made available within the territory of the Republic of Moldova. These institutions could collect information to ensure the identification of those who post false information on social networks, possibly take measures to deactivate these accounts, with the involvement of social network administrators.

Actions to analyse the sources of income and expense structure of participants who systematically place false information in the media landscape of the Republic of Moldova would also be welcome. If financing from illegal sources is detected, this should be included in the criminal components provided by the Criminal Code, with the initiation of criminal prosecution.

An important aspect is to ensure the transparency of the shareholding of broadcasters in the Republic of Moldova, including in the context of anti-competitive practices that abuse the dominant position in the adjacent advertising services market.

Another recommendation is to implement training mechanisms for journalists, through professional organisations, the AC, and the SIS, on fair and equidistant information techniques.

This study also recommends the approval of credible source criteria for media institutions in the country and outside the country, as well as the conditions for obtaining this status. Also, the study admits the possibility of losing this status as a result of actions of systemic disinformation, violation of the rules of exposure of information, respect for privacy, and verification of the sources of data presented to the general public.

Finally, it calls for further promotion of media education and critical thinking, as well as ensuring media literacy and digital training for local influencers, including teachers, librarians, and other civil servants. The formation of credible voices with critical skills could have a long-term positive result and an important impact in addressing hostile narratives and generally negative influences in the Republic of Moldova.

4.2. Strengthen parliament's role in fighting disinformation and propaganda

The Parliament of the Republic of Moldova must play a more proactive role in monitoring and ensuring the supervision of the government and relevant public authorities to secure the info-media landscape and effectively combat disinformation activities in the country.

First, it is recommended to that a parliamentary group and/or a multi-party group be set up to revise national policy and the regulatory framework in the field of information security and media development.

Second, it is recommended that regular parliamentary hearings and discussions are organised on multi-party policy in the field of combating disinformation and propaganda in the Republic of Moldova. Another important measure involves some regular ex-post assessments of the impact of the national policy framework on information security and media development. Strengthening institutional and national policy coordination capacities in strategic communications at the national level is another strategic task for the parliament.

Finally, the parliament could play an important role in strengthening regional, European, and international parliamentary cooperation to exchange knowledge, and to assess, review, and improve national policies in the field of combating disinformation and propaganda.

4.3. Improve policies and strategic communication skills

The Republic of Moldova also benefits from EU support in addressing disinformation and propaganda activities, through the contribution of the EU's East StratCom Task Force.⁵² In addition, support and expertise is provided to EU and NATO member states, including through the Centre of Excellence for Countering Hybrid Threats (<https://www.hybridcoe.fi/>) and the NATO Centre of Excellence for Strategic Communication (<https://stratcomcoe.org/>). The EU-funded project "Strategic Communication and Media Support in the Republic of Moldova"⁵³ provided additional support from StratCom. However, so far, the practical actions have been limited in terms of policies and measures to intensify the strategic communications effort at the national level. In this context, it is recommended that a government Communication Strategy be developed and approved.

The study suggests analysing the appropriateness of setting up an external disinformation unit, like StratCom, at the level of the Ministry of Defence (along the Lithuanian model).

4.4. Streamline the efforts of CSOs in combating disinformation

An important contribution to the anti-disinformation and anti-propaganda effort in the Republic of Moldova is made by civil society organisations, through initiatives such as the platform www.stopfals.md, produced by the Independent Press Association (API) and www.mediacritica.md, managed by the Centre for Independent Journalism (CIJ). These platforms counteract the effects of propaganda and help citizens critically analyse the information. Users of the platforms are encouraged to report fake news detected in local or foreign journalistic materials, respond to various surveys, participate in debates, etc. There are also smaller online communities that engage in monitoring and exposure but are not fully effective due to the massive presence of trolls and opinion influencers employed for this purpose. Projects implemented by CSOs in the field of combating disinformation should be synchronised and coordinated to increase their impact.

52 EUvsDisinfo. (2021): <https://euvsdisinfo.eu/>

53 Internews (2020). https://internews.md/wp-content/uploads/2021/10/INTERNEWS_Final-report_24.11.20_EN.pdf

4.5. Strengthen the cooperation with social networks

Social networks represent a space where the dissemination of false information and the launching of disinformation campaigns can be carried out very easily. In this regard, the cooperation of state and non-state actors with social media companies such as Facebook, Instagram, Twitter, Google, etc. is essential.

Although quite limited, there is some cooperation between the relevant public authorities and social media platforms to fight disinformation in the Republic of Moldova. An example is the collaboration between the Central Electoral Commission (CEC) and Facebook to prevent disinformation activities during the election campaign.⁵⁴ At the same time, there are several cooperation frameworks and initiatives of independent media and civil society organisations that address disinformation, propaganda, and “trolling” activities.

For instance in 2019, based on reports from civil society organisations, the Facebook Newsroom closed 168 Facebook accounts, 28 Facebook pages, and eight Instagram accounts in Moldova, including some belonging to government officials. These accounts were suspected of spreading fake news, political propaganda, and disinformation in the run-up to the parliamentary elections in February 2019.⁵⁵ However, Facebook’s actions are difficult to verify because the company does not provide access to its internal data. The fact-checking partner for the Republic of Moldova is the French press service AFP (Agence France Press), but in other countries in the region, such as Georgia, individual CSOs can become partners for fact-checking.

54 Interview with an official of the Secretariat of the Central Electoral Commission, July 2021.

55 Internews (2021). Civil Society Tracks Trolls and Fakes, Prompts Facebook Action in Moldova: <https://internews.org/story/civil-society-tracks-trolls-and-fakes-prompts-facebook-action-moldova/>

5. Conclusions

Most studies in the field of disinformation (see Annex 1) reveal that the Republic of Moldova is very vulnerable to this phenomenon, in fact to a disastrous level. Based on the Disinformation Resilience Index, for instance, the Republic of Moldova ranked lowest out of 14 countries analysed (six Eastern Partnership countries and eight EEC states that are in the EU). The media and information landscape of the Republic of Moldova (info-media) is alarmingly exposed to external and internal disinformation activities. The precarious economic situation, a lack of critical thinking skills in the population, increased dependence on authorities, ethnic cleavages, a geopolitical split, and an information space exposed to threats creates a situation whereby the Republic of Moldova has become very vulnerable to propaganda and fake news. From an external dimension perspective, the country is a constant target of disinformation activities.

This study also demonstrates that the key vulnerabilities of the Republic of Moldova are related to the significant exposure to and popularity of Russian television channels among wide spheres of the Moldovan society, as well as the absolute dominance of the Russian media in the Transnistrian region, in the Gagauzia autonomous region, and among ethnic minorities. An important role is also played by the high levels of trust of the population in the Orthodox

Church of Moldova, which is extremely conservative and is part of the Russian Orthodox Patriarchy. These factors are combined with the fragility, inefficiency, and political obedience of state institutions responsible for information security and media regulation.

In the Republic of Moldova several institutions are responsible for information security and media regulation (Audiovisual Council, Security and Intelligence Service). In critical moments, these institutions have shown tacit approval rather than fighting propaganda and fake news. The major problem, in addition to their politicisation, is that they have no clear delimitation of competences. Moreover, the general inability to understand how the information and media security in the Republic of Moldova works constitutes a significant problem.

International organisations and CSOs believe that this situation has arisen as a result of oligarchic control over institutions and their obedience to media interests, including to Russian media interests. Moreover, Moldovan law enforcement and judicial institutions remain highly corrupt and are also controlled by the political sector. International reports and assessments by CSOs highlight the presence of a high level of corruption. This state of affairs weakens the ability to build effective resistance to unconventional disinformation attacks.

There currently still lacks a concrete government Action Plan to fight disinformation and propaganda. However, a number of policy measures for 2019-2024 are listed in the Information Security Strategy of the Republic of Moldova. At the same time, the national regulatory framework does not currently include a legal definition of the term disinformation. It is necessary to revise the concept and adopt a National Media Development Programme in the Republic of Moldova.

Following intense public debates on information security and the state's ability to react to threats in the field, in 2018 the government together with the Security and Intelligence Service developed the Information Security Strategy of the Republic of Moldova for 2021-2024, which was adopted by parliament⁵⁶ (see Chapter 3). The strategy is a complex document and includes an Action Plan to be implemented by all the responsible authorities to ensure the country's information and cyber security. Moreover, it clearly defines threats, and describes the current situation and challenges in the field, as well as the gaps in the ability to provide a strong response to all the information security threats. The only criticism that experts and NGOs have of the Strategy is that it does not include adequate budgeting, which jeopardises

its implementation and turns it into an "intentional" rather than an operational action plan.

At the same time, in 2017-2018, the Parliament of the Republic of Moldova adopted two important legislative acts aimed at ensuring better protection against disinformation and propaganda coming from the Russian Federation. The first and main act is called "Amendments to the Audiovisual Code of the Republic of Moldova."⁵⁷ These amendments stipulated that radio and TV stations were only allowed to rebroadcast news, analytical information, political and military content produced in EU member states, the US, Canada, or any other states that have ratified the European Convention on Transfrontier Television. These major amendments prohibited the rebroadcasting of Russian talk shows, analytical products, and news. As a result, the media companies of the Republic of Moldova, which used to rebroadcast Russian TV channels, were forced to stop broadcasting the above-mentioned products.

However, in December 2020, the provisions of the new Code of Audiovisual Media Services, which referred to fighting against external disinformation and propaganda (Article 5 (2), 6 (4-8), 17 (4)) were repealed by the parliamentary majority, consisting of the pro-Russian

56 Intelligence and Security Service of the Republic of Moldova. (2019). Report: monitoring and evaluation of implementation Information Security Strategy of the Republic of Moldova for 2019-2024: <https://sis.md/sites/default/files/transparenta/Raport%20realizari%202019%20SSIfinal.pdf>

57 Parliament of the Republic of Moldova. (2017). Amendments on the Audivisual Code of the Republic of Moldova Nr. 189: www.parlament.md

Socialist Party and the Sor Party (of the fugitive oligarch Ilan Sor).⁵⁸ These amendments came into force in 2021, undermining previous efforts to prevent external disinformation activities in the Republic of Moldova.

The new parliamentary majority is committed to revising and amending the provisions of the Code of Audiovisual Media Services by the end of 2021 to actively address disinformation and propaganda activities in the Republic of Moldova.

In recent years, foreign donors encouraged a growing number of NGOs to work on disinformation issues. Several NGOs, including the Foreign Policy Association, the Center for Independent Journalism, the Association of Independent Press, and the Center for Investigative Journalism, have been working actively on this topic.

Also, several sites were created with the task of exposing and fighting disinformation – www.stopfals.md, www.watchdog.md, www.mediacritica.md. No matter how admirable these initiatives are, they are still insignificant compared to access to television, radio, well-funded and troll-based web pages, sponsored advertising on social media, optimised search engines, and titles with attractive clicks that are trying to go viral.

However, civil society organizations and independent media are often more effective in fighting disinformation than the competent national authorities, such as the Audiovisual Council and the Security and Intelligence Service. In this regard, more efforts are needed to strengthen the cooperation between state and non-state actors to fight disinformation in online and social media. Also, it is recommended that the creation of the Information Security Coordinating Council as provided in the Information Security Strategy be accelerated.

A dozen studies have so far been carried out that describe the media landscape of the Republic of Moldova and the country's vulnerabilities in the face of Russian disinformation. Despite these, there are still many questions to be answered. Further publications regarding disinformation in the Republic of Moldova are provided in Annex 1.

58 Parliament of the Republic of Moldova. (2020). Law on the amendment of some normative acts: https://www.legis.md/cautare/getResults?doc_id=124566&lang=ro

Annex 1. Further publications on disinformation in the Republic of Moldova

- Chatham House (2018). "Civil Society under Russia's Threat: Building Resilience in Ukraine, Belarus and Moldova," <https://www.chathamhouse.org/publication/civil-society-under-russias-threat-building-resilience-ukraine-belarus-and-moldova>
- EAST Center (2021). "Disinformation Resilience Index in Central and Eastern Europe in 2021," <https://east-center.org/disinformation-resilience-index-in-central-and-eastern-europe-in-2021/>
- Global Focus (2018). "Propaganda Made to Measure: How our Vulnerabilities Facilitate Russian influence. A Study of Romania, Bulgaria, Georgia and the Republic of Moldova," <https://www.global-focus.eu/wp-content/uploads/2018/03/Propaganda-Made-to-Measure-How-Our-Vulnerabilities-Facilitate-Russian-Influence.pdf>
- Marin, Danu (2018). "Cultivating Information Resilience in Moldova's Media Sector", https://freedomhouse.org/sites/default/files/inline_images/Moldova_Policy_Brief_Information_Resilience_ENG_2.pdf
- PRISM UA (2018). "Resilience to Disinformation in Central and Eastern Europe: Moldova," pages 209-237, http://prismua.org/wp-content/uploads/2018/06/DRI_CEE_2018.pdf
- Sharan, Vladislav (2018). "Russian Propaganda in the Republic of Moldova: A Great War for a Small Audience," <http://ukraine-analytica.org/wp-content/uploads/saran.pdf>