

IBERIFIER — Iberian Digital Media Observatory

# **Social impact of disinformation campaigns in Spain and Portugal 2024-2026**

Report

Deliverable — D4.3



Co-funded by  
the European Union

Iberifier – Iberian Digital Media Observatory has received funding from the European Commission under the Call DIGITAL-2023-DEPLOY-04, European Digital Media observatory (EDMO) — National and multinational hubs, with the reference IBERIFIER Plus - 101158511

**Programme:** Digital Europe Programme (DIGITAL)  
**Call:** Accelerating the best use of technologies (DIGITAL-2023-DEPLOY-04)  
**Work program topic:** European Digital Media observatory (EDMO) — National and multinational hubs  
**Grant Agreement:** IBERIFIER Plus - 101158511  
**Project coordinator:** Ramón Salaverría (University of Navarra)  
**Term:** May 1, 2024 – Oct 31, 2026 (30 months)  
**Report submission date:** September 30, 2026  
**Dissemination level:** Public  
**Task 4.3:** Social impact of disinformation campaigns in Spain and Portugal 2024-2027  
**Deliverable Task Leader(s):** Ángel Badillo (Real Instituto Elcano)

Cite this Report as:

Badillo, Á., Paisana, M., Arteaga, F., Izquierdo, D., Salaverría, R., Sánchez-Hualde, A., Cardoso, G., Margato, A. (2026). *Social impact of disinformation campaigns in Spain and Portugal 2024-2026*. IBERIFIER. <https://doi.org/10.5281/zenodo.20556457>

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## 1. Executive summary

This report constitutes the second IBERIFIER strategic analysis of disinformation in Spain and Portugal, examining the period from 2023 to 2026. It documents an information environment that has been reshaped by three interlocking transformations: the operational maturation of generative artificial intelligence as a tool of foreign and domestic manipulation, the consolidation of the EU's Digital Services Act (DSA) and adjacent regulatory instruments, and the coordinated withdrawal of major digital platforms from the co-regulatory model that had structured European action against disinformation since 2018 — a process this report terms the Great Retreat.

At the European level, AI-based tactics were involved in 27% of foreign information manipulation and interference (FIMI) incidents detected in 2025, an increase of approximately 260% over the previous year. Hostile state actors — most notably Russia-linked networks such as Doppelgänger, Portal Kombat and Storm-1516, and China-linked clusters such as Spamouflage — have industrialised media impersonation, deepfake production and LLM grooming to flood the information space rather than persuade specific audiences. The EU has responded with the AI Act, the European Democracy Shield and the FIMI Deterrence Playbook, but a significant implementation gap persists: the transparency obligations of Article 50 of the AI Act do not become fully applicable until August 2026.

This European response is being tested by the simultaneous retreat of the platforms. Following X's withdrawal from the voluntary Code of Practice in May 2023, Meta dismantled its US third-party fact-checking programme in January 2025; Google and Microsoft formally exited the fact-checking commitments of the Code of Conduct during 2025. By the close of the period, only TikTok and Meta retained these specific obligations in Europe, and 89.3% of fact-checking organisations worldwide identify financial sustainability as their greatest threat.

The national chapters document how these dynamics materialise in each country. Portugal experienced four elections between March 2024 and February 2026, a compressed cycle that accelerated the consolidation of immigration as the dominant organising frame of electoral disinformation, displacing corruption, and confirmed the structural dominance of Chega and its leader André Ventura in the social media attention economy. Spain saw the weaponisation of the Spanish language as a transnational FIMI vector, the proliferation of pseudo-media and superspreaders, the convergence of disinformation with cybercrime, and a paradigmatic infodemic during the October 2024 Valencia DANA crisis. On the institutional side, Spain advanced an ambitious Action Plan for Democracy and began drafting a National Strategy against Disinformation, while Portugal designated ANACOM as Digital Services Coordinator under the DSA.

The report concludes that the resilience of the Iberian information environment now depends less on the diagnostic capacity of fact-checkers and researchers — which has



improved markedly — than on the political will to sustain a regulatory framework that the platforms, and an increasingly hostile transatlantic environment, are actively contesting.

## 1.1. Resumen ejecutivo en español

El presente informe constituye el segundo análisis estratégico de IBERIFIER sobre la desinformación en España y Portugal y abarca el periodo comprendido entre 2023 y 2026. Documenta un entorno informativo reconfigurado por tres transformaciones interrelacionadas: la maduración operativa de la inteligencia artificial generativa como herramienta de manipulación exterior e interna, la consolidación del Reglamento de Servicios Digitales (DSA) de la UE y de los instrumentos normativos adyacentes y la retirada coordinada de las grandes plataformas digitales del modelo de corregulación que había estructurado la acción europea contra la desinformación desde 2018, un proceso que este informe denomina la Gran Retirada.

En el plano europeo, las tácticas basadas en IA estuvieron implicadas en el 27% de los incidentes de manipulación e interferencia de la información por parte de actores extranjeros (FIMI) detectados en 2025, lo que supone un incremento de aproximadamente el 260% respecto al año anterior. Actores estatales hostiles —en particular redes vinculadas a Rusia como Doppelgänger, Portal Kombat y Storm-1516, así como agrupaciones vinculadas a China como Spamouflage— han industrializado la suplantación de medios, la producción de *deepfakes* y el adiestramiento de modelos de lenguaje (*LLM grooming*) para inundar el espacio informativo en lugar de persuadir a audiencias concretas. La UE ha respondido con el Reglamento de IA, el Escudo Europeo para la Democracia y el Manual de Disuasión frente a la FIMI, pero persiste una importante brecha de aplicación: las obligaciones de transparencia del artículo 50 del Reglamento de IA no serán plenamente aplicables hasta agosto de 2026.

Esta respuesta europea se ve sometida a prueba por la retirada simultánea de las plataformas. Tras la salida de X del Código de Buenas Prácticas voluntario en mayo de 2023, Meta desmanteló su programa de verificación de datos con terceros en Estados Unidos en enero de 2025; Google y Microsoft abandonaron formalmente los compromisos de verificación del Código de Conducta a lo largo de 2025. Al cierre del periodo, solo TikTok y Meta conservaban estas obligaciones específicas en Europa, y el 89,3 % de las organizaciones de verificación de datos de todo el mundo señalan la sostenibilidad financiera como su mayor amenaza.

Los capítulos nacionales documentan cómo se materializan estas dinámicas en cada país. Portugal vivió cuatro elecciones entre marzo de 2024 y febrero de 2026, un ciclo comprimido que aceleró la consolidación de la inmigración como marco organizador dominante de la desinformación electoral, desplazando a la corrupción, y confirmó el dominio estructural de Chega y de su líder, André Ventura, en la economía de la atención de las redes sociales. España asistió a la instrumentalización de la lengua española como vector transnacional de FIMI, a la proliferación de pseudomedios y superdifusores, a la



convergencia de la desinformación con la ciberdelincuencia y a una infodemia paradigmática durante la crisis de la DANA de Valencia de octubre de 2024. En el plano institucional, España impulsó un ambicioso Plan de Acción por la Democracia y comenzó a redactar una Estrategia Nacional contra la Desinformación, mientras que Portugal designó a ANACOM como Coordinador de Servicios Digitales en virtud del DSA.

El informe concluye que la resiliencia del entorno informativo ibérico depende hoy menos de la capacidad diagnóstica de verificadores e investigadores —que ha mejorado notablemente— que de la voluntad política de sostener un marco normativo que las plataformas y un entorno transatlántico cada vez más hostil están impugnando activamente.

## 1.2. Resumo executivo em português

O presente relatório constitui a segunda análise estratégica do IBERIFIER sobre a desinformação em Espanha e Portugal, abrangendo o período entre 2023 e 2026. Documenta um ambiente informativo reconfigurado por três transformações interligadas: a maturação operacional da inteligência artificial generativa enquanto instrumento de manipulação externa e interna, a consolidação do Regulamento dos Serviços Digitais (DSA) da UE e dos instrumentos regulatórios adjacentes, e a retirada coordenada das grandes plataformas digitais do modelo de correção que estruturara a ação europeia contra a desinformação desde 2018 — um processo que este relatório designa por Grande Retirada. À escala europeia, as táticas baseadas em IA estiveram envolvidas em 27 % dos incidentes de manipulação e interferência de informação por agentes estrangeiros (FIMI) detetados em 2025, um aumento de aproximadamente 260 % face ao ano anterior. Agentes estatais hostis — em particular redes ligadas à Rússia como a Doppelgänger, a Portal Kombat e a Storm-1516, e agrupamentos ligados à China como a Spamouflage — industrializaram a usurpação da identidade de meios de comunicação, a produção de *deepfakes* e o adestramento de modelos de linguagem (*LLM grooming*) para inundar o espaço informativo em vez de persuadir audiências específicas. A UE respondeu com o Regulamento da IA, o Escudo Europeu para a Democracia e o Manual de Dissuasão face à FIMI, mas persiste uma lacuna significativa na aplicação: as obrigações de transparência do artigo 50.º do Regulamento da IA só se tornam plenamente aplicáveis em agosto de 2026.

Esta resposta europeia está a ser testada pela retirada simultânea das plataformas. Na sequência da saída do X do Código de Conduta voluntário em maio de 2023, a Meta desmantelou o seu programa de verificação de factos com terceiros nos Estados Unidos em janeiro de 2025; a Google e a Microsoft abandonaram formalmente os compromissos de verificação de factos do Código de Conduta ao longo de 2025. No final do período, apenas o TikTok e a Meta mantinham estas obrigações específicas na Europa, e 89,3 % das organizações de verificação de factos a nível mundial identificam a sustentabilidade financeira como a sua maior ameaça.

Os capítulos nacionais documentam como estas dinâmicas se materializam em cada país. Portugal viveu quatro eleições entre março de 2024 e fevereiro de 2026, um ciclo



comprimido que acelerou a consolidação da imigração como o enquadramento organizador dominante da desinformação eleitoral, deslocando a corrupção, e confirmou o domínio estrutural do Chega e do seu líder, André Ventura, na economia da atenção das redes sociais. Espanha assistiu à instrumentalização da língua espanhola como vetor transnacional de FIMI, à proliferação de pseudomeios e superdifusores, à convergência da desinformação com o cibercrime e a uma infodemia paradigmática durante a crise da DANA de Valência, em outubro de 2024. No plano institucional, Espanha avançou com um ambicioso Plano de Ação pela Democracia e iniciou a redação de uma Estratégia Nacional contra a Desinformação, ao passo que Portugal designou a ANACOM como Coordenador dos Serviços Digitais ao abrigo do DSA.

O relatório conclui que a resiliência do ambiente informativo ibérico depende hoje menos da capacidade de diagnóstico dos verificadores de factos e dos investigadores — que melhorou de forma assinalável — do que da vontade política de sustentar um quadro regulatório que as plataformas, e um ambiente transatlântico cada vez mais hostil, contestam ativamente.

### 1.3. Specific acronyms used in this report

AD: Aliança Democrática, Portugal's Democratic Alliance, centre-right PSD/CDS coalition

ANACOM: Autoridade Nacional de Comunicações, Portuguese National Authority on Communications

AMI: Asociación de Medios de Información, Spanish Information Media Association

APDC: Associação Portuguesa para o Desenvolvimento das Comunicações, Portuguese Association for the Development of Communications

BE: Bloco de Esquerda, Portuguese Left wing party

CCN-CERT: Spanish National Cryptologic Center

CIS: Centro de Investigaciones Sociológicas, Spanish public Center for Sociological Research

CNE: Comissão Nacional de Eleições, Portuguese National Electoral Commission

CNMC: Comisión Nacional de los Mercados y la Competencia, Spain's Commission on Markets and Competition

CNPD: Comissão Nacional de Proteção de Dados, Portuguese National Commission on Data Protection

CSN: Consejo de Seguridad Nacional, Spain's National Security Council

DANA: depresión aislada en niveles altos, upper-level isolated depression

DSA: Digital Services Act

DSN: Departamento de Seguridad Nacional, Department of National Security, Government of Spain

EDAP: European Democracy Action Plan

EDMO: European Digital Media Observatory

EEAS: European External Action Service, European Commission

EFCSN: European Fact-Checking Standards Network

EMFA: European Media Freedom Act



ERC: Entidade Reguladora para a Comunicação Social, Portuguese Regulation Entity for Social Communications

FCCD: Foro contra las Campañas de Desinformación, Spanish civil society forum against disinformation campaigns

FIMI: Foreign Information Manipulation and Interference

IFCN: International Fact-Checking Network

PERTE: Proyectos Estratégicos para la Recuperación y Transformación Económica, Spanish strategic projects for economic recovery and transformation

PP: Partido Popular, Spain's conservative Popular Party

PS: Partido Socialista, Portugal Socialist Party

PSD: Partido Social Democrata, Portuguese Social-Democratic Party

PSOE: Partido Socialista Obrero Español, Spain's Workers and Socialist Party

RAS: Rapid Alert System

RNE: Radio Nacional de España, part of Spain's public broadcaster RTVE

RSF: Reporters Without Borders

RTVE, CRTVE: Radio Televisión Española, Spain's national public broadcaster

SEGIB: Secretaría General Iberoamericana, Ibero-American General Secretariat, the international cooperation organisation of Spanish- and Portuguese-speaking countries in Latin America and the Iberian Peninsula

SLAPP: Strategic Lawsuit Against Public Participation

TVE: Televisión Española, part of Spain's public broadcaster RTVE

## 2. Presentation

### 2.1. Methodological approach

This report constitutes the second iteration of the IBERIFIER strategic analysis of disinformation and its political, economic, social, and security dimensions in Spain and Portugal, following the foundational report published in 2023 (Badillo-Matos et al., 2023). This report established the central analytical framework for IBERIFIER's approach to research as a pillar for policy and to the sustained recognition of the multidimensional impacts of disinformation in Iberia. Further contributions have been made to pinpoint specific aspects of the phenomenon, namely its political and legal aspects (Moreno-Castro et al., 2023), its impacts on media industry (Moreno-Castro & Paisana, 2022) and, from the audience side, contributions that identify and describe the specific disinformation consumption patterns in Spain and Portugal (Magallón-Rosa et al., 2024).

As with its 2023 predecessor, this report adopts a comparative, multi-source, mixed-methods design, examining the dynamics of disinformation in both Iberian countries across a shared temporal window while acknowledging that the nature and availability of evidence differs meaningfully between the two national contexts. In this case, we focused specifically on the 2023 to 2026 timeframe in order to identify substantial changes to the landscape described in the first report.

The comparative intent aims to provide a structural overview rather than describe the situation of both countries. Spain and Portugal share a common regulatory environment shaped by European Union frameworks, a broadly similar foundational media ecosystem typology within the Polarised Pluralist tradition (Hallin & Mancini, 2004), and an increasingly interconnected disinformation landscape, particularly with regard to the transnational circulation of narratives through shared Iberian populist far-right networks and, in the Portuguese case, the Lusophone communicative sphere and the linguistic bridge with Brazil. At the same time, the two countries present sufficiently distinct political trajectories, media market structures, institutional responses, and research infrastructures to make genuine comparison analytically granular rather than merely descriptive. As such, the chapter on the European Union regulatory framework, which precedes both national chapters, is not merely introductory: it establishes a necessary baseline, discussing the supranational framework within which both national disinformation landscapes must be situated and against which both institutional responses must be assessed.

The report does not aim to produce a statistically representative account of disinformation prevalence in either country. Disinformation, by its nature, resists comprehensive measurement: it circulates across platforms with varying degrees of transparency, it changes as it travels, and the boundary between what counts as disinformation and what counts as politically contested speech is itself an object of ongoing scholarly and regulatory debate.



As we have shown over the years, the perception of disinformation is largely dependent on the attitudinal and behavioural orientation of audiences. The same can be said for context, as the overlap between research fieldwork and the prevalence of hard-news topics in media coverage can have profound impacts on the way people perceive information and disinformation and in the way they model their behaviour accordingly (G. Cardoso et al., 2025) (Sierra et al., 2025).

For this reason, the analytical ambition of this report is more modest: to identify observable trends and evolutions, document specific cases with sufficient analytical depth, and situate both within the evolving regulatory and institutional environment of Spain and Portugal. The findings should be read as analytically grounded rather than exhaustive.

## 2.2. Data sources, national scope and asymmetries

The analysis draws on four categories of sources, applied with varying degrees of symmetry across the two national chapters.

- a. Public opinion and survey data. Both national chapters draw on the Eurobarometer (Standard and Flash editions, 2023–2026) and the Reuters Institute Digital News Report (2023–2026 waves, Portugal editions produced by OberCom, Spain editions produced by the University of Navarra) to track trends in media consumption, news trust, disinformation awareness, and attitudinal orientations towards information sources. These datasets provide the broadest and most cross-nationally comparable empirical foundation for contextual claims about how citizens in both countries relate to news and disinformation. The Spanish chapter additionally draws on the CIS Study 3421 on Media Audiences (September–October 2023, n=27,433) for granular national data on media consumption patterns. Where figures from survey sources are reported, weighted estimates are used unless otherwise noted. As mentioned above it should be acknowledged that survey measures of disinformation exposure and concern capture self-reported perceptions rather than actual exposure, and are therefore best treated as indicators of public salience rather than behavioural fact.
- b. Fact-checking repository data. Here the two chapters for Spain and Portugal diverge substantially. The Spanish chapter draws extensively on the IBERIFIER fact-checking dataset, which aggregates verified claims published by five accredited organisations (EFE Verifica, Infoveritas, Maldita.es, Newtral, and Verificat) from 2017 to 2026, comprising 9,188 individual fact-checks classified by topic, verdict, platform of circulation, and date of publication. The systematic analysis concentrates on the 2023 to 2026 window, using the historical record as a comparative baseline. The Portuguese chapter does not draw on an equivalent structured repository. The Portuguese fact-checking repository, centred on Polígrafo, operates at a smaller scale and as such does not allow for systematic longitudinal quantitative analysis of the kind performed for Spain. Where specific fact-checked cases are referenced in the Portuguese chapter, they are treated qualitatively and cited individually rather

than as elements of a structured dataset. This asymmetry should not be read as a difference in the intensity or significance of disinformation in either country. It reflects a difference in the research infrastructure available to the respective national teams.

- c. Original primary research. In this dimension the two chapters also differ. The Spanish chapter incorporates qualitative analysis of three in-depth case studies: the July 2023 general elections, the June 2024 European Parliament elections, and the October 2024 Valencia DANA crisis. Each of these is characterised through close reading of the IBERIFIER repository data during the relevant event window, alongside analysis of institutional responses, policy documents, and media coverage. The Portuguese chapter incorporates methodologically distinct primary research: three social media monitoring studies conducted by MediaLab CIES Iscte and OberCom across consecutive electoral periods: the March 2024 general election, in partnership with Agência Lusa, the June 2024 European elections, in partnership with the Comissão Nacional de Eleições (CNE), and the May 2025 general election, again in partnership with the CNE. These studies combine quantitative tracking of publication volumes and interaction metrics across Facebook, Instagram, X, and TikTok, using CrowdTangle and SentiOne as data collection tools, with qualitative analysis of specific disinformation cases identified through fact-checker flagging and citizen reporting. The Portuguese chapter further incorporates a quantitative and qualitative content analysis of 99 news items covering disinformation in the Portuguese digital press between February 2024 and April 2026, collected via Google News and supplemented by targeted searches based on the Digital News Report Portugal 2025 audience rankings, and coded across dimensions of source, prevalence of Agência LUSA wire usage, theme, and typology of reference to disinformation.
- d. Secondary analysis of policy, regulatory, and institutional documentation. This was applied symmetrically across both chapters and across the report. Key common sources include the annual National Security Reports (DSN, 2021–2025), the EEAS FIMI Threat Reports (2023–2026), the EFCSN White Papers (2024 and 2026), platform transparency reports submitted under the EU Code of Practice on Disinformation and the DSA, and ERC regulatory reports for Portugal. Country-specific legislative and institutional sources are identified within the respective national chapters.

### 2.3. Case study selection

Case studies and focal episodes are selected in both national chapters according to a common underlying logic, even where the specific evidence base differs. Episodes are treated as full case studies when they satisfy at least two of the following three conditions: i) they generate a detectable and documented concentration of disinformation activity in the available data sources during a defined event window, ii) they provoke a measurable institutional or regulatory response that is itself analytically informative regarding the state of



the national or European governance framework, or iii) they illustrate a thematic dynamic or structural mechanism that recurs across the broader evidence base.

For Spain, case selection is additionally anchored in the volume and intensity of activity within the IBERIFIER fact-checking repository during the relevant period. For Portugal, where the equivalent structured repository is not available, case selection draws on the concentration of findings in the social media monitoring studies and on the relevance of the episode to the transnational disinformation dynamics documented in the Lusophone sphere analysis. Episodes that meet only one condition, or that present a limited documented disinformation footprint despite high political salience, are discussed where they illuminate specific mechanisms but are not treated as full case studies and not described and analysed as thoroughly.

## 2.4. Limitations

Several limitations warrant explicit acknowledgement. The structural reliance on fact-checking data for the Spanish chapter introduces selection biases that cannot be fully corrected: verification organisations respond to virality, public demand, and journalistic judgement, and their output reflects a curated sample rather than the full universe of circulating disinformation. The absence of an equivalent structured dataset for Portugal means that the two national chapters are not directly comparable in quantitative terms, and any effort to draw symmetric cross-national conclusions from the empirical data should be undertaken with caution. The monitoring of semi-closed platforms, particularly Telegram and WhatsApp, is structurally limited in both national contexts, resulting in a systematic undercount of disinformation circulating through private or semi-private messaging channels, which, as available evidence suggests, constitute a significant and growing vector in both countries.

Cross-platform measurement remains methodologically nuanced and the aggregate scale and reach of disinformation campaigns cannot be assessed with precision from any single data source used in this report. The temporal scope, from 2023 to 2026, captures a period of unusually rapid transformation in the information environment and some documented trends may reflect transitional dynamics whose longer-term trajectory is hard to gauge in this research context. Finally, several contributors to this report are affiliated with institutions that feature as actors in the analysis — IBERIFIER partner organisations, fact-checking networks, and regulatory / policy bodies that have some level of relation with the consortium.

This report was produced by a team comprising experts from several partner organisations in both countries, working within the project's Working Package 4 (Strategy and Policy Research) and the issue of institutional affiliation to the project is managed through transparency of attribution and methodological DISCLOSURE rather than through any claim to external neutrality.



### **3. The 2023–2026 context: the rise of AI, EU regulatory responses and the Great Retreat**

To address the analysis of the cases of Spain and Portugal on disinformation between 2023 and 2026, it is essential to begin with an account of the evolution of the main policies developed and implemented by the European Union in this field. Of particular relevance to understanding the period examined in this report are, moreover, two key dynamics: on the one hand, those connected to the massive and widespread global emergence of artificial intelligence (AI) and the responses articulated in this sphere; and on the other, the withdrawal of digital platforms from the co-regulatory model they had maintained with European institutions and the fact-checking ecosystem.

This is because a substantial portion of the initiatives developed in these two countries cannot be understood in isolation, but rather derive from the regulatory frameworks, strategic orientations and actions driven by the European Union, as well as from the — increasingly strained — interaction between public institutions, technology platforms and content fact-checkers. Consequently, the analysis of national dynamics requires situating them first within this supranational context, since it is here that both the guiding principles and the instruments that are subsequently adopted, adapted or implemented by member states are shaped, as well as the conditions of cooperation — or retreat — that determine their effectiveness in the recent period.

#### **3.1. European action against disinformation**

The European Union's public policies on disinformation, foreign interference and information integrity began to take systematic shape following Russia's actions linked to the invasion of Ukraine in 2014, as well as the strategies deployed during the 2016 US presidential campaign and the Brexit referendum. Although the trajectory traced below extends beyond the temporal scope of this report, it is essential for contextualising and understanding the most recent developments.

##### **3.1.1. Contextual framework**

It was in 2016 that European institutions formally recognised disinformation as a core tactical component of destabilisation operations. In their joint framework against hybrid threats, the European Commission warned that "large-scale disinformation campaigns, using social media to control the political narrative or to radicalise, recruit and manipulate individuals to act on their behalf, can serve as vectors for these hybrid threats" (European Parliament and Council, 2016). As an organic response, the EU Hybrid Fusion Cell was established within the EU Intelligence and Situation Centre (Badillo-Matos et al., 2024). On the legislative front, the European Parliament adopted a specific resolution urging member



states to develop measures and intervene on various fronts to counter "third-party propaganda directed against them" (European Parliament, 2016).

In 2017, the European Centre of Excellence for Countering Hybrid Threats (HybridCoE) was inaugurated in Helsinki, functioning as a joint collaboration between EU and NATO countries. Simultaneously, the European Commission established a High-Level Expert Group (HLEG) to assess the phenomenon and propose policy initiatives to address it (Badillo-Matos et al., 2024). At the same time, the EEAS created two strategic communications task forces: one for the Southern Neighbourhood (Middle East and North Africa) and one focused on the Western Balkans.

The regulatory drive of 2018 was heavily shaped by the revelation of structural interference operations such as the Cambridge Analytica scandal. At the sociological level, public concern reached critical and quantifiable levels: the Flash Eurobarometer 464, published in April 2018, revealed that 88% of respondents in Spain (and a high percentage across the EU) considered false or distorted information a serious problem for their country and for the stability of democratic institutions (Badillo-Matos et al., 2024). Drawing on the work of the HLEG, the European Commission published in April the Communication "Tackling Online Disinformation: A European Approach" (European Commission, 2018c), with specific proposals for a coordinated EU response ahead of the following year's European elections. This document delimits the concept, defining disinformation as "verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and which may cause public harm" (BOE, 2020; European Commission, 2018c). In October 2018, the first Code of Practice on Disinformation was presented (European Commission, 2018a), a pioneering self-regulation mechanism in which the technology industry and digital platforms (such as Facebook, Google and Twitter) assumed commitments to limit the monetisation of accounts spreading disinformation, ensure transparency in political advertising and remove fake accounts and bots.

Before the year was out, in December 2018, the Commission presented the Action Plan against Disinformation (European Commission, 2018b), which structures European efforts around four fundamental pillars: 1) improving the capabilities of EU institutions to detect and analyse disinformation; 2) strengthening joint and coordinated responses, including the creation of a Rapid Alert System (RAS); 3) mobilising the private sector; and 4) raising awareness and improving social resilience (ECA, 2021b; European Commission, 2018d). Additionally, by the end of the year, the revision of the Audiovisual Media Services Directive was agreed, introducing a legal obligation for member states to promote the development of media literacy competences in civil society (European Commission, 2018d).

The year 2019 represented a stage of institutionalisation and consolidation of European and national strategies against disinformation, driven primarily by the need to safeguard the integrity of the European Parliament elections held in May of that year (Badillo-Matos et al., 2024). At the Community level, the problem of foreign digital interference captured the priority attention of the European External Action Service (EEAS) in 2019 following multiple incidents and operations revealed through open-source intelligence, such as the "Indian



Chronicles" network uncovered by the organisation EU DisinfoLab (Hénin, 2023). To provide the bloc's defence with greater operational capacity, in July 2019 the Council of the European Union established the Horizontal Working Party on Enhancing Resilience and Countering Hybrid Threats, aimed at improving strategic communication and combating systematic disinformation (Badillo, 2019; Badillo-Matos et al., 2024).

From a regulatory standpoint, in 2019 Directive (EU) 2019/790 on copyright and related rights in the Digital Single Market was adopted (Badillo-Matos et al., 2024). This European directive was conceived as a mechanism to protect the financial sustainability of the press against major online platforms, recognising quality journalism as an essential element for the proper functioning of democracy and as one of the main guarantors of reliable information against disinformation (Badillo-Matos et al., 2024).

The COVID-19 health crisis represented a turning point in 2020, generating a vulnerability scenario that was exploited through aggressive disinformation strategies to polarise society and discredit democratic institutions (DSN, 2021b). In the face of the proliferation of false narratives about the pandemic — the phenomenon categorised by the World Health Organisation as an "infodemic" — the European Commission and the High Representative published the communication "Tackling COVID-19 disinformation: Getting the facts right" in June 2020 (European Commission, 2020a). This document established concrete measures requiring digital platforms to give greater visibility to authorised information sources and remove misleading advertising (ECA, 2021a). To strengthen social resilience and equip the EU with an independent analytical infrastructure, the European Digital Media Observatory (EDMO) was launched in June 2020. This project brought together fact-checkers, media literacy experts and academic researchers to analyse and better understand the mechanisms of disinformation.

On 4 December 2020, the European Commission presented the European Democracy Action Plan (EDAP), structured around three fundamental pillars: promoting free elections, strengthening the freedom and pluralism of the media, and countering disinformation (European Commission, 2020b). That same month, the Commission published the first formal proposal for the Digital Services Act (DSA). This legislative proposal sought to establish, for the first time, a horizontal framework of regulatory oversight, accountability and transparency in the digital environment (European Commission, 2020c). Additionally, in 2020, the European Parliament created the Special Committee INGE on foreign interference in all democratic processes in the EU, including disinformation, highlighting the prioritisation of this issue at the parliamentary level (European Parliament, 2020).

In 2021, the European External Action Service (EEAS) introduced the concept of Foreign Information Manipulation and Interference (FIMI) in the report produced by the Strategic Communication Task Forces and Information Analysis Division, proposing a paradigm shift: the focus of attention was no longer solely on the falsity of content but on the coordinated, manipulative and intentional behaviour of threat actors:



Foreign Information Manipulation and Interference – also often labelled as “disinformation” – is a growing political and security challenge for the European Union and has been recognised as such in many high level policy documents, such as the Action Plan against Disinformation (2018), the European Democracy Action Plan (2020), the European Strategic Compass (2022), and several Council Conclusions. Given the foreign and security policy component, the High Representative, supported by the European External Action Service (EEAS), has a leading role in addressing the issue.

FIMI is a pattern of behaviour that threatens or has the potential to negatively impact values, procedures and political processes. Such activity is manipulative in character, conducted in an intentional and coordinated manner. Actors of such activity can be state or non-state actors, including their proxies inside and outside of their own territory.

Foreign actors trying to manipulate and interfere with our information environment use a variety of constantly evolving Tactics, Techniques, and Procedures (TTPs), often in combination with cyber security and hybrid threats. For example, cyber-attacks can be among other things used to obtain sensitive documents, which can then be leaked selectively at politically opportune moments to influence the political agenda, sow distrust, or drown out unwanted political debates. (EEAS, 2021)

In May of that same year, the European Commission published formal guidelines to strengthen the 2018 Code of Practice, urging platforms to address their shortcomings and create a more transparent and secure online environment. Furthermore, to expand detection capacity in the field, the national and regional hubs of the European Digital Media Observatory (EDMO) were launched. To close out the year, in November 2021, the Commission took a key legislative step by presenting a proposal for a regulation on the transparency and targeting of political advertising.

Following Russia's invasion of Ukraine in February 2022, and in the face of an imminent wave of war propaganda, the EU took an unprecedented decision in March: to ban broadcasting and block online content from the Russian state media RT and Sputnik within EU territory. That same month, the Strategic Compass was approved, a document that strengthened the EU's security and defence policy and incorporated the FIMI Toolbox, a catalogue of instruments designed to improve situational awareness, resilience and the disruption of interference operations. In parallel, the European Parliament, through its special INGE committee, urged the Union to create a common strategy against foreign interference and requested greater financial and logistical support for independent media, fact-checkers and researchers.

On the regulatory and platform front, June 2022 marked a milestone with the signing of the strengthened Code of Practice on Disinformation. This new agreement, signed by major online platforms (such as Meta and Google), advertising agencies, fact-checkers and civil society, incorporated 44 commitments and 127 specific measures, among which the most notable were stronger action to demonetise disinformation, greater data access for researchers and the creation of a Transparency Centre. In September, the European



Commission presented the proposal for the European Media Freedom Act (EMFA), designed to protect editorial independence and pluralism against public or private interference.

Finally, the European legal architecture culminated in autumn 2022 with the adoption and subsequent entry into force of the Digital Services Act (DSA). This landmark law abandoned the model of mere voluntary self-regulation to impose a binding legal framework of accountability and transparency. In particular, the regulation began requiring Very Large Online Platforms (VLOPs) and search engines (VLOSEs) to annually assess and actively mitigate systemic risks in their services, including the spread of disinformation. Under this new legal umbrella, the strengthened Code of Practice became a co-regulatory code of conduct for compliance with DSA obligations.

#### *The 2023–2026 period*

Russia's invasion of Ukraine in February 2022 — which escalated the conflict affecting the eastern provinces since 2014 — triggered a surge in influence operations, compelling the EU to develop more sophisticated countermeasures, such as the EEAS FIMI Toolbox (Foreign Information Manipulation and Interference). Successive EEAS reports have warned of the qualitative leap represented by generative Artificial Intelligence, which facilitates the automated creation of hyperrealistic false content (deepfakes) and the concealment of state authorship through the use of proxies. Hostile state actors have evolved their tactics to evade sanctions, shifting from traditional state media to covert infrastructures and complex impersonation networks focused on algorithmic manipulation.

During the period analysed in this report, the European context has been marked by several lines of action that determine the evolution of the landscape in Spain and Portugal. The year 2022 marked a point of no return in the European Union's regulatory architecture against information threats, leaving behind the corporate self-regulation of platforms that had displayed deep structural cracks. The epicentre of this paradigm shift was the adoption of the Digital Services Act (DSA), a legal text normatively designed to establish "a single market for digital services" (European Parliament and Council, 2022). But its political and sociological underpinning went far beyond that, establishing for the first time a binding accountability regime for major technology companies in the mitigation of systemic risks in their algorithms.

This coercive turn, however, did not crystallise in a vacuum. Russia's invasion of Ukraine in February of that same year acted as a powerful geopolitical accelerator. Faced with the imminence of large-scale hybrid warfare, the European Council adopted drastic decisions, grounded in the urgency of imposing "restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine" (Council of the European Union, 2022). In practice, this amounted to the unprecedented blocking of the Kremlin's propaganda apparatuses, such as RT and Sputnik, within EU territory. That exceptional climate prompted, almost simultaneously, the adoption of the Strategic Compass (Council of the European Union, 2022) and its corresponding FIMI Toolbox



(Foreign Information Manipulation and Interference) (Council of the European Union, 2022), laying the foundations of Europe's cognitive defence. At the same time, in an attempt by the technology industry to adapt to the looming pressure, a strengthened Code of Practice was concluded (European Commission, 2022).

Once the legal scaffolding of the DSA had been erected, the year 2023 was largely devoted to the institutionalisation of the threat. The European External Action Service (EEAS) articulated its doctrine through its first FIMI report, explicitly calling for a shift "towards a framework for networked defence" (EEAS, 2023a). This was a tacit acknowledgement that Community institutions, working alone and in silos, could not counter highly professionalised hostile operations. Indeed, towards the end of that year, the European Commission demonstrated unprecedented punitive resolve by opening the first formal enforcement proceedings against X (formerly Twitter) under the newly minted DSA.

In December 2023, the European Commission adopted the so-called Democracy Defence Package (European Commission, 2023a), which acts as a natural extension and revision of the work begun three years earlier with the European Democracy Action Plan (European Commission, 2020b). Its development was driven by a climate of evident institutional vulnerability in the face of the 2024 electoral cycle, a scenario in which information manipulation and covert interference threatened to erode Community public trust. To articulate this defence, Brussels avoided fragmented solutions and designed an instrument structured around a central legislative element and two complementary, more advisory recommendations.

The centrepiece of this package is a proposed Directive focused directly on foreign influence. The text seeks to establish harmonised rules that "will improve the transparency and democratic accountability of interest representation activities on behalf of third countries" (European Parliament and Council, 2023b). In practice, this legislative move represents a serious attempt to scrutinise the lobbying and pressure networks that, funded opaquely from abroad, seek to covertly alter decision-making and the European civic space itself.

Alongside this attempt to suffocate foreign financial opacity, the package's scaffolding is reinforced with soft law tools oriented towards internal resilience, for which the Commission integrated two Recommendations aimed at promoting free, fair and resilient elections (European Parliament and Council, 2023a) and the participation of citizens and civil society organisations in policy-making (European Commission, 2023). With this dual move, the approach abandons the purely reactive perspective towards the hostile actor. The underlying logic assumes that a citizenry actively involved in the public policy-making process and a strong associative fabric ultimately operate as the most effective immunological barrier against any external destabilisation campaign.

The true stress test for this entire system, however, came during 2024. With the DSA already fully applicable to all digital intermediaries from February, the continent faced the European Parliament elections. Although the vote managed to avoid the feared scenario of systemic



disruption through foreign interference, it exposed the fragility of the journalistic ecosystem. In this context, the adoption of the European Media Freedom Act (EMFA) sought to consolidate "a common framework for media services in the internal market" (European Parliament and Council, 2024b), attempting to protect editorial independence against pressures from both state actors and private oligopolies. The EMFA aims to strengthen the internal market for communication services while protecting pluralism, freedom and editorial independence in the EU through the introduction of safeguards against politicisation and external interference. To this end, it establishes measures such as guaranteeing the autonomy of public service media, protecting journalists and their sources — including a specific ban on the use of spyware — and requiring transparency in media ownership and the distribution of institutional advertising. It also obliges member states to assess the impact of media concentration on informational pluralism and provides mechanisms to protect journalistic content against unjustified moderation by major platforms, incorporating a "prior notification right" requiring them to notify independent media before restricting their content.

The subsequent entry into force of the landmark AI Act (European Commission, 2024b) in August added another layer of technical complexity to Europe's defences, attempting to rein in — with a degree of success that remains the subject of deep academic debate — the mass synthetic generation of disinformation.

The era of mere corporate goodwill comes to a close when soft law instruments are definitively integrated into the hard core of European regulation. The formal milestone of this transition occurs in February 2025, when the former Code of Practice on Disinformation is officially reconceived as a mandatory Code of Conduct under the Digital Services Act (DSA). This metamorphosis grants regulators a direct coercive power that materialised historically in December 2025, when the European Commission imposed the first fine under the DSA on the platform X following its refusal to remedy infringements (EFCSN, 2026).

Beyond the logic of sanctions, the institutional approach has been slowly rotating towards the concept — perhaps somewhat more diffuse in its definition but of vital importance — of "information integrity". Strategic priorities now focus on securing resilience infrastructures that do not depend on direct public funding. Milestones such as the deployment of cross-border databases operated by independent fact-checker networks (such as the EFCSN), or the deadline for transposing the Anti-SLAPP Directive in May 2026, illustrate an effort to suffocate judicial harassment of researchers and ensure the economic viability of the sector. The ultimate assumption is that the best algorithmic regulation proves sterile if the media fabric responsible for nurturing public debate lacks the minimum conditions for operational and financial survival.

