

Executive Summary: DEM-Debate

Building an enabling environment for democratic debate: Insights from community-governed platforms to cultivate a resilient election information ecosystem in Europe

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Executive Summary

The DEM-Debate project (Building an Enabling Environment for Democratic Debate: Insights from community-governed platforms to cultivate a resilient election information ecosystem in Europe), is an interdisciplinary research project examining how to increase resilience of the online information ecosystem to safeguard informed civic participation. In particular, the project examined how certain community-governed platforms tackle election disinformation, including through a case study of Wikipedia during the 2024 European Parliament elections. Based on this research, the DEM-Debate project sought to develop new policy approaches to contribute to ensuring the information ecosystem surrounding elections in the EU is sufficiently insulated from the harmful effects of disinformation, with the research seeking to contribute to building an “enabling environment” for democratic debate.

European legal research has mainly focused on the role of large commercial online platforms, operating a centralised-governed model (e.g., TikTok, Instagram, YouTube, and X), in the dissemination of disinformation during elections, and current European legal policy is mainly focused on these platforms. However, there has been less in-depth European legal analysis given to examining (non-commercial) community-governed platforms, and how they tackle disinformation during elections in the EU, and how European disinformation regulation applies to these platforms. Building on work by various scholars, community-governed platforms broadly encompass those online platforms where content moderation is generally not undertaken in a centralised “top-down” approach, but rather is “user-led moderation” undertaken by a community of users of the platform in a generally decentralised manner.

The DEM-Debate project aimed to address this gap by examining one such community-governed platform - Wikipedia – as a case study, and examining how it addresses disinformation during European elections, and how the European legal framework on election disinformation applies to such community-governed platforms. This was an opportune time to engage in this study, given that Wikipedia was designated as a so-called Very Large Online Platform (VLOP) under a new landmark piece of EU legislation, which addresses the risks associated with online disinformation: the Digital Services Act (DSA). Indeed, Wikipedia is the only non-profit community-governed platform designated under the DSA.

The DEM-Debate project’s legal research proceeded in four phases: first, it mapped the EU regulatory frameworks on online disinformation during elections that are applicable to community-governed platforms (Mapping Report D2.1). The Report examined the regulatory frameworks on election disinformation under EU law, including the landmark DSA, and regulatory guidance issued pursuant to the DSA (2024 Commission Guidelines for Very Large Online Platforms on the mitigation of systemic risks for electoral processes). In addition, co-regulatory initiatives, such as the EU’s Code of Conduct on Disinformation, were also discussed. The EU’s Regulation on Political Advertising, and the European Media Freedom Act, were also set out, as both have important provisions on disinformation. The Report also set out the current Council of

Europe legal framework on disinformation during elections, including case law of the European Court of Human Rights, and relevant standard-setting instruments; and set out selected EU Member State national laws regulating disinformation during elections.

Second, an examination of Wikipedia's policies on tackling disinformation during elections in the EU, and its risk mitigation measures targeting election disinformation under the DSA, was also conducted (Mapping Report D2.3). Wikipedia's policies and principles applicable to election disinformation in the EU were examined, including policies on verifiability of facts, prohibition of original research, neutrality policies, policies on political biographies, and policies on elections; the Wikimedia Foundation's Universal Code of Conduct and its operation; and the Wikimedia Foundation's Terms of Use. Notably, given Wikipedia's designation as a VLOP under the DSA, this review had a unique opportunity to examine how designation as a VLOP, and the consequent additional rules under the DSA in relation to systemic risks related to disinformation during elections, are applicable to community-governed platforms.

Third, there was a critical assessment of the application of EU regulatory frameworks on election disinformation to community-governed platforms, using Wikipedia as a case study (Evaluation Report D2.4). It integrated the findings of Mapping Reports D2.1 and D2.3, and using normative legal analysis, to critically assess the application of EU regulatory frameworks on election disinformation. This legal analysis was twofold: first, it assessed how disinformation regulation applies to, and may impact upon, how community-governed platforms tackle disinformation during elections, including on policies, mechanisms and risk-mitigation measures adopted by such platforms. It also examined enforcement of disinformation regulation, and its impact on freedom of expression on community-governed platforms. Second, it assessed how mechanisms adopted by community-governed platforms, such as Wikipedia, may have potential to inform policy making on election disinformation regulation in the EU.

Finally, the project developed policy recommendations for legislative and regulatory reforms of the EU regulatory framework to better counter disinformation during elections (Final Report D2.6), building upon the earlier findings in relation to community-governed platforms' approach to disinformation, and the computational analysis of the editorial activity and dynamics of the Wikipedia communities during the 2024 European Parliament election (Computation Analysis Report D2.5). The Final Report assessed how mechanisms adopted by community-governed platforms, such as Wikipedia, may have potential to inform policy making on election disinformation regulation in the EU; while also considering a broader regulatory reform on disinformation during elections, including enforcement practices for regulators (both at EU and national level). It concluded on how to ensure that community-governed platforms can operate in a regulatory environment where there are no disproportionate regulatory constraints in providing an online environment to promote election-related freedom of expression. The recommendations were made with explicit regard to Article 91 DSA, which contains an obligation on the Commission to review and evaluate the DSA by 2027. The recommendations included the following: First, on the definition and legal classification of disinformation, the Commission, and

national Digital Services Coordinators, need to recognise that the notion of disinformation is actually captured under certain EU member state legislation, and can qualify as “illegal content” under Article 3 DSA. Research has documented the growing criminalisation of disinformation at an EU member-state level, and the Commission should update on how it views criminal laws on disinformation and their consistency with freedom of expression.

Second, in its review of Articles 9 and 16 DSA, it is recommended the European Commission examine how these provisions are being operationalised under national laws on disinformation and false information, whether this was intended by the Commission, and whether it raises serious concerns relating to freedom of expression under Article 10 ECHR.

Third, on the capturing of Wikipedia by the DSA, as well as its classification as a VLOP, the European Commission should consider whether the definition of online platform should be reviewed to exclude those platforms which do not operate on the basis of personal-data collection and personal-data-monetisation, algorithmic systems, advertising, and personalisation; and whether a non-profit encyclopaedia-exception should be included.

Fourth, without VLOP designation, the regulatory burden on a community-governed platform like Wikipedia could be considerably lighter under the DSA. There is an argument that Wikipedia should not, in principle, be considered a VLOP, although adopting this approach would require a rethink of the underlying approach to VLOP designation set out in the DSA; although the Article 91 DSA review procedure does allow for such reform. The Final Report recommended that the European Commission consider whether the sole designation criterion for VLOP status should be “number of average monthly active recipients” should be retained, or a more sophisticated set of criteria linked in risk.

Fifth, regarding the application of the DSA to community-governed platforms and specific questions about how responsibility is allocated between service providers and decentralised user-communities it raises, the Report recommended that there should be clearer clarification of this distinction through future DSA reform or guidance from the Commission. Additionally, when assessing the DSA’s operation with regard to Wikipedia, the Commission should examine whether the “annual” risk assessment and auditing, and the audit implementation mechanism, could disproportionately affect Wikipedia’s arguably low-risk, community-governed platform model.

Sixth, relating to the question whether the DSA’s risk-based approach is sufficient to protect elections across the entire EU from disinformation, the Final Report’s recommendation is that the requirement in Article 34 DSA should be strengthened, with a clearer connection established between electoral processes, Member States and disinformation in systemic risk assessments.

Seventh, concerning the extent of transparency surrounding the Commission’s DSA enforcement, this Final Report recommended the European Commission to apply a presumption favouring disclosure in its regulatory activity under the DSA, particularly with regard to the regulation of election disinformation. This would take effect at several levels, including the publication of preliminary proceedings documents, as well as decisions.

Finally, the Final Report recommended that arguments for Wikipedia joining the Code of Conduct on Disinformation may not outweigh the arguments against, especially given Wikipedia's transparent systems. The Final Report also recommended that the Commission review specifically Measure 14.2 of the Code, and whether it is consistent with freedom of expression.

The Report has also discussed how policy may be informed by the Wikipedia model. Notably, the Wikipedia community moderation and governance model, coupled with core content policies (e.g Neutral Point of View, Verifiability, No Original Research) provide a major bulwark against disinformation and support the aim of providing accurate, reliable, and unbiased election-related information. The Report discussed several relevant aspects of how these features might be able to inform policymaking on election disinformation, including: first, further strengthening of the election-disinformation risk-mitigation measures under Section 3.2.1 of the Commission Election Guidelines (Specific mitigation measures) could be achieved by utilising Wikipedia's procedures for deprecating sources. The model of Wikipedia's deprecated and non-deprecated sources could thus be an important tool to implement in the broader ecosystem to "help users assess the trustworthiness of information sources".

Second, it is recommended that Wikipedia's mechanism for alerting users to issues of neutrality can be used to further strengthen election disinformation risk mitigation measures and to alert users to biased or partisan political opinions about a political party, person or government that are presented as fact. Thus, using Wikipedia's model of political information neutrality could be an important tool to implement in the broader ecosystem to protect political debate online.

Third, Wikipedia's content rules, particularly its application of core policies to biographies of living persons, demonstrate how treating information about politicians and political figures with heightened care can prevent election-related disinformation and provide insights for broader regulation of the online environment. It is recommended as a potential policy option that Wikipedia articles on politicians and political figures could be categorised as "authoritative information on the electoral process" and made prominent and easily accessible across the online election-related ecosystem, thereby building on the Commission's Election Guidelines.

Fourth, Wikipedia's patrolling system, which includes the Recent Changes Patrol and the Recent Changes list showing all live edits made to Wikipedia articles, offers a notable example of how accountability and transparency can be operationalised through community-based oversight. The concept of establishing patrols for political and election-related pages informs the broader online information ecosystem, showcasing how targeted monitoring can help to prevent the dissemination of election-related disinformation.

Finally, in the context of election disinformation, Wikipedia's approach to paid editing and conflict-of-interest disclosure can offer a useful point of reference, particularly in relation to informing regulation of political social-media influencers. Wikipedia disclosure rules and the Conflict of Interest Noticeboard are possible models that could be built upon when regulating paid-for political messages by social media influencers during election periods.