*Table 1. Main actions on disinformation in the EU, Spain and Portugal*

|             | EU                                           | Portugal | Spain |
|-------------|----------------------------------------------|----------|-------|
| <b>2015</b> | East StratCom Task Force                     |          |       |
| <b>2016</b> | Joint Framework on countering hybrid threats |          |       |

|             | EU                                                                                                                                                                          | Portugal                                                                                                                                                                                                                                                                                                                                                                      | Spain                                                                                                                  |
|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| <b>2017</b> |                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                               | Non-legislative proposal on digital rights and truthfulness of information                                             |
| <b>2018</b> | Report of the High Level Expert Group (HLEG)<br>Communication on tackling online disinformation<br>Code of Practice on Disinformation<br>Action Plan against Disinformation |                                                                                                                                                                                                                                                                                                                                                                               | Organic Law 3/2018 (right of rectification on the internet)                                                            |
| <b>2019</b> | Rapid Alert System (RAS)                                                                                                                                                    | ERC Report (A Desinformação)                                                                                                                                                                                                                                                                                                                                                  | AEPD Circular 1/2019<br>Creation of the Permanent Commission against Disinformation<br>National Cybersecurity Strategy |
| <b>2020</b> | Launch of the European Digital Media Observatory (EDMO)<br>European Democracy Action Plan (EDAP)<br>Digital Services Act (DSA) proposal                                     |                                                                                                                                                                                                                                                                                                                                                                               | Order PCM/1030/2020 (Procedure against disinformation)                                                                 |
| <b>2021</b> | Guidance on Strengthening the Code of Practice on Disinformation<br>StratCom activity report 2021                                                                           | Law n.º 27/2021 – Portuguese Charter of Human Rights in the Digital Age (Art. 6.º right to protection against disinformation)                                                                                                                                                                                                                                                 | National Security Strategy (ESN21)                                                                                     |
| <b>2022</b> | Strengthened Code of Practice on Disinformation<br>Approval of the Digital Services Act (DSA)                                                                               | Resolução do Conselho de Ministros n.º 142/2023                                                                                                                                                                                                                                                                                                                               | Order PCM/541/2022 (Forum against disinformation campaigns)<br>General Audiovisual Communication Law (Law 13/2022)     |
| <b>2023</b> | Defence of Democracy package<br>1st EEAS Report on FIMI threats                                                                                                             | Council of Ministers Resolution No. 142/2023 – National Media Literacy Plan guidelines (combating disinformation and promoting media literacy)                                                                                                                                                                                                                                |                                                                                                                        |
| <b>2024</b> | European Media Freedom Act (EMFA)<br>Artificial Intelligence Act (AI Act)<br>DSA fully applicable<br>Regulation on the transparency and targeting of political advertising  | Law n.º 20-B/2024 – ANACOM designated Digital Services Coordinator (DSA); ERC designated competent authority for media content<br>RCM n.º 105/2024 – Creation of #PortugalMediaLab (mission structure for media policy and anti-disinformation)<br>News Media Action Plan (Plano de Ação para a Comunicação Social, October 2024) – government media action plan with axis on | Democracy Action Plan<br>Royal Decree 444/2024                                                                         |



| EU          |                                                                                                             | Portugal                                                                                                                                                                                                                                                                                                                                        | Spain                                                                                                                                  |
|-------------|-------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
|             |                                                                                                             | combating disinformation and media literacy                                                                                                                                                                                                                                                                                                     |                                                                                                                                        |
| <b>2025</b> | Integration of the Code of Practice into the DSA framework<br>Presentation of the European Democracy Shield | RCM n.º 65/2025 – National Media Literacy Plan (Plano Nacional de Literacia Mediática 2025–2029 - PNLM); national strategy to combat disinformation and promote media literacy<br>DSA national implementing bill approved by Council of Ministers (July 2025) and submitted to parliament (August 2025); approved by parliament (February 2026) | National Strategy against Disinformation Campaigns<br>Draft Laws on professional secrecy and democratic governance of digital services |
| <b>2026</b> | 4th EEAS Report on FIMI threats<br>Launch of the EFCSN Protection Scheme                                    | Lei n.º 12-A/2026 – DSA national implementing law: ANACOM as Digital Services Coordinator; ERC and CNPD as sectoral authorities.                                                                                                                                                                                                                | Draft Organic Law regulating the Right of Rectification<br>Preliminary Draft of the Public Sector Advertising Law                      |

*Source: own elaboration.*

### 3.2. The rise of generative artificial intelligence and the European response

The rise of generative artificial intelligence represents the most disruptive technological factor in the evolution of disinformation campaigns during the analysed period. This technology emerges as a significant risk by enabling the mass creation and circulation of false content — in text, audio, image or video — at an unprecedented scale. At the continental level, data reveal that 27% of foreign information manipulation and interference incidents detected by European authorities in 2025 involved AI-based tactics, an increase of approximately 260% compared to the previous year (EEAS, 2026). Hostile actors have fully integrated these tools into their operations to accelerate content production and maximise influence at minimal resource expenditure (EEAS, 2026). In this respect, the attackers' strategy has mutated: the primary objective is no longer the precision of deception, but massive "presence", seeking to flood the information space in order to generate cognitive chaos that erodes the very principle of trust in information.

To address this threat, the European Union adopted Regulation (EU) 2024/1689, the AI Act (European Commission, 2024b), which establishes a risk-based framework for AI systems. The Regulation classifies deepfake generation tools under specific transparency obligations (Article 50): providers and users of systems that generate synthetic audio, image, video or text content are required to ensure that such outputs are marked in a machine-readable format, through techniques such as watermarks or embedded metadata, enabling subsequent detection by platforms and end users. However, a significant implementation gap persists. While the general provisions of the AI Act entered into force in August 2024,



the transparency obligations of Article 50 — which are directly relevant to the deepfake threat — will not be fully applicable until August 2026.

Audiovisual falsification is compounded by the mass automation of texts through large language models (LLMs), developed on a massive scale from the "transformer" neural network model formulated by Google in 2017 (Vaswani et al., 2017). These tools allow attackers to draft misleading articles, social media posts and interactive responses with impeccable grammatical accuracy and high persuasive power, adapted to multiple languages without the need for human translators (EEAS, 2026).

At the same time, AI has radically changed the way impersonation and cloning tactics targeting both institutions and media outlets are developed. The shift from manual falsification or superficial cloning to the automated and highly sophisticated generation of synthetic content marks a substantial transformation in the complexity and dangerousness of these strategies. In this context, the FIMI operations aligned with Russian activities aimed at destabilising the European public sphere and weakening the structural cohesion of the European Union are particularly notable. Within the broader framework of Foreign Information Manipulation and Interference (FIMI), the Russian Federation has refined media falsification into a sophisticated tactical component of its asymmetric warfare strategy.

This approach transcends traditional state propaganda through the construction of a complex online influence architecture based on digital simulation, behavioural manipulation and identity impersonation (Pomerantsev, 2019). Operating through state-linked entities such as the Internet Research Agency (IRA) and military intelligence (GRU), the Kremlin deploys coordinated armies of bots, cyborgs and "sock puppets" that infiltrate online communities under the guise of local citizens or activists, thereby fabricating false public consensus and injecting polarising narratives into the European public sphere (Lilly, 2022; Pomerantsev, 2019). Furthermore, the technical processes of media falsification encompass sophisticated hack-and-leak operations channelled through fictitious digital personas — such as Guccifer 2.0 or DCLeaks — as well as the systematic fabrication of news designed to deceive (Harding, 2017; Lilly, 2022; Snyder, 2018). The ultimate objective of this industrial-scale falsification is not necessarily to persuade audiences of a coherent alternative ideology, but to generate an overwhelming volume of "information noise" (*infoshum*) (Galeotti, 2022). By deliberately blurring the boundaries between reality and fiction, these FIMI operations seek to destroy the epistemic foundations of objective truth, fostering widespread cynicism and eroding public trust in democratic institutions and the media themselves (Galeotti, 2022; Snyder, 2018).

At the operational level, the deployment of Artificial Intelligence for inauthentic impersonation has drastically accelerated the capabilities of manipulation infrastructures. This technology branches into vectors of hyperpersonalisation and large-scale procedural generation. Within Russian networks, clusters such as Storm-1516 (also known as False Façade) have automated the creation of hundreds of highly sophisticated web portals and deepfake videos (voice cloning and lip syncing) designed to directly attack the integrity of political figures, as evidenced by aggressive campaigns against Moldovan President Maia



Sandu and German leaders (EEAS, 2026). Added to these falsification tactics is an emerging and highly dangerous strategy: the manipulation of the algorithms themselves, or LLM grooming. Infrastructures such as the Russian Portal Kombat network massively publish low-quality multilingual content with the aim of contaminating the training data of AI systems; as European agencies warn, "large language models (LLMs) are being 'groomed' by operators who are flooding the internet with false information in an effort to manipulate results when we use these tools" (EEAS, 2026).

In parallel, the manipulation infrastructure linked to China has also refined its algorithmic sequences. The Spamouflage cluster employs AI-assisted impersonation videos aimed at silencing and degrading political dissidents through the fabrication of false accusations, while the False Friends network — covertly linked to the state broadcaster CGTN — resorts to generative models such as DALL-E to synthesise from scratch the corporate visual identities of non-existent local media outlets, forging logos, avatars and even the small icons that appear in browser tabs (favicons) to legitimise its propaganda (EEAS, 2026). Networks such as Paperwall automate the translation and near-simultaneous publication of content aligned with the interests of Beijing and Moscow, often leaving evident forensic traces such as residual hyperlinks or exposed prompt error messages in the source code (EEAS, 2026). Attackers accept these technical imperfections because their priority is flooding and saturating the information space (EEAS, 2026; European Parliament, 2025b). As the European Union's strategic assessment of these operations concludes, "the goal is not precision but presence" (EEAS, 2026). Through this incessant volume, they seek to compel citizens and moderation systems to process continuous hyperrealistic simulations, inducing an overload that causes cognitive chaos and structurally erodes epistemic trust in the digital ecosystem (EEAS, 2026; European Parliament, 2025b).

To counter this systematic saturation, the European Union has promoted a strategic paradigm shift, moving from mere diagnosis to proactive impact through the "FIMI Deterrence Playbook". This new operational approach seeks to neutralise these threats by acting directly on the critical nodes and key enablers of influence operations, such as intermediaries, proxies and service providers (EEAS, 2026). To identify precisely where to implement these measures, the European strategy relies on the "FIMI Galaxy" explorer, an analytical tool that provides a visual representation of digital infrastructures and assesses how threats cluster around specific channels (EEAS, 2026). Tracing these covert networks and their links enables defenders to discover the critical nodes that enable hostile actors to operate at scale, providing clear options for applying the deterrence playbook in a surgical, empirically grounded manner (EEAS, 2026). The joint application of this playbook and the explorer seeks to increase operational costs, limit the attackers' room for manoeuvre through digital regulation or sanctions, and make their infrastructures increasingly fragile and unsustainable, thereby protecting society's narrative resilience (EEAS, 2026).

### 3.3. The Great Retreat of digital platforms from the co-regulatory model

In the European context — unlike the approach adopted in the United States — the relationship between major technology platforms and fact-checking organisations has been structured primarily through co-regulatory instruments. This ecosystem was initially sustained by the Code of Practice on Disinformation launched by the European Commission in 2018, and subsequently by its strengthened version of 2022 (European Commission, 2018a, 2022). Under this voluntary framework, corporations such as Google, Meta, TikTok and Twitter — the latter now X — signed specific commitments aimed at mitigating information disorder. X's withdrawal from the voluntary Code at the end of May 2023 (EFCSN, 2024) marked the beginning of the "Great Retreat", signalling a shift towards minimum compliance with the mandatory requirements of the DSA and abandoning the collaborative spirit of the previous co-regulatory era.

The key strategic guidelines of the co-regulatory model included designing policies to improve the verification of advertising spaces — thereby reducing the revenues of malicious actors — together with the obligation to support independent research by sharing "privacy-protected datasets" (European Commission, 2018a). Furthermore, the strengthened version of this framework requires the establishment of fair collaboration through formalised agreements. These guarantee "full coverage of EU member states and official languages", ensuring fact-checkers a fair financial contribution and granting them the data access needed to maximise the quality and impact of their scrutiny (EFCSN, 2024).

Within this co-regulatory framework, a close partnership developed between major technology platforms and fact-checking organisations, oriented towards combating disinformation and safeguarding the integrity of public debate. Following the electoral crises and influence operations identified in 2016, companies such as Meta launched external fact-checking programmes, injecting funds that sustained and professionalised hundreds of journalistic verification projects around the world.

The cornerstone of this collaboration was Meta's Third-Party Fact-Checking Program, first announced in December 2016 (Frau-Meigs & Corbu, 2024). The system employed a direct mitigation mechanism: once a fact-checker confirmed that a piece of content was false, Meta intervened by "downranking it in the News Feed" to drastically reduce its reach, while withdrawing monetisation and advertising privileges from repeatedly offending pages or accounts (DSN, 2022b). The strategy demonstrated its efficacy; corporate data indicate that when a warning screen is placed over a post, users avoid clicking on it 95% of the time (DSN, 2022b). Furthermore, 46% of European Union users chose not to share content after seeing a fact-checking alert (EFCSN, 2024). This model fundamentally transformed the sector globally, driving its expansion from barely 11 initiatives in 2008 to 417 fact-checking projects in 100 countries and 69 languages by 2023 (Frau-Meigs & Corbu, 2024). During that same year, approximately 37% of IFCN signatories (95 organisations) operated as official partners within Meta's programme (Frau-Meigs & Corbu, 2024).



While the financial support of the technology giants catalysed the professionalisation of the sector, it also fostered a "strong dependence on corporate funding" (Frau-Meigs & Corbu, 2024). Experts warned early on about "media capture": the ethical risk that fact-checking journalism would become economically dependent on the very social networks whose algorithms promote and profit from polarising or false content in order to maintain user engagement. Moreover, the relationship was fundamentally asymmetric. Platforms unilaterally dictated the rules, contracts and technical limitations, ultimately deciding how many people actually saw the debunking reports (Science Feedback, 2026). Revenue from Meta's programme became the primary source of sustainability, representing 45.2% of total revenues of the global fact-checking industry — far above other main sources such as grants (29%) or donations and subscriptions (6.5%) (Frau-Meigs & Corbu, 2024). This reality placed organisations in a position of significant vulnerability, highlighting the urgent need to diversify revenue sources to avoid operating under extreme financial dependence in the face of potential budget cuts or policy changes by platforms (Frau-Meigs & Corbu, 2024). This strong control by technology companies is precisely what left the sector so exposed when the massive cuts began in 2025.

On 20 January 2025, on the first day of his second presidency, Donald Trump signed a battery of legislation, including Executive Order 14149, "Restoring Freedom of Speech and Ending Federal Censorship" (Gov.info, 2026). This aligned with the narrative of the "Free Speech" movement, according to which platform moderation disproportionately targeted conservative viewpoints or favoured "woke" ideologies. In February 2025, the Federal Trade Commission (FTC) followed the same line, opening an investigation to determine whether technology platforms "deny or degrade users' access to services based on the content of their speech or their affiliations" (FTC, 2025). The new White House guidelines on platform content regulation will be decisive for the role of social networks in the spread of disinformation.

While Meta was decisive in launching the era of professionalised fact-checking, it was also the first to signal its dismantling. On 7 January 2025 — less than two weeks before the presidential inauguration in the United States — Mark Zuckerberg ended Meta's third-party fact-checking programme in the United States (Meta, 2025b). He argued that moderation had "gone too far" and accused fact-checkers of political bias, a move that closely mirrored the rhetoric of the incoming administration.

Google followed a similar path in its European operations. In early 2025, Google formally notified the European Commission that it would not integrate the work of fact-checkers into its search results or on YouTube. In a letter to the Commission's Directorate-General for Communications Networks, Content and Technology (DG CONNECT) — leaked by Axios — Google's head of Global Affairs justified the decision by arguing that mandatory fact-checking "is simply not appropriate or effective for our services" (Weatherbed, 2025). As a result, Google unilaterally abandoned specific commitments under the EU Code of Practice, precisely as the framework was transitioning into a formal Code of Conduct under the legal requirements of the Digital Services Act (DSA) (EFCSN, 2026; Weatherbed, 2025).



The final months of 2025 consolidated the structural collapse of the European co-regulatory framework. On 1 July 2025, the voluntary Code of Practice became a formal Code of Conduct under the Digital Services Act (Science Feedback, 2026). To circumvent these new mandatory assessments, major technology corporations executed a coordinated withdrawal. Alphabet formally notified the European Commission that Google Search and YouTube were rejecting all fact-checking commitments, with the company considering such measures inappropriate for its services (Weatherbed, 2025). Microsoft also withdrew from the fact-checking chapters covering Bing and LinkedIn (EFCSN, 2026). As a result, by the close of 2025, only TikTok and Meta maintained these specific obligations in Europe. However, Meta cancelled its third-party programme in the United States in January 2025 and warned European authorities that the corporation would assess the future applicability of these agreements for Facebook and Instagram (Duke Reporters Lab, 2025; EFCSN, 2026). Furthermore, empirical audits conducted in October 2025 evidenced a systematic corporate boycott of independent scrutiny. Despite the explicit legal mandates of Article 40 of the Digital Services Act, only LinkedIn delivered the required data samples to external assessors (Science Feedback, 2026). This complete opacity characterises the fragile state of information integrity at the close of the year.

The EFCSN explicitly condemned this scenario in its March 2026 White Paper. The institution reports the withdrawal of YouTube, Google Search, Bing Search and LinkedIn from all fact-checking commitments (EFCSN, 2026). As the assessors conclude, "this retreat of some platforms from important commitments they subscribed to for years — when the Code was not part of the DSA framework — puts the Code itself at risk" (EFCSN, 2026). This mass desertion leaves Meta and TikTok as the only evaluated actors and severely weakens the European regulatory structure.

*Table 2. The Great Retreat — Platform withdrawals from the EU Code of Conduct*

| <b>Commitments from the EU Code of Practice</b> | <b>X (Twitter)</b>           | <b>Google (Search &amp; YouTube)</b>                                               | <b>Microsoft (Bing &amp; LinkedIn)</b>                                    | <b>Meta (Facebook &amp; Instagram)</b>                              | <b>TikTok</b>          |
|-------------------------------------------------|------------------------------|------------------------------------------------------------------------------------|---------------------------------------------------------------------------|---------------------------------------------------------------------|------------------------|
| General Subscription to the Code                | Full withdrawal in May 2023. | Maintained, but with massive withdrawals.                                          | Maintained, but with selective withdrawals.                               | Maintained in the EU.                                               | Maintained in the EU.  |
| Fact-Checking Chapter                           | Abandoned (May 2023).        | Formal withdrawal notified in early 2025 amid the transition to the DSA framework. | Formal withdrawal in early 2025 amid the transition to the DSA framework. | Commitment maintained in the EU (Cancelled US program in Jan 2025). | Commitment maintained. |



|                                                             |                       |                                                                                           |                                                                                           |                                                                                           |                                                                                           |
|-------------------------------------------------------------|-----------------------|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| Chapter on Political Advertisements                         | Abandoned (May 2023). | Withdrew from commitments / banned political ads in the EU between July and October 2025. | Withdrew from commitments / banned political ads in the EU between July and October 2025. | Withdrew from commitments / banned political ads in the EU between July and October 2025. | Withdrew from commitments / banned political ads in the EU between July and October 2025. |
| Financial support for independent Fact-Checking (EMIF/IFCN) | Abandoned (May 2023). | Refusal to renew EMIF and Global Fact Check Fund commitments in 2025.                     | N/A                                                                                       | Renewed contracts for 2026, but with reduced financial support levels.                    | N/A                                                                                       |
| Incorporation of Fact-Checking tools (e.g., Snippets)       | Abandoned (May 2023). | Eliminated the ClaimReview snippet in Google Search in June 2025.                         | Formal commitment withdrawn; zero results shown on first page in empirical tests.         | N/A (Uses direct alert labels).                                                           | N/A                                                                                       |

*Various sources (EDMO, 2025; EFCSN, 2026; Maldita.es, 2026; Meta, 2025b; Weatherbed, 2025)*

Current legislation does not strictly require digital platforms to partner with independent fact-checkers:

- a. The 2022 Code of Practice on Disinformation establishes a core commitment for platforms to sign agreements with independent fact-checking organisations — guaranteeing comprehensive coverage of all EU member states and official languages — but participation in this Code (or in specific chapters thereof) remains voluntary.
- b. The DSA instead imposes an outcome-oriented obligation, requiring Very Large Online Platforms (VLOPs) to implement "reasonable, proportionate and effective mitigation measures" (Art. 35) to address systemic risks such as disinformation. In theory, this allows platforms to achieve these objectives using any internal or community-driven mechanism they deem appropriate.

Despite this voluntary nature, the implicit requirements of the DSA have led several platforms to maintain ties with European fact-checkers. Corporate transparency reports submitted to the European Commission up to 2026 indicate the following partnerships:

- a. Meta: Works with 29 fact-checkers across the EU (in Spain: AFP, EFE Verifica, Maldita.es and Newtral).
- b. TikTok: Collaborates with 14 organisations (including Newtral in Spain).
- c. Microsoft (LinkedIn): Collaborates with Reuters.



- d. Google and Microsoft (Bing): Have integrated the open ClaimReview protocol from Schema.org. This allows search engines to detect and display fact-checking labels embedded directly in the websites of independent organisations and media outlets.

Google has chosen to channel its financial support to European researchers and fact-checkers through an independent fund. To date, the company declares having contributed 25 million euros to the launch of the European Media and Information Fund (EMIF), which has funded 121 projects in 28 countries (Google, 2025a, 2025b, 2026).

In an effort to reduce costs, platforms such as X and Meta have largely replaced professional fact-checkers with "Community Notes" systems, whereby users themselves provide context on questionable posts (Meta, 2025b). For a note to become public, the algorithm requires "bridging consensus": it must receive positive votes from users who normally hold opposing views (Tech Policy Press, 2026). While some academics argue that this "democratises truth" and could reduce scepticism towards traditional media (Pnas Nexus, 2026), practical results reveal deep cracks in the system (Meta Oversight Board, 2026; Tech Policy Press, 2026):

- a) Latency: The process is frequently too slow to intercept viral hoaxes during their peak "golden hour" of propagation.
- b) Scale: The volume of published notes is statistically insignificant compared with the millions of labels previously applied by human experts (Meta Oversight Board, 2026; Tech Policy Press, 2026).

This corporate flexibility encounters a rigorous regulatory limit in the EU. If a platform opts to dispense with independent fact-checkers in favour of its own proprietary systems, such as "Community Notes", it assumes the legal burden of demonstrating to the European Commission that these alternatives effectively mitigate the systemic risks contemplated in the DSA. European authorities are already scrutinising this shift, having launched formal investigations to determine whether user-driven moderation is truly capable of combating information manipulation. If these internal systems fail to meet DSA standards, platforms face potential penalties of up to 6% of their total global turnover. Ironically, this "citizen" model remains parasitic on professional journalism. A recent study revealed that links to investigations by professional fact-checkers — such as Maldita.es or Newtral — are among the most frequently used sources by X users to validate and justify their own community notes (Maldita.es, 2026).

Meta's own Oversight Board issued a severe warning in March 2026: it concluded that exporting the "Community Notes" model — where moderation is left in the hands of users — to countries facing repressive regimes, armed conflicts or electoral tensions creates an unacceptable risk to human rights (Meta Oversight Board, 2026). The Board highlighted that state-sponsored disinformation networks can easily hijack these community systems to silence minority voices.



The fracture of the partnership between technology platforms and fact-checkers has configured three differentiated global realities: deregulation in the United States, legal resistance in Europe and extreme vulnerability in the Global South.

- a) The United States: an ecosystem without guardrails. In the US, proactive moderation and independent oversight are increasingly dismissed as "political censorship". This shift has resulted in an unchecked digital landscape where foreign disinformation campaigns — particularly those orchestrated by Russia or China — circulate freely with practically no algorithmic friction (Tech Policy Press, 2026).
- b) Europe: the path of resistance. Europe has moved in the opposite direction, hardening voluntary agreements into "a co-regulatory code of conduct under the Digital Services Act (DSA)" (Bleyer-Simon, 2024). This landmark legislation demands rigorous systemic risk assessments and grants researchers and civil society unprecedented access to internal data (through the Meta Content Library, TikTok's Research API and Google/YouTube researcher programmes). The impact of the DSA is already quantifiable: in its first two years, online platforms "have reversed almost 50 million decisions affecting user content or accounts", reversing arbitrary moderation through formal appeals processes (European Commission, 2026). Furthermore, the EU is reinforcing its position with the European Democracy Shield, a comprehensive, forward-looking framework designed to address an escalating threat landscape of hybrid attacks and foreign information manipulation (EPRS, 2026; European Parliament, 2025c). Central to this strategic initiative is the establishment of a new independent entity — the European Centre for Information Integrity — conceived as a hub of operational excellence and knowledge exchange to unify the European response, dismantle the logistical foundations of hostile operations and proactively safeguard the common public space. This regulatory assertiveness has triggered a geopolitical clash. "The Trump administration has launched a full-scale assault on the EU's digital rules, specifically targeting the DSA", backed by technology allies and right-wing US think tanks (Corporate Europe Observatory, 2026). Analysts suggest that Meta and Google are tactically adopting this "anti-censorship" rhetoric as a proxy strategy to protect their economic interests and erode the European legal framework (EFCSN, 2026). A comprehensive report published by the US House of Representatives Judiciary Committee in early 2026 perfectly illustrates this transatlantic conflict. The document, entitled "The Foreign Censorship Threat, Part II", accuses the European Commission of deliberately instrumentalising the Digital Services Act to compel global technology platforms to censor American freedom of speech. The Congressional investigation claims that European efforts to combat disinformation and hate speech constitute a decade-long campaign to suppress conservative political

narratives within the United States. Furthermore, the committee presents interactions between European regulators, non-governmental organisations and technology companies as an unacceptable incursion into American political discourse (U.S. House of Representatives Committee on the Judiciary, 2026). This institutional offensive demonstrates how US political actors are actively framing European regulatory frameworks as direct threats to their national sovereignty.

- c) The Global South: maximum vulnerability. In Latin America, Africa and Asia, the dismantling of information integrity systems could be catastrophic. Meta's Oversight Board recently warned that deploying Community Notes globally without a safety net of fact-checkers "risks causing real harm in conflict zones, repressive regimes and countries facing elections" (Tech Policy Press, 2026). These are precisely the regions where public anxiety about disinformation is highest — reaching 73% in Africa, with similar levels in Latin America and Asia (RISJ, 2025a). In these environments, independent fact-checkers are often the last line of defence against state propaganda and the algorithmic amplification of harmful content.

The withdrawal of funding by major technology corporations — particularly Meta, which until 2024 provided almost half of the global sector's revenues — has left fact-checking agencies in a critical state. Today, 89.3% of these organisations consider financial sustainability their greatest threat, and some are already anticipating layoffs or closures (Poynter Institute, 2025). To prevent the total collapse of the sector in the most vulnerable regions, the International Fact-Checking Network (IFCN) launched an emergency fund of 750,000 dollars to provide "financial relief" to 25 key agencies worldwide (IFCN, 2026).

## 4. Portugal

In recent years, namely after the landmark report published by IBERIFIER in 2023 (Badillo-Matos et al., 2024), Portugal has been going through wide societal changes at many levels. The challenges faced by the country are plenty and diverse, from growing political polarisation to the national-level impacts of global geopolitical events in the economy, several sources mention a diverse subset of themed anxieties that impact different sociodemographic cohorts and that are very sensitive to nudging by the news-agenda. This was a clear trend in the lead-up to the 2023 IBERIFIER report, when rising negative behaviours towards the news were identified in Portugal, most likely relating to the prevalence of hard-news in the agenda during the period under which the sentiment of Portuguese consumers was measured (Cardoso et al., 2022).

In terms of its relationship to disinformation and news, Portugal stands among the European landscape at a unique position. On the one hand, the country is traditionally characterised as standing among other southern European countries within the Polarised Pluralist Model in terms of its media ecosystem features (Hallin & Mancini, 2004) but, on the other, recent evidence suggests that due to its recent historical evolution Portugal may no longer fit the same framework (Hallin & Mancini, 2016; Santana-Pereira, 2015; Sierra Iso et al., 2024). In some dimensions, such as trust, reliance on news and a society-wide positive view of the Public Service Media, Portugal has much more in common with markets such as Finland, Norway, Denmark or Sweden but in terms of raw habits such as sources or general behaviours towards news it is much more similar to markets such as Spain or Italy (Paisana et al., 2026).

The particularities of the Portuguese media ecosystem are closely linked with the disinformation sphere in its growing expressions. At the political level, the Portuguese landscape has been marked by significant turbulence in recent years, most notably exemplified by the high-profile resignation of majority-governing Socialist Prime Minister António Costa in 2023, an event that has further contributed to an increasingly polarised political environment. This polarisation is further amplified in the digital sphere, where social media platforms present Portuguese users with a distorted representation of political reality — one in which the visibility afforded to political actors on these platforms diverges substantially from their institutional representation within parliament (Badillo-Matos et al., 2024).

Within this context, the emergence and rapid consolidation of the far-right populist party Chega constitutes a particularly salient case study (Marchi, 2023). The party has cultivated a robust and strategically deliberate social media presence (Pina, 2023), through which it systematically appropriates content from legacy media outlets to lend legitimacy to populist narratives (Baptista et al., 2024), while simultaneously engaging in disinformation practices that further erode the informational integrity of the public sphere (Canavilhas et al., 2025; Pardal & Narciso, 2023).



Against this backdrop of intensifying political polarisation, as mentioned above, Portugal presents a theoretically compelling and empirically distinctive case study, setting itself apart from comparable Southern European contexts (Sierra Iso et al., 2024). What makes the Portuguese case particularly complex to read and even contradictory is the coexistence of somewhat conflicting attitudinal orientations among its citizens: on the one hand, self-reported levels of trust in news media remain comparatively elevated (Cardoso et al., 2023); on the other, citizens simultaneously express considerable concern regarding the prevalence of online disinformation (Cardoso, 2023), while demonstrating a limited capacity to accurately identify it when encountered (Eurobarometer, 2024).

In this sense, the overlap between politics and media, news media in particular, contributes to a much different outset as compared to countries with a predictable pattern read such as Spain, where low trust in journalism is matched by opposing high concern about disinformation (Sierra et al., 2025). More recent research highlights and confirms the thematic diversity of disinformation in Portugal noted by Badillo-Matos et al. (Badillo-Matos et al., 2024). While political disinformation in electoral contexts, related to corruption, tends to be more visible, more recently immigration has gained traction as a core topic of electoral disinformation (C. Cardoso et al., 2025) because it highlights a wide range of anxieties within a single thematic framework —the sustainability of the pension and social security system, the overload of the national health service, lack of resources in public education, employment, fears related to the ‘Great Replacement’ theory, etc. Experts also underline the importance of enhanced initiatives relating to financial literacy which has real impact on the lives of citizens due to poor decision-making and economic fraud (LUSA, 2025) and that is propelled by wider economic anxiety due to rising and / or persistent inflation.

The circulation of disinformation between Portugal and Brazil, facilitated by their shared language, has a real impact on Portugal’s disinformation dynamics . While Badillo-Matos et al. (Badillo-Matos et al., 2024) initially theorised this cross-border flow as a phenomenon mostly limited to the importation of narratives and discursive practices, subsequent elections have revealed a significant shift: what was once a conceptual exchange has escalated into direct intervention by foreign actors in domestic political affairs.

In this chapter we explore the depth of the political, economic, social and security issues of disinformation in Portugal. In the first section we introduce the country’s background and context, while considering issues of regulation and governance, pinpointing changes away from the legislative and regulatory framework described by Badillo-Matos et al. (Badillo-Matos et al., 2024). In the second section we examine the different typological aspects of disinformation measured through an analysis of media coverage on the topic. In the third section, we discuss the themes of disinformation and the surrounding social discussion , with particular insight into election periods, during which Portuguese IBERIFIER researchers participated in the Rapid Response System (RRS) under the Code of Practice on disinformation (European Commission, 2022). Finally, we elaborate on the impact of the Portuguese language as a linguistic bridge that facilitates the circulation of disinformation across Portuguese-speaking countries, namely Brazil, identifying specific cases and proposing an analytical framework to shared languages across different geographies.

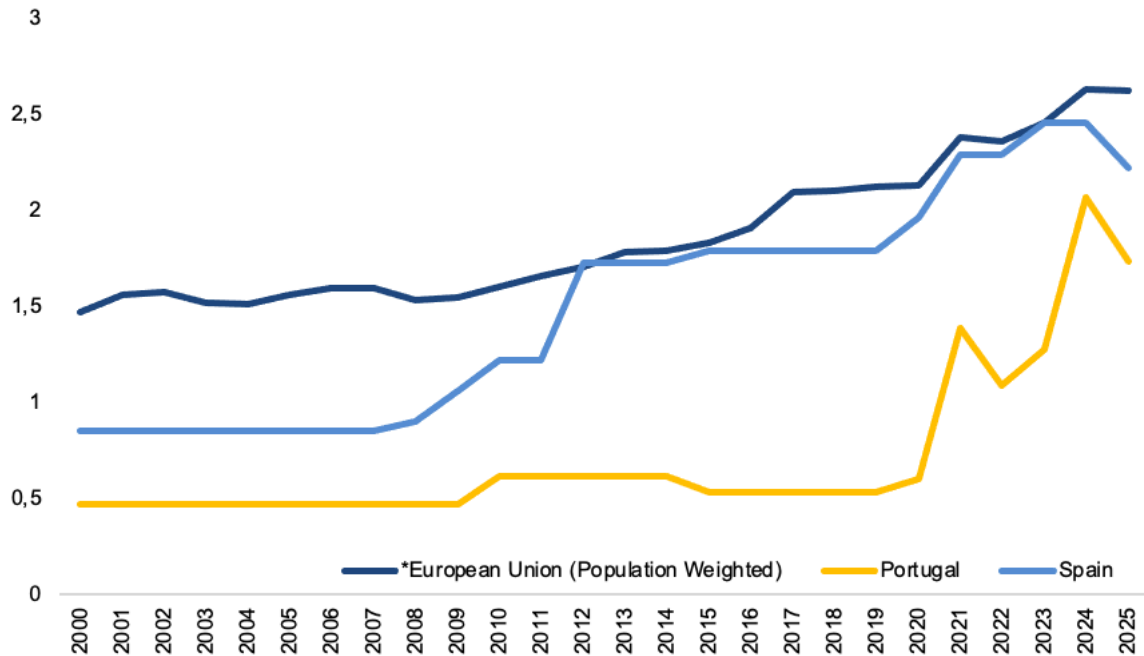


#### 4.1. Background and context

In terms of its setting and relationship between the public and the news, Portugal has traditionally been characterised by comparatively high levels of trust in news, a relatively stable media system, and lower levels of political polarisation than many European counterparts, with journalism being perceived as trustworthy by the majority of citizens —54%, in strong contrast to Spain's 31%. Moreover, the country also displays very high net trust values, meaning that those who trust the news far outnumber those who do not (Paisana et al., 2026). Historically, the levels of trust and the steady relationship to news media has contributed to an institutionalised view of the media sphere, as operating under a homogenous and steady subset of rules and principles, with both strong Public Service Media reaching across the territory and a private sector that, despite the small size of the Portuguese market, is able to drive innovation and to mobilise audiences through content.

However, in recent years this equilibrium has been increasingly challenged by structural transformations in the information ecosystem, most notably the platformisation of news consumption happening in parallel with the intensification of electoral cycles, and the growing salience of disinformation as a political and social risk. As such, the historically low polarisation rates have increased in recent years to more closely match the trends found in Spain and Europe as a whole.

Figure 1. Political polarisation in the EU, Portugal and Spain, 2000 to 2025



Source: V-Dem – Varieties of Democracy. Edition: OberCom.

Recent data point to a hybrid media environment in which legacy media—particularly television—retain a central role, while digital platforms and social media have become key vectors for information access and dissemination, in a complementary logic (European

Parliament, 2025). While social media usage rates for general use and information have become meaningful in size, these have remained relatively stable over the years and Portugal ranks as one of the countries in the world where most people use television to access the news – 71% use it and 59% use it as their main source for news (European Parliament, 2025a). Even among 18-24's the usage rates for television are structurally higher than those found in other European markets. This coexistence between legacy and new media is accompanied by persistent concerns about disinformation exposure, fragmentation of audiences, and declining capacity to distinguish between verified and misleading content, especially in the age of AI.

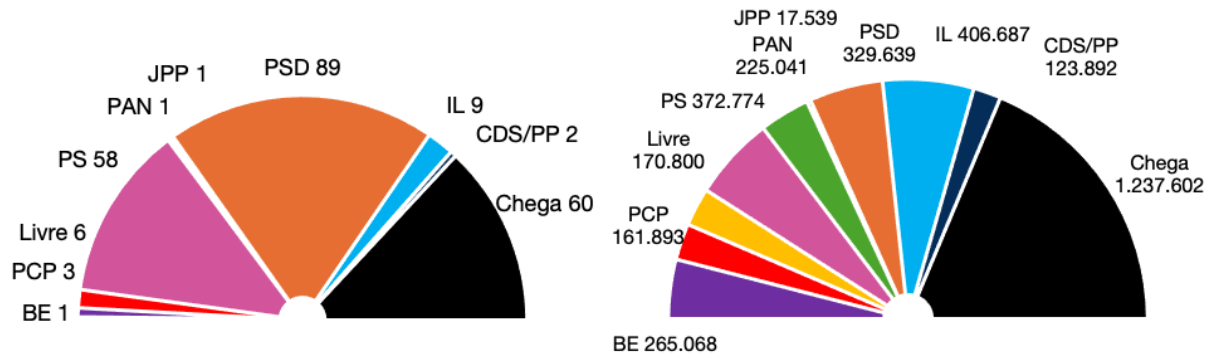
In recent years the rise of negative behaviours towards the news, such as news saturation, news avoidance and news shutdowns, has become concerning. Although these behavioural patterns can be exacerbated by heavy news agendas (such as armed conflicts, polarising politics, harsh economic environment) it has been found that a significant proportion of Portuguese news users employ news shutdowns as an active means to control and improve their experience and well-being (Cardoso et al., 2023). The trends which were identified and discussed by Badillo-Matos et al. (Badillo-Matos et al., 2024) in terms of negative behaviours towards the news have remained stable ever since, to the point where it is reasonable to question whether they have become an intrinsic characteristic of the Portuguese media ecosystem and of the way the Portuguese relate to news. However, the same applies to the majority of Western European countries and, unlike France, Spain or Italy, the normalisation of negative behaviours towards the news or, at the very least, higher control of the news experience, is matched in Portugal by the aforementioned high level of trust in news and concern about disinformation, meaning that there appear to be individual and personal informal systems in place that citizens rely on to safeguard the integrity of the information process (Paisana et al., 2026).

The Portuguese media system continues to display resilience, supported by relatively strong journalistic brands, emerging fact-checking practices, and increasing –albeit uneven– levels of media literacy. Structurally high trust in news rates place Portugal among Scandinavian countries with which it also shares a widespread positive view of the public service media service across all demographics. However, these positive aspects are not matched by equally positive trends in key aspects such as a culture of paying for digital news. With only 8% of internet users paying for digital news, Portugal ranks among the lowest in a pool of 48 global markets (Paisana et al., 2026).

Within this evolving context, disinformation in Portugal has shifted from predominantly imported narratives to more domestically produced and politically embedded content, often linked to electoral processes and amplified through transnational linguistic networks. These dynamics are particularly visible in periods of heightened political contestation, where polarisation, while still moderate in comparative terms, has intensified, with the populist far-right emerging as a central node in both the production and circulation of disinformation

narratives (Canavilhas et al., 2025). The rise of Chega<sup>1</sup> has been quick – evolving from one single member in parliament in the 2019 General Election to 60 in 2025 – and has upended the 50 year, post-revolution bipartisan status quo.<sup>2</sup>

Figure 2. Number of Members elected for Parliament in the 2025 General Election (left) and number of social media followers on the five main platforms (right)



Source: *Parlamento.pt* and social media pages for all parties. Edition: OberCom. Note: The graph on the right displays the aggregate number of social media followers for each party on Facebook, Instagram, X, TikTok and Youtube as of March 26th 2026. This is the total number of users; instances of the same user following a party on more than one platform have not been removed, but only the main profile of each party was considered. All parties have several active accounts for different groups, sections or departments within the party.

Beyond the impact of its entry into the parliamentary equation, Chega has imported the current populist style of politics to Portugal with notable electoral and communicational success, building on the framework inaugurated by leaders such as Jair Bolsonaro in Brazil, with which the Portuguese expression of far-right populism appears to share key genetic traits (see section 4.3.1).

While social media interactions and dynamics do not directly translate into electoral results (Cardoso et al., 2023), the rise in influence of Chega and its leader, André Ventura, on social media platforms has closely mirrored the party's electoral growth. The size and typology of

<sup>1</sup> Far-right populist party founded by André Ventura in 2019 and is part of Patriots for Europe alongside parties such as Vox, Front Nationale or Fratelli d'Italia.

<sup>2</sup> From 1976 to 2025 the Portuguese political spectrum has been dominated by center-right PSD – Partido Social Democrata and center-left PS – Partido Socialista in organic electoral rotation, despite occasional instances of coalition executives always led by either party. The rise of Chega as a third block or pillar in parliamentary arithmetic has fostered intense debates regarding the ideological range of parties and politicians in the right side of the spectrum. A similar discussion occurred on the left regarding the PS-led government between 2015 and 2019, a minority government supported by PCP – Partido Comunista Português and BE – Bloco de Esquerda.

the disinformation phenomena we explore in this chapter, relating to the Portuguese context, should be observed against the backdrop of the current political social media sphere in which Chega and Ventura have considerable visibility and, as noted by Canavilhas (Canavilhas et al., 2025) a strong influence in the disinformation landscape in Portugal. As identified over three consecutive elections in 2024 and 2025, the control of Chega over attention on social media platforms is overwhelming in networks such as Facebook or Instagram and nearly total in platforms such as TikTok (C. Cardoso et al., 2025; Casquinho et al., 2024a, 2024b).

The emergence of far-right populist parties in the Iberian Peninsula — Chega in Portugal and Vox in Spain — represents a significant case study in the strategic exploitation of social media for political mobilisation, with direct implications for disinformation dynamics in both countries. Drawing on a comparative content analysis of 674 social media messages published during the 2019 Spanish and 2022 Portuguese electoral campaigns, Pina (Pina, 2023) identifies both meaningful convergent and divergent dynamics in how these actors operate across digital platforms.

Both parties prioritised nationalist messaging —consistently exceeding half of all content— while systematically attacking established political elites, undermining press freedom, and targeting minority communities, tactics which collectively erode foundational democratic structures. However, platform strategies and thematic emphases diverged notably. In Portugal, Chega concentrated activity on Facebook and Instagram, foregrounding corruption narratives and colonial-era nostalgia, reflecting domestic vulnerabilities in institutional trust. In Spain, Vox maintained a more aggressive Twitter / X presence<sup>3</sup>, with stronger anti-immigrant and anti-press rhetoric, shaped by Spain's greater exposure to migration pressures and a more polarised media environment. Chega would later inaugurate the use of TikTok for political communication in Portugal, having an overwhelming control over attention in that platform as well.

Critically, both parties exploited social media's capacity to bypass traditional journalistic gatekeeping, disseminating populist and, at times, disinformation-adjacent content directly to large audiences. This equalisation dynamic, whereby resource-poor newcomer parties leverage digital platforms to compensate for limited legacy media access, poses enduring challenges for both the Portuguese and Spanish information ecosystems, underscoring the need for coordinated regulatory responses within the broader DSA implementation framework. Chega leader André Ventura has been particularly successful in expanding the party's reach on social media towards legacy media, television in particular, where his confrontational style of communication, echoing the one used by many other mainstream right-wing populist politicians, has driven journalistic and audience attention. For this

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<sup>3</sup> Note: the justification for this difference is most likely communicational and not political / ideological: Portuguese social media usage patterns are remarkably different than the ones found in Spain, particularly in the case of X. Whereas only 10% of the Portuguese use X in general and 5% for news, in Spain the usage rates rise to 25% and 16%, respectively (C. Cardoso et al., 2025; Sierra et al., 2025).

reason, some debate has taken place regarding the role of journalism and journalists in covering Chega and André Ventura in particular, highlighting the ambivalent role that journalism can have in the coverage of populist parties and politicians —to what extent the mainstream does the coverage of far-right populism inadvertently amounts to the promotion of those very actors (Magalhães, 2024).

These dynamics happen in parallel with a regulatory and legislative framework that is still trying to come to terms with the contemporary challenges. In 2023 IBERIFIER researchers described Portugal's anti-disinformation framework as fragmented, rights-conscious, and still institutionally incomplete (Badillo-Matos et al., 2024). Portugal did not, at that stage, have a single, clear statutory regime specifically tailored to online disinformation. Instead, the response combined general constitutional protections for freedom of expression and pluralism, sectoral media regulation, support for fact-checking and media literacy, and an emerging EU-level platform-governance agenda. The report highlighted two central tensions: first, the need to combat disinformation without sliding into censorship; second, the mismatch between the traditional remit of ERC – Portuguese Regulatory Authority for the Media and the growing importance of social platforms and user-generated content.

ERC itself acknowledged limits to intervention in content circulating on social networks and online platforms, because the legal framework had not been designed for that environment. The Regulator also highlights the controversy around Article 6 of the 2021 Portuguese Charter of Human Rights in the Digital Age, whose original wording on “protection against disinformation” was widely criticised for its vagueness and substantially rolled back in 2022, leaving a much narrower provision in force.

Since 2023, the most important change has been the full application of the EU Digital Services Act (European Commission, 2022). The DSA became fully applicable on February 17th 2024, formalised in law n° 20-B/2024<sup>4</sup>. The law named the national authorities responsible for enforcement, with ANACOM<sup>5</sup> named as Portugal's Digital Services Coordinator and competent authority. ERC was given the responsibility of matters concerning the media and information sphere and IGAC<sup>6</sup> became responsible for issues pertaining to copyright and related rights. This is a major institutional shift because it moves practical oversight of platform obligations away from the earlier, more ambiguous landscape we described in Badillo-Matos et al. (Badillo-Matos et al., 2024) towards a defined supervisory architecture linked to EU enforcement.

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<sup>4</sup> Decreto-Lei n.º 20-B/2024, de 16 de fevereiro, disponível em: <https://diariodarepublica.pt/dr/analise-juridica/decreto-lei/20-b-2024-852994087>

<sup>5</sup> ANACOM – *Autoridade Nacional de Comunicações* is the National Authority for Communications, in charge of regulation for the communication sphere outside the range of ERC's action, which is circumscribed to the area of media and information.

<sup>6</sup> Inspeção Geral das Atividades Culturais



In parallel, a working group was created to adapt the domestic legal order to the regulation. However, the European Commission considered this initial solution insufficient, on the grounds that the designated authorities did not yet have all the necessary powers and that the sanctions regime had not been fully defined. The proposal presented in 2024 then moved toward a more articulated model, involving ANACOM, ERC and CNPD<sup>7</sup>, but this solution lapsed with the dissolution of Parliament (January 2024) which led to the General Election of May 2024 we cover on chapter 4.3.1.

The process resumed in 2025 with a new legislative proposal that substantially altered the previous architecture. Instead of a model shared among several authorities, the Government began to advocate a solution in which ANACOM alone concentrates the supervision and enforcement of the DSA, while also performing the function of Digital Services Coordinator. According to the document itself, this legislative option is justified by the need to avoid the “fragmentation of responsibilities” and to simplify the identification of the competent authority for operators and rights holders. ERC notes, however, that this shift comes at a time when most Member States have already defined institutional models and when the broader European debate tends to recognise the cross-cutting nature of the regulation, which covers media, data protection, consumer rights, advertising, the protection of minors, and other areas (ERC, 2026).

As for the typology of the DSA implementation model, an analysis by ERC (ERC, 2026) provides a simple overview of the European and Iberian landscape: the dominant model in the European Union is the concerted model, in which there is a Digital Services Coordinator working in coordination with other sectoral authorities; 16 of the 23 countries that had already completed the process follow this approach.

The centralised model is a minority option, adopted by only 7 countries. In the countries where the process was still ongoing at the time of this ERC analysis, the rule also remained the concerted approach —including Spain, whose proposal provides for the CNMC<sup>8</sup> as coordinator, in cooperation with the Spanish Data Protection Agency, with competences divided by subject matter, especially in relation to personal data. Portugal appears as an exception, being expressly identified as the only country still in the implementation process proposing a centralised approach.

The first results of the regulatory action have already been made public. ANACOM reported receiving 65 complaints in 2024 under the new digital-services framework (Anacom, 2024), showing that the DSA is becoming an operational route for users and authorities. It has also

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<sup>7</sup> CNPD - *Comissão Nacional para a Proteção de Dados* is the National Commission for Data Protection

<sup>8</sup> CNMC – *Comisión Nacional de los Mercados y la Competencia* is the National Commission for Markets and Competition.



moved to structure the trusted flagger<sup>9</sup> system, which is relevant to reporting illegal content online, even though disinformation itself is only actionable under the DSA when it connects to illegality or systemic-risk obligations (Anacom, 2024).

The framework mapped in Badillo et al. (Badillo-Matos et al., 2024) has changed, but mostly due to external interference. Portugal has moved from a largely declaratory and contested national approach to a more institutionalised EU-centred model of platform regulation. The core change is that Portugal now has a clearer mechanism for supervising how platforms manage disinformation-related risks under the DSA. In the next subchapter we look closely at the Portuguese disinformation landscape in 2026 and to how much it has changed since IBERIFIER first studied its multidimensional impacts in 2022 / 2023.

## 4.2. Portugal: the representation and thematic diversity of disinformation in the media

To analyse the depth and range of media discourse of disinformation in Portugal we examined media coverage of the topic in the main Portuguese media outlets, focusing primarily on what was published on websites between late 2024 and the first part of 2026. This approach is based on the assumption that news continues to play a structural role in the construction of social reality. Even if *agenda-setting* does not tell citizens what to think, it influences what they think, in line with the arguments put forward by Shaw and McCombs (McCombs & Shaw, 1972), and this is despite the difficulties in dismantling reality or disrupting reality, as Innerarity (Innerarity, 2009) emphasises.

In this sense, it is understood that reference to certain subjects highlights relevant themes, influencing the cognitive perception of citizens; in other words, it acts as a mechanism for the production of social knowledge. News media, as specialised organisations, have the advantage of capturing the historical moment and enabling the sharing of meaning, which makes them a central medium in social cognition, since they help to structure what we understand as reality (Silveira & Marôpo, 2014).

### 4.2.1. Methodology

To conduct this study, a hybrid, mixed-methods approach was adopted, based on quantitative and qualitative content analysis of news items relating to the topic of disinformation, covering a period of over a year, including items from 2024 and 2026, up to the beginning of April. The identification of trends across the sample and the examined

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<sup>9</sup> Through its MediaLab\_CIES Iscte research center, IBERIFIER member Iscte has been awarded the status of trusted flagger under the DSA in Portugal, due to the center's work in the context of the Rapid Response System, which is automatically activated in electoral periods across EU member states, Portugal included.

period complements and reinforces the qualitative side of the analysis (Bryman, 2006; Creswell & Plano Clark, 2018; Tashakkori & Teddlie, 2010).

The data was collected via Google News, starting from 3 April 2026, with the search conducted on a monthly basis, moving backwards in time once the initial set of news articles on the topic of disinformation had been exhausted. It should be noted that the Google News search prioritises content from recognised and credible sources as defined by Google, leading newspapers and/or specialist publications; therefore, when it became apparent that the media outlets selected by the Google News algorithm did not provide a comprehensive overview of Portuguese news coverage on the topic, the search was adjusted to include, in addition to the topic, the news outlets from the list of the five television or print websites most frequently visited by the Portuguese, according to the Digital News Report Portugal 2025 (C. Cardoso et al., 2025).

It was at this stage that news items from Correio da Manhã, for example, were added to the panel. It should also be noted that, although the search category was designated ‘news disinformation’, some publications appeared in the results whose sources were institutions, highlighting the hybrid nature of the news. In total, 99 articles were analysed. Upon collection the data was filtered using key categories —date, source, usage of Agência LUSA news wires<sup>10</sup>, theme, and typology of reference to disinformation— followed by a more detailed content analysis in a second phase, which provided details on news agents, sources, actors and related issues.

#### 4.2.2. Results

The distribution of the 99 items across media suggests that, in addition to national news outlets, some magazines in the technology and marketing sectors covered the topic. It is also worth noting that around 4 out of 10 items classified as news replicate the work carried out by Agência LUSA (n=41). In other words, the media’s news agendas do not prioritise the production of news focused on disinformation, since the dissemination of this type of content was limited to the reproduction of reports from the news agency in Portugal; one might wonder whether, without the news coverage provided by Agência LUSA, there would be a news vacuum in this particular field. It is also worth noting the presence of some pieces on the subject in question which appear in the list proposed by Google News; whilst not strictly news produced by a recognised media outlet, they appear with that status, leading

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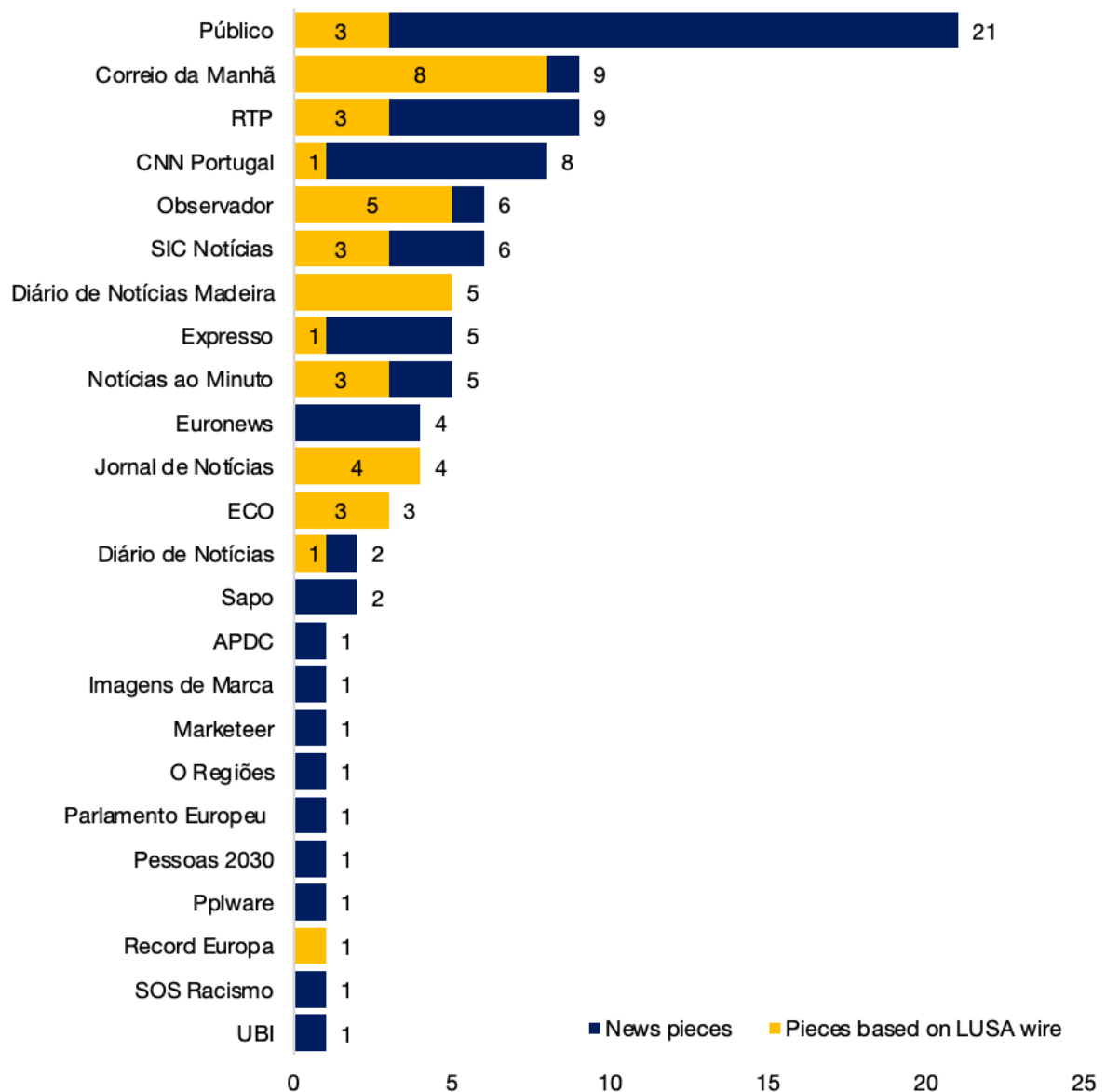
<sup>10</sup> Note: In Portugal the publicly funded agency has a key role in helping both larger scale national and smaller regional / local outlets overcoming the scarcity of resources and being able to provide a comprehensive and diverse choice of content and topics. As it happens in small news markets, the reliance and dependence on source material provided by news agencies is high (Boyd-Barrett & Rantanen, 1998). The categorisation of content as agency content helps us understand the reach of the Agency in shaping the coverage regarding disinformation and its importance in giving visibility to the topic.



to the conclusion that Google's own algorithm for this type of search facilitates this exposure to hybrid content.

Figure 3 presents the distribution of news pieces covering the topic of disinformation across Portuguese digital news brands, collected between February 2024 and April 2026, distinguishing between original reporting and pieces based on LUSA wire content (n=99). The data reveals a markedly uneven distribution of coverage across outlets, as well as a structurally significant dependence on the national news Agência LUSA across a considerable portion of the sample —nearly 4 out of 10 news articles regarding disinformation are based on the agency's wires.

*Figure 3. News pieces by brand covering the topic of disinformation in the Portuguese digital press between February 2024 and April 2026*



Source: OberCom / IBERIFIER. n=99



The outlet with the highest absolute volume of coverage is Público, accounting for 21 news pieces, of which only 3 were based on LUSA wires — suggesting a comparatively high degree of original, editorially driven reporting on the topic of disinformation. This positions Público as the most active and independently productive outlet in this domain within the period studied. Correio da Manhã and RTP follow jointly in second place with 9 pieces each, though their profiles differ substantially: Correio da Manhã produced 8 LUSA-based pieces out of 9, indicating a high degree of wire dependency, whereas RTP produced 3 LUSA-based pieces out of 9, suggesting a more balanced editorial contribution. CNN Portugal produced 8 pieces, with only 1 based on LUSA wires, which is noteworthy given its relatively recent entry into the Portuguese media landscape.

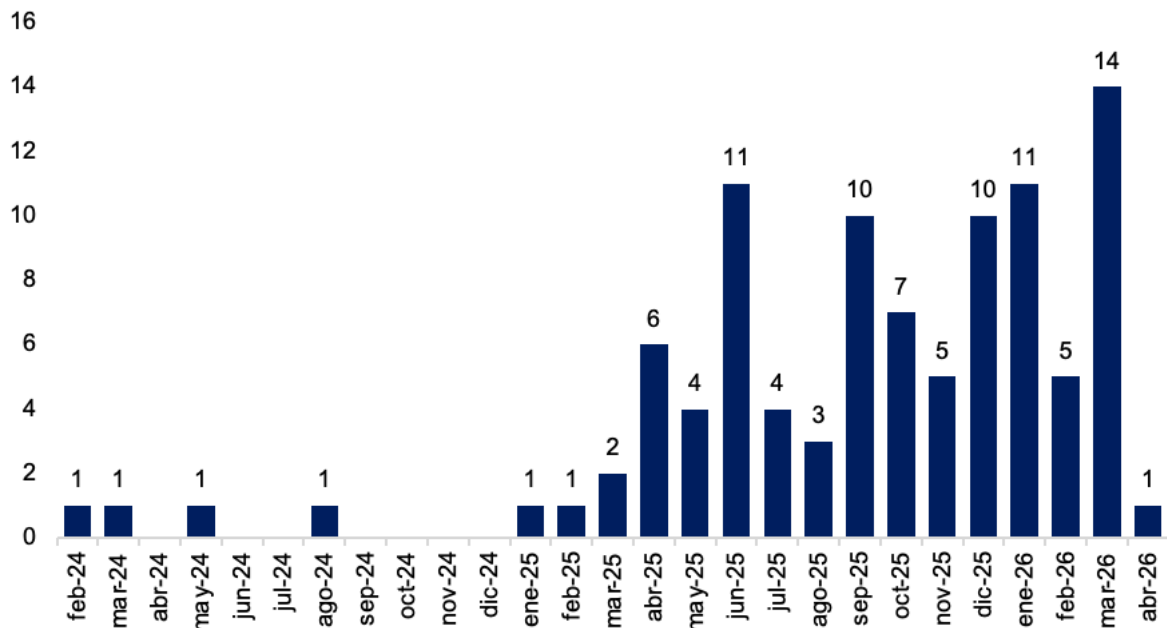
One of the most significant dimensions of this sample is the proportion of coverage attributable to LUSA wire content across the sample. Several outlets, including Jornal de Notícias (4 out of 4) and Euronews (4 out of 4), appear to have covered the topic of disinformation exclusively or near-exclusively through LUSA wires, producing no identifiable original reporting on the subject during the period. Observador presents a particularly striking case, with 5 out of 6 pieces based on LUSA content. These findings suggest, that for a significant share of Portuguese digital news brands, coverage of disinformation as a topic is largely mediated —and in some cases entirely determined— by the editorial choices of the national news agency rather than by autonomous newsroom decisions.

This pattern has meaningful implications for understanding the Portuguese information ecosystem. If the agenda on disinformation is substantially set by a single, publicly funded wire service, the diversity of perspectives, framings, and actors represented in public discourse on this issue may be more limited than the number of publishing outlets would superficially suggest.

A long tail of outlets, including Diário de Notícias Madeira, Expresso, Notícias ao Minuto, ECO, and a range of smaller or institutional publishers, each contributed between 1 and 5 pieces to the sample, several of which included a LUSA-based component. The presence of institutional sources such as APDC, Parlamento Europeu, Pessoas 2030, and SOS Racismo in the dataset, each contributing a single item, reflects the hybrid nature of the news landscape noted in the methodology, where the boundary between journalistic and institutional communication is increasingly porous.

Figure 4, Figure 5 and Figure 6, respectively, display the overall temporal distribution of news pieces covering disinformation in the Portuguese digital press, the thematic breakdown of that coverage across the full period, and the temporal, monthly evolution of three dominant thematic categories — National politics / elections, International politics, and Society.



*Figure 4. News pieces by month and year, February 2024 to April 2026.*

Source: OberCom / IBERIFIER. *n*=99.

The monthly distribution of coverage reveals a pattern that is strikingly uneven and suggestive of an episodic, event-driven media culture around disinformation, rather than one characterised by sustained and institutionalised journalistic attention to the phenomenon. The period from February 2024 to December 2024 is marked by near-total absence of coverage, with only isolated single pieces appearing in February, March, May, and August, and a complete absence of any coverage across six consecutive months from June through November. This extended absence of coverage is analytically significant in itself, occurring during a period that included the General Elections of May 2024 and the European Parliament elections of June 2024.

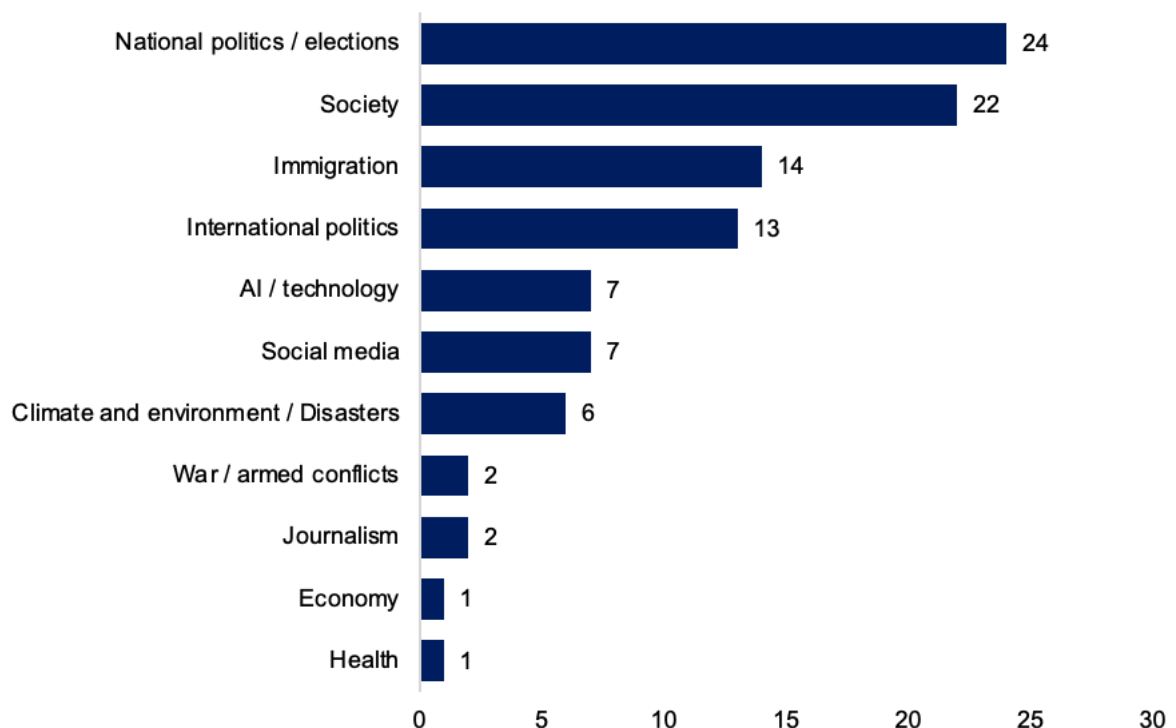
It should be noted that the 2024 elections took place against a backdrop of political turmoil due to the fall of majority-led Socialist government amid judicial enquiries. Within the space of three months, the Portuguese people went to the polls twice, creating a continuous stream of political communication and electoral debate that lasted from March to June 2024. Despite the near absence of media coverage on the topic of disinformation, research shows that disinformation was circulating and was a relevant issue to the political debates taking place with significant changes to themes and trends (Casquinho et al., 2024a, 2024b). As such, given the strong proactivity of fact-checkers and news media in tackling instances of disinformation, coverage is almost totally devoted to fact-checking. It focuses on debunking specific instances rather than offering a self-reflexive analysis of the broader societal impacts of disinformation and the responsibilities of various actors, including the media itself.

The coverage landscape changes markedly from early 2025, with a clear and sustained inflection beginning in February and accelerating through the spring months. Coverage rises

from 2 pieces in February 2025 to 6 in April and peaks at 11 in May, before settling at 4 in June — the month of the Portuguese legislative elections. A second sustained wave follows across the autumn and winter of 2025, with 10 pieces in September, 7 in October, 5 in November, and 10 in December. The highest monthly figure in the entire dataset is recorded in March 2026 with 14 pieces, occurring in the immediate aftermath of the presidential election of January 2026, which itself generated 11 pieces — jointly the second highest monthly figure alongside May 2025.

Considering the aggregate thematic breakdown of disinformation coverage in Portugal we find that the landscape is predominantly anchored in domestic political and social contexts. National politics / elections constitutes the largest single thematic category with 24 pieces, followed closely by Society with 22. Immigration is the third most represented theme with 14 pieces, a finding of particular analytical significance given its well-documented role as one of the most frequently exploited vectors for disinformation production and circulation in the Iberian context. International politics accounts for 13 pieces, while AI / technology and Social media each contribute 7, and Climate and environment / Disasters 6. The remaining categories of War / Armed conflicts and Journalism (2 each), and Economy and Health (1 each) represent a markedly smaller share of the overall sample.

*Figure 5. News pieces by theme, February 2024 to April 2026.*



*Source: OberCom / IBERIFIER. n=99*

The relative marginalisation of themes such as Economy, Health, and War/armed conflicts is noteworthy, given that each constitutes a well-documented domain of contemporary

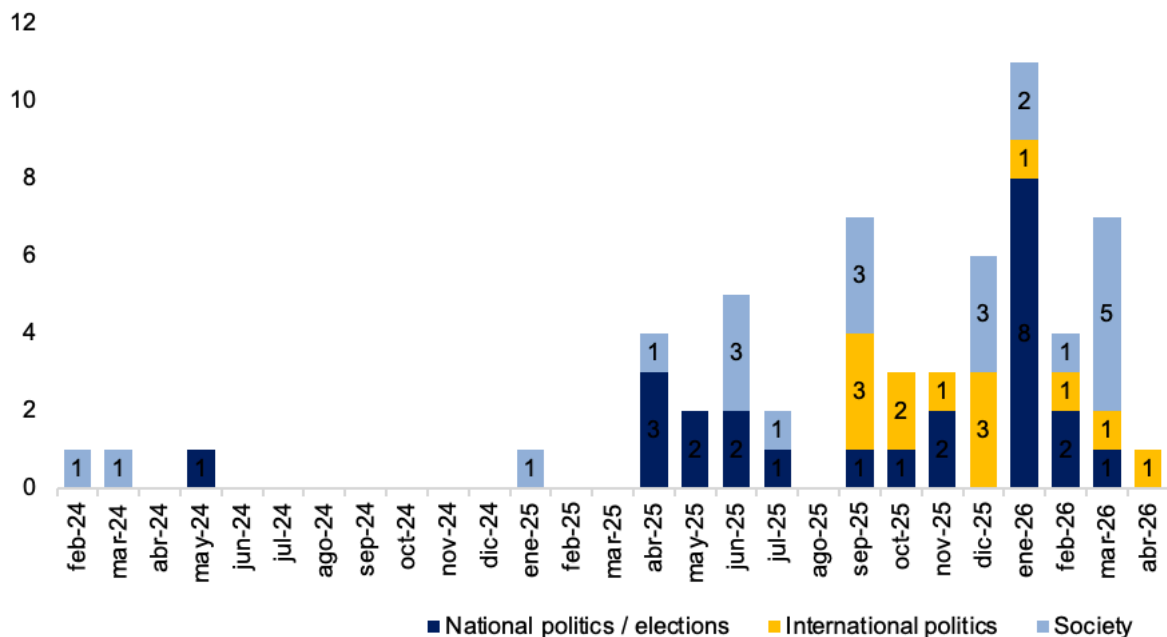


disinformation activity both in Portugal and internationally. The near absence of Journalism as a topic underlines the lack of self-reflection on the role of journalists, brands and the field in relation to the topic. Their limited representation in the dataset of these three themes most certainly reflects genuine gaps in editorial coverage rather than an absence of disinformation activity in these areas, pointing to potential blind spots in the Portuguese media's treatment of the phenomenon that warrant attention from both editorial and policy perspectives.

Figure 6 disaggregates the distribution of three of the most numerically significant thematic categories across the whole period, allowing for a more precise reading of what was driving coverage at different moments across the period. Several important patterns emerge.

National politics / Elections is clearly the primary driver of the two major coverage peaks. In the pre-electoral period leading up to the June 2025 Legislative Elections, this category dominates the April and May 2025 surge, accounting for 3 and 2 pieces in those months, respectively. Its most pronounced concentration, however, occurs in January 2026 with 8 pieces, the highest monthly figure for any single thematic category across the entire dataset, in direct temporal alignment with the Presidential Election campaign. This pattern once again confirms that electoral cycles function as the dominant structural catalyst for disinformation-related journalism in Portugal.

*Figure 6. News pieces about National politics / elections, International politics and Society, February 2024 to April 2026.*



Source: OberCom / IBERIFIER. n=59

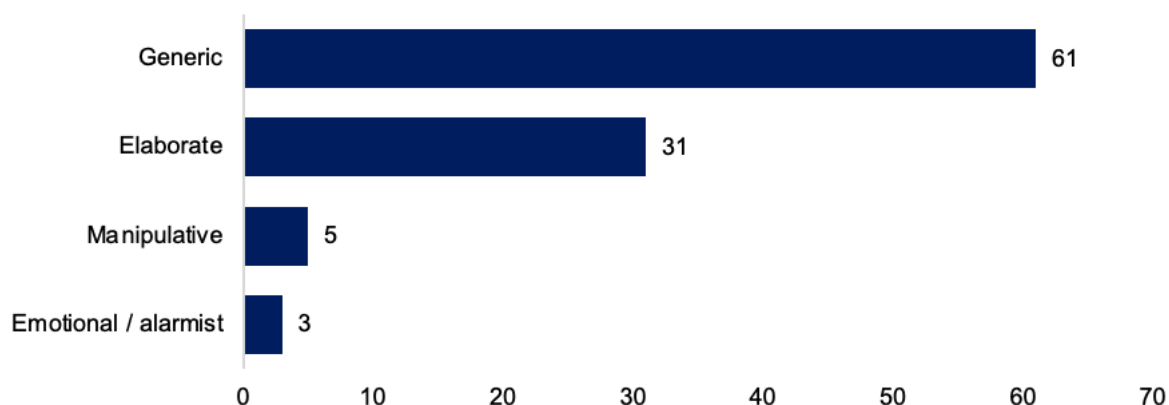
The Society category exhibits a meaningfully different temporal pattern. Rather than clustering sharply around electoral moments, it demonstrates a more distributed and gradually intensifying presence across the second half of 2025 and into 2026, reaching its highest monthly figure of 5 pieces in March 2026 and maintaining consistent representation



from September 2025 onwards. Society-themed disinformation coverage reflects a partially autonomous dynamic, potentially capturing the growing institutionalisation of disinformation as a broader social and policy concern that persists beyond the immediate pressures of electoral competition. The group of 22 articles about the Society theme relate to coverage aiming to reflect on the impact of disinformation in the public sphere, at measures or policies being implemented to tackle the phenomenon or other more general aspects.

International politics, by contrast, remains a relatively modest and intermittent presence throughout the period, with its most visible contribution occurring in August 2025 with 3 pieces and in April 2026 with 1 piece. Its aggregate weight of 13 pieces in the thematic distribution notwithstanding, its temporal footprint is notably diffuse, suggesting that international political events generated disinformation-related coverage in a more sporadic and contextually contingent manner than domestic political developments.

*Figure 7. Typology of reference to disinformation*



Source: OberCom / IBERIFIER. n=99

Figure 7 presents the distribution of news pieces according to the typology of their reference to disinformation, classified into four categories —Generic, Elaborate, Manipulative, and Emotional / Alarmist— reflecting the dominant analytical approach adopted in each item. This categorisation, grounded in a qualitative reading of the sample, offers a meaningful diagnostic of the depth and nature of disinformation coverage in the Portuguese digital press, moving beyond the purely quantitative dimensions of volume and theme to interrogate how the concept itself is treated journalistically.

The most immediately striking finding is the overwhelming predominance of the *Generic* category, which accounts for 61 pieces. Generic pieces are characterised by a superficial engagement with disinformation as a concept without situating it within a broader analytical or contextual framework. Disinformation is invoked but rarely examined, a pattern that may both reflect and reinforce the limited media literacy infrastructure available to general audiences seeking to understand the phenomenon but that is also due to the fact that the approach of specific disinformation conceptualisations is made mostly through

fact-checking, an expression of journalism that has found significant adherence in Portuguese audiences.

The *Elaborate* category accounts for 31 pieces, representing approximately one third of the total sample. These are items in which disinformation is engaged with in greater depth, and within which, as the qualitative analysis progressed, a set of analytically distinct sub-themes emerged. The most prevalent of these is *Artificial Intelligence*, reflecting the growing salience of AI-generated content as a disinformation vector in public and journalistic discourse. This is closely followed by narrative-based coverage, including *anti-immigration narratives* and other ideologically framed content, and by more conceptually oriented pieces, the latter largely drawn from educational or *media literacy contexts* in which disinformation is explicitly defined and contextualised for audiences.

A further sub-theme within this category concerns the impact and effects of disinformation, capturing pieces that move beyond description to address the demonstrable consequences of disinformation on public opinion, institutional trust, or democratic processes. The presence of *satire and humour* as an emergent sub-theme within the Elaborate category is also noteworthy, pointing to the complex boundary between intentional misleading content and other forms of non-literal or parodic/ satirical communication that may nonetheless contribute to informational confusion (Wardle & Derakhshan, 2017).

The Manipulative category accounts for 5 pieces and the Emotional / Alarmist category for 3 pieces. While quantitatively modest, both categories carry disproportionate analytical weight. The isolation of the Manipulative category is theoretically grounded in the foundational distinction between disinformation and misinformation established by Wardle and Derakhshan (2017), for whom the deliberate intent to deceive is the defining characteristic that differentiates disinformation from the broader category of false or inaccurate information. Pieces classified under this category are therefore those in which the element of intentional manipulation is made explicit — a relatively rare but analytically significant occurrence within the sample. The Emotional / Alarmist category, meanwhile, captures pieces in which the treatment of disinformation is itself marked by heightened affective register, whether through alarmist framing, emotionally charged language, or an emphasis on threat and urgency that may itself risk amplifying the very phenomena it purports to describe.

#### 4.2.3. Final remarks on the representation of disinformation in Portuguese media

The quantitative and qualitative analysis of the news sample assembled for this study — comprising 99 items collected across Portuguese digital news brands between February 2024 and April 2026 — yields an analytically significant picture of how disinformation is represented, framed, and discussed within the Portuguese news media landscape.

The most significant finding, cutting across both the quantitative and qualitative dimensions of the analysis, is that disinformation is predominantly covered in generic and politically



anchored terms. Over half the items in the sample engage with the phenomenon superficially, without substantive conceptual elaboration, and the thematic center of coverage is located in the domain of national politics and elections. This pattern is in part explained by context: Portugal held four elections between 2024 and 2026<sup>11</sup> creating a sustained and unusually dense electoral cycle that predictably elevated political disinformation as a news category itself.

Recurring terms across the sample, including 'elections', 'politics', 'political disinformation', and 'politicians' lies', reflect a journalistic framing in which disinformation is understood primarily as an instrument of electoral manipulation and a threat to the integrity of democratic processes. This framing, while not inaccurate, risks producing a reductive public understanding of disinformation as a phenomenon bounded by electoral competition rather than one that permeates a far wider range of social and institutional domains.

A second structurally significant thematic discussion concerns immigration, which emerges as the third most represented topic in the corpus and is repeatedly associated with specific disinformation narratives, notably 'demographic replacement' and discourses around pressure on public services, that are recognisable features of the broader European right-wing populist disinformation ecosystem. The prominence of immigration-related disinformation in Portuguese media coverage is consistent with the findings presented later in this chapter regarding the communication strategies of the Portuguese far-right populist movement, and underscores the extent to which globally circulating disinformation templates are being localised and amplified within the national information environment.

A third thematic aspect, less prominent but analytically important, concerns the geopolitical dimension of disinformation, with international politics framed as an arena in which disinformation functions as a strategic instrument of influence. While the sample does not match the intensity of contemporary foreign information manipulation interference (FIMI) dynamics, the presence of this framing signals growing awareness within Portuguese journalism of disinformation as a tool of geopolitical competition rather than merely a domestic political pathology.

The qualitative analysis also surfaces a number of specific political figures around whom disinformation-related controversy coalesced during the period. Internationally, Donald Trump and Emmanuel Macron featured prominently, reflecting the global circulation of disinformation narratives associated with these actors. Domestically, Prime Minister Luís Montenegro and Presidential candidate Henrique Gouveia e Melo both generated coverage by positioning themselves publicly as victims of disinformation, a framing that, significantly, provoked debate about the conceptual boundaries of the term itself and the risks of its strategic deployment by political actors to delegitimise criticism. These cases highlight a

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<sup>11</sup> General Elections on March 10th 2024 and May 18th 2025, European Elections on June 9th 2024 and Presidential Elections on January 2026 (1st round on January 18th and 2nd round on February 8th).

broadier tension in the public discourse on disinformation between its analytical use as a precisely defined concept and its rhetorical appropriation as a political instrument.

From a technological and infrastructural perspective, the corpus samples suggest growing journalistic awareness of the platforms and mechanisms through which disinformation is disseminated and amplified. References to TikTok, X, Telegram, AI, algorithms, and deepfakes feature with increasing frequency, positioning digital infrastructure, rather than content alone, as a central object of concern in the disinformation debate. This infrastructural turn in coverage aligns with the broader European regulatory trajectory exemplified by the Digital Services Act (DSA), though it is notable that explicit references to the DSA and to the evolving regulatory framework remain comparatively rare in the sample, suggesting that the regulatory dimension of the disinformation debate has not yet been fully integrated into mainstream Portuguese journalistic coverage.

One of the more distinctive and analytically consequential features of the sample is the prominent role of academic institutions and researchers as actors within the news items themselves. Approximately a quarter of the articles incorporate scientific studies or the direct participation of researchers in explaining, contextualising, or interpreting disinformation-related developments. Entities including MediaLab\_Cies Iscte, LabCom at the University of Beira Interior, OberCom, EDMO, and IBERIFIER are cited with notable frequency, often in the context of formal partnerships with regulatory and electoral bodies such as the Portuguese Regulator for the Media (ERC) and the Comissão Nacional de Eleições (CNE)<sup>12</sup>.

This configuration is significant: it positions researchers not merely as sources but as active mediators between scientific knowledge and public understanding, functioning simultaneously as interpreters of the phenomenon, validators of observed trends, whistleblowers of social effects, and translators between academic research and general audiences. It also signals that disinformation has been institutionalised as a field of scientific inquiry in Portugal, with academic production increasingly shaping the terms in which the phenomenon is publicly discussed and regulated.

The sample also contains a meaningful, if minority, strand of coverage oriented towards media literacy, including both educational pieces explaining how to identify and counter disinformation and reporting on literacy initiatives at national and international level. This normative and preventive dimension of coverage represents a qualitatively distinct register within the corpus, one that emphasises individual and collective competencies as a response to disinformation rather than focusing exclusively on its production and circulation. Its presence, while not yet dominant, might signal an emerging shift in the Portuguese disinformation discourse towards a more proactive and educationally oriented framing.

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<sup>12</sup> National Electoral Commission

Several further thematic threads appear in the sample with limited but noteworthy frequency. The boundary between humour and disinformation, and between propaganda and disinformation, emerges as an object of journalistic reflection —a conceptual concern directly relevant to the difficulties of operationalising regulatory definitions in practice. Climate change, vaccination, wildfires, and security feature as secondary topics, confirming that disinformation is recognised across a range of policy domains beyond politics, albeit without achieving comparable salience. The link between disinformation and conspiracy theories, by contrast, appears strikingly weak in the corpus, with the latter mentioned only exceptionally —a finding that may reflect editorial choices, the specific search methodology employed, or a genuine feature of the Portuguese disinformation landscape that merits further investigation.

Finally, the structural role of Agência LUSA in the dissemination of disinformation-related coverage documented in the quantitative analysis of the sample deserves a final reflection. The extent to which a significant share of Portuguese news brands relied on LUSA wire content as their primary or exclusive source of coverage on this topic means that the agency's editorial choices effectively shaped the national news agenda on disinformation for a substantial portion of the sample. This concentration of agenda-setting power in a single, publicly funded wire service is a structural feature of the Portuguese media ecosystem that has direct implications in the nature of media coverage regarding disinformation.

In sum, the Portuguese media landscape, as viewed through this sample, engages with disinformation in ways that are predominantly reactive, politically anchored, and conceptually generic, with the depth of treatment most reliably found in the contributions of academic researchers and specialist institutions rather than in autonomous journalistic investigation. Thus, the highlight might be on the nature of disinformation as a study object, worthy of scientific attention, rather than on the social problem needing further attention than the one provided by academics or experts. Electoral cycles remain the primary driver of coverage intensity, immigration the most prominent non-electoral thematic vector, and LUSA the central infrastructural node through which information about disinformation reaches much of the national press. These structural conditions, simultaneously reflecting and reproducing the vulnerabilities of the Portuguese information ecosystem, define both the current state of the field and the terrain on which future regulatory, editorial, and educational interventions must operate.

#### **4.3. Portugal: Political and electoral disinformation and the Lusophone sphere as an information sphere**

In this chapter we cover the aspects of electoral disinformation and the dynamics of disinformation in the Lusophone sphere. The aim is to cover two of the key topics for disinformation in Portugal raised in 2023 (Badillo-Matos et al., 2024) and that, after three years, warrant an update at the theoretical, conceptual and empirical level.



In the case of electoral disinformation, the compression of political cycles in Portugal has led to multiple general elections over the years. Whereas Spain has gone through three general elections since 2019, Portugal has gone through four<sup>13</sup>, the 2024 and 2025 ones being particularly impactful with the election of 50 and 60 members of parliament by Chega, respectively, further consolidating the idea of a shift towards a tripartite democratic system instead of the 50-year-long bipartisan division of power between the center-left and center-right parties.<sup>14 15</sup>

In the section devoted to the analysis of electoral disinformation dynamics we cover the results of research conducted by IBERIFIER partners MediaLab\_CiesIscte and OberCom during the May 10th 2024 and May 18th 2025 General Elections, as well as the European Elections of June 9th 2024. We cover the main results of the research in each election and undertake an overarching analysis of the trends identified across the three events. Also, it should be noted that the analysis of disinformation is made in parallel with the measurement of the performance of Parties and candidates across the most used social media platforms, in order to establish a relationship between the visibility of political actors and disinformation.

In the section dedicated to the circulation of disinformation in the Lusophone sphere we conduct a deeper approach into the issue of shared language as a bridge for disinformation across geographies, with a particular focus on the connection between Portugal and Brazil. This topic was lightly covered in the 2023 report (Badillo-Matos et al., 2024) and is now developed with higher detail as in the last three years new theoretical and empirical elements have appeared which allow for a deeper discussion of the topic and an exploration of the relationship between the two countries with increased granularity. We propose an analytical framework which is based on the Portugal-Brazil bridge but that may be exported to other shared language contexts.

#### 4.3.1. Political disinformation during electoral periods

##### *General Election (March 10th 2024)*

The General Election of March 10th 2024 took place in an exceptionally turbulent political context, shaped by the unexpected resignation of PS-led majority government following

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<sup>13</sup> Spain: General Elections took place on April 28th 2019, November 10th 2019 and July 23rd 2023; Portugal: General Elections took place on October 6th 2019, January 30th 2022, March 10th 2024 and May 18th 2025.

<sup>14</sup> PSD – Partido Social Democrata and PS – Partido Socialista, respectively.

<sup>15</sup> Paisana et al. (2025) provide a detailed analysis of the electoral landscape in Spain and Portugal, highlighting the political context surrounding regular General Elections and describing the chain of events that lead to snap General Elections.



judicial investigations into corruption and influence trafficking, as well as a broader rightward shift in the Portuguese electorate that would be confirmed by the results. This context created the conditions for a particularly charged informational environment, one in which the boundaries between political communication, disinformation, and strategic amplification were frequently blurred. The research conducted by MediaLab\_Cies Iscte and OberCom (Casquinho et al., 2024b), in partnership with Agência LUSA, monitors social media activity across Facebook, X, Instagram, and TikTok over five consecutive weeks, from 1 February to 6 March 2024, tracking the online activity of candidates, parties, and third-party users, as well as cases of disinformation identified by fact-checkers.

One of the most significant findings concerns a structural reconfiguration of the social media landscape for political communication in Portugal. While Facebook has historically been the dominant platform for political content, the 2024 elections mark the ascendance of Instagram as the most impactful platform for candidates in terms of reach and engagement. Each candidate post on Instagram generates, on average, five times more interactions than an equivalent post on Facebook — a ratio that reflects a fundamental change in the attention economy of Portuguese digital politics. TikTok, while still in an early phase of political adoption, shows considerable potential, particularly in the case of André Ventura, whose TikTok interactions in the final two weeks of the campaign surpass the total Facebook and X interactions of all other candidates combined. Facebook and X retain relevance, the former as the most widely used platform for publication volume, the latter as the pre-eminent arena for politically engaged users, commentators, and media outlets but neither of them no longer commands the centrality they had enjoyed in previous electoral cycles.

A consistent pattern is identified across all platforms: political content, in general, competes poorly for user attention. In the case of Facebook, entertainment, sport, and lifestyle content accounted for 80% of total user interactions, against 6% for news and a mere 2% for political content. This marginalisation of political content in the broader attention framework is compounded by Meta's algorithmic decisions to reduce the prominence of political material, and possibly also by a growing user fatigue with political content — two processes that may be mutually reinforcing.

André Ventura and Chega appear consistently as the political actors most capable of mobilising social media for the propagation of their message in all four analysed platforms. In the Facebook case, Chega is the only party to appear with any regularity in the top rankings of interacted-with content during the pre-campaign period. On Instagram, Chega and Iniciativa Liberal<sup>16</sup> lead party-level metrics, while on TikTok, Chega's growth trajectory in the final weeks of the campaign far outsizes the one from other parties. This performance is due not only to the scale of Chega's follower base but above all to the notoriously superior interaction rates as the average engagement per post far exceeds that of other parties.

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<sup>16</sup> Right-wing party focused on a liberal approach to both the economy and societal values.

This finding is analytically significant disinformation-wise: because the amplification of any narrative whether accurate or misleading depends on the capacity of actors to generate attention, Chega's structural dominance of social media engagement gives it disproportionate power to circulate narratives that reach large audiences before corrections or counter-narratives can take hold and render systematic fact-checking inefficient. Four dimensions of amplification stand out relating to this particular election: Communicative, Political, International, and Commercial.

The Communicative dimension concerns the role of television and legacy media. Television debates generate near-instantaneous amplification effects on X, with spikes in discussion of specific terms and narratives occurring in real time during broadcast<sup>17</sup>. Also notable is the finding that candidate appearances in entertainment and lifestyle programmes rather than in formal political debates generate higher interaction volumes on platforms with broader audience reach, particularly Instagram. This suggests that informal media contexts function as powerful vectors for political visibility in a fragmented attention environment.

The Political dimension focuses on the deliberate amplification of disinformation by political actors, with three specific cases examined. The most emblematic is the "shots fired in Famalicão" incident: on February 21st 2024, a Chega campaign convoy was allegedly received with gunfire, a narrative that circulated extensively on Facebook and X for approximately four hours before a PSP press release confirmed that the sounds were engine backfires from a motorcycle. However, in that window, the original false narrative accumulates substantially more interactions than the subsequent correction, a pattern directly illustrating the asymmetry between the speed of disinformation propagation and the reach of its correction. The amplification is driven primarily by Chega's own social media infrastructure.

A second case concerns a poll published by the Brazilian institute Paraná Pesquisas —an entity not accredited by the ERC for media publication of polling results (mandatory by law) which is amplified almost exclusively through Chega's networks, with Ventura's Instagram post alone accounting for 94% of all interactions on that platform. A third case involves an allegation of electoral fraud posted by a Bloco de Esquerda<sup>18</sup> member on X; Ventura's eventual response, posted four days later, generates more interactions than all preceding posts on the subject combined, demonstrating the capacity of delayed but strategically timed responses to dominate the informational flow.

The International dimension reveals a structurally significant entanglement between the Portuguese and Brazilian political spheres, which we explore in depth in the next section.

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<sup>17</sup> This effect is amplified by the oversized reliance of the Portuguese in television as a source for news compared to other countries, making legacy televised media important gatekeepers for politics (Paisana et al., 2026).

<sup>18</sup> Far-left wing party devoted to traditional left-wing causes in the labour and economy field but also focused on identitarian issues relating to race, gender, sexual identity and climate.

Brazilian political figures including Eduardo Bolsonaro and Carla Zambelli, published posts in support of André Ventura that each generated interaction volumes equivalent to those of Portuguese media outlets, despite representing single, isolated posts. The report also documents a case of a Portuguese content creator detained in Brazil in the context of pro-Bolsonaro mobilisations, which became a significant topic in the Portuguese online political discussion. Additionally, one of the illegal political advertising cases traced back to Nekoplay LLC, a company registered in Delaware, linked through subsequent journalistic investigation to an Argentine firm flagged during the Panama Papers inquiry, under the YouTube channel name "Bolsonaristas em Portugal", further illustrating the transnational character of disinformation infrastructure targeting the Portuguese electoral context.<sup>19</sup>

The Commercial dimension concerns three identified cases of illegal political advertising during the campaign period. Two YouTube advertisements and one set of Facebook sponsored posts are identified as violating Portuguese electoral law, which prohibits political advertising during campaign and pre-campaign periods. The Facebook sponsored posts, distributed through a page called "Notícias Internacionais", target Luís Montenegro and former Prime-Minister Pedro Passos Coelho, reaching an estimated 2 million accounts (approximately 22% of the Portuguese electorate) with an estimated investment of €12,000 over three days. The opacity of the financing sources and the transnational character of the entities involved raise concerns that extend beyond individual electoral infractions to the structural vulnerability of the Portuguese regulatory framework to externally financed digital influence operations.

#### *European Election (June 6th 2024)*

Held about three months after the March General Election, the European Parliament elections of June 9th 2024 took in the same charged political atmosphere. The compressed electoral calendar (two elections within a single quarter) creates a continuous thread of political communication and online discussion that spans the full first half of 2024. The research happened in partnership with Comissão Nacional de Eleições (CNE)<sup>20</sup>, monitored social media activity across Facebook, X, Instagram, and TikTok during the campaign period, using the legislative elections as a systematic comparative baseline throughout (Casquinho et al., 2024a).

The most structurally significant finding of the European Elections research is the confirmation that the second-order character of European elections is fully reproduced in the Portuguese social media environment. Publication volumes during the European

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<sup>19</sup> Agência LUSA (2024, February 28th). MediaLab: "Indícios de interferência externa" em anúncios eleitorais 'on-line' contra PS e PSD. Available at: <https://combatefakenews.lusa.pt/medialab-indicios-de-interferencia-externa-em-anuncios-on-line-contra-ps-e-psd/>

<sup>20</sup> National Electoral Committee.



campaign range between 4,000 and 10,000 per week, compared to 18,000–24,000 during the General Election. Total weekly interactions range between 100,000 and 400,000 for the European elections, against approximately 1–1.2 million during the General Election campaign. The gap is unambiguous and consistent across all platforms. Notably, however, the trajectory of engagement during the European campaign is one of gradual growth as election day approaches, in contrast to the General Election campaign, which peaks early and then stabilises, suggesting that, despite lower levels of attention, public interest in the European elections builds meaningfully over the campaign period.

Comparison of party-level social media activity across both electoral periods reveals a striking degree of strategic continuity. Publication volumes on Facebook and Instagram follow nearly identical weekly trajectories across both campaigns, strongly suggesting that party communication teams apply comparable planning frameworks to both electoral periods, which is probably a logical consequence of their temporal proximity. The primary exception is X, where party activity was noticeably higher during the General Election. Across both elections, Instagram consistently emerges as the platform that best converts publication effort into audience engagement: despite parties publishing more content on X, Instagram generates substantially more interactions per post, consolidating its position as the most impactful platform for political communication in Portugal.

At the party level, Chega's dominance is again decisive and unambiguous. During the European campaign, Chega generates approximately double the total interactions of all other parties combined — a ratio that holds consistently across all four platforms and across all weeks of the campaign period. No other party approaches this level of digital engagement, with Iniciativa Liberal, PS, and PCP<sup>21</sup> forming a distant secondary tier.

An analytically distinctive feature of the European elections campaign is the prominence of candidate announcement moments as drivers of online attention. The most significant single spike in discussion during the entire monitored period is generated by the announcement of Sebastião Bugalho (a young journalist and conservative political commentator that built his presence and brand on social media) as the Aliança Democrática's<sup>22</sup> lead candidate, an unexpected choice that triggers an exceptionally high volume of publications and interactions across all platforms. This announcement effect, combined with the inherent unpredictability of several candidacies, makes the April announcement period one of the most active moments of online political discussion in the entire campaign. The pattern reinforces a finding consistent across both electoral periods: moments of surprise and novelty drive engagement far more reliably than standard campaign messaging.

The role of entertainment media and informal interview formats as amplifiers of political attention is again confirmed. Appearances on programmes such as the YouTube series Bom

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<sup>21</sup> Portuguese Communist Party.

<sup>22</sup> Aliança Democrática is a moderate right-wing coalition movement that includes PSD, CDS-PP (Christian Democrats) and the Popular Monarchist Party (PPM).

Partido<sup>23</sup> and the satirical show *Isto É Gozar Com Quem Trabalha*<sup>24</sup> generates significant interaction spikes on Instagram in the final weeks of the campaign. This mirrors the pattern observed during the legislative elections and further consolidates the finding that candidates reach the broadest and most engaged audiences not through formal political content but through culturally accessible, informal media contexts.

The most analytically significant dimension of the European elections concerns the nature and distribution of disinformation identified during the campaign period. A key innovation of the MediaLab\_Cies Iscte / CNE partnership was the establishment of a WhatsApp reporting line through which citizens could flag disinformation and illegal political advertising, the first initiative of its kind in the Portuguese electoral context. While the channel proves valuable for awareness-raising and case identification, its use was not without limitations: a number of reports received correspond not to disinformation as technically defined but to politically disagreeable or polarising content, pointing to a broader conceptual gap in public understanding of what disinformation actually entails. The report recommends that future iterations of the mechanism be accompanied by clear, accessible typologies of disinformation, drawing on the foundational framework of Wardle and Derakhshan (Wardle & Derakhshan, 2017) to improve reporting quality and analytical yield.

In terms of thematic content, the Portuguese disinformation landscape during the European elections diverges markedly from the broader European pattern. While EDMO monitoring identified seven major disinformation themes circulating across European member states during the same period (climate, politics and politicians, Covid-19, the war in Ukraine, the electoral process, gender and LGBTQ+ issues, and immigration) the Portuguese sample of content reveals that only immigration generates disinformation content with meaningful reach in the national online environment. This thematic singularity is analytically significant and points to the specific vulnerabilities and polarisation dynamics of the Portuguese public sphere at this moment.

*Figure 8. Instagram posts by Chega and Vox in Spain on the Islamisation of Europe*

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<sup>23</sup> Interview / conversational podcast where candidates are interviewed in a humorous way.

<sup>24</sup> Sunday prime-time late-night style show, presented by the most prominent comedian in the country.





Source: Casquinho et al., 2024a.

The cases documented in the report, including a decade-old video of a statue's destruction falsely attributed to a Portuguese context and amplified by Chega with over 40,000 interactions; a parody Facebook page presented by André Ventura as evidence of Islamist political organisation in Portugal; a truncated SIC<sup>25</sup> news clip used to discredit an immigrant who had publicly challenged Ventura during the campaign; and a Chega Instagram post virtually identical to one published simultaneously by Vox in Spain collectively illustrate two structural dynamics.

First, the central role of political actors as amplifiers without whom disinformation narratives fail to achieve meaningful reach: the report documents consistently that content lacking political amplification remains confined to small audiences, while politically amplified content can accumulate tens of thousands of interactions rapidly. Second, the increasingly transnational and coordinated character of anti-immigration disinformation in the Iberian context, with content templates, visual formats, and core narratives circulating across national boundaries and being adapted by homologous far-right populist parties — a finding that positions Portugal as increasingly convergent with the broader European far-right populist disinformation ecosystem.

<sup>25</sup> Generalist free-to-air TV channel.

The report also identifies what is believed to be the first deepfake involving a Portuguese political figure: a manipulated video of André Ventura with AI-generated audio used to promote a financial scam. This shows that technologically sophisticated disinformation, previously more associated with larger media markets, has begun to penetrate the Portuguese electoral environment, even if not with large-scale impact.

#### *General Election (May 18th 2025)*

The General Election of May 18th 2025 took place in a political context defined by rapid succession and structural transformation of the Parliament in terms of the distribution of power. Portugal's third election in little over a year confirmed what the preceding cycles had suggested: the emergence of a tripartite system in which Chega, running on an increasingly confident radical far-right populist platform, had ceased to be a disruptive insurgency and become an institutionalised force —having elected one single member for Parliament in 2019, in this election it elected 60 out of 230.

Similarly to what happened in the two last elections, the MediaLab\_Cies Iscte and OberCom team monitored social media activity across Facebook, Instagram, X, and TikTok over four consecutive weeks of pre-campaign and official campaign (C. Cardoso et al., 2025). The purpose remained unchanged: to conduct quantitative and qualitative analysis of disinformation meta-narratives, coordinated amplification behaviour, and specific disinformation cases identified through fact-checking platforms and citizen reports submitted to the CNE.

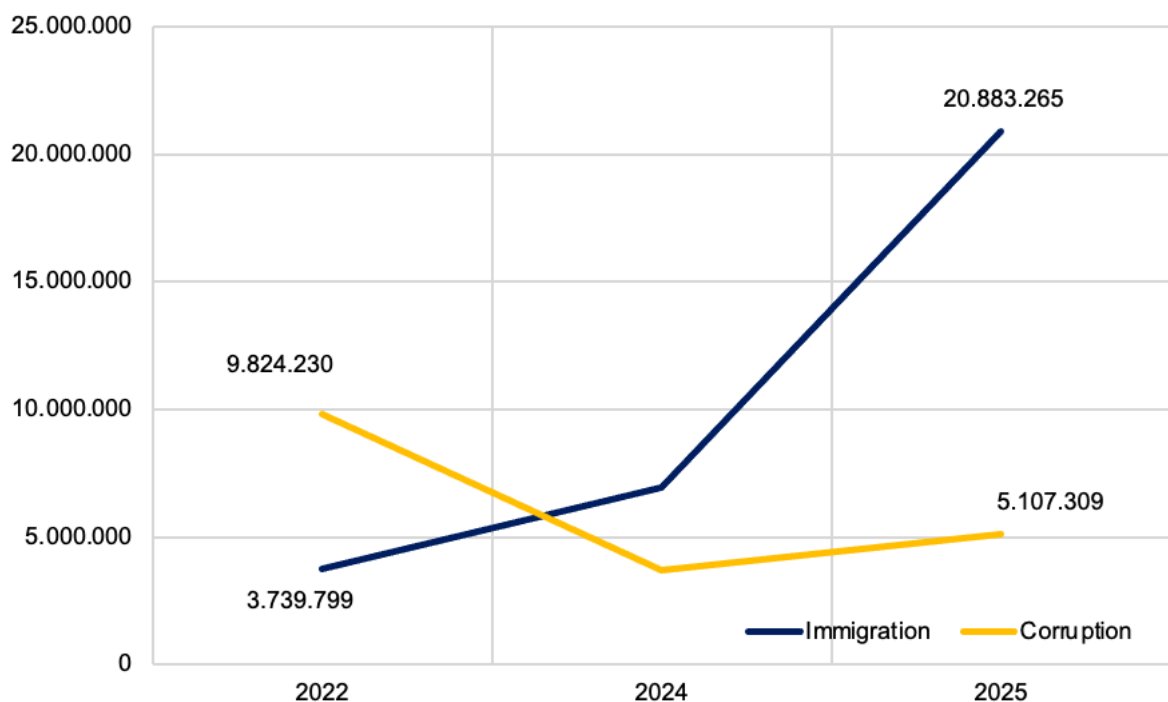
Between the 2024 and 2025 General Elections, the aggregate social media presence of Portuguese political actors expanded significantly: party follower bases grew by 20% to 2.2 million, while the combined following of party leaders grew by 55% to reach 2.5 million, this being the first time in the series that candidates collectively surpassed their own parties. TikTok registered the sharpest relative growth of any platform, with party follower counts increasing by 176% and the number of candidates maintaining active accounts doubling from three to six. Yet the analytically decisive story of the 2025 elections is not platform growth but the intensifying concentration of attention. André Ventura captured between 74% and 83% of total candidate visualisations throughout the four-week campaign period, reaching 83% in the final week, a level of unprecedented digital dominance in the series.

Chega generated one in every three total party interactions on Facebook, averaging 6.500 interactions per post, a figure six times higher than any competing party. Ventura personally averaged 18.500 interactions per publication across all platforms, thirteen times the figure recorded for Pedro Nuno Santos (head candidate for centre-left PS). This concentration is not merely a measure of partisan popularity, it is structurally consequential for the disinformation environment, since the capacity to propagate any narrative, regardless of its trustworthiness, at speed and scale, is effectively a function of engagement dominance of precisely this order.



In a notable reversal of the pattern observed in 2024, when Instagram had led on total candidate interactions, Facebook reclaimed the top position for aggregate interactions in 2025, generating over one million across the monitoring window. Instagram remained the platform of greatest reach for party content in the final campaign week, concentrating double the visualisations of Facebook during that period. TikTok emerged for the first time as the most efficient platform by interaction rate per post relative to follower base, surpassing X in total interactions. On X, political discussion remained dominant in terms of volume accounting for over 70% of all third-party publications mentioning candidates by name, but the platform's translation of volume into broader social attention remained limited. The most viral content mentioning candidates on X and TikTok was produced almost exclusively by individual users and alternative media accounts, rather than mainstream news organisations. On Facebook, legacy broadcasters such as SIC Notícias<sup>26</sup> and CNN Portugal<sup>27</sup> led in interaction volumes from third-party mentions, and one moment (Far-left BE's head candidate Mariana Mortágua's use of Lego bricks during a debate with Ventura to critique Chega's economic programme) became the most interacted post across both platforms, illustrating how televised moments continue to set the terms of social media attention even in an increasingly fragmented environment.

Figure 9. Evolution in the number of views on Facebook posts about 'corruption' and 'immigration' between the 2022, 2024 and 2025 general elections



Source: MediaLab CIES\_Iscte and OberCom.

<sup>26</sup> SIC owned a 24-hour dedicated news channel.

<sup>27</sup> National branded CNN channel for Portugal, owned by Media Capital, main competitor of SIC owner Impresa.

The report's most significant contribution concerns the displacement of corruption by immigration as the organising frame of electoral disinformation in Portugal. Through systematic extraction and thematic clustering of Facebook publications in the thirty days preceding the 2022, 2024, and 2025 elections, the research documents an exponential trajectory: immigration-related content reached nearly 21 million Facebook impressions in 2025, which is approximately five times the figure recorded for corruption discourse in the same period, and a 200% increase over the immigration figures from 2024.

Corruption, which had been the dominant disinformation theme since at least the 2019 election cycle, declined in both volume and visibility. The shift is not merely quantitative. Lexical clustering analysis using unsupervised machine learning methods reveals that the immigration debate in 2025 was internally differentiated in ways absent from previous cycles, structured around at least three distinct but interrelated vocabularies: institutional discourse on deportation and irregular migration linked to the operations of AIMA<sup>28</sup>, the association of immigration with public insecurity, amplified by statements from former Prime-Minister Pedro Passos Coelho (centre-right PSD) during the 2024 cycle that continued to reverberate, and an emotionally charged anti-immigration discourse, distinguished by disproportionately high "angry" reaction metrics, concentrated almost entirely in 2025 and circulated through accounts with established connections to radical right content ecosystems.

The report also identifies three interconnected meta-narratives that structured the disinformation environment of the 2025 campaign, all mainly amplified through Chega-aligned actors and networks. The first ("Portugal is being invaded") centred on the demonstrably false claim that two million immigrants had entered the country, a figure that circulated across Facebook, Instagram, TikTok, and WhatsApp groups, reaching over one million users. Ventura's own amplification of this narrative, published across three platforms and still available despite fact-checker refutations by IBERIFIER partner Polígrafo and others, alone exceeded one million visualisations. Member of Parliament for Chega Pedro Frazão reinforced the same narrative across three Facebook videos totalling 1.5 million views.

A keyword search for the formulation "2 million immigrants" on Facebook alone identified approximately 600 publications generating over 6 million impressions, a figure that excludes X, Instagram, and TikTok. The second meta-narrative recycled the satirical "Partido Islâmico Português"<sup>29</sup> page from the 2024 European election cycle, re-circulated without its parodic framing as evidence of an organised Islamist political threat, and merged with allegations of an electoral pact between the Bangladeshi community and the PS — a claim disseminated without verifiable sources but distributed by a single authenticated user across more than seventy public Facebook groups within approximately one hour. The third narrative recast

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<sup>28</sup> Agência para a Integração, Migrações e Asilo – Agency for Integration, Migrations and Asylum.

<sup>29</sup> Portuguese Islamic Party



the 50th anniversary of the April 25th Revolutions as fifty years of systemic corruption and democratic failure, positioning Chega as the only force capable of rupture with a discredited establishment. These three meta-narratives, though thematically distinct, converged on a common logic: the systematic delegitimation of democratic institutions, of established parties, and of the pluralist order itself.

The report documents coordinated amplification behaviour centred on a network of anonymous Instagram accounts sharing overlapping follower bases, synchronised content schedules, and strategically vague profile identities. Critically, the analysis finds no evidence of automated control or foreign operational direction; the pattern is consistent instead with highly motivated domestic digital activists, some potentially managing multiple accounts, engaged in deliberate network amplification of Chega-aligned narratives. This network generated approximately 850,000 impressions on the day of reflection alone. This finding carries significant methodological implications, directly contesting the conclusions of a report by the Israeli firm Cyabra, widely circulated by CNN Portugal, which claimed that 58% of pro-Chega accounts on X were fake (Martins, 2025).

The MediaLab\_Cies Iscte / OberCom team identifies this episode as an instance of "reflexive disinformation", i.e. methodologically imprecise claims about disinformation that themselves generated misleading public perceptions, conflating anonymous and pseudonymous accounts with inauthentic ones, and paradoxically reinforcing Chega's own narrative of persecution by a hostile institutional "system". A related case involved a fabricated text falsely attributed to CNN Brussels alleging a Russian cyberattack on European electricity infrastructure, circulated via WhatsApp during the pre-campaign blackout period, illustrating the continued structural vulnerability of closed messaging platforms to disinformation that cannot be contextualised, corrected, or removed by the platform.

Taken together, the findings of the 2025 report describe a disinformation ecosystem that is more thematically coherent, more emotionally charged, and more deeply embedded in the organic dynamics of far-right populist digital mobilisation than any previous Portuguese electoral cycle has evidenced.

#### 4.3.2. The dynamics of disinformation in the Lusophone sphere: considerations on the case of Portugal and Brazil

The Lusophone sphere operates as an organic communication structure potentiated by Portuguese as a shared language. With over 260 million speakers across nine countries the transnational Lusophone space is institutionalised by CPLP (Community of Portuguese Speaking Countries). Brazil accounts for about 80% of Portuguese speakers across the world, having disproportionate power over the language, the norms which apply to it and of the global perception of Portuguese (Azevedo, 2005; Reto et al., 2012). Due to its demographic and cultural weight, Brazil has been able to gauge its media production and ability to export culture as mechanisms of influence (Fiorin, 2013) and Brazilian-origin culture



has had an enduring influence over the way in which the Portuguese consume entertainment (Porto, 2012; Vargas et al., 2017).

The exchange of influence between Portugal and Brazil became particularly salient at the political level during the second half of the 20th century, as both countries experienced overlapping authoritarian trajectories, with the Portuguese Estado Novo (1933–1974) and the Brazilian military dictatorship (1964–1985) sharing anti-communist ideologies, corporatist elements, and comparable mechanisms of political control. Comparative scholarship has highlighted the extent to which Iberian and Latin American authoritarian regimes formed part of a broader transatlantic framework of governance, characterised by ideological affinities and institutional parallels (Pinto & Finchelstein, 2019). To this extent, Portuguese (and also Spanish) authoritarianism was influenced and resonated with Latin American regimes.

Crucially, and to materialise the argument of a Lusophone disinformation sphere, the influence relationship between Portugal and Brazil is also expandable to the rise of the new populist far-right, in that the origins of the phenomenon in both countries is widely debated, with reference, on the one hand, to a) the fact that it can be seen as a legacy of the authoritarian regimes that played a significant historical role in both sides of the Atlantic, and b) the emergence of an international populist right, in some sense federated, whose operating principles are adapted to the Portuguese and Brazilian realities (Kumar, 2020; Marchi & Zúquete, 2024; Rocha et al., 2021; Solano, 2019).

In Brazil, Bolsonarismo is ideologically anchored simultaneously within the framework of traditional right-wing authoritarianism, inherited from the Getúlio Vargas regime (religion and militarism at the core) and in the symbolic axes of the new radical international populist right, combining the military and religious genesis (Lopes et al., 2025) with the opposition to the ‘cultural hegemony of the left’ (Rocha et al., 2021), anti-establishment / ‘anti-petismo’<sup>30</sup> rhetoric and neoconservatism (Solano, 2019). As in other countries, also in Brazil the anti-elite discourse aimed at the left and in particular at Partido dos Trabalhadores is fostered by the conservative elites aiming to replace it (Mourão, 2018).

In the Portuguese case, the debate over Chega’s ideological foundations is based on a similar logic in the sense that there is intense debate over whether the party represents a continuity, rooted in the institutionalised foundations of the Portuguese right, “being neither new nor anti-establishment” (Kumar, 2020) or a new ideological expression, not belonging to the genealogical line of the Portuguese radical right and differing in terms of its political

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<sup>30</sup> Term used to name the sentiment created around the opposition to the Partido dos Trabalhadores (PT) (Worker’s Party) in the follow-up to a series of corruption scandals by party leaders. The “anti-petista” precedes the rise of Bolsonaro and is a wider sociopolitical phenomenon but was key to the rise of far-right populism in Brazil. A similar narrative anchor is used by Chega in Portugal and is visible in the prevalence of the topic of corruption in disinformation phenomena during electoral periods, as we have seen in the previous section.

culture, discursive strategy and the structure of its leadership and supporter base (Marchi & Zúquete, 2024).

The analysis of the three electoral moments conducted in the previous section allows us to understand the Portuguese electoral disinformation ecosystem between 2024 and 2025 as part of a broader transnational communicative environment. Within this space, Brazil emerges as a particularly relevant reference, not just through direct, traceable intervention by identifiable Brazilian actors, but through the circulation of narratives, communicative styles, and strategic repertoires that have been consolidated in the Brazilian political context over the past decade.

This influence unfolds progressively across the electoral cycles under analysis, moving from latent convergence to more structured forms of narrative and strategic alignment. In terms of a timeline, Jair Bolsonaro's election as President of Brazil in 2018 happens the year before Chega is founded and comparative literature points to an alignment in terms of digital strategies between Jair Bolsonaro, André Ventura and also Santiago Abascal, sustained by strong similarities in the amplification of aligned media, personalisation of political messaging and the use of confrontative and antagonistic framing (Biscaia, 2024). A direct comparison between Bolsonaro and Ventura allows for the establishment of direct support / influence frameworks but it also underlines the strong ideological and symbolic parallels between both, anchored in the anti-elite discourse, moral conservatism and the contamination of politics by religion (Pimenta et al., 2024).

In the context of the 2024 General Elections there is an international dimension involving the intervention of Brazilian actors, with direct evidence that the themes and topics circulating in Brazilian communication flows do impact political discussion in Portugal. Quoting (Casquinho et al., 2024b) directly, referring to the specific cases themselves:

“During the debate between André Ventura and Rui Tavares<sup>31</sup>, the former mentioned Lula da Silva, the President of Brazil, in one of his arguments, accusing him of being corrupt. This comment gained traction in the online political debate after the TV clip was shared on Chega's TikTok page, where it became one of the most viral posts among political parties that week. Furthermore, the same comment gained prominence in the Portuguese online political debate through posts on X by Eduardo Bolsonaro and Carla Zambelli<sup>32</sup>, who praised André Ventura's stance.” (Casquinho et al., 2024b).

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<sup>31</sup> Head candidate of Livre, left-wing party focused on progressive values and stronger integration with Europe and the Union.

<sup>32</sup> Eduardo Bolsonaro (Jair Bolsonaro's son) and Carla Zambelli are both members of Bolsonaro's Partido Liberal.

Figure 10. Posts by Carla Zambelli and Eduardo Bolsonaro on X in support of André Ventura



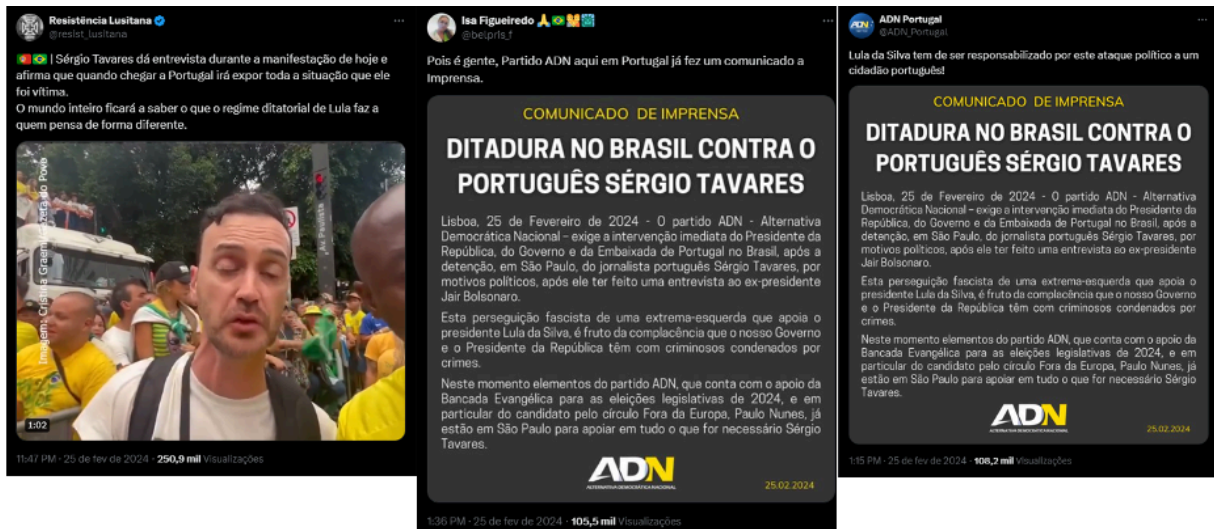
Source: (Casquinho et al., 2024b). MediaLab\_CIES Iscte and OberCom.

"It is worth noting that these figures, with just a single post, generated as many interactions as several media accounts covering the candidates. On Facebook, Carla Zambelli garnered 13.137 interactions and Eduardo Bolsonaro totalled 7,433 interactions. On X, both garnered around 13,000 interactions each. Thus, with just a single post mentioning André Ventura, these Brazilian political figures managed to feature among the accounts that garnered the most attention (measured in interactions) in the discussion surrounding the candidates for prime minister." (Casquinho et al., 2024b).

In the following week, a Portuguese right-wing influencer traveled to Brazil to cover the demonstrations organised by Jair Bolsonaro, further deepening the overlap between Brazilian and Portuguese politics:

"The following week saw Sérgio Tavares's trip to Brazil. The Portuguese content creator travelled to Brazil to cover the demonstrations organised by Bolsonaro and was detained at the airport, leading to accusations that his detention was an attack on freedom of expression." (Casquinho et al., 2024b).

Figure 11. Examples of posts in defense of Sérgio Tavares



Source: Casquinho et al., (2024b). MediaLab\_CIES Iscte and OberCom.

“Once again, the Portuguese and Brazilian political spheres have intersected. Several of the posts with the most engagement this week on X mentioned Sérgio Tavares and his arrest. Furthermore, among the political parties in Portugal, it was the ADN party that attracted attention on X and managed to be the party account with the post receiving the most engagement. Even more interactions were generated by a post from a Brazilian citizen who praised the ADN’s official statement condemning the arrest of Sérgio Tavares.” (Casquinho et al., 2024b).

Another case relates to the publication of a non-certified poll with what appeared to be misread results<sup>33</sup> by a Brazilian pollster called Instituto Paraná Pesquisas:

“On the morning of 22 February, Folha Nacional, the media outlet of the Chega Party, published the results of a poll that indicated a deadlock between AD, PS and Chega. The study was carried out by the Paraná Pesquisas Institute, which is not accredited in Portugal, and the fieldwork was conducted by Intercampus<sup>34</sup>. António Salvador, head of Intercampus, reacted to the publication of this poll by stating that the release of the results to the media had not been agreed. Unlike the previous day, the publication of this poll saw greater involvement from Chega Party leaders and activists. The posts consisted of a screenshot of the headline from the Folha Nacional article. Collectively, these shares generated over 50,000 interactions across Facebook, / X and Instagram.” (Casquinho et al., 2024b: 227).

<sup>33</sup> By law, all pollsters covering politics must be registered with ERC – Entidade Reguladora para a Comunicação and the results of all polling must be deposited in a repository managed by ERC before being made public.

<sup>34</sup> Portuguese pollster, registered in ERC.

Figure 12. Image from the Folha Nacional article on the Paraná Pesquisas poll

ELEIÇÕES LEGISLATIVAS

## Pela primeira vez sondagem apresenta empate técnico entre PS, AD e CHEGA para as legislativas

22 fev, 2024 - 11:54

O partido de André Ventura aproxima-se cada vez mais do pelotão da frente, com uma diferença entre os três partidos abaixo da margem de erro de 3.4%.



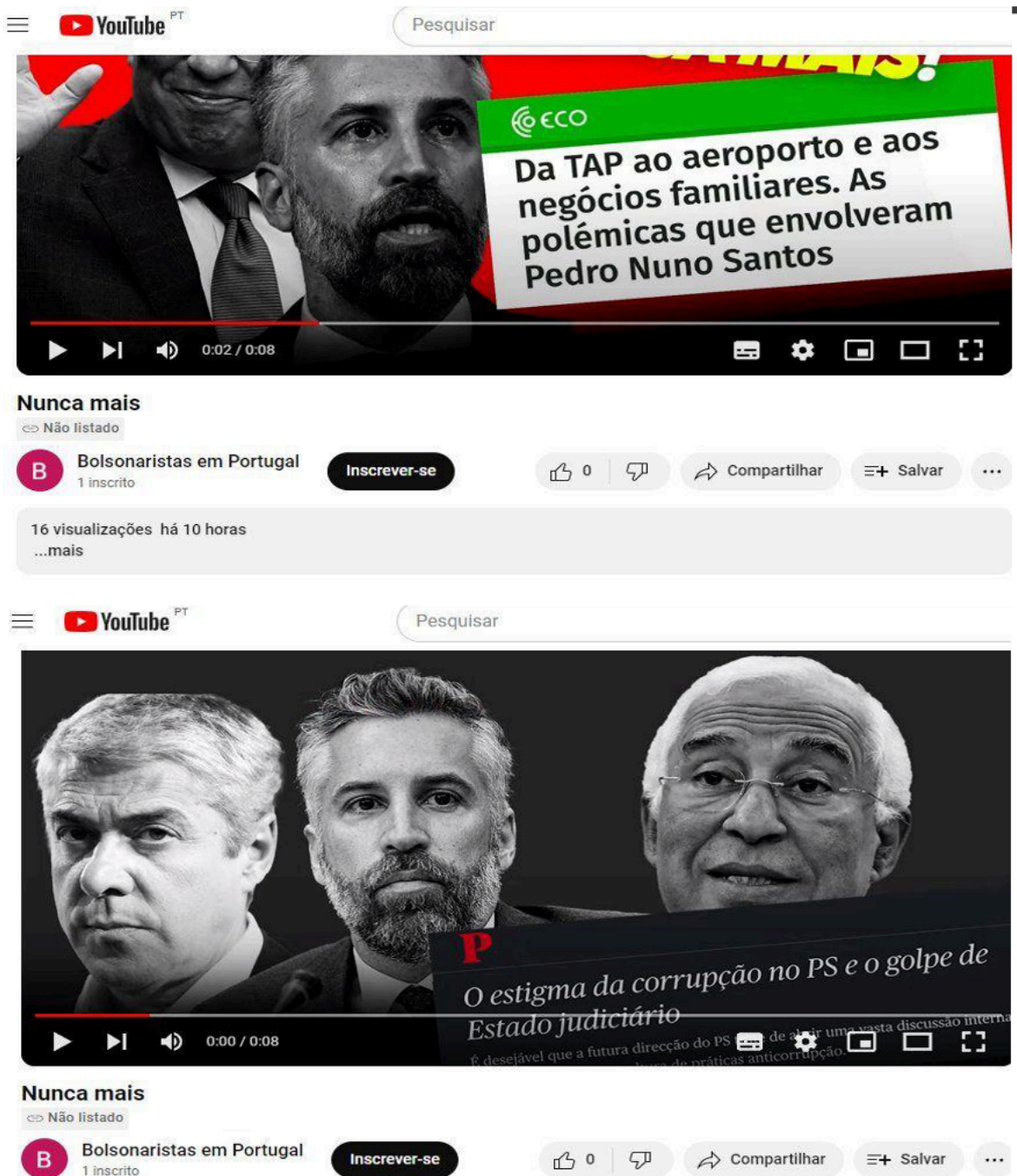
Source: Casquinho et al., (2024b). MediaLab\_CIES Iscte and OberCom. The article reads: “For the first time poll shows a deadlock between PS, AD and Chega for the General Election / André Ventura’s party is getting closer to the leading parties, the difference between the three parties being below the margin of error of 3.4%.

The impact of the poll adds further repercussions on the campaign, regaining relevance five days later, on February 27th, achieving 52.709 interactions, half of these on Instagram, where Ventura accounts for 94% of the interactions that took place during the research period. On Facebook, the Paraná Pesquisas poll was shared across 47 pages and groups and on X, though with lower impact. The involvement of the parties and leaders in the promotion of the false polls contributes significantly to the reach.

Another relevant case, which took place in this election refers to the identification of illegal political advertising on YouTube:

“During the election campaign, two instances of irregular political advertising were also identified on YouTube and one on Facebook. It should be noted that, on the one hand, political advertising is not permitted in Portugal during election campaigns and pre-campaign periods and that, on the other hand, in at least one of the cases there appears to be an external source of funding. Both situations therefore prompted an investigation, which utilised OSINT methods, enabling the source of funding to be identified in one case and an estimate of the investment to be made in the other.” (Casquinho et al., 2024b).

Figure 13. Screenshots of disinformative ads on Google / YouTube



Source: (Casquinho et al., 2024b). MediaLab\_CIES Iscte and OberCom. Note: both articles target centre-left PS, drawing parallels between head candidate Pedro Nuno Santos and former Prime Ministers José Sócrates and António Costa, both involved in corruption scandals at the time.

“The first piece of political advertising identified was a misleading YouTube advert. By taking newspaper front pages out of context, the image in the advert linked current and former leaders of the Socialist Party to corruption. Using Google’s ad library, the company that funded this advert was identified: Nekoplay LLC.

The entity is based in the US state of Delaware, known for being a tax haven on American territory and jurisdiction. The name of the channel hosting the unlisted video was “Bolsonaristas em Portugal”, thus pointing to the international dimension already identified in political communication during the general election. Through further journalistic investigation (Expresso, 2024), it was established that Nekoplay LLC is owned by an Argentine company that was flagged during the Panama Papers investigative journalism case. Our investigation also identified other adverts funded by the same company in Panama, Romania and Singapore.” (Casquinho et al., 2024b).

A third ad was shared on Facebook though not shared by actors appearing to be linked to Brazil or Jair Bolsonaro.

During the June 2024 European Elections, which happened three months later, Casquinho et al. (Casquinho et al., 2024a) did not identify clear instances of interference or overlap between the Brazilian and Portuguese political spheres. However, it must be noted that the European Elections tend to be not as impactful, campaign-wise, as the General or Presidential Elections and that André Ventura was not the lead candidate for Chega. However, in these elections the circulation of transnational narratives is more clearly identifiable. The analysis of disinformation cases reveals a strong emphasis on themes such as immigration, “islamisation,” cultural conflict, and institutional distrust. These narratives are not uniquely Portuguese; rather, they belong to a broader repertoire that circulates across different national contexts, including Brazil. The case of the so-called “Partido Islâmico Português” is particularly illustrative. It combines satire, misinformation, and political instrumentalisation in a way that closely resembles communicative strategies widely used in Brazilian digital politics, where ambiguity and irony often serve as tools to amplify controversial claims while preserving plausible deniability.

Furthermore, the report highlights the importance of platform-specific dynamics in the amplification of these narratives. High-volume platforms such as X function as spaces for rapid dissemination, while platforms like Instagram and Facebook concentrate higher levels of engagement and visibility. This architecture facilitates the circulation of transnational content, as narratives can be quickly introduced into the Portuguese context and subsequently amplified through more engagement-driven platforms. Although the report does not identify Brazilian actors directly, the formats of communication (short videos, emotionally charged posts, and meme-like content) are consistent with those developed and refined in Brazilian political campaigns. The influence thus operates through shared platform cultures and communicative practices, rather than through identifiable external agents.

The 2025 General Election report (C. Cardoso et al., 2025) is not easy to read in this context, mainly due to the impact of methodological aspects which lead the authors to actively define terms and keywords to prevent the collection of Brazilian related content when it comes to measuring the diversity of topics in disinformation flows.

However, as in the case of the 2024 European Election, the research identifies three dominant meta-narratives in the Portuguese disinformation ecosystem: the idea that “Portugal está a ser invadido,”<sup>35</sup> the notion of the “islamização de Portugal,” and the framing of the democratic regime as “50 anos de corrupção”<sup>36</sup> These narratives are structurally aligned with those observed in Brazil, where political communication has increasingly relied on themes of insecurity, demographic threat, and systemic corruption. The Portuguese versions of these narratives are adapted to local conditions, yet their underlying logic and emotional framing remain consistent with their transnational counterparts.

The amplification of these narratives is closely associated with domestic political actors, particularly those positioned on the far-right. The report shows that actors such as Chega and its leader once again dominate attention and engagement across platforms, capturing a disproportionate share of visibility. While this dominance is rooted in the Portuguese political context, the strategies employed (high-frequency posting, emotional intensification, and personalization around a central figure) are once again strongly reminiscent of Brazilian digital campaigning practices. This suggests not direct borrowing from specific actors, but rather the diffusion of a strategic model that has proven effective in similar political environments.

Another important dimension concerns the presence of coordinated behaviour within the Portuguese digital ecosystem. The research identifies networks of anonymous or pseudonymous accounts that operate in a synchronised manner to amplify specific narratives. Although there is no evidence of foreign-controlled operations, these patterns closely resemble the decentralised yet coordinated networks observed in Brazil, particularly in the use of informal digital communities to amplify political messaging. The Portuguese case thus reflects a hybrid model in which domestic actors adopt and adapt forms of networked communication that have been previously developed in other contexts.

Taken together, the evidence from the three elections suggests that the influence of Brazilian politics in the Portuguese disinformation ecosystem is best understood as indirect, diffuse, and mediated, although sporadic cases highlight direct intervention, influence and coordinated intent. The overlap between Brazilian and Portuguese politics operates mainly through the circulation of narratives, the adoption of communicative strategies, and the replication of networked amplification models through a process of transnational diffusion in which ideas and practices developed in one context are adapted and reconfigured in another.

Although the first election analysed by the MediaLab\_Cies Iscte and OberCom team is the one with the most instances of direct overlap / intervention being identified, the subsequent European and General Elections are not less meaningful in terms of the similarity of ideas,

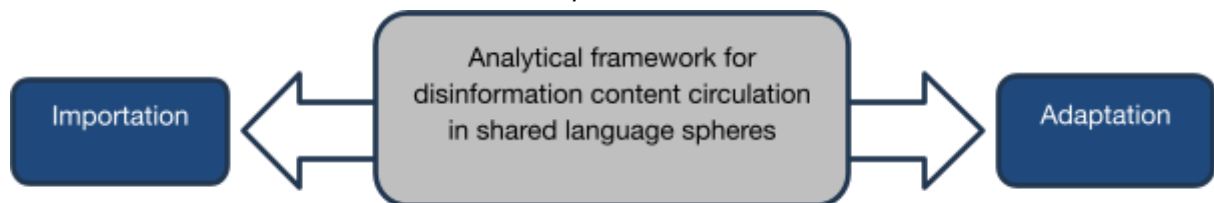
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<sup>35</sup> “Portugal is being invaded.”

<sup>36</sup> “50 years of corruption”. 2024 marks the 50th anniversary of the April 25th Revolution that ended the authoritarian regime that ruled the country from 1933 to 1974.

strategies, and practices. Within this framework, Brazil appears to function as an important reference point, particularly due to linguistic proximity and shared platform environments. The result is a hybrid disinformation ecosystem in which local actors play a central role, but operate within a repertoire of narratives and strategies that is increasingly globalized.

*Figure 14. Analytical framework for disinformation content circulation in shared language spheres*



*Source: OberCom / IBERIFIER.*

Figure 14 proposes an analytical framework for understanding the circulation of disinformation within shared language spheres, offering a particularly relevant lens for analysing the relationship between Portugal and Brazil. The examples analysed in this section point to a framework in which disinformation is not necessarily a unidirectional or externally driven process, but operating under a set of mechanisms through which content, narratives, and communicative strategies move across contexts where linguistic proximity lowers barriers to diffusion, more easily understandable under a gradient that has direct importation at one end and adaptation at the other.

The first dimension, direct importation, establishes the baseline condition for the possibility of the existence of the Lusosphere as a disinformation ecosystem: the possibility that content produced in one country can circulate in another with minimal or no adaptation. The hypothesis is that, in the Lusophone context, shared language significantly reduces the costs of translation and reinterpretation, allowing formats such as screenshots, memes, short videos, or commentary to be immediately intelligible across national boundaries. While empirical evidence from the Portuguese case suggests that large-scale direct importation is not the dominant mode of circulation, its inclusion is essential, as it defines the underlying permeability of the communicative space.

More central to the Portugal–Brazil relationship is the second mechanism, discursive template transfer. Here, what circulates is not necessarily the content itself, but the rhetorical structure underpinning it. Themes such as anti-elite resentment, anti-media hostility, moral panic, and conspiratorial delegitimation of institutions are not confined to a single national context but form part of a broader transnational framework. In this respect, the framework helps explain the observed convergence between Bolsonarismo and the communicative strategies of Chega. The Portuguese case reflects not the replication of specific messages, but the adoption of narrative logics that have been previously consolidated in the Brazilian context.

The third dimension, selective adaptation to local political context, further refines this process by highlighting the role of domestic actors in recontextualizing imported or shared narratives. Disinformation does not circulate unchanged; rather, it is rewritten to align with local institutions, political actors, and policy debates. The persistence of narratives such as “Portugal está a ser invadido” or the framing of immigration as a civilisational threat illustrates this mechanism. Also the prevalence of corruption is key to the comparison, as it is central to the establishment of antagonistic discursive anti-elite strategies (us vs. they). These narratives retain a recognizable structure while adapting their targets and symbols to the Portuguese political environment, made even more intense by the utter dominance of Chega over the Portuguese social media ecosystem in terms of attention. This dimension is particularly important in avoiding deterministic interpretations, as it underscores the agency of national actors in shaping the final form of circulating content.

The fourth mechanism, platform-mediated circulation through hybridisation, introduces the technological layer to this proposal. Circulation is not only enabled by language but also by the architecture of digital platforms, which connect diasporic and transnational publics. Content moves across borders through shared platform environments such as Facebook, X, Instagram, TikTok, or private messaging applications, where algorithmic amplification and user practices facilitate its visibility and spread. In the Lusophone space, these platforms function as infrastructures that extend the reach of narratives beyond national audiences, allowing content produced in one context to gain traction in another even in the absence of direct coordination. More importantly, these platforms allow for the bypassing of legacy and traditional media, in which it is much harder for parties to monopolise attention or, at least, to erase contradictory views.

Finally, the dimension of re-legitimation through commentary and mainstream pickup captures the process through which circulating narratives acquire credibility. Disinformation often originates in fringe or partisan spaces but can be reintroduced into broader public debate through influencers, partisan media, or even mainstream outlets – as discussed above, Chega’s dominance over the digital sociability landscape also plays a role here. In a shared language environment, this process is facilitated by the ease with which content can be reinterpreted and reframed for new audiences. As a result, narratives that may have limited legitimacy in their original context can gain renewed authority when embedded within familiar media ecosystems elsewhere.

Taken together, these five mechanisms conceptualise disinformation circulation as a multi-stage and non-linear process, in which content may move through different pathways and undergo varying degrees of transformation. Applied to the Portugal–Brazil case, the framework supports the interpretation of Brazil as a key pole in the process, with Bolsonarismo preceding the rise of Chega and being used across the Atlantic as some sort of omen or premonitory cue of the rise of an international and cross-border movement far-right movement. Importantly, this framework does not imply direct external interference, but rather a form of transnational diffusion enabled by linguistic proximity, shared platform infrastructures, and converging political dynamics.



#### 4.4. Final remarks about the Portuguese disinformation landscape

The discussion conducted in this chapter describes a Portuguese disinformation landscape that is both resilient and structurally vulnerable. Resilient in the sense that it retains features, such as comparatively high news trust, a stable public media service, and an increasingly active research and fact-checking infrastructure, that provide a defense against the worst effects of information disorder. Vulnerable in the sense that several of its most distinctive characteristics create conditions that disinformation actors, both domestic and transnational, have proven efficient in tackling.

The most fundamental structural condition shaping the Portuguese disinformation environment is the compression and acceleration of the electoral cycle. Four elections between March 2024 and February 2026 (two General Elections, one European Election, and one Presidential Election) created a period of sustained political instability in which the boundaries between campaign communication, partisan mobilisation, and disinformation are complex to distinguish. This compression did not merely intensify existing disinformation dynamics but appears to have helped change them.

Across the three electoral periods monitored by MediaLab\_CIES Iscte and OberCom, the evidence shows a pattern of escalation: more sophisticated narratives, broader reach, more deeply embedded coordination, and a growing thematic coherence that by 2025 had stabilised around immigration as the dominant organising frame of electoral disinformation, displacing corruption — itself a long-standing fixture of the Portuguese political imagination — as the primary topic for anti-establishment mobilisation.

The displacement is not merely thematic. It shows a strategic evolution in the Portuguese radical right disinformation ecosystem, one in which emotionally charged, demographically targeted, and algorithmically optimised content has replaced the more diffuse, scandal-driven dynamics that characterised earlier cycles. The exponential growth of immigration-related disinformation between 2024 and 2025, reaching nearly 21 million Facebook impressions in the final campaign, approximately five times the figure recorded for corruption discourse in the same period, represents a qualitative shift in the ambition and reach of domestic disinformation production.

The three dominant meta-narratives identified in the 2025 General Election cycle ("Portugal is being invaded", the "Islamisation of Portugal", and "fifty years of corruption and democratic failure") share a common underlying logic: the systematic delegitimation of democratic institutions, established parties, and the pluralist order itself. This logic is not original to Portugal; it belongs to a broader transnational repertoire that has been refined over the previous decade in Brazil and across the European radical right, and that circulates through shared platform environments, shared linguistic spaces, and shared communicative strategies in ways that the analytical framework proposed in section 4.4.2 seeks to formalise.



The role of political actors as the amplification node of disinformation in Portugal is among the most consistently documented findings of this chapter. Across all three electoral periods, content that lacked political amplification remained confined to small audiences; content that received it could accumulate millions of impressions in hours. Chega and its leader André Ventura occupy a position of structural dominance in the Portuguese social media attention economy that has no equivalent among other parties or political actors. This concentration is not merely a measure of partisan popularity; it is a structural feature of the Portuguese information environment that shapes what narratives achieve traction and what corrections reach audiences. The capacity to propagate any content at speed and scale is, in the Portuguese context, functionally inseparable from Chega's social media dominance.

This structural reality poses acute challenges for the regulatory and institutional framework whose evolution is documented in section 4.2. The full application of the DSA since February 2024 and the designation of ANACOM as Digital Services Coordinator represent meaningful institutional progress compared to the fragmented landscape mapped in the previous IBERIFIER report (Badillo-Matos et al., 2024). Yet the cases documented in this chapter illustrate the persistent gap between the pace of regulatory institutionalisation and the pace of disinformation innovation.

The analysis of media coverage of disinformation in section 4.3 adds a dimension that is easily overlooked in accounts focused primarily on political actors and platforms: the role of journalism itself in shaping public understanding of the phenomenon. The finding that over 60% of news items covering disinformation do so in generic, conceptually superficial terms, and that a significant proportion of that coverage is mediated by Agência LUSA wire content rather than driven by autonomous editorial decisions, points to a structural gap in the journalistic capacity to engage with disinformation as a complex and multidimensional phenomenon. A media environment in which disinformation is extensively referenced but rarely examined, and in which academic researchers increasingly function as the primary interpreters of the phenomenon for public audiences, is one in which the informational function of journalism risks falling short of what democratic resilience requires.

These findings, taken together, define both the current state of the Portuguese disinformation landscape and the terrain on which future interventions must operate. The regulatory architecture is consolidating but needs solidification. The research and fact-checking infrastructure as well. The media literacy landscape is growing but uneven. And the political and platform dynamics that make disinformation both possible and consequential in Portugal show no sign of diminishment. Meeting these challenges will require sustained coordination between regulatory authorities, research institutions, news organisations, and civil society — the very form of institutional collaboration that this chapter, and this report, are designed to support.

## 5. Spain

Focusing on the specific case of Spain, this section provides an overview of the main developments during the period under analysis (2023–2026). The analysis is structured around three thematic blocks: (a) the general landscape of the media industry and public policy initiatives against disinformation; (b) the distinctive factors that characterise Spain as a society vulnerable to disinformation within the European context; and (c) the most significant disinformation case studies recorded during this period.

Taken together, these blocks follow a common analytical logic: structural transformations in the media system generate vulnerabilities that shape both the forms disinformation takes and the responses designed to counter it. In this report, disinformation is understood as a set of strategic practices driven by multiple actors and interests, operating within these structural conditions.

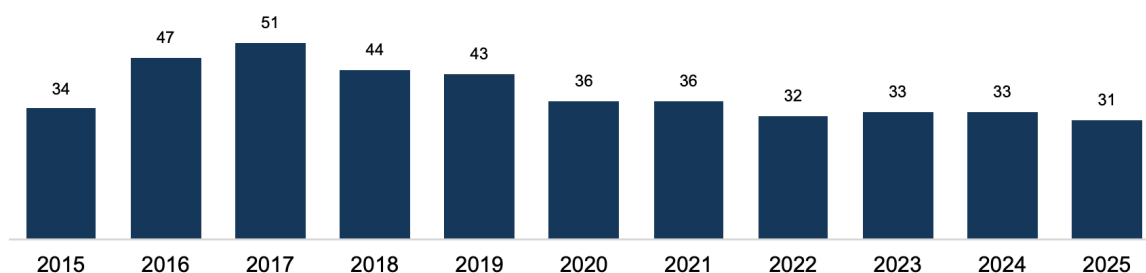
### 5.1. General context

#### 5.1.1. Main changes in the Spanish media system

Previous IBERIFIER documents identified the general state of crisis in Spain's communication sector, stemming from the structural transformations of the digital environment, the economic pressures of successive crises, political tensions in a context of intense polarisation, and the erosion of public trust.

The situation of the Spanish media system remains defined by a prolonged crisis of audience fragmentation, debates over the independence of public media, and the entry into force of new European and national regulatory frameworks, all against a backdrop of intense political, media and social polarisation (Kreab, 2025; RISJ, 2025d). This polarisation, compounded by the precarious working conditions of journalists, has driven public trust in news to a historic low of 31% in 2025, the lowest figure recorded in Spain over the past decade (RISJ, 2023, 2025b, 2025c).

*Figure 15. Trust in news in Spain, in percentage (2015–2025)*



*Source: Reuters Institute for the Study of Journalism (RISJ, 2025c)*

In the public media sphere, the RTVE Corporation is undergoing an unprecedented governance and independence crisis. Despite receiving public funding in excess of 1.174 billion euros per year (CNMC, 2025), its autonomy has been curtailed by Royal Decree-Law 5/2024 (BOE, 2024b). This measure enabled the Government to lower the parliamentary majority thresholds required — from two-thirds to an absolute majority on a second vote — to elect and expand its Board of Directors from 10 to 15 members (IPI & MFRR, 2025; MPM, 2025). The change facilitated the appointment of the current president, José Pablo López, and consolidated a profound shift in programming strategy aimed at competing directly with commercial broadcasters.

Within the RTVE Corporation, the move generated strong internal opposition. The News Councils of Televisión Española (TVE) and Radio Nacional de España (RNE) — the bodies responsible for guaranteeing the objectivity and pluralism of the public broadcaster — strongly criticised the reform, warning that lowering the consensus thresholds posed a serious threat to the public broadcaster's independence (IPI & MFRR, 2025; MPM, 2025). Professional representatives demanded a selection process based on professional merit rather than party quotas (MPM, 2025). Confronted with what they described as an "ideological drift" and "partisan management" placing the public broadcaster at the service of the Government, the News Council threatened to pursue legal action and launch public protests (Barlovento, 2025b).

The European Commission swiftly signalled that it was "closely monitoring" the situation and would examine the decree to assess its compliance with the new European Media Freedom Act (EMFA), which establishes strict safeguards for the independent operation of public service media (IPI & MFRR, 2025). Reporters Without Borders (RSF) openly criticised the Government's majority change, stating that the measure directly contravenes the spirit of European regulation (RSF, 2025). The outcome of these structural reforms is what academic and journalistic research organisations describe as a clear case of "media capture" (IPI & MFRR, 2025). International reports, such as those by the IPI, underline that the current Board of Directors displays an extremely high degree of bias and politicisation, with 11 of its 15 members having clear and direct ties to the political parties that nominated them (IPI & MFRR, 2025). In the absence of an independent body to oversee these appointments, the governance framework allows for direct political interference (IPI & MFRR, 2025). Critics warn that these changes serve primarily to consolidate the Government's influence over public broadcasting (RISJ, 2025), compromising editorial independence and turning the public service into an instrument of political confrontation and polarisation (MPM, 2025).

With regard to the private sector as a whole, the Spanish media market displays a very high concentration risk, exceeding 75% in both audience reach and ownership of television, radio and print media (MPM, 2025). This concentration is accompanied by a deep financialisation of the sector, with major banks, foreign investment funds and real estate interests controlling listed corporations such as Grupo Prisa and Vocento, undermining their autonomy in the face of commercial pressures (EurOMo, 2025; MPM, 2025). In the audiovisual sector, the two dominant groups are Atresmedia (controlled by the Planeta-DeAgostini group) and



Mediaset España (owned by the Berlusconi family). Together, they captured 73.7% of free-to-air television (DTT) advertising investment in 2025, and more than 80% when non-linear audiovisual data are included. This reflects the audience leadership of Atresmedia (26.1% share across 6 free-to-air channels) and Mediaset (24.4% share across 7 free-to-air channels), followed by CRTVE with 16.6% (Barlovento, 2025a, 2025b; SGAE, 2025).

In terms of audiences, conventional television consumption continues to decline in favour of the hybrid ecosystem and connected television, led by streaming platforms and OTTs (Netflix, Amazon Prime Video), as well as YouTube, which competes intensely for the attention of younger users (Barlovento, 2025b; CNMC, 2025; SGAE, 2025). Meanwhile, radio is the only medium maintaining enviable financial health, recovering pre-pandemic levels, with on-demand audio and podcast penetration already exceeding 40% of internet users (Kreab, 2023, 2024, 2025; RISJ, 2024b).

The print press is accelerating its systemic decline in physical format, sustaining itself through the implementation of digital paywalls. In this field, El País comfortably leads the market, followed by El Mundo and La Vanguardia, while digital-native outlets such as El Español and elDiario.es set the pace in unique users and community retention (Kreab, 2024, 2025; RISJ, 2025a). However, the viability of the entire digital ecosystem is being strangled by the technology giants (Google, Meta, Amazon), which absorb the vast majority of the digital advertising market. This has triggered multi-million-euro lawsuits by the Asociación de Medios de Información (AMI) on grounds of unfair competition (AMI, 2026).

The disruption caused by Generative Artificial Intelligence (GAI) represents the defining challenge for the cultural and journalistic industry. While publishers sign opaque agreements with companies such as OpenAI to train algorithms on their content (EAO, 2025; MPM, 2025), artistic and intellectual creators denounce the mass violation of their intellectual property rights through unauthorized scraping by major technology corporations. The transformative impact of AI threatens to automate processes and devalue creative work, demanding urgent regulation at the European level to safeguard cultural rights and prevent the algorithmic proliferation of disinformation.

#### *Audience disconnection and exodus*

Over the past decade, the media industry has suffered unprecedented structural erosion in its direct relationship with audiences, manifested in a disconnection that is not merely quantitative but represents a profound paradigm shift in consumption models. This crisis rests on four major dynamics: the sustained collapse of interest in news content, algorithmic intermediation, the rise of the creator ecosystem (videofication), and the recent zero-click barrier, whereby information is consumed directly within artificial intelligence interfaces without users visiting the original media outlets.

In quantitative terms, the decline in news interest is striking. In Spain, the proportion of citizens expressing high interest in current affairs has plummeted from 85% in 2015 to a



stagnant 52% in 2024 (Labiano, 2024). This disengagement is alarmingly acute among younger demographic cohorts, where barely 38% of those under 35 express high interest in news (Labiano, 2024). This disconnection is particularly pronounced among younger cohorts and reinforces the consolidation of the news NEETs phenomenon — individuals who display neither interest in current affairs nor trust in news sources — which by 2024 already encompasses more than a third of the Spanish population (Vara-Miguel, 2023, 2024b).

The exodus is not defined by disinterest alone, however, but by a radical mutation in access patterns. Audiences have abandoned the hierarchical and direct navigation of media homepages in favour of extreme algorithmic intermediation. In Spain, 66% of digital access to news is already mediated by algorithms — social networks, search engines, aggregators —, relegating direct access to journalistic brands, which has fallen to 54% (Vara-Miguel, 2024a). This phenomenon consolidates the "News Finds Me" effect, an ecosystem in which the consumer assumes a passive and receptive role in the constant flow of their social media feeds (Novoa-Jaso & Vara-Miguel, 2024). The traditional role of the media as gatekeepers of the public agenda dissolves into an attention economy where information competes in the same space — and under the same rules — as entertainment (Díaz Nosty, 2013).

This exodus coincides with what has been termed the "videofication" of consumption and the rise of an alternative media ecosystem. Text dominance is being rapidly displaced by visual formats; globally, the proportion of people consuming news via video on social networks has grown from 52% in 2020 to 65% in 2025 (RISJ, 2025e). Image- and short-video-based platforms (YouTube, TikTok, Instagram) have overtaken traditional text- or link-based networks (such as Facebook or X) in capturing younger audiences (RISJ, 2025e; Sierra, 2024b). In this new visual landscape, the sovereignty of attention is no longer held by journalistic institutions but by a constellation of content creators, podcasters and influencers. The media are, in short, witnessing an exodus in which audiences are changing not just devices or platforms, but also language, format and figures of authority.

#### *News fatigue and active avoidance*

The overabundance of content, driven by permanent connectivity and the architecture of digital platforms, has generated news fatigue. This exhaustion — characterised by a sense of mental wear and saturation in the face of a relentless torrent of frequently negative or conflictual information — already affects 44% of Spanish citizens, placing the country among the ten with the highest levels of exhaustion globally (Sierra, 2024a).

Far from being a homogeneous phenomenon, news fatigue displays revealing demographic and behavioural asymmetries. On the one hand, it penalises women (51%) more severely than men (38%), a statistically significant gap suggesting different ways of perceiving and managing information overload (Sierra, 2024a). On the other hand, it shows a paradoxical relationship with frequency: fatigue is inversely proportional to the regularity of consumption. Those who access news sporadically — at least once a month — suffer high levels of



exhaustion (67%), while hyperconnected individuals who consult information several times a day display notably lower fatigue (38%) (Sierra, 2024a).

The ideological factor adds a further layer to this picture, with the political centre displaying the highest levels of exhaustion (49% among the centre-right), while the extremes record the lowest fatigue levels (25% on the far left and 35% on the far right) (Sierra, 2024a). This behaviour is explained by the refuge of echo chambers: the most polarised voters mitigate their cognitive stress by avoiding dissonant information and consuming almost exclusively content that confirms their own biases.

As a direct consequence of this saturation, active news avoidance has surged, consolidating a crisis of intermediation for journalism. While globally 40% of people avoid news sometimes or frequently — the highest figure ever recorded on a sustained basis (RISJ, 2025e) — in Spain this phenomenon has seen an alarming eight-percentage-point increase in a single year, reaching 37% of the population (Sierra, 2024a). There is, in fact, a systemic feedback loop between the two problems: 58% of Spaniards who avoid news acknowledge also suffering from news fatigue (Sierra, 2024a).

The profile of the news "avoider" reveals a deep new generational divide. Disconnection affects 44% of those under 35, compared with 35% of those above that age (Sierra, 2024a). Among young people, avoidance is fuelled by a sense of helplessness in the face of existential problems (such as the climate crisis or economic insecurity), the perception that news can generate toxic arguments, and frustration at finding news too difficult to follow in its fragmented state (RISJ, 2025e). By gender, women in Spain (40%) also avoid current affairs in greater proportion than men (34%) (Sierra, 2024a).

The reasons behind this cognitive withdrawal are multiple and interconnected. Globally, 39% of avoiders justify their attitude by the negative effect of news on their mood, 31% feel overwhelmed by the sheer volume of information, and 30% are retreating from excessive coverage of wars and international conflicts (RISJ, 2024a, 2025e). According to a recent CIS study on the fears of Spanish society, 77.1% of citizens perceive that the media contributes to heightening feelings of fear and anxiety (CIS, 2026).

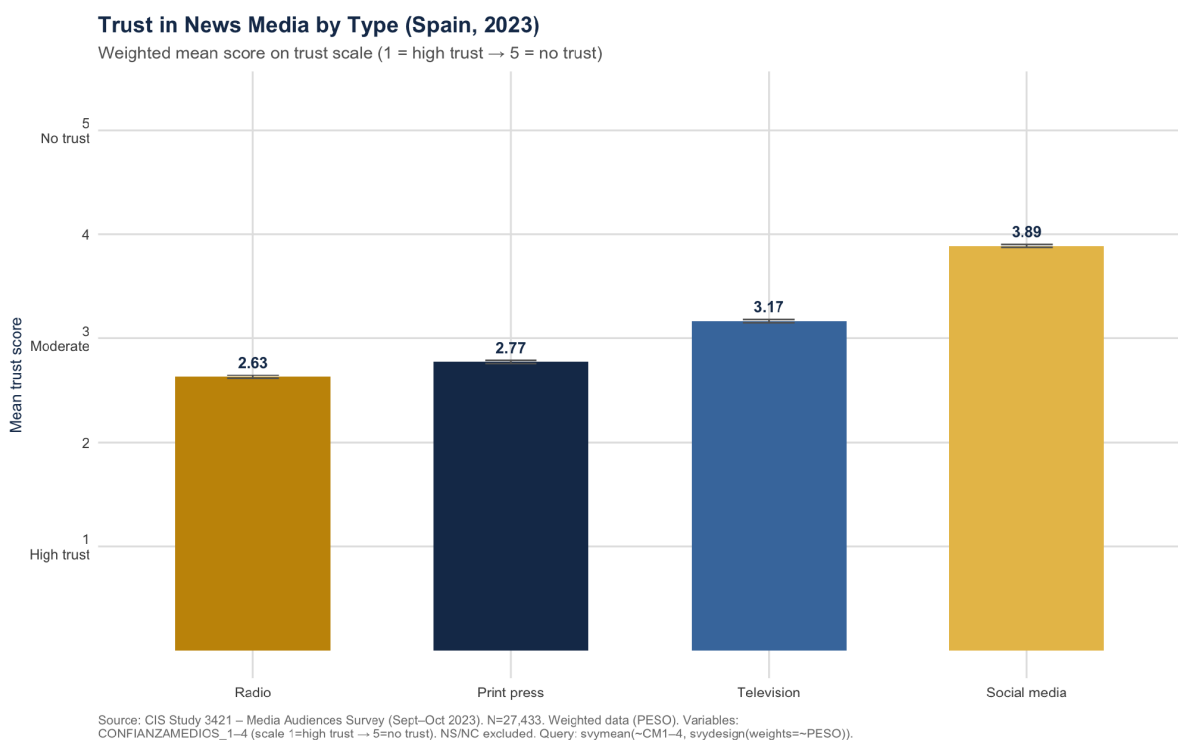
In practice, this disconnection materialises through periodic strategies — such as disabling notifications, fast-scrolling or changing channel — and highly selective ones (Moreno, 2023a). Those who practise selective avoidance overwhelmingly reject so-called hard news: 86% avoid topics related to domestic politics, armed conflicts and the economy, prioritising their mental wellbeing over a reality they perceive as immutable and depressing (Moreno, 2023b). Finally, the consumption channel plays a determining role in this dynamic: users who rely on social networks as their primary news source display a much higher avoidance rate (44%) compared with those who maintain more passive and traditional consumption habits, such as television viewers (33%) or newspaper readers (36%) (Sierra, 2024a).



### *The erosion of trust and the credibility crisis*

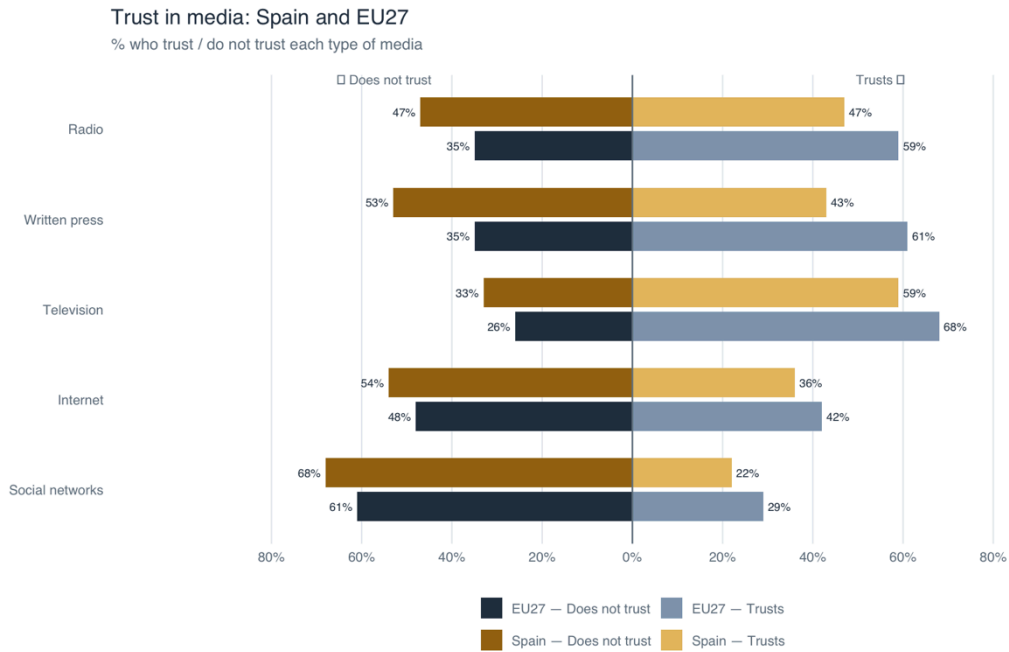
Globally, overall trust in news remains stagnant at 40%, considerably below the levels recorded during the peak of the pandemic (RISJ, 2025e). The situation in Spain clearly illustrates this fracture: overall trust in news, which had been in continuous decline before stabilising at 33% between 2023 and 2024, has fallen again to 31% in 2025, the lowest level recorded in the Reuters Institute series (RISJ, 2023, 2025b, 2025c). Similar figures emerge from Eurobarometer (Eurobarometer, 2026) and Centro de Investigaciones Sociológicas (CIS) studies (CIS, 2023).

*Figure 16. Trust in media by type (Spain, 2023)*



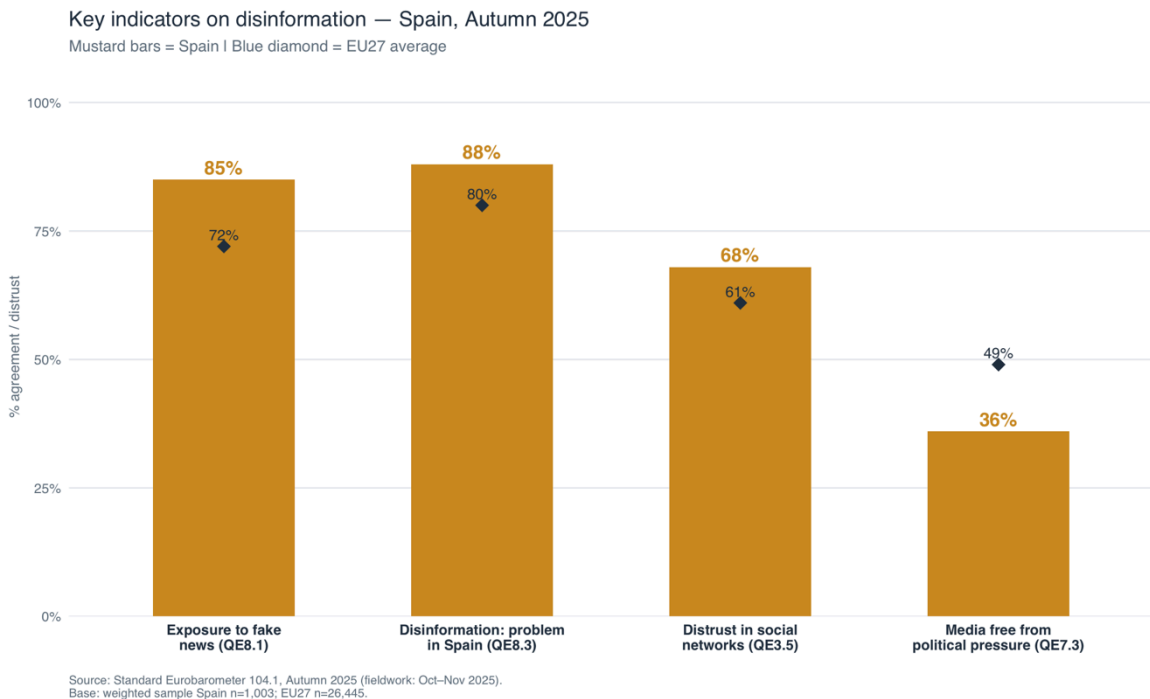
*Source: own elaboration based on CIS Study 3421. Media Audience Survey (September–October 2023). N=27,433. Weighted data.*

Figure 17. Trust in media types: Spain and EU27 (Eurobarometer, 2025)



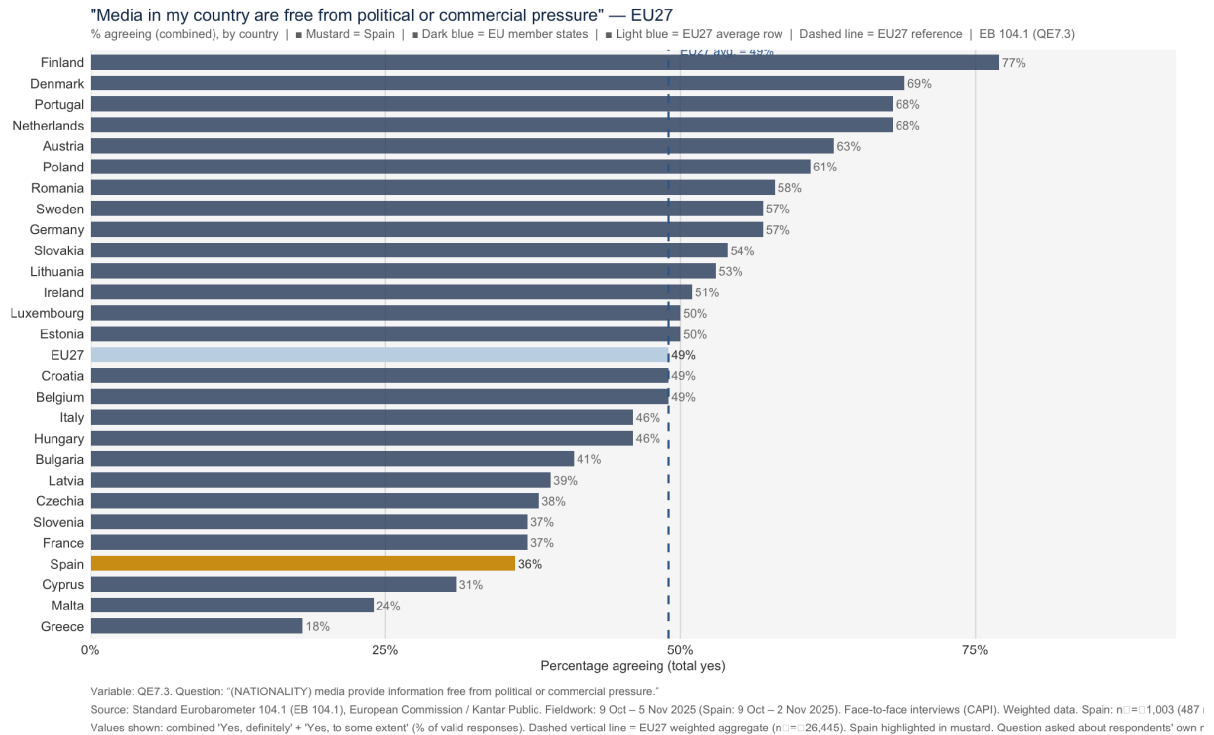
Source: own elaboration based on Eurobarometer (Eurobarometer, 2026).

Figure 18. Key indicators on disinformation and media trust (Spain, autumn 2025)



Source: own elaboration based on Eurobarometer (Eurobarometer, 2026)

Figure 19. "The media in my country are free from political or commercial pressure" (Spain, 2025)



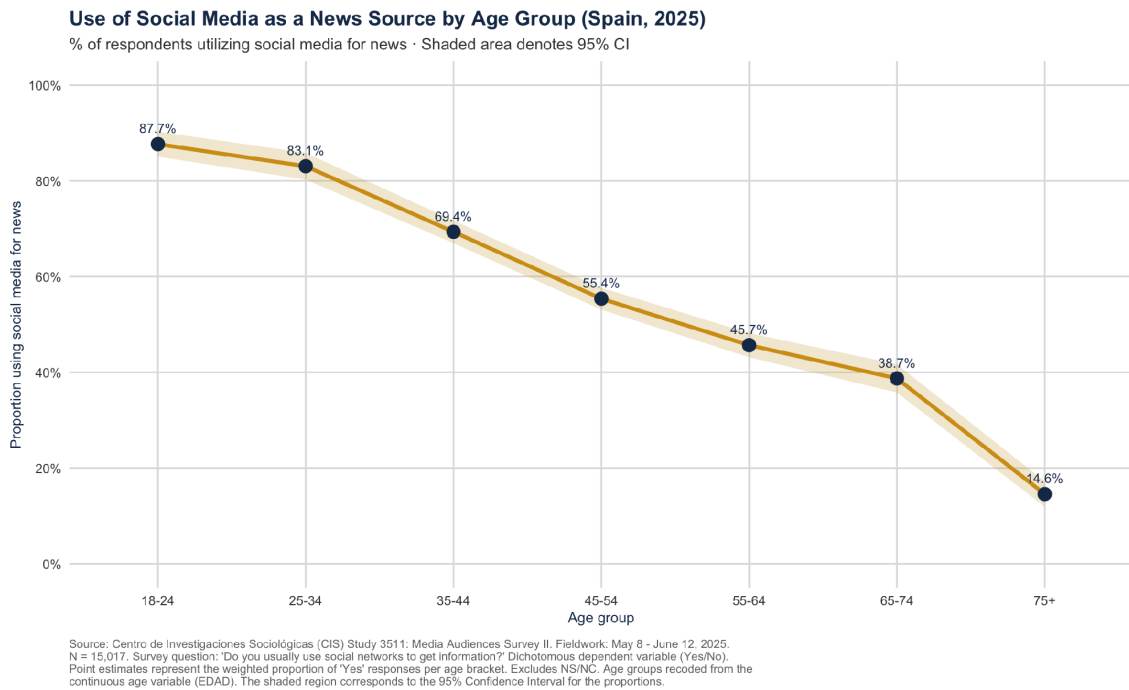
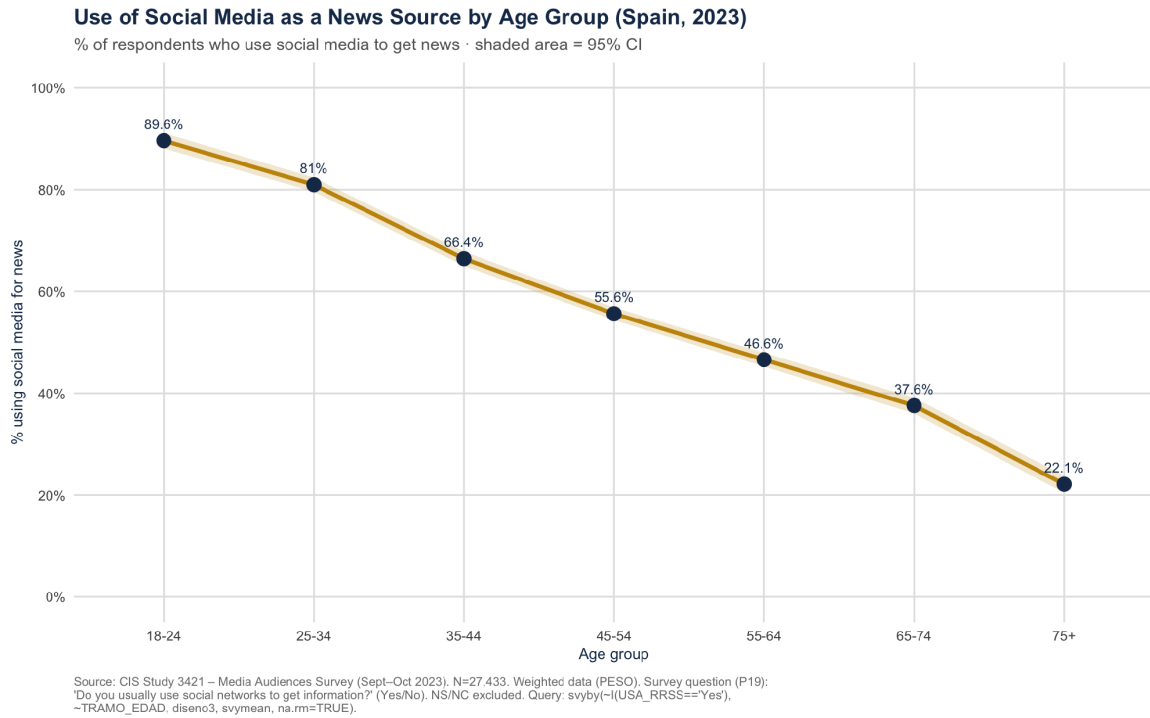
Source: own elaboration based on Eurobarometer (Eurobarometer, 2026)

This disconnection is extremely critical among younger generations, with barely 19% of those under 24 trusting information from traditional media (Vara-Miguel, 2024a). As a result of this trend, a worrying 37% of the Spanish population is now categorised as news NEETs (Vara-Miguel, 2024b).

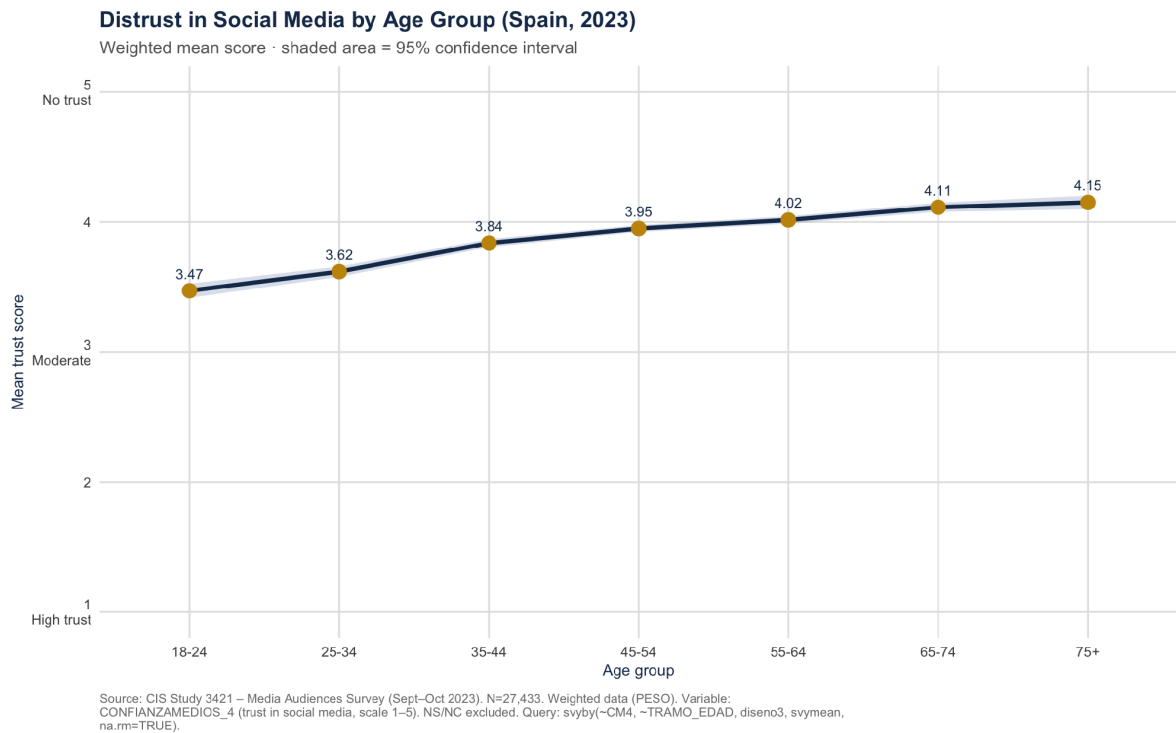
The vulnerability of younger demographic cohorts warrants specific attention. Recent empirical data from a sample of 800 young Spaniards aged 15 to 24 show that screens function as their primary gateway to reality. Specifically, 70.3% of these individuals use social networks as their main source of information (Evercom, 2025). Within this highly mediated ecosystem, 80% of young people regularly encounter disinformation, particularly on platforms such as TikTok (identified by 46.6% of respondents as the main source of false content) and X (20.5%). These false narratives focus predominantly on politics, international conflicts and migration. Despite this constant exposure, barely 13% systematically verify the information they consume. This dynamic generates a serious democratic and psychological risk. Indeed, 87.6% of the young people surveyed acknowledge that disinformation damages democratic quality, and two in three express their inability to fully trust the content available on social platforms (Evercom, 2025). Consequently, this environment aggravates their emotional exhaustion: 48.3% admit to a lack of motivation to participate in political debates, and 31.6% have temporarily abandoned social networks to escape information overload (Evercom, 2025).



Figure 20. Use of social networks as a news source by age group (Spain, 2023–2025)



Source: own elaboration based on CIS studies 2023–2025 (CIS, 2023, 2025).

*Figure 21. Distrust in social networks by age group (Spain, 2023)*

*Source: own elaboration based on CIS Study 3421. Media Audience Survey (September–October 2023). N=27,433. Weighted data. Age groups recoded from the exact age variable (EDAD).*

Alongside this loss of credibility, social concern about disinformation has reached peak levels. While globally 58% of people express anxiety about their ability to distinguish true from false online — a concern that rises to 73% in regions such as the United States and Africa (RISJ, 2025e) — in Spain 70% of respondents doubt the veracity of online content, representing the highest alarm level recorded since 2018 (Novoa-Jaso & Vara-Miguel, 2024). When identifying the source of this avalanche of false or misleading information, citizens overwhelmingly point to two main actors: national politicians (particularly in polarised countries such as Spain and the United States, at 57%) and internet influencers or personalities (notably in African nations, with figures approaching 60%) (RISJ, 2025e).

This credibility crisis has been exponentially amplified by the rise of generative artificial intelligence and the proliferation of synthetic media. The World Economic Forum has classified AI-mediated disinformation as one of the main short-term global risks, warning that deepfakes have crossed a critical threshold by becoming practically indistinguishable from reality (Singh & Jagolinzer, 2026). The spread of this hyperrealistic content generates a severe "plausible deniability shield" — a cognitive phenomenon whereby the mere existence of deepfakes causes the public to doubt everything they see and read, while simultaneously enabling political actors to discredit genuine evidence by labelling it as AI-generated manipulation (Singh & Jagolinzer, 2026). The digital ecosystem thus risks being saturated by what the industry terms "AI slop" (automatically generated informational waste), as well as

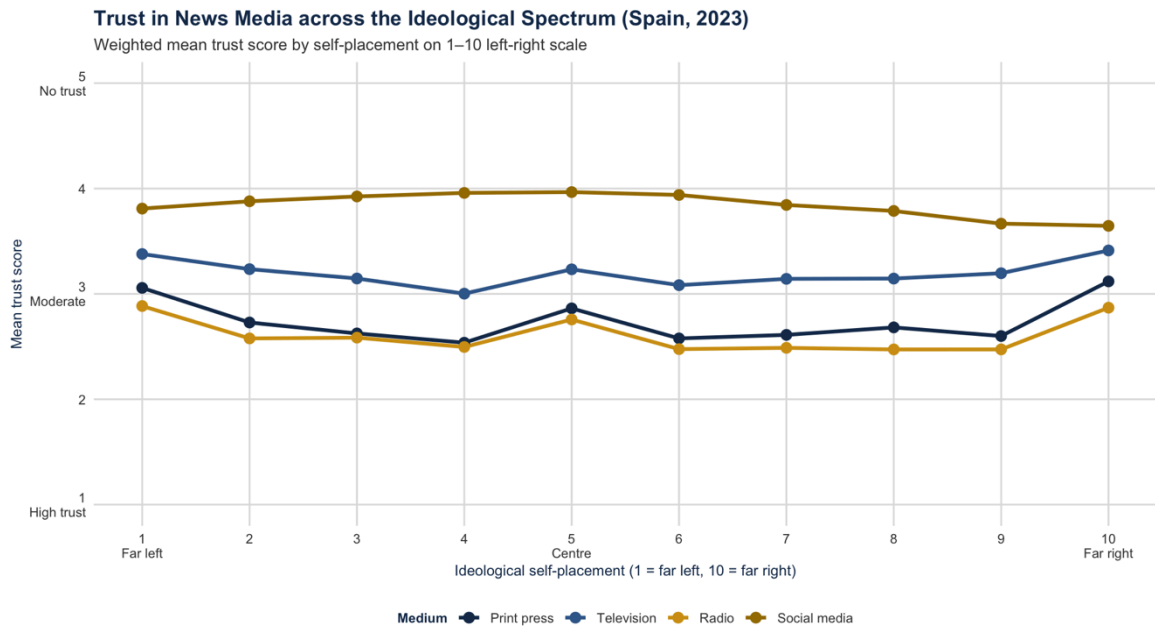
by deceptive websites known as "pink slime" that mimic the appearance of local media to spread propaganda at industrial scale (RISJ, 2026). In the face of this saturation of hyperreality, there is an urgent need to promote "truth literacy" in society to strengthen citizens' critical capacities.

Finally, the collapse of informational trust is dangerously reinforced by political hostility and economic pressures on the sector. The latest Reporters Without Borders (RSF) index warns that the extreme financial fragility of the press erodes editorial independence and cedes the public space to propaganda, posing a serious threat to the stability of democracies (RSF, 2025). Populist leaders around the world systematically deploy the term "fake news" to vilify critical media and evade public scrutiny — a tactic evidenced in recent initiatives such as the "Offender Hall of Shame" promoted by the White House, which advocates for certified digital provenance and uncompromising ethical rigour to restore the media's status as a trusted refuge of truth (RISJ, 2026).

This dynamic is particularly acute in Spain, where citizens do not perceive the media landscape as ideologically neutral. As shown in Figure 24, Spanish respondents assign markedly different positions to the main media outlets on a 1-to-10 left-right scale: La Sexta (3.75), Cadena SER (3.97) and El País (4.16) are consistently placed on the left of the spectrum, while COPE (7.90), ABC (7.79) and La Razón (7.66) are clearly located on the right. El Mundo (6.92) and Antena 3 (6.34) occupy the centre-right. Notably, elDiario.es (4.47) sits only marginally left of centre, much closer to the midpoint than its reputation might suggest. The outlets perceived as most ideologically centrist are La Vanguardia (5.48) and Cuatro (4.97), while TVE1 (4.35) and RNE (4.61) are seen as centre-left rather than strictly neutral. This polarised map of the media ecosystem provides fertile ground for "fake news" rhetoric: when citizens already perceive the media as ideologically aligned, accusations of bias find immediate resonance.

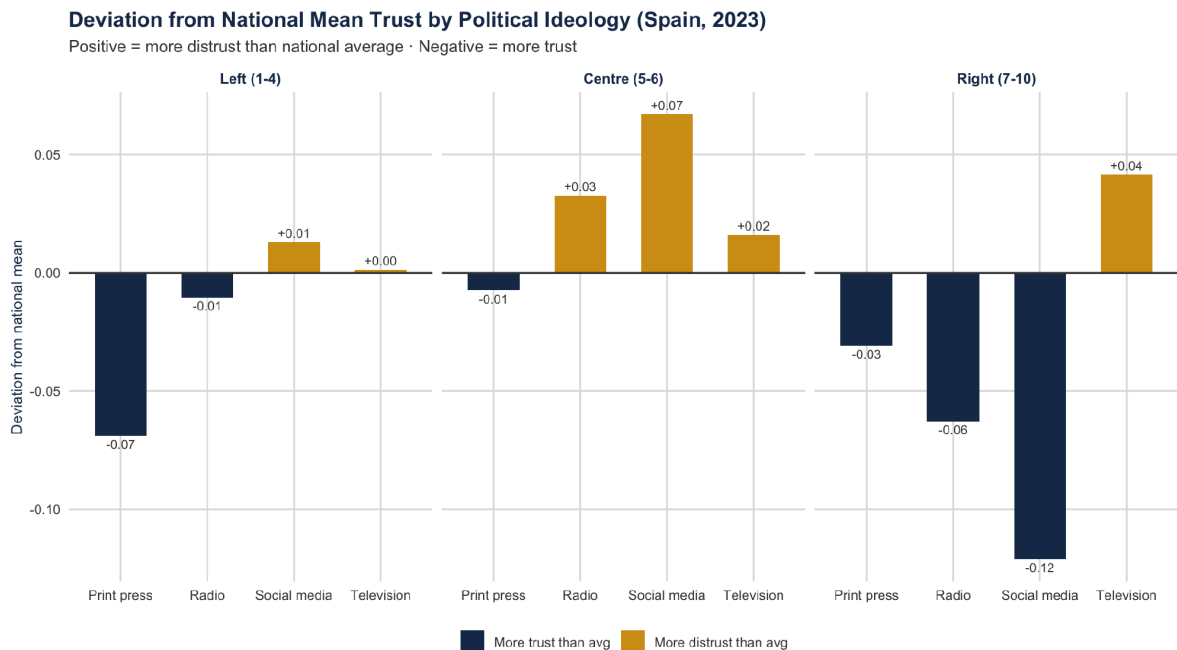
This perception does not, however, translate into strongly differentiated patterns of media trust. When trust in each medium type is analysed across the full 1-to-10 ideological self-placement scale, Spearman correlations at the individual level are negligible for all media ( $p = -0.025$  for the press,  $-0.009$  for television,  $-0.046$  for radio,  $-0.017$  for social media). Television shows no statistically significant variation by ideology ( $F = 1.39$ ,  $p = 0.25$ ). Where differences do emerge, they are statistically significant but substantively small: social networks are the most ideologically differentiated medium ( $F = 36.81$ ,  $p < 0.001$ ), with right-leaning respondents reporting marginally higher trust (mean 3.77) than left-leaning ones (3.90) — a difference of just 0.13 points on a five-point scale on which both groups express high distrust. For the press and radio, the relevant pattern is not a left-right divide but a U-shaped curve: respondents at both ideological extremes display greater distrust of traditional outlets than those in the centre, suggesting that ideological polarisation per se — regardless of direction — is associated with lower institutional media trust.

Figure 22. Trust in media by political ideology (Spain, 2023)



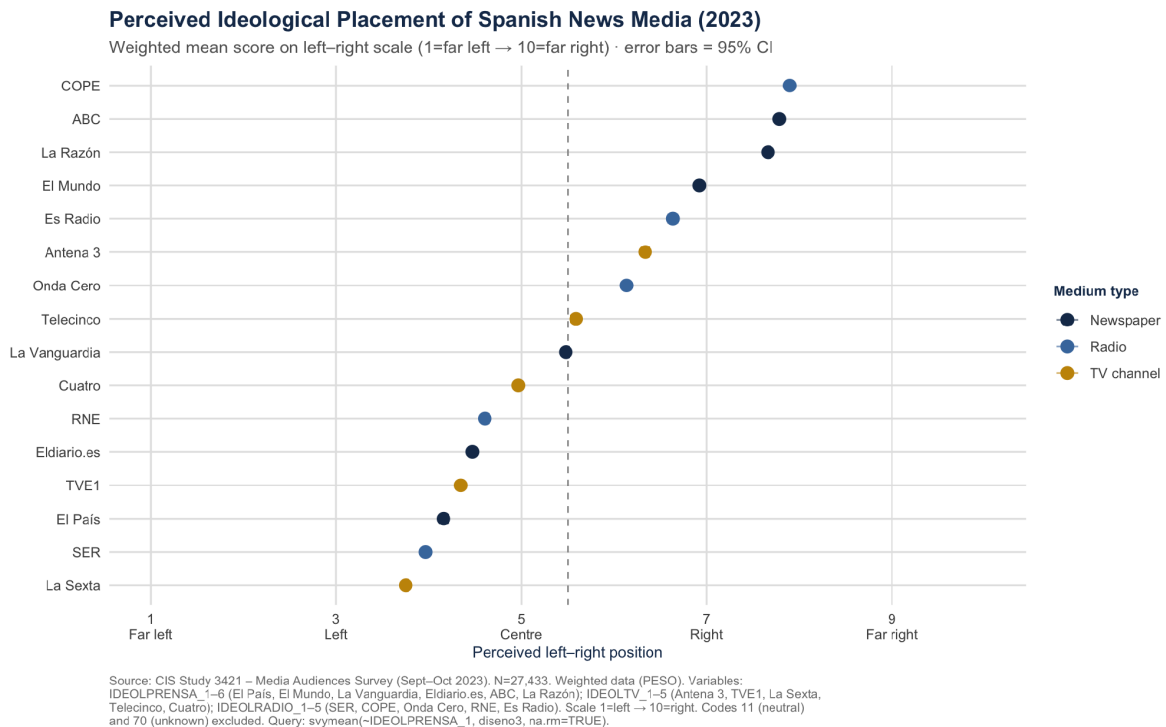
Source: own elaboration based on CIS Study 3421. Media Audience Survey (September–October 2023). N=27,433. Weighted data. Political ideology recoded into three groups from the 1–10 self-placement scale (Left: 1–4; Centre: 5–6; Right: 7–10). DK/NA excluded.

Figure 23. Trust in media by political ideology (Spain, 2023)



Source: own elaboration based on CIS Study 3421. Media Audience Survey (September–October 2023). N=27,433. Weighted data. Political ideology recoded into three groups from the 1–10 self-placement scale (Left: 1–4; Centre: 5–6; Right: 7–10). DK/NA excluded.

Figure 24. Perceived ideological position of Spanish media outlets (2023)



Source: own elaboration based on CIS Study 3421. Media Audience Survey (September–October 2023). N=27,433. Weighted data. Perceived ideological placement scale from 1 (far left) to 10 (far right). Respondents who answered "neutral" or "I do not know this outlet" are excluded.

#### Audience decline and the arrival of AI search responses

Finally, 2026 has witnessed a development of extraordinary relevance for the media sector, arising from Google's algorithmic changes in late 2025 and, above all, from the default activation of the AI Overview system in most searches from January 2026 onwards. As a result, media outlets have begun to experience a severe reduction in visits and a substantial loss of unique users which, for the leading digital outlets as of February 2026, stands at approximately two million fewer visitors per month.

This audience contraction, known in the industry as the zero-click crisis, occurs because users obtain direct answers synthesised by artificial intelligence on the search results page itself, entirely disincentivising clicks through to the original source. In early 2026, AI Overview coverage increased by approximately 58% year-on-year across various content categories, further consolidating the Google Gemini model as the default engine and

retaining users within native conversational environments. Recent assessments by the International News Media Association point to a severe threat: organic search traffic could potentially fall to near zero within the coming years (INMA, 2025). Although referrals from AI chatbots such as ChatGPT show a slight increase, these figures do not offset the massive loss of referrals from traditional search engines (INMA, 2025). The Financial Times illustrates this phenomenon clearly: its internal assessments show that, while its readers use AI tools far more frequently, the newspaper derives limited benefit, and clicks from these platforms actually declined in late 2025 (FT, 2025).

To survive this zero-click era, experts propose a paradigm shift: media executives must adopt a "zero-search strategy" that prioritises direct audience connections over algorithmic dependence (INMA, 2025). Specific tactics include expanding newsletters, producing podcasts and fostering community loyalty (FT, 2025; INMA, 2025). Industry analysts also urge publishers to develop AI-powered subscription models to secure user retention and to negotiate fair compensation agreements with technology companies (Cerezo, 2025; INMA, 2025).

In Spain, the impact of this structural shift is proving dramatic, culminating in early 2026 in what the digital press has dubbed "Black February". According to data from the official measurement platform GfK DAM, February 2026 recorded historic collapses at the leading outlets (Demócrata, 2026a). Newspapers such as El Mundo lost more than two million unique users and 23% of their page views in a single month; El Español fell 27% in page views year-on-year; and La Vanguardia saw its page views halved on an annual basis (Demócrata, 2026a). The impact has been particularly severe for evergreen or service content, whose organic traffic fell by between 30% and 50% due to its ready summarisability by AI (Jiménez, 2026). Compounding this scenario were drastic updates to Google Discover — Google's personalised content recommendation system — which significantly curtailed the traffic flows sustaining revenues across much of the sector (Torralba, 2026).

*Table 3. Evolution of unique users among the monthly digital "top 10" (Jul. 2025–Mar. 2026)*

|         | El Mundo | El Español | El País | ABC   | 20 Minutos | El Confidencial | El Periódico | OKdiario | Huffington Post |
|---------|----------|------------|---------|-------|------------|-----------------|--------------|----------|-----------------|
| Jul '25 | 18,87    | 9,30       | 7,16    | 6,91  | 7,88       | 7,19            | 0,00         | 0,00     | 0,00            |
| Aug '25 | 18,17    | 19,14      | 16,60   | 17,26 | 16,21      | 17,48           | 0,00         | 14,17    | 0,00            |
| Sep '25 | 18,00    | 17,95      | 16,87   | 17,57 | 15,62      | 17,72           | 0,00         | 13,84    | 0,00            |
| Oct '25 | 18,47    | 18,87      | 17,68   | 17,05 | 17,87      | 17,28           | 0,00         | 13,98    | 14,74           |
| Nov '25 | 18,78    | 17,29      | 17,10   | 15,12 | 14,05      | 14,23           | 15,82        | 14,88    | 13,55           |
| Dec '25 | 19,66    | 18,69      | 18,55   | 16,84 | 15,75      | 15,17           | 14,82        | 14,43    | 14,96           |
| Jan '26 | 20,08    | 19,57      | 19,36   | 17,28 | 16,10      | 14,79           | 15,92        | 15,32    | 15,36           |



|         |       |       |       |       |       |       |       |       |       |
|---------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Feb '26 | 17,92 | 16,84 | 16,63 | 14,98 | 13,36 | 13,92 | 15,42 | 14,21 | 13,12 |
| Mar '26 | 18,56 | 17,72 | 16,80 | 15,31 | 14,75 | 14,45 | 15,31 | 14,26 | 12,24 |

*Source: GfK DAM. Empty cells correspond to outlets that were not part of the national "top 10" in unique users during the corresponding month.*

The economic consequences of this structural traffic loss have been swift, triggering a wave of layoffs and closures in the Spanish media market during the opening months of the year. The digital-native media group Noxvo, publisher of established portals such as Fórmula TV and eCartelera, entered insolvency proceedings and ceased operations after more than a decade of activity (Dircomfidencial, 2026; Torralba, 2026); the Catalan daily El Nacional was forced to implement a temporary employment regulation scheme with reduced hours, citing changes in the search engine; El Español carried out newsroom redundancies due to falling traffic; and popular publications such as the magazine Pronto permanently closed their websites to focus exclusively on the print edition (Dircomfidencial, 2026; PR Noticias, 2026). In short, the emergence of agentic AI appears to be breaking the traditional digital press business model, forcing the industry to pivot towards exclusivity, community-building and subscriptions in order to survive algorithmic asphyxiation.

In response to this crisis, the Spanish media ecosystem has executed a strategic shift towards a direct relationship with audiences: the financial survival of an outlet no longer hinges on the sale of anonymous traffic to advertisers, but rests on the economic support of a loyal community through paywalls, memberships or subscriptions. Both legacy and digital-native media have accelerated the implementation of sophisticated first-party data collection and management strategies in preparation for the definitive disappearance of third-party cookies (FIPP, 2024), and are doubling down on reader revenue subscription models. Outlets are now moving beyond simple paywalls to adopt high-engagement membership models centred on community-building and direct reader revenues (FIPP, 2024; Kreab, 2024). This transition from mass scale to premium quality is yielding tangible financial results; official industry data confirm continued growth in digital subscriptions, with El País surpassing 400,000 subscribers by mid-2024, alongside solid upward trajectories for La Vanguardia and elDiario.es (APM, 2024; Kreab, 2025).

The sector is also witnessing an emerging trend of "defensive AI integration". Under this approach, newsrooms are establishing dedicated artificial intelligence units to leverage generative models not to increase content volume, but to achieve hyperpersonalisation, automate newsletters and generate segmented article summaries that successfully drive reader retention (FIPP, 2024; Sánchez, 2025). This shift seeks to reduce dependency on intermediaries and to rebuild the direct connection with audiences — a connection that suffered severe erosion during the previous decade of platform-centred distribution, a period in which algorithmic intermediaries progressively captured the majority of digital news access in Spain, fostering the climate of news fatigue and active avoidance examined above (APM, 2024; Vara-Miguel, 2024a).

### 5.1.2. Spanish public policies against disinformation within the European framework

In this context, public policies on disinformation, foreign interference and information integrity in Spain are closely tied to the broader European impetus that emerged following Russia's actions in the wake of the 2014 invasion of Ukraine, as well as the techniques deployed during the 2016 US presidential campaign and the Brexit referendum (Badillo-Matos et al., 2024; CIS, 2023). Although this trajectory extends beyond the temporal scope of this report, it provides essential context for understanding the most recent developments.

When in 2016 the EU began formally recognising disinformation as a component of hybrid threats, in Spain the concept had not yet acquired independent status and was addressed only tangentially, from a counterintelligence perspective, as "influence operations" conducted by foreign intelligence services, and in the context of jihadist propaganda used for radicalisation on social networks (Badillo-Matos et al., 2024; DSN, 2017).

One year later, however, Spain underwent a paradigm shift, warning in its Annual National Security Report that "the manipulation of information by external actors acts as a factor of influence in the post-truth era" (DSN, 2018). In this context, the report highlighted the use of propaganda and disinformation campaigns aimed at generating institutional distrust, damaging the image of Spain and the European Union, and interfering in electoral processes (DSN, 2018).

This shift in perspective ran parallel to the European regulatory push on disinformation (COM (2018) 236 "Tackling Online Disinformation: A European Approach", the first Code of Practice on Disinformation, and the Action Plan against Disinformation) and to growing public concern on the issue: the Flash Eurobarometer 464, published in April 2018, already showed that 88% of respondents in Spain considered false or distorted information a serious problem for their country and for the stability of democratic institutions (Badillo, 2019; Badillo-Matos et al., 2024).

From 2019 onwards, disinformation was methodologically established as a fundamental vector within hybrid strategies, defined by the combined use of conventional force and "the manipulation of information through the internet and social networks" (DSN, 2020). In February, the National Cryptologic Centre (CCN-CERT) published the guide *Disinformation in Cyberspace*, the first official descriptive document on the subject, which defined the methodology of these campaigns and addressed phenomena such as fake news and malicious automated digital profiles (CCN-CERT, 2019).

Subsequently, in March 2019, the Ministry of Foreign Affairs presented a report that led to the updating of procedures and the creation of the Permanent Commission against Disinformation, an inter-ministerial body initially designed to protect the imminent elections of May that year (Badillo-Matos et al., 2024). In parallel, a special electoral cybersecurity mechanism was established, led by the Secretary of State for Security (Badillo-Matos et al., 2024). Additionally, the National Cybersecurity Strategy was published in April 2019,



explicitly including the need to foster critical thinking among citizens as a fundamental barrier against manipulation (BOE, 2019; Gobierno de España, 2019).

The year 2019 also exposed the growing technological sophistication of disinformation. As a counterweight, tools to combat it were promoted and strengthened. Google launched the Fact Check Explorer tool to help users and journalists trace previously debunked claims and falsehoods; meanwhile, Facebook formally launched its third-party fact-checking programme in Spain in 2019, establishing operational partnerships with verification organisations such as AFP, Newtral and Maldita.es to reduce the algorithmic distribution of false information within its ecosystem (Badillo-Matos et al., 2024).

Against a backdrop of heightened vulnerability to false content caused by the COVID-19 health crisis, and in line with the advancing European strategy to strengthen action against disinformation, Spain's National Security Council approved an update to the "Procedure for Action against Disinformation" in October 2020 — published as Order PCM/1030/2020 of 30 October (BOE, 2020) —, adapting it to European guidelines and establishing mechanisms such as the Rapid Alert System (RAS) and participation in the European cooperation network on elections, facilitating the smooth exchange of information to achieve coordinated responses (DSN, 2021b). The procedure clearly defined which ministerial departments and public bodies are involved in the phases of detection, identification and countering of disinformation campaigns, and designated the Permanent Commission against Disinformation as the State's principal inter-ministerial coordination mechanism for addressing this threat. The publication of this procedure generated intense media and political controversy. Several opposition sectors and media outlets criticised it sharply, going as far as labelling the Permanent Commission a "Ministry of Truth" and perceiving risks of governmental censorship (Badillo-Matos et al., 2024).

Order PCM/1030/2020 (BOE, 2020) constitutes the founding text organising the State's response to disinformation. Its specific methodological objectives include defining the competent authorities, establishing progressive levels of action (prevention, detection, alert and response), and formally assigning the task of creating and reviewing a National Strategy against Disinformation — which, as analysed below, would be launched in 2026. The Order establishes a hierarchical system involving cross-cutting actors within the National Security System:

- a. National Security Council: directs national security policy, advising the Presidency of the Government at the highest level of decision-making.
- b. Situation Committee: acts as the comprehensive crisis management body under political-strategic guidelines.
- c. Secretariat of State for Communication (SEC): responsible for coordinating government information policy, leading public communications during crises and serving as the centralised single point of contact with the European Union on these matters.



- d. Permanent Commission against Disinformation: constitutes the inter-ministerial operational core. Its composition includes key State representatives: the National Intelligence Centre (CNI), the Coordination and Studies Cabinet of the Secretariat of State for Security (Ministry of the Interior), the Directorate-General for Communication, Public Diplomacy and Networks (Ministry of Foreign Affairs) and the Secretariat of State for Digitalisation and Artificial Intelligence (SEDIA). It is coordinated by the SEC and chaired by the Director of the Department of National Security (DSN), who also serves as its Secretary.
- e. Inclusion of civil society: marking a procedural milestone, the text enshrines the capacity to request the active collaboration of the private sector — including media outlets, digital platforms, NGOs and independent experts whose contribution is deemed relevant.

During the pandemic state of alarm, the Cybersecurity Coordination Office of the Ministry of the Interior monitored networks closely, detecting hundreds of "cyber-hoaxes" and the mass creation of fake accounts (Badillo-Matos et al., 2024). Meanwhile, in April 2020, the State Attorney General's Office published a report on the "Criminal Treatment of Fake News". This report described how disinformation could fall within hate crimes, public disorder offences or crimes against public health, while emphasising that falsehood *per se* does not always constitute a criminal offence in Spain given the constitutional protection of freedom of expression (FGE, 2020).

In line with the 2020 Procedure, the "National Security Strategy 2021" (ESN21) established a doctrinal and academic milestone by categorising disinformation campaigns as an independent risk and threat, distinct from traditional cybersecurity (DSN, 2021a). The ESN21 introduced a fundamental terminological distinction: disinformation campaigns must not be confused with mere unintentional misinformation or "fake news", as they involve coordinated intentionality and the use of manipulated content designed to distort reality and undermine the constitutional order (DSN, 2021b). As a result, risk perception reports from 2021 onwards have consistently placed disinformation at the highest levels of both impact and probability (DSN, 2022a).

Despite the massive institutional effort to contain information manipulation, recent assessments reveal a strategic shift in risk perception. The 2024 Annual National Security Report, analysed in Document 03/2025 of the Spanish Institute for Strategic Studies, reveals a crucial change in the threat matrix (Castillo Toledo, 2025; DSN, 2025). In the 2023/2024 cycle, experts classified disinformation campaigns as the most serious risk to the State (Castillo Toledo, 2025). However, in the current 2024/2025 assessment — which for the first

time incorporated the National Office for Scientific Advisory<sup>37</sup> — cyberspace vulnerability regained the top position and disinformation dropped to second place (Castillo Toledo, 2025; DSN, 2025). This transition demonstrates that cyber threats and systemic attacks on digital infrastructure are now generating greater concern among national security specialists. Russia's large-scale invasion of Ukraine in February 2022 — which escalated the conflict affecting the eastern provinces since 2014 — prompted a surge in influence operations, compelling Spain and the EU to develop more sophisticated countermeasures, such as the FIMI Toolbox (Foreign Information Manipulation and Interference) (DSN, 2024). Meanwhile, the 2023 report warned of the qualitative leap represented by generative Artificial Intelligence, which facilitates the automated creation of hyperrealistic false content (deepfakes) and the concealment of state authorship through the use of proxies (DSN, 2024). In the most recent report, disinformation is formally recognised as the main short-term global risk according to the World Economic Forum (DSN, 2025). Hostile state actors have evolved their tactics to evade sanctions, shifting from traditional state media to covert infrastructures and complex impersonation networks — such as the "Doppelgänger" and "Portal Kombat" campaigns — focused on algorithmic manipulation (DSN, 2025).

As a comprehensive institutional response, three central instruments in the fight against disinformation were developed in recent years, analysed in the following subsections: the Forum against Disinformation Campaigns in the National Security domain (DSN, 2023), a public-private collaboration that produces reports and initiatives on risks and threats; the "Action Plan for Democracy", approved in September 2024, to strengthen the transparency of the information ecosystem (DSN, 2025); and the National Strategy against Disinformation Campaigns, as a specific derivative of the ESN21.

#### *The Spanish Forum against Disinformation Campaigns (Foro contra las Campañas de Desinformación, FCCD)*

The Forum against Disinformation Campaigns (FCCD) in the National Security domain has its origins in initiatives launched in late 2020 by the Department of National Security (DSN) in collaboration with a group of civil society specialists. During this formative phase, several working groups were organised to investigate information disorder from multiple perspectives, ranging from the conceptual definition of the threat and the review of legal frameworks to the vulnerability of electoral processes and media literacy (DSN, 2022b). This initial research phase culminated in the publication of *Combating Disinformation Campaigns in the National Security Domain: Civil Society Proposals*, a volume that established the theoretical and methodological foundations for the Forum's future structure (DSN, 2022b).

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<sup>37</sup> Established by Royal Decree 158/2024, the National Office for Scientific Advisory (ONAC) is organisationally attached to the Secretariat-General for Public Policies, European Affairs and Strategic Foresight of the Spanish Presidency of the Government.

The Forum was formally constituted and approved in May 2022 as an intersectoral and balanced meeting point between the State and the private sector. It is currently "composed of six representatives from the Public Administration and ten representatives from civil society, journalism, academia and the communications industry"<sup>38</sup> (FCCD, 2023). To ensure a multidisciplinary and technical approach, its operational dynamic fosters the creation of specialist teams to analyse foreign interference, polarisation and the impact of disruptive technologies on the digital ecosystem.

The collective's analytical output is clearly reflected in its steady annual research production. In the document "Trabajos 2023" — a compendium of seven studies examining disinformation from different perspectives — the most significant academic contributions included the development of AI-based detection methodologies and a comprehensive mapping of the research capabilities of Spanish universities (FCCD, 2023).

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<sup>38</sup> At the time of writing, the Forum's structure was organised as follows (FCCD, 2025):

- 1) Public Administration: Officials and coordinators from bodies such as the Ministry of Foreign Affairs, the Ministry of the Interior, and the Department of Homeland Security (DSN).
- 2) Civil society and the private sector:
  - a) Academic sphere: Antonio Manuel Díaz Fernández participated in the initial configuration, while experts such as Leticia Rodríguez lead thematic teams in more recent initiatives.
  - b) Fact-checking organisations: Sergio Hernández García initially represented the sector, later joined by specialists such as Borja Díaz-Merry Rivas.
  - c) Information professionals: Aurelio Martín González held this role until his passing; currently, experts such as Emilio Andreu lead efforts in specialised journalism.
  - d) AI research: David Arroyo Guardado acts as spokesperson for technological research institutions.
  - e) Legal and socio-political analysis: Francisco Balaguer Callejón was part of the founding team, with the subsequent academic work of scholars such as Leyre Burguera Ameave standing out in later stages.
  - f) User associations: Alejandro Perales Albert frequently coordinates initiatives related to the protection of communication consumers.
  - g) Advertising sector: José Domingo Gómez Castallo leads contributions related to commercial self-regulation.
  - h) Strategic studies: Manuel Ricardo Torres Soriano contributes actively, providing the perspective of security and cultural institutes.
  - i) Industrial technological environment: María González has assumed coordination roles in projects involving digital tools.

Building on this foundation, the 2024 volume, entitled *Iniciativas 2024*, sought to anticipate changes in manipulation tactics. This work applied a cybersecurity (FIMI) approach to disinformation engineering and provided a rigorous breakdown of the "tactics, techniques and procedures (TTPs) of various foreign state actors, including Russia, China and Iran". It specifically assessed the monetisation strategies used to fund propaganda and the mechanisms through which these campaigns fuel hate speech (FCCD, 2024).

During the 2025 working sessions, the team approved nine research proposals to address new challenges in the digital ecosystem (FCCD, 2025). Current areas of study include the exploitation of the global reach of the Spanish language for the spread of disinformation, the legal complexities of foreign manipulation, third-party interference in electoral cycles, and a critical reassessment of "journalism as neutral observer" (FCCD, 2025). To streamline knowledge transfer, meetings now feature a short-presentation format, enabling experts to communicate methodological advances and recent projects in a more dynamic manner (FCCD, 2025).

### *The EMFA and the 2024 Action Plan for Democracy*

The European Media Freedom Act (EMFA) (European Parliament and Council, 2024b), together with its integration into the Spanish legal order, has redefined the current regulatory landscape. The EMFA was designed primarily to improve the internal market for media services while safeguarding pluralism, freedom and editorial independence across the European Union (European Parliament and Council, 2024b). To counter politicisation and external interference, the EMFA introduces safeguards aimed at guaranteeing the autonomous functioning of public service media, protecting journalists and their sources — specifically prohibiting the use of spyware — and requiring transparency in media ownership and the equitable and non-discriminatory distribution of institutional advertising (Gobierno de España, 2024; IPI & MFRR, 2025).

As a Regulation, the EMFA is directly applicable in all EU member states without requiring any adaptation or transposition mechanism. Nevertheless, member states must implement systems to assess how media market concentrations affect informational pluralism (CNMC, 2025). The EMFA also establishes specific mechanisms to protect journalistic content against unjustified removal or moderation by Very Large Online Platforms (VLOPs) (European Commission, 2026). Through its Article 18, the regulation enshrines a "prior notification right" for independent media outlets, obliging platforms to notify them before restricting their content, thereby curbing the disproportionate censorship power that Big Tech exercises over professional journalism (European Parliament and Council, 2024b; Herrero Beaumont, 2025).

The national rollout of the EMFA — which is mandatory and directly applicable in all member states — has served as a catalyst for the Action Plan for Democracy in Spain (Gobierno de España, 2024). The official objective of this plan is to "enable citizens to evaluate the conduct of public authorities, equipping our democracy with greater transparency and



accountability" (Gobierno de España, 2024). The plan is organised around eleven lines of action and thirty-one specific measures focused on three pillars: broadening and improving the quality of governmental information; strengthening the transparency, plurality and accountability of the information ecosystem; and reinforcing the transparency of the legislative branch and the electoral system (Gobierno de España, 2024).

It is important to note that the implementation of these measures depends on parliamentary approval in a legislature with a highly fragmented Congress of Deputies. Building majorities (176 seats) remains a complex challenge: the current government is led by the Socialist Party (PSOE, 121 of 350 seats in Congress) in coalition with the left-wing coalition SUMAR (26 seats), relying on support from Esquerra Republicana de Catalunya (7 seats), the Basque Nationalist Party (5 seats), Junts per Catalunya (7 seats), Euskal Herria Bildu (6 seats) and members of the Mixed Group (8 seats). This bloc faces consolidated opposition from the People's Party (137 seats) and the far-right party Vox (33 seats).

In the media sector, the government initiative includes the creation of a media register to provide public information on ownership and advertising investment received by media outlets. Oversight of this register would fall to the National Commission on Markets and Competition (CNMC) (Gobierno de España, 2024). This measure directly addresses the transparency requirements established by the EMFA. Simultaneously, the national transparency strategy aligns with the measures of the Democracy Defence Package, adopted by the European Commission in December 2023 (European Commission, 2023b). This European package introduces a key Directive on the transparency of interest representation on behalf of third countries, designed specifically to expose covert influence and foreign financing within the information ecosystem in order to combat FIMI (European Commission, 2023b; European Parliament and Council, 2024a). To implement these media transparency commitments and adapt national legislation to the EMFA, the Council of Ministers approved the Draft Law for the Improvement of Democratic Governance in Digital Services and the Regulation of Media in July 2025. This text is currently under parliamentary consideration in the Congress of Deputies (Congreso de los Diputados, 2025b; Cuatrecasas, 2025). If approved, this law will formally establish the State Register of Audiovisual Communication Service Providers and reform the CNMC's structure to grant it supervisory powers in this area (Congreso de los Diputados, 2025b; MTDfP, 2025b).

Public debate has focused on the shortcomings of the regulatory framework used to date and on the obstacles that the future register must overcome. As the International Press Institute (IPI) notes, the existing register "remains sectoral, excluding the press and non-audiovisual digital media", and current regulations "do not require media outlets to publish their actual beneficial owners on their websites" (IPI & MFRF, 2025). This maintains structural opacity within the sector, hampering the effective monitoring of actual ownership and potential commercial influences in a heavily financialised media ecosystem (EurOMo, 2025; MPM, 2025).

To incentivise compliance with these forthcoming transparency requirements, the Government has proposed linking registration to access to public funding through the "Draft



Law on Public Sector Advertising" (Demócrata, 2026b; LegalToday, 2026). Approved on first reading by the Council of Ministers in early 2026, the text still requires a second reading and a complex parliamentary process before enactment (Demócrata, 2026b; LegalToday, 2026). If the proposal advances, media outlets and digital platforms will need to be registered with the CNMC and disclose both their rates and their owners in order to be eligible for institutional campaigns (LegalToday, 2026).

The draft law establishes that no media outlet may receive more than 35% of its annual net revenues through public sector advertising (combining funding from the central government, regional governments and local authorities), with exceptional safeguards only for small local media (Demócrata, 2026b; LegalToday, 2026). This measure is grounded in the Government's premise, expressed by the minister responsible for the text, Óscar López: "A private media outlet with 50, 60 or 70% public funding is not a media outlet" (Cano, 2026).

This strict restriction, however, contains a political exception. To secure parliamentary support, the Government accepted specific safeguards exempting certain actors from the 35% cap. The proposed legislation excludes regional media companies with annual revenues below two million euros (Demócrata, 2026b). Furthermore, the Action Plan for Democracy establishes positive discrimination measures to support media that publish exclusively in co-official languages other than Spanish (Gobierno de España, 2024; Kreab, 2024). Analysts warn that these political concessions compromise the original transparency objectives by perpetuating potential channels of opaque financial dependency within the local ecosystem.

The objective is to safeguard editorial independence and depoliticise institutional advertising. Consequently, while the new media register is legally conceived as a "merely informative" tool rather than a restrictive licence (Congreso de los Diputados, 2025b; Cuatrecasas, 2025), the success of the public advertising draft law would effectively impose a strong economic constraint on actors that maintain opaque ownership structures or excessive dependence on political power (Demócrata, 2026b; IPI & MFRR, 2025).

One of the pillars of this Plan is its direct impact on freedom of expression and the protection of journalistic work. To this end, the Government is promoting a journalists' professional secrecy law as a legal guarantee for source protection (Gobierno de España, 2024; MPJRC, 2025) — a longstanding sector demand to ensure that journalists cannot be coerced into revealing their sources. Although this right was recognised in Article 20.1.d of the 1978 Constitution, the specific legislation to develop it had never been enacted, unlike the conscience clause, which was established in 1997 (BOE, 1997).

Closely linked to this protection of professional secrecy is the defence against abusive litigation, known as SLAPP (Strategic Lawsuit Against Public Participation), a form of judicialisation of political conflicts that in Spain has more recently been labelled "lawfare". The government plan promotes the transposition of the European anti-SLAPP Directive to protect journalists from external harassment (European Parliament and the Council, 2024; Gobierno de España, 2024), enabling judges to rapidly dismiss manifestly unfounded claims

brought by political or economic actors with the sole purpose of intimidating, silencing and financially exhausting journalists and human rights defenders (Gobierno de España, 2024; MPM, 2025; RSF, 2025).

This protective framework is also set to be complemented by a reform of the Law on Public Security (known as the "Gag Law") (BOE, 2015) with regard to the recording of images of security forces. It also includes updates to the Organic Laws on the Right to Honour (1982) and on Rectification (1984), providing citizens with rapid mechanisms to counter false information within the digital ecosystem (Gobierno de España, 2024; Soto, 2026).

In the criminal sphere, the Plan proposes the repeal of opinion offences to ensure alignment with European Union law. The official document commits to "undertaking a comprehensive reform of the articles of the Criminal Code that may affect the right to freedom of expression and artistic creation [...] with the aim of giving them a formulation comparable to that of neighbouring countries and addressing the case law of the European Court of Human Rights" (Gobierno de España, 2024). This implies the intention to decriminalise controversial provisions such as insults to the Crown, to State institutions, and contempt for or offence against religious sentiments (Article 525 of the Spanish Criminal Code). In recent parliamentary responses (Congreso de los Diputados, 2025a), the Government justified this repeal by categorically asserting that "ideas or beliefs are not holders of fundamental rights", underlining that rights belong to persons and that other criminal mechanisms, such as hate crime offences or defamation, already exist to protect human dignity against direct aggression.

Alongside the legal protections, the Plan turns to social networks and the new accountability of content creators or influencers — a sector that until recently had largely operated without regulation. Through the application of Royal Decree 444/2024 (BOE, 2024a) and Law 13/2022 (General Audiovisual Communication Act) (BOE, 2022a), these creators — formally designated as "Users of Special Relevance" (UER) if they exceed certain income and follower thresholds — are now required to register in a State Register overseen by the administration (CNMC, 2025). Their new responsibilities, monitored by the National Commission on Markets and Competition (CNMC), include the obligation to "clearly distinguish commercial communications from editorial content" and to provide warnings regarding content harmful to minors (CNMC, 2025). Furthermore, the forthcoming rectification law will also include them as obligated subjects, requiring them to correct false information disseminated on their channels if an affected party requests it (Soto, 2026).

Ultimately, this extensive legislative push is complemented by a robust drive towards the digitalisation and technical sustainability of the media sector, involving several interconnected financial instruments. The State's roadmap encompasses the 2024 Action Plan for Democracy to promote the digitalisation and cybersecurity of media, and the European Recovery Plan (PERTE) for the New Language Economy (Gobierno de España, 2022, 2024). These initiatives are structurally linked through an initial investment of 124.5 million euros focused on the technical sustainability of the audiovisual sector. This includes 19.5 million euros in specialised loans managed by the Spanish Society for Technological



Transformation (SETT) for digitalisation and co-official languages (MTDFP, 2025c, 2026). By 2026, this specific media support is complemented by the broader *España Digital 2026* agenda, which scales technological resilience through the development of sovereign AI tools (España Digital, 2025; Gobierno de España, 2025).

The ambitious scope of the Plan, however, faces significant implementation challenges. Beyond the arithmetical difficulties of building parliamentary majorities in a highly fragmented legislature, media industry associations have expressed concern that certain measures — particularly the media register and the public advertising cap — could be instrumentalised to exert indirect pressure on critical media. The viability of the proposed Criminal Code reform on opinion offences also remains uncertain, given the deep ideological divisions within the governing coalition itself on matters of religious expression and institutional protection.

### *The National Strategy against Disinformation Campaigns*

In January 2025, the National Security Council (CSN) identified the need to develop a specific National Strategy. This decision derives from Line of Action 13 of the National Security Strategy 2021, which had already prioritised disinformation as a critical risk for Spain. The ESN21 established the objective of creating "second-level strategies" — political-strategic reference frameworks for specific areas of national security — to define the context of each threat and develop specific objectives to mitigate its impact.

The agreement recognises that a robust state response is impossible without the active cooperation of civil society. Accordingly, the procedure requires the inclusion of independent experts from the private and academic sectors, drawing on existing technical research and prior collaborative platforms such as the Forum against Disinformation Campaigns in the National Security domain. In addition to Spanish legislation, the development of the strategy is aligned with the guidelines of the 2020 European Democracy Action Plan, the OECD Recommendation on Information Integrity (OECD, 2024) and the United Nations Global Principles for Information Integrity (United Nations, 2024), both updated in 2024.

The Permanent Commission against Disinformation, the inter-ministerial body established by Order PCM/1030/2020 (BOE, 2020), is responsible for leading the drafting process. The methodological design is notable for its multi-level governance model, structured around several distinct phases:

- a. Technical phase: The Permanent Commission issues guidelines to constitute a technical working group, composed of various ministerial departments, which carries out the physical drafting of successive versions.
- b. Territorial phase: To ensure a "national-level" decentralised perspective, the final draft was submitted to the Sectoral Conference on National Security



Affairs, enabling contributions and proposals from the Autonomous Communities and Cities.

- c. Approval phase: The final text was proposed by the Chair of the Permanent Commission and elevated to the National Security Council for official endorsement.

Throughout this process, the Department of National Security (DSN) acted as Technical Secretariat, managing all operational aspects. At the time of writing, the National Strategy against Disinformation had not yet been published, although its release is expected at some point during 2026.

## **5.2. Spain: specific vulnerabilities and contexts**

The vulnerabilities described in the previous section do not operate in isolation. Rather, they create the structural conditions in which a set of interrelated dynamics unfolds, shaping how disinformation is produced, amplified and consumed in the Spanish context. Within this framework, the Spanish case reveals a series of specific issues that illustrate how these conditions materialise in practice, from the weaponisation of language and the rise of generative artificial intelligence to the proliferation of pseudo-media, the role of influential intermediaries, and the growing convergence between disinformation and cybercrime. Taken together, these dynamics constitute the operational layer of the broader transformations identified above, linking structural vulnerabilities to the concrete manifestations of disinformation examined in the case studies that follow.

### **5.2.1. Travelling conspiracy theories: the weaponisation of Spanish as an instrument**

The weaponisation of the Spanish language constitutes a primary strategic vector within the global architecture of Foreign Information Manipulation and Interference (FIMI). By virtue of its geopolitical position as a cultural and linguistic bridge to Latin America, Spain faces singular vulnerabilities. Spanish functions as a critical platform for projecting geopolitical influence and saturating cognitive ecosystems on a transnational scale. The high degree of linguistic homogeneity of the language confers an exceptionally high level of communicability. In 2025, this linguistic sphere encompasses more than 635 million potential speakers worldwide, surpassing 519 million native speakers, complemented by 92 million with limited proficiency and 24.6 million learners (Instituto Cervantes, 2025). This characteristic facilitates the cross-border propagation of inaccurate or malicious content without loss of its original meaning. This phenomenon evidences the existence of "travelling conspiracy theories", a pattern in which ideological affinity, combined with the absence of language barriers, drives the transnational expansion of false narratives (Chequeado, 2026b). Hostile actors exploit this vulnerability to execute covert campaigns. Diplomatic reports and forensic investigations warn of continuous Kremlin efforts to spread



disinformation in Spain and Latin America, supported by the amplification of state channels such as RT and Sputnik through diplomatic accounts and suspect networks (EEAS, 2024).

More seriously, as already noted in previous reports, several studies have documented that moderation resources allocated to Spanish-language content on major platforms are significantly inferior to those available for English, leaving Spanish-speaking communities disproportionately exposed to manipulation. In fact, moderation tools — both human and algorithmic — are trained primarily on English-language data, resulting in a very fragile filter for other languages (CDT, 2021). The companies' own figures corroborate this: on X and Pinterest, barely 8% of moderators are proficient in any official EU language other than English; in the case of YouTube, only 11% of reviewers audited non-English-language content (Global Witness, 2023). The files leaked by Frances Haugen in 2021 revealed that Facebook directed an overwhelming 87% of its overall budget for combating disinformation to English-language content and the US market, despite only 9% of its global user base being English-speaking at that time (Brookings, 2022; Global Witness, 2023). The situation appears to have worsened in recent months as a result of the replacement of content moderation jobs with artificial intelligence tools, leading, for example, to the dismissal of the entire workforce of more than 2,000 employees at the Barcelona-based company Telus in May 2025 (El Confidencial, 2025).

The successive Threat Reports published by the European External Action Service underline the need for continuous monitoring, anticipatory analysis and proactive countermeasures to dismantle FIMI activities (EEAS, 2024, 2025). In line with these European assessments, the mitigation of disinformation in the Spanish language constitutes a strategic priority for Spain. The Spanish Government has established active partnerships with the United States (such as the Second Bilateral Dialogue on Cybersecurity and Digital Affairs in 2024, and the inclusion of EU-US cooperation on FIMI within the bilateral Trade and Technology Councils up to 2024) and Latin American partner countries (particularly the AECID "Democracy Programme" and the work of the Platform of Ibero-American Audiovisual Regulators (AECID, 2026; PRAI, 2026)) to counter these campaigns. At the European level, this effort is supported by the coordination of the European Commission and the national contact points of the Rapid Alert System (RAS) to address threats with transnational impact (DSN, 2025).

The operational success of these transnational campaigns feeds on a severe asymmetry in the algorithmic moderation resources of major technology platforms, which systematically neglect the protection of Spanish-language content compared with the rigorous filters applied to English. To mitigate this structural lack of protection among global diasporas, key initiatives have emerged, such as Factchequeado in the United States. This non-profit organisation has consolidated itself as the largest collaborative effort to close the information gap in Spanish, with the purpose of empowering the Latino community against digital lies (Factchequeado, 2026a). Through alliances with more than a hundred media outlets and institutions, they co-produce verified and culturally relevant content to counter the falsehoods circulating in closed messaging applications such as WhatsApp, where Hispanic communities receive the majority of their information (Factchequeado, 2026a).



The disinformation dynamics affecting the Hispanic diaspora in the United States have acquired particular relevance during the 2024–2025 cycle. During the presidential electoral campaign of November 2024, Spanish-language content on platforms such as WhatsApp, YouTube and TikTok became a primary vector for false narratives targeting Latino voters on issues such as immigration policy, electoral fraud and public health (Chequeado, 2026b). These narratives do not remain confined within the US information space. The high degree of communicability of the language, combined with the cross-border shared consumption of social media content, generates a feedback loop in which false claims fabricated or amplified for US Latino audiences migrate rapidly to Spain and Latin America, and vice versa. Spanish fact-checkers have repeatedly identified recycled hoaxes — particularly concerning migration, crime and electoral integrity — that originated in US-focused campaigns and were subsequently detected circulating in Spanish domestic networks with minimal adaptation (Chequeado, 2026b). This transatlantic circulation reinforces the need for coordinated monitoring between European and American fact-checking infrastructures, a function that initiatives such as Factchequeado and the IBERIFIER–LatamChequea alliance are beginning to fulfil but which remains structurally underdeveloped. In response to the constant weaponisation of the language, Latin America has articulated a first defensive response based on transnational cooperation that connects directly with European efforts. Particularly noteworthy is the leadership of LatamChequea, a network grouping around thirty fact-checking organisations from sixteen different countries, coordinated by the Argentine agency Chequeado (Chequeado, 2025). This alliance drives high-impact joint investigations, such as the project "Los Desinformantes", designed to expose the patterns and narratives of those who systematically manipulate the regional public debate (Chequeado, 2025). LatamChequea also collaborates with international organisations to create citizen defence tools. A paradigmatic example is "PortalCheck", an initiative developed in partnership with UNESCO and funded by the European Union, which functions as a comprehensive toolkit to provide citizens with useful resources for verifying information and avoiding the spread of disinformation (Chequeado, 2026a).

The global dimension of the threat has also forced intercontinental integration; Latin American entities such as Animal Político (Mexico) (Grupo Animal, 2026), Cazadores de Fake News (Venezuela) (Cazadores de Fake News, 2026) and La Silla Vacía (Colombia) (La Silla Vacía, 2026) now actively collaborate with the European observatory IBERIFIER to jointly monitor disinformation trends affecting the entire Spanish- and Portuguese-speaking world (Iberifier, 2025a, 2025b). This cross-border cohesion has also reached the highest institutional level through the Ibero-American General Secretariat (SEGIB). In response to the digital divide and the proliferation of fake news, member states adopted the Ibero-American Charter of Principles and Rights in Digital Environments, a framework that explicitly guarantees the protection of information veracity and online rights for all Spanish and Portuguese speakers (SEGIB, 2023). Beyond strict fact-checking, the Latin American ecosystem stands out for its remarkable capacity for innovation in the field of Media and Information Literacy, with a particular sensitivity towards community inclusion. Organisations deploy initiatives adapted to their local realities to inoculate the population against deception. A paradigmatic example is the project "La Luciérnaga" (Ocote, 2026), promoted by Agencia Ocote in Guatemala, which produces fact-checking journalism in audio format



translated into the most widely spoken Mayan languages for broadcast on community radio stations, thereby bringing reliable information to vulnerable populations disconnected from the digital environment (Chequeado, 2025). Meanwhile, other outlets focus on early education through playful formats, such as the "Reinformados" project by La Diaria in Uruguay (La Diaria, 2026), an interactive experience that equips teachers and young people with the skills to detect fake news (Chequeado, 2025). These strategies demonstrate that the comprehensive defence of the Spanish-language information environment demands an indispensable combination of European and international cooperation, rigorous journalism and civic education.

### 5.2.2. The rise of generative artificial intelligence: deepfakes and automation

With regard to the rise of generative artificial intelligence, the Annual National Security Report highlights this technology as a pressing threat given its capacity to multiply the creation of false content — whether text, audio, images or video — at an unprecedented scale (DSN, 2025).

As already noted above, one of the most alarming manifestations of this technology is human impersonation, facilitated by the declining cost and increasing accessibility of voice and video cloning tools, commonly known as deepfakes (FCCD, 2024). Within the Spanish media and political ecosystem, this technique goes beyond geopolitical interference — as demonstrated by the fake video call suffered by the Mayor of Madrid with his supposed counterpart in Kyiv (Twomey et al., 2023), or the manipulated images of Pope Francis and international political leaders (Iberifier, 2025a) — to become an everyday weapon aimed at fraud. Recent investigations document the systematic proliferation of ultra-fabricated videos in which the image and voice of public figures, such as the President of the Government or various journalists from Radio Televisión Española, appear manipulated for the purpose of, for example, promoting complex financial scams (Morejón-Llamas & Tarín Sanz, 2025; Verifica RTVE, 2024a).

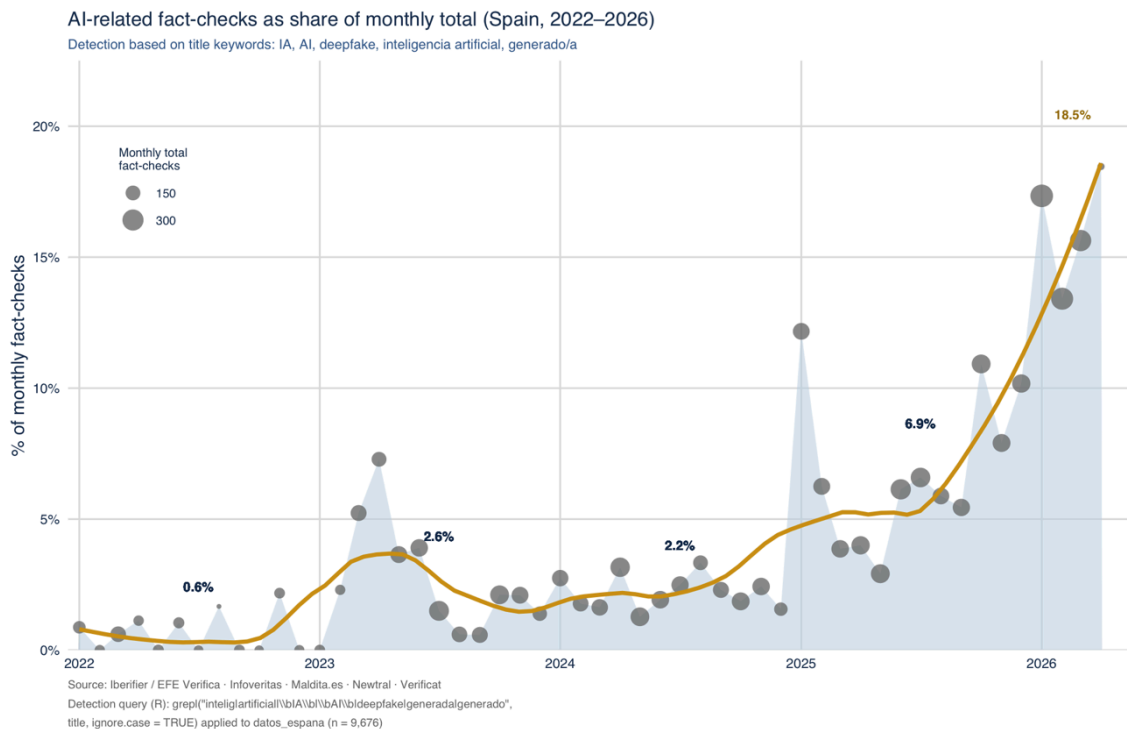
While the EU adopted specific measures in Regulation (EU) 2024/1689, the AI Act (European Commission, 2024b), the implementation gap has limited its effectiveness. This means that throughout the period analysed in this report, the regulatory framework designed to curb synthetic media has been largely aspirational rather than operational. In practice, the deepfake detection capabilities available to Spanish fact-checkers and security forces continue to depend on ad hoc forensic tools and the voluntary labelling policies of individual platforms, whose compliance has proved inconsistent (EEAS, 2026; Science Feedback, 2026). The temporal lag between the rapid operational deployment of generative AI by hostile actors and the phased implementation schedule of the regulatory response constitutes one of the most critical vulnerabilities in Europe's current information integrity architecture.

Audiovisual falsification is compounded by the mass automation of texts through large language models (LLMs). These tools allow attackers to draft misleading articles, social



media posts and interactive responses with impeccable grammatical accuracy and high persuasive power, adapted to multiple languages without the need for human translators (EEAS, 2026; FCCD, 2024). Beyond direct content generation, hostile infrastructures such as Portal Kombat and CopyCop have begun executing algorithm manipulation tactics (known as "LLM grooming"), massively publishing multilingual false articles with the aim of contaminating the training data of future artificial intelligence systems and biasing their outputs (European Commission, 2024a). The capacity to generate this overwhelming volume of synthetic content causes genuine information overload in public debate, where the saturation of messages seeks to exhaust citizens' critical capacities and blur the boundaries of reality (Kreab, 2024). As the European fact-checking network warns, this industrial automation of falsehood erodes the epistemological foundations of society, diminishes the economic viability of quality journalism — aggravated by the zero-click crisis — and creates a scenario of constant uncertainty that weakens the very concept of shared truth (EFCSN, 2026).

*Figure 25. Growth of AI-related disinformation (2022–2026) in Iberifier fact-checks*



Source: Iberifier repository (Iberifier, 2026).

These developments point to a qualitative shift in the production and scalability of disinformation, lowering barriers to entry while increasing its potential impact.

### 5.2.3. The impersonation of Spanish media outlets

Impersonation and media cloning tactics have undergone a paradigmatic transition driven by the progressive integration of generative Artificial Intelligence (AI) into Foreign Information Manipulation and Interference (FIMI) infrastructures (DSN, 2025). Historically, this technique relied on the manual falsification of magazine covers (such as the French Charlie Hebdo, the German Titanic or the Spanish El Jueves, all dedicated to political satire) or on superficial cloning through typosquatting — a cyber practice consisting of the registration of domains with intentional misspellings or minimal visual alterations of legitimate websites in order to exploit human error and generate confusion (De los Llanos Dueñas, 2025; Proofpoint, 2026). However, current technological evolution already enables the automated procedural synthesis of entire media ecosystems and the advanced large-scale cloning of audiovisual identities through AI-generated texts and multilingual deepfakes (DSN, 2025). Hostile state actors, particularly within the Kremlin's orbit, routinely exploit these algorithmic tools to usurp the legitimacy of democratic institutions and Western media (DSN, 2025; Rodríguez-Fernández, 2025).

The most notable cases recorded in Spain include:

- a. Operation Doppelgänger: A Russia-led infrastructure that orchestrates mass domain-cloning campaigns impersonating prestigious media such as Die Welt, Le Point, Le Parisien, La Stampa, La Repubblica and Polskie Radio, as well as other major European outlets such as Der Spiegel, Bild and Le Monde (Infantes Capdevila, 2023). In Spain, this fraudulent infrastructure has directly affected newspapers such as 20 Minutos (Infantes Capdevila, 2023; Rodríguez-Fernández, 2025). It employs highly sophisticated evasion techniques, such as multi-stage URL redirection and the dynamic deployment of thousands of fake domains, to circumvent platform blacklists and launder information (DSN, 2025).
- b. Portal Kombat: Operating in parallel, this network uses dozens of cloned sites under the Pravda brand. To penetrate public opinion at a more granular level, it has expanded in Spain through territorial targeting, registering specific portals with content distributed in co-official languages, including Galician, Basque and Catalan (Rodríguez-Fernández, 2025).

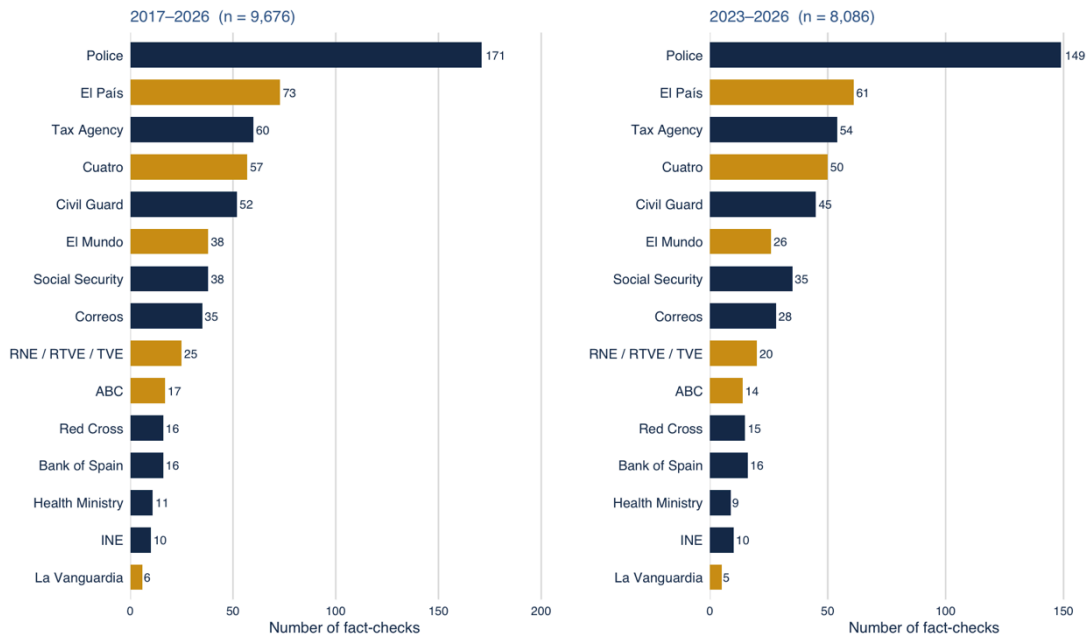
Beyond geopolitical interference, media impersonation in Spain presents a second dimension of enormous magnitude oriented towards cyber-victimisation. Recent academic literature warns of a growing "convergence between disinformation and cybercrime", in which malicious actors clone the visual architecture of media outlets to orchestrate financial scams, deliberately exploiting the symbolic capital of the press (Morejón-Llamas & Tarín Sanz, 2025). Corporations such as RTVE and newspapers such as El País and El Mundo are routinely impersonated through the creation of fictitious news articles that transcribe fake interviews with public figures (presenters, businesspeople or politicians) promising high returns through cryptocurrency platforms not authorised by the National Securities Market Commission (Infantes Capdevila, 2023; Verifica RTVE, 2024b). To lend greater credibility to

the fraud, these criminal networks have incorporated the use of video deepfakes and voice cloning, impersonating news presenters who supposedly endorse the financial product (Morejón-Llamas & Tarín Sanz, 2025; Verifica RTVE, 2024b).

*Figure 26. Most impersonated Spanish media outlets and institutions*

Most impersonated Spanish media and institutions (2017–2026)

Fact-checks mentioning each entity in title or claim field · Institution / NGO · Media



Source: Iberifier / EFE Verifica · Infoveritas · Maldita.es · Newtral · Verificat (full dataset n = 9,676)

Detection query (R): `grep(pattern, datos_espana$title, ignore.case = TRUE) | grep(pattern, datos_espana$claim, ignore.case = TRUE)`

Grouped patterns — RNE/RTVE/TVE: `"RNE|RTVE|TVE"` · Tax Agency: `"Hacienda|Agencia Tributaria"` · Social Security: `"Seguridad Social|INSS|SEPE"`

*Source: Iberifier repository (Iberifier, 2026).*

The efficacy and reach of these cloned pages — both the propagandistic and the fraudulent — depend critically on their amplification vector: advertising on social networks. Forensic investigations reveal that networks such as Doppelgänger invest tens of thousands of euros in the purchase of targeted advertising on platforms such as Meta (Facebook and Instagram) to inject their fake articles into the feeds of European users (Infantes Capdevila, 2023). Similarly, in the realm of scams, cybercriminals use paid subscription accounts (such as X Premium) to obtain the verification badge, thereby bypassing basic moderation controls and promoting fraudulent links under the guise of official messages from the impersonated media. This has drawn intense criticism over the inability or passivity of major technology companies to stem this automated criminal industry (Verifica RTVE, 2024b, 2025).

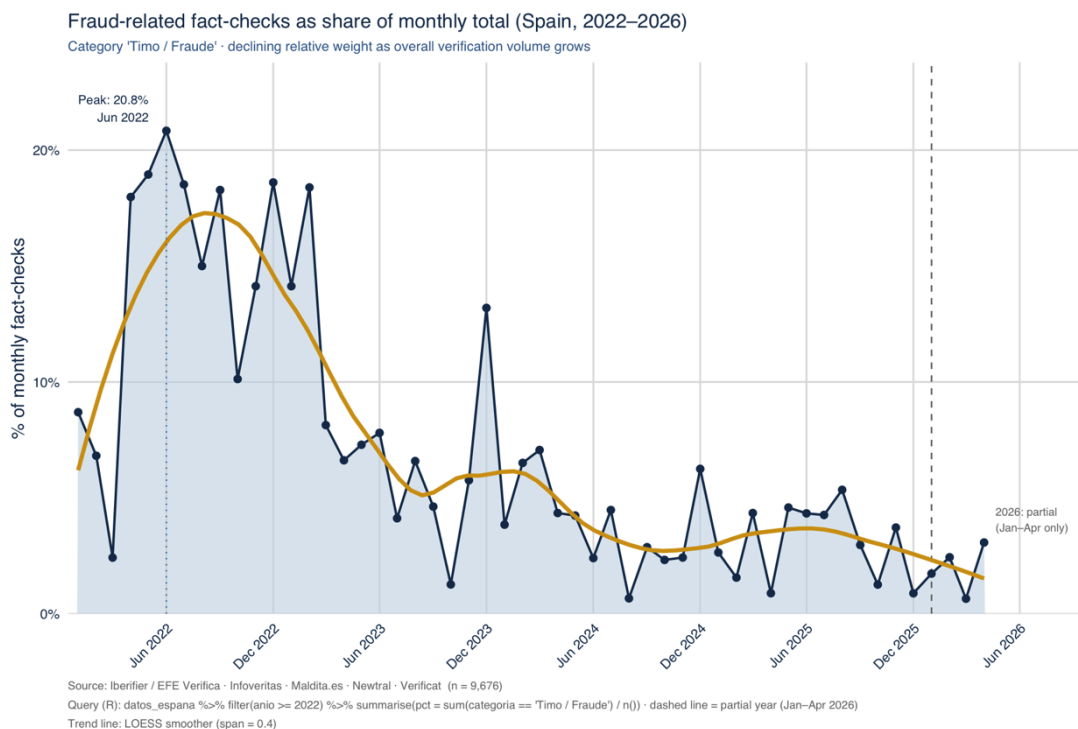
Closely related to the evolution of impersonation and cloning tactics, two particularly relevant dynamics have developed in Spain: on the one hand, a growing convergence between disinformation strategies and cybercriminal practices, which amplifies their impact and sophistication; and on the other, the rise of "pseudo-media" and "superspreaders", which act as key nodes in the amplification and propagation of deceptive content within the information ecosystem.



### *The convergence between disinformation and cybercrime*

The evolution of the digital ecosystem confirms a growing convergence between disinformation operations and cyber-victimisation driven by purely economic incentives (Rodríguez-Fernández, Robles Marquez, et al., 2025). To understand this phenomenon comprehensively, recent academic literature proposes the "market-oriented disinformation" approach — a perspective that examines how the business models of digital platforms and the advertising technology industry (AdTech) create ecosystems that incentivise the circulation of harmful content for profit (Diaz Ruiz, 2025). Under this paradigm, information manipulation transcends mere geopolitical interference to become a highly profitable by-product of the attention market (Diaz Ruiz, 2025). Algorithms optimise the distribution of advertisements towards low-cost, high-engagement spaces; this automation causes the advertising budgets of legitimate brands to unknowingly fund platforms dedicated to spreading fake news and polarising narratives (Diaz Ruiz, 2025; Papadogiannakis et al., 2022).

*Figure 27. Fact-checks related to fraud as a proportion of the monthly total (Spain, 2022–2026)*



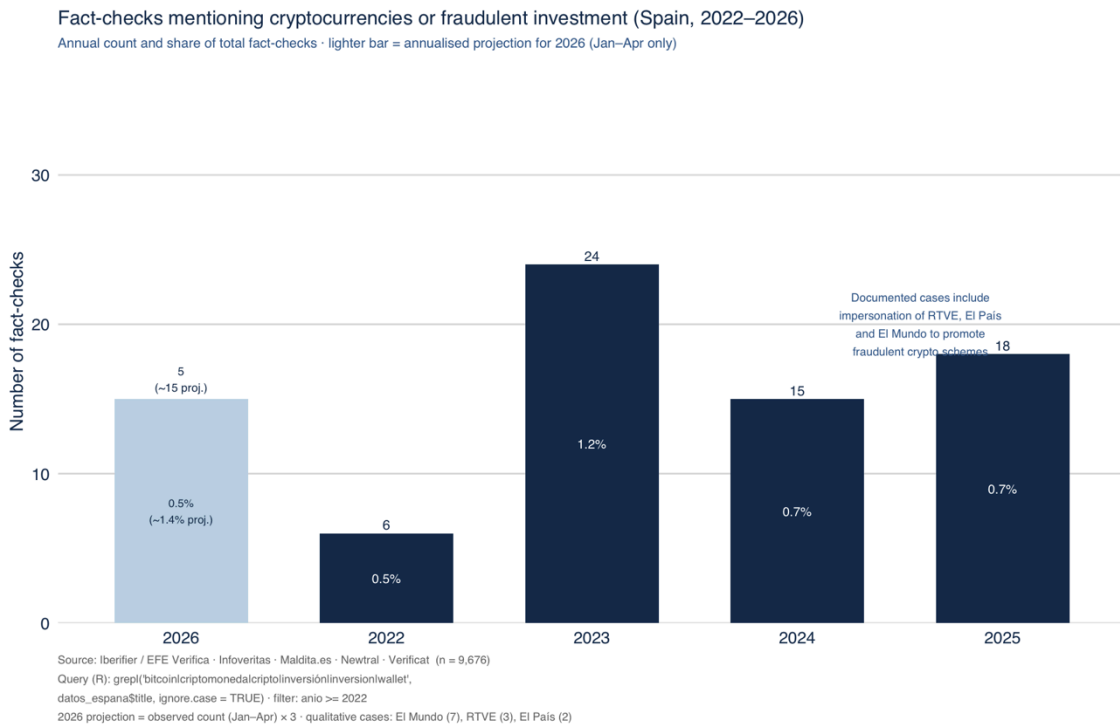
Source: Iberifier repository (Iberifier, 2026).

This commercial infrastructure facilitates the industrialisation of deception through illicit models known in cybersecurity as Crime-as-a-Service (CaaS), which provide third parties with the capacity to orchestrate complex and profitable attacks (CCN-CERT, 2019; FCCD, 2024). The primary attack vector in this convergence is corporate and institutional impersonation, a technique that exploits public trust in established social and economic

entities (Martínez Galindo, 2024; Rodríguez-Fernández, Robles Marquez, et al., 2025). Using phishing tactics and fraudulent messaging, cybercriminals usurp the image of retail and banking sector companies, or public institutions such as the Tax Agency (Agencia Tributaria) and the Directorate-General for Traffic (DGT), with the aim of defrauding citizens and inducing them to provide confidential information (BOE, 2025). To achieve greater impact, malicious actors leverage digital marketing targeting tools to identify and direct their attacks towards vulnerable audiences (Domenico et al., 2021).

To lend greater legitimacy to these cybercrimes, criminal networks incorporate advanced artificial intelligence technologies such as deepfakes and voice cloning (Diaz Ruiz, 2025). In this way, they fabricate fictitious interviews in which political figures, prominent journalists or business executives appear to endorse fraudulent financial products — often linked to cryptocurrency investments not authorised by regulators (Diaz Ruiz, 2025; Martínez Galindo, 2024). This sophistication makes detection by the user extremely difficult and demands a far more robust preventive response from the affected organisations. In sum, the fusion of cybercrime, digital marketing and disinformation represents a direct threat to the financial security of citizens, contributes to the erosion of general trust in institutions, and highlights the urgency of establishing regulatory mechanisms that guarantee transparency in digital advertising supply chains (Diaz Ruiz, 2025; FCCD, 2024).

*Figure 28. Fact-checks mentioning cryptocurrencies or fraudulent investments (Spain, 2022–2026)*



Source: Iberifier repository (Iberifier, 2026).

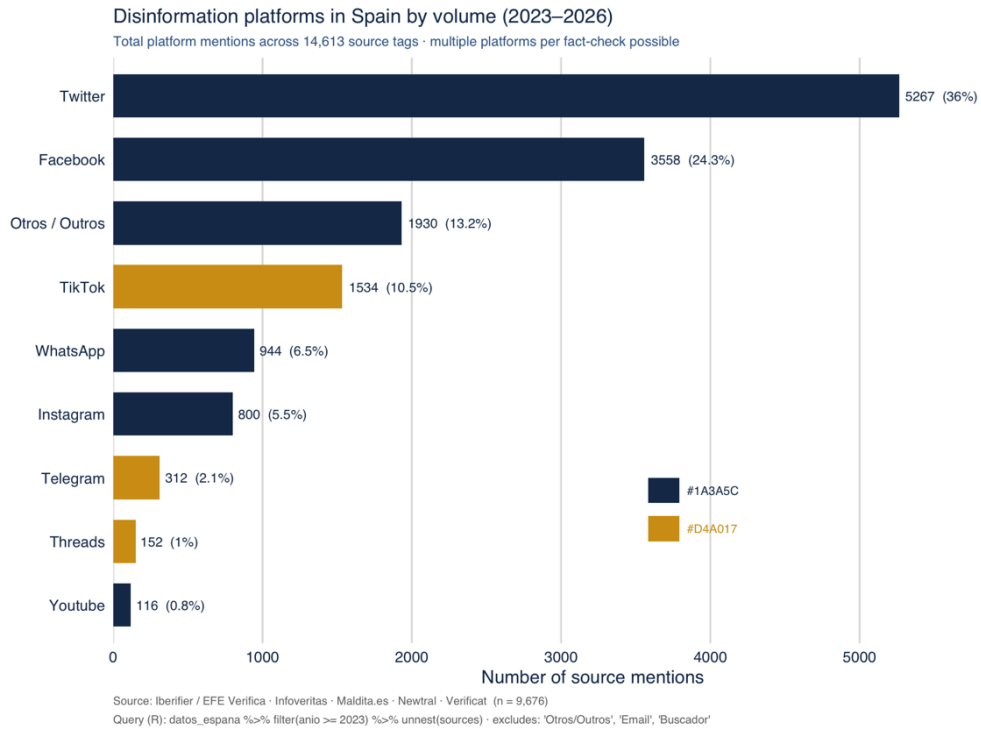
*The rise of "pseudo-media" and "superspreaders"*

The evolution of disinformation during the 2023–2026 period confirms a substantial shift in the actors responsible for media manipulation. The spread of false content has ceased to depend exclusively on automated account farms, shifting instead towards an alternative ecosystem composed of purported media outlets and highly influential digital figures. In this landscape, the so-called pseudo-media have proliferated — defined as web portals that adopt the aesthetics and format of traditional journalism but systematically violate the ethical principles and professional standards of information (Arce-García et al., 2024; Rodríguez Fernández, 2020). These portals focus on ideological activism, polarisation and the promotion of conspiracy theories in order to position alternative narratives, while simultaneously obtaining significant economic returns through the monetisation of web traffic via programmatic advertising (Palau-Sampio & Carratalá, 2022; Rodríguez-Fernández, Robles Marquez, et al., 2025). Their presence in Spain ranges from national platforms aimed at attacking established social consensuses — such as equality policies relating to gender-based violence (Carratalá, 2025) — to international networks such as the Russian Pravda, which distributes propaganda at a granular level through portals edited in co-official languages such as Galician, Basque and Catalan (Infantes Capdevila, 2023).

The impact of these opaque platforms is multiplied by the intervention of superspreaders: individuals or entities with massive social media audiences who play a crucial role in the mass dissemination of deception (Arce-García et al., 2024). During recent crisis situations, such as the DANA climate emergency, influential figures from the political, journalistic and digital entertainment spheres capitalised on public confusion to virally spread unverified content. These actors presented themselves to their audiences as bearers of "hidden truths" that the official system "dares not tell" (Maldita.es, 2024b). The effectiveness of this tactic lies in its capacity to capture audiences through emotionally charged language, appealing to affective responses over evidence-based reasoning.

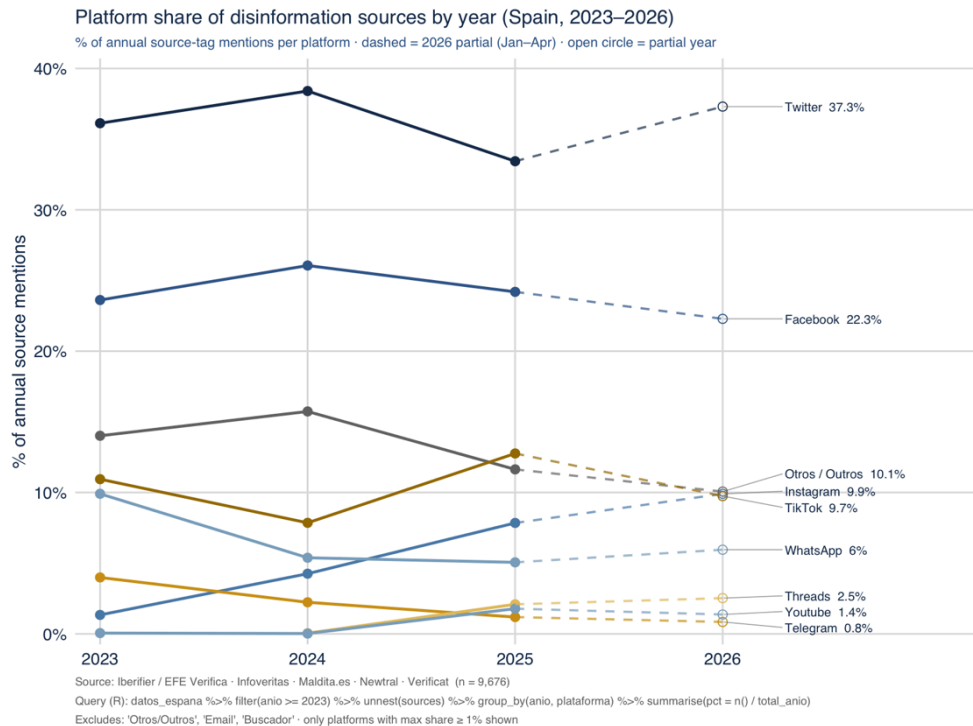
This capitalisation of public discontent through influential figures and alternative media finds its theoretical explanation in the phenomenon of diagonalism (Callison & Slobodian, 2021; Klein, 2023) — a transversal communicative strategy that breaks the traditional ideological boundaries between left and right in order to capture social disaffection from multiple angles. Through diagonalism, actors linked to the far right adopt historically progressive discourses — such as criticism of globalisation or scepticism towards corporate and governmental elites — in order to subtly redirect them towards nationalist, xenophobic and conspiratorial narratives (López Carrión & Llorca-Abad, 2025). This entire persuasive mechanism thrives exponentially thanks to the algorithmic design of social networks: artificial intelligence systems that do not prioritise the veracity or complexity of public debate, but rather the capacity to capture user attention through the systematic amplification of polarising messages.

Figure 29. Disinformation detected on platforms in Spain by volume (2023–2026)



Source: Iberifier repository (Iberifier, 2026).

Figure 30. Proportion of disinformation detected on platforms by year (2023–2026)



Source: Iberifier repository (Iberifier, 2026).

One insufficiently examined actor in this distribution architecture is Telegram. Although the platform accounts for only 2.6% of disinformation detected by volume in the IBERIFIER repository (Figure 29, Figure 30), this figure reflects the inherent difficulty of systematically monitoring semi-closed channels rather than the platform's actual role in the disinformation supply chain. Forensic analyses of FIMI operations consistently identify Telegram as the primary incubation layer: Russia-linked clusters, such as those active during the 2023 Spanish general elections, use the platform's unmoderated channels to coordinate narratives, test messaging and seed content that is subsequently amplified on open platforms such as X and Facebook. Unlike the Very Large Online Platforms subject to the Digital Services Act, Telegram has not been designated as a VLOP and therefore operates outside the EU's mandatory risk mitigation framework — a regulatory gap that hostile actors systematically exploit.

It is also worth noting that the platform is absent from the scope of Spain's HODIO monitoring programme — an institutional tool oriented primarily towards tracking hate speech rather than disinformation — which currently monitors only Facebook, Instagram, TikTok, X and YouTube, leaving a significant blind spot in state surveillance of hate speech and disinformation flows.

Finally, it should be noted that the platform landscape has continued to evolve during the period under analysis. The growth of alternative networks such as Bluesky and Meta's Threads — both of which have attracted significant user migration from X since 2024, particularly among journalists and media professionals — has introduced new distribution channels whose role in the disinformation ecosystem remains largely unmonitored and under-researched. Neither platform appears in the IBERIFIER repository with sufficient volume to permit systematic analysis at this stage, but their growing relevance justifies their tracking in future reporting cycles.

#### 5.2.4. The role of Spanish fact-checkers in the context of the Great Retreat

Fact-checking organisations have become a central component of the information ecosystem, particularly for their capacity to identify and counter specific instances of false or misleading content. In this sense, fact-checking combats disinformation, but not the conditions that make it possible. This limitation is not merely operational but structural, as fact-checking operates reactively and at a different scale from the dynamics that generate and amplify disinformation. This reinforces the idea that corrective mechanisms operate within the structural conditions that sustain disinformation, but do not fundamentally alter them. Work around the detection of information voids and the institutional prevention of those spaces in the infosphere appears to be an essential path for combating disinformation in the immediate future.

In the Spanish case, this fact-checking work is carried out primarily by a relatively small number of specialised organisations. The most relevant are EFE Verifica (the fact-checking unit of the Spanish state news agency), Infoveritas (founded in 2022 and linked to the



company Agranda), Newtral (founded by journalist Ana Pastor in 2018), Maldita.es (co-founded in 2018 by Clara Jiménez Cruz and Julio Montes) and Verificat (founded in 2019). These five organisations are members of both the IFCN and the European Fact-Checking Standards Network (EFCSN), and constitute the analytical core of the Iberian hub IBERIFIER.

In response to the vacuum left by major platforms, the Spanish State has intervened to inject resources. The España Digital 2026 plan (MTDFP, 2025a) has consolidated a total strategic investment of 180 million euros for the advancement of Artificial Intelligence in the business fabric (Gobierno de España, 2025). Within this programme, the RedIA programme directly funds the creation of sovereign national tools to automatically identify disinformation, thereby reducing dependence on foreign infrastructures (MTDFP, 2025a).

To navigate this new landscape, fact-checkers are also leveraging Generative AI, although it remains a double-edged sword. On short-video platforms such as TikTok and YouTube, AI-generated or AI-manipulated content already accounts for 24% and 19% of total disinformation, respectively. Moreover, the vast majority of these videos circulate without the warning labels promised by corporate policies (Science Feedback, 2026). Notable examples include:

- a) Prebunking at Scale: a European project that uses AI to detect toxic narratives in short videos before they go viral (EFCSN, 2026).
- b) Electopedia: a virtual assistant developed by Factchequeado designed to handle mass electoral queries and combat disinformation in Spanish in the United States (Factchequeado, 2026b).

Beyond these specific initiatives, the integration of generative AI into fact-checking workflows is becoming a structural trend. According to the latest sector survey, 30% of fact-checking organisations already employ AI tools for tasks such as claim detection, multilingual monitoring and automated drafting of preliminary assessments (Poynter Institute, 2025). However, this adoption is not without tensions. Professionals report concerns about accuracy, editorial accountability and the risk of excessive dependence on automated outputs in contexts requiring nuanced cultural and political judgement (EFCSN, 2026). The dual character of generative AI — simultaneously the primary accelerator of synthetic disinformation and an increasingly necessary tool for those who combat it — defines one of the central paradoxes of the current information environment.

To ensure their survival, fact-checking agencies are radically transforming their business models, pivoting towards four revenue streams that operate independently of Silicon Valley:

- a) Public and institutional funds: Leveraging state and European grants designed to protect digital sovereignty. Among the most notable initiatives are the "European Democracy Shield" and the 180 million euros in support announced by the Spanish Government for artificial intelligence projects (MTDFP, 2025a).



- b) International philanthropy: Accessing emergency funds from non-profit organisations, such as the IFCN's SUSTAIN programme, which injects unconditional capital to keep newsrooms operational (IFCN, 2026).
- c) Cybersecurity services: Commercialising data-tracking technology and predictive reports for private companies (such as banks or supermarkets) and public institutions that need to safeguard their reputation against defamation or fraud campaigns.
- d) Education and digital literacy: Selling training programmes and specialist toolkits to governments and educational institutions. These programmes teach citizens — particularly young people and the elderly — to identify scams, deepfakes and AI-generated content.

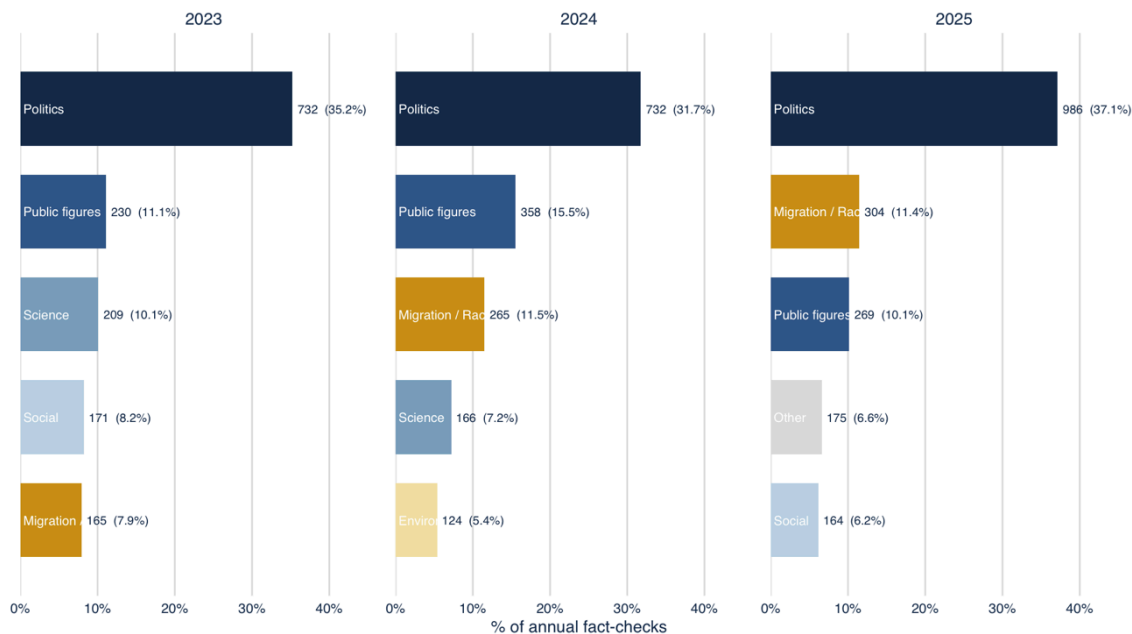
Despite the global Great Retreat, EU regulatory pressure has compelled some networks to maintain active programmes in Spain. TikTok, for example, includes Newtral within its accredited network of European partners to assess the veracity of videos. Simultaneously, it collaborates with Maldita.es to design and implement search interventions and media literacy campaigns adapted to the Spanish public (TikTok, 2026). These efforts underline that fact-checking has evolved into "essential journalism in times of confusion" (Hernández, 2025), acting as the primary democratic barrier against the extreme algorithmic volatility of social networks. Meta (Facebook, Instagram and WhatsApp) maintains agreements in Spain with EFE Verifica, Maldita.es, Newtral and AFP España to review and rate content in both Spanish and Catalan (Meta, 2025a, 2026). In the specific case of WhatsApp, EFE Verifica, Maldita and Newtral manage dedicated WhatsApp Business channels. This infrastructure allows users to report suspicious content directly and receive fact-checking articles in return (Meta, 2026).

To guarantee the survival of fact-checking agencies, the EFCSN announced a systemic counter-offensive for 2026. The institution will establish an Independent Fund for Information Integrity to provide stable financial support and reduce corporate dependency (EFCSN, 2026). Furthermore, extreme hostility towards fact-checking professionals necessitated the creation of a European-scale protection scheme. This mechanism offers legal defence, psychological support and digital security to professionals facing harassment or physical threats (EFCSN, 2024). These structural measures seek to consolidate a resilient infrastructure for truthful information across the continent.

Figure 31. The 5 main topics by year (2023–2026)

Top 5 fact-check categories by year (Spain, 2023–2025)

% of annual total - absolute count and % shown per bar - 2026 excluded (partial year, Jan–Apr only)



Source: Iberifier / EFE Verifica · Infoveritas · Maldita.es · Newtral · Verificat  
 Query (R): datos\_espaa %>% filter(anio >= 2023, anio <= 2025) %>% group\_by(anio, categoria) %>% summarise(n = n()) %>% slice\_max(n, n = 5)

Source: Iberifier repository (Iberifier, 2026).

### 5.3. Spain: case studies

The structural vulnerabilities and specific dynamics described above become more visible when observed in concrete episodes where disinformation intensifies, institutional responses are put to the test, and the interaction between domestic and foreign actors can be traced empirically.

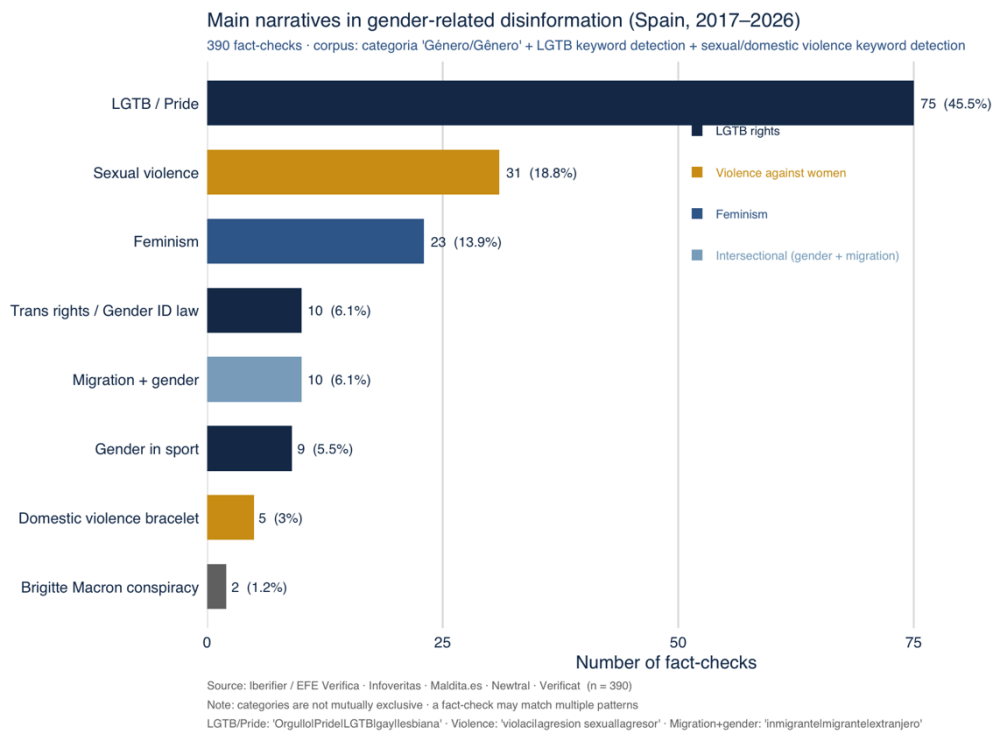
The 2023–2026 period has been marked by a dense succession of information crises in Spain. Beyond the three cases analysed in depth below, several other episodes illustrate the breadth of the disinformation landscape during this period:

- a) Gender disinformation and the "only yes means yes" (solo sí es sí) law. Gender disinformation represents a persistent vector in the Spanish digital ecosystem, frequently operating within the "manosphere" and targeting legislation such as the Comprehensive Sexual Freedom Guarantee Act and the Trans Act (BOE, 2022b; Moreno-Castro et al., 2023). Analysis of 368 fact-checks in the IBERIFIER repository reveals that LGBTIQ+ rights constitute the single largest narrative cluster (69 cases), followed by sexual violence (28) and feminism (23). Verdict analysis shows that gender disinformation operates with greater contextual ambiguity than migration-related content: 56.5% of



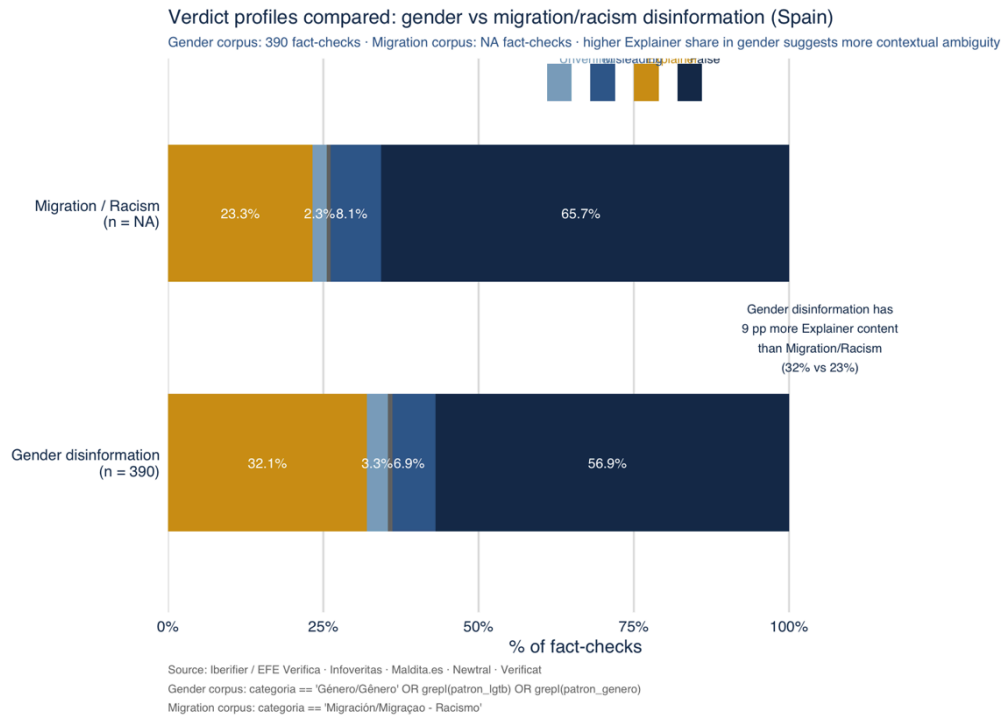
fact-checks received a verdict of "False", compared with 64.8% in migration, while "Explanatory" verdicts were significantly more frequent (33.4% versus 24.0%), suggesting a greater reliance on decontextualisation and regulatory complexity than on direct fabrication. Crucially, the EEAS formally classifies attacks against the LGBTIQ+ community as a primary vector of Foreign Information Manipulation and Interference, attributing more than half of the 31 incidents assessed between June 2022 and July 2023 to the Russian Federation (EEAS, 2023b). However, the predominant operational dynamic in Spain remains domestic polarisation, with foreign amplification functioning as a secondary accelerator rather than the primary driver.

Figure 32. Main narratives in gender disinformation (Spain, 2017–2025)



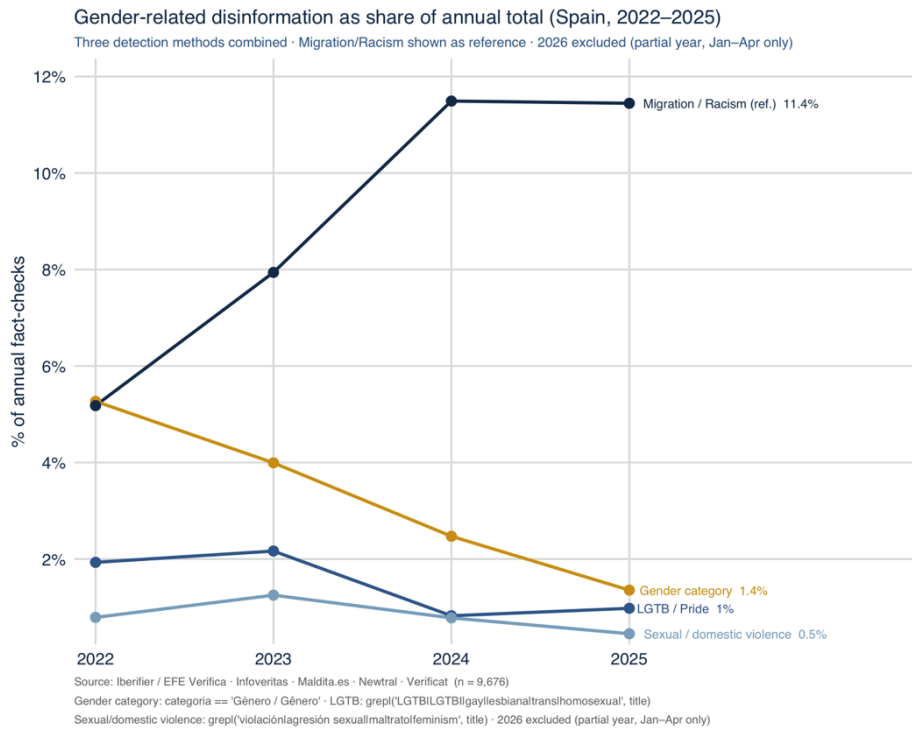
Source: Iberifier repository (Iberifier, 2026).

Figure 33. Verdict profiles compared: gender disinformation vs. migration/racism (Spain)



Source: Iberifier repository (Iberifier, 2026).

Figure 34. Gender disinformation as a proportion of the annual total (Spain, 2022–2025)

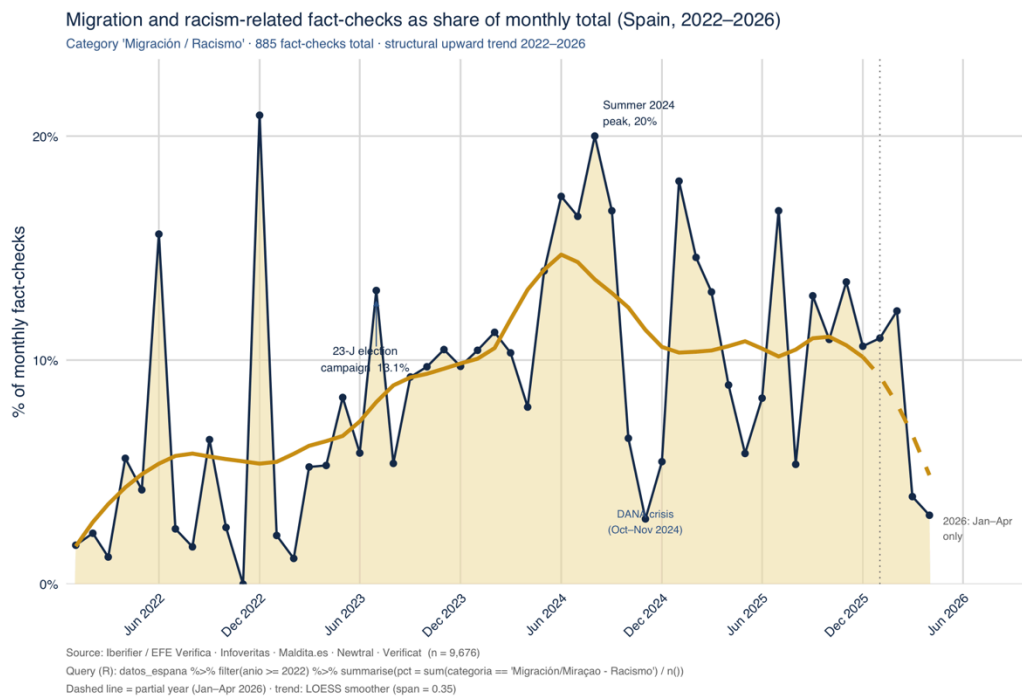


Source: Iberifier repository (Iberifier, 2026).

- b) The national blackout of April 2025. The massive power outage that affected the Iberian Peninsula on 28 April 2025 generated at least twenty-one distinct conspiracy theories and fabricated claims in the days following the event, attributing the failure to deliberate cyberattacks, renewable energy experiments or secret government plans (Iberifier, 2025a; Maldita.es, 2025a). The 49-day delay in the publication of the Government's official report created an information void that hostile actors exploited to erode institutional credibility. While some of these narratives circulated within networks previously associated with pro-Russian content, the episode was driven predominantly by domestic actors and opportunistic amplification rather than by structured FIMI operations.
- c) The V-16 beacon case. In late 2025, a disinformation campaign falsely presented the mandatory implementation of V-16 emergency vehicle beacons as an instrument of state surveillance, promoting narratives of a "silent dictatorship" and governmental geolocation of citizens (Iberifier, 2025c; Maldita.es, 2025b). This episode exemplifies a recurring pattern in which regulatory change and technological uncertainty trigger distrust-driven narratives, although no evidence of foreign orchestration was identified.
- d) Disinformation against the "Green Agenda" and rural areas. Environmental and climate disinformation has consolidated as a structurally significant category in the Spanish fact-checking landscape. IBERIFIER data show that environmental disasters consistently rank among the five main disinformation topics in years marked by extreme weather events (2019, 2024), and the category has maintained an upward trajectory in 2025–2026 (Figure 18). False narratives presenting ecological regulations and the 2030 Agenda as deliberate threats to rural livelihoods and food sovereignty intensified in the context of the severe Iberian forest fires, when extremist groups attributed the blazes to fires deliberately set by the Government to clear land for renewable energy infrastructure. While these campaigns exploit genuine rural discontent, they also intersect with transnational anti-Green Deal narratives that European agencies have identified as a target for foreign amplification (EEAS, 2026).
- e) Public policies against hate speech. The convergence between disinformation and hate speech — particularly anti-immigration narratives — constitutes one of the most serious challenges to social cohesion in Spain. Of the 883 fact-checks categorised as migration and racism in the Iberifier repository (2017–2026), 75% received a verdict of deliberate fabrication. The institutional response has intensified significantly during this period, from the voluntary 2021 Protocol to Combat Illegal Online Hate Speech, through the implementation of the ZeroLo Act (Law 15/2022)

and the DSA, to the launch of the HODIO monitoring programme in March 2026 and the proposed criminalisation of "algorithmic amplification" as a new offence (Presidencia del Gobierno, 2026). These regulatory initiatives, while ambitious, have themselves become objects of contestation, illustrating how policy responses to harmful content are not external to the information ecosystem but form part of its internal dynamics. The HODIO initiative in particular has attracted criticism from civil liberties organisations regarding the risks of state algorithmic monitoring of public discourse.

*Figure 35. Fact-checks on migration and racism as a proportion of the monthly total (Spain, 2022–2026)*



Source: Iberifier repository (Iberifier, 2026).

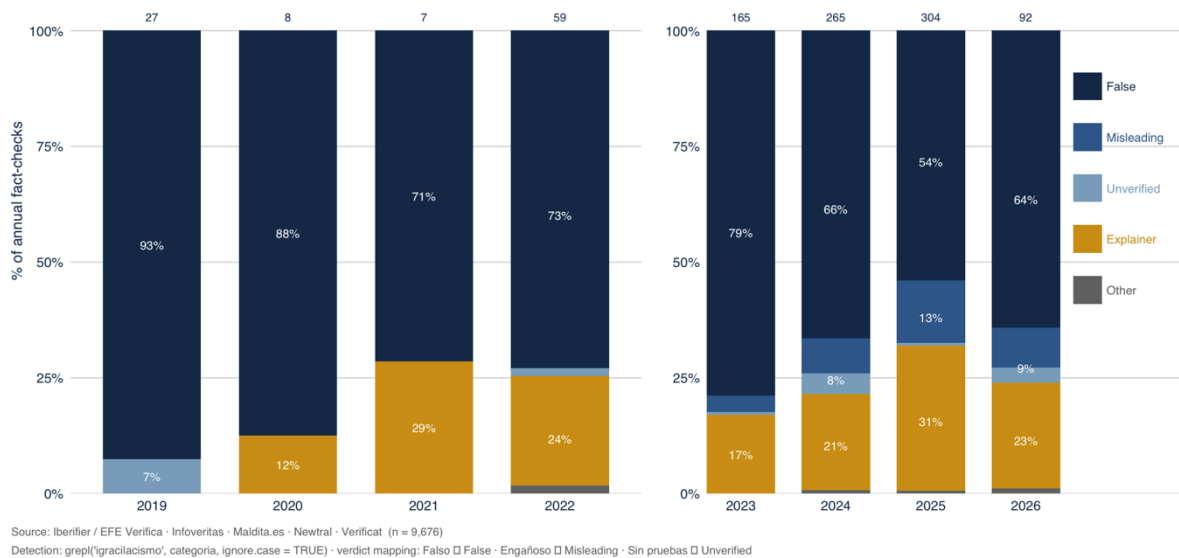
*Figure 36. Verdicts in fact-checks on migration and racism (Spain, 2017–2026)*

Verdicts in migration and racism fact-checks (Spain, 2017–2026)

Corpus: category 'Migration / Racism' · 927 fact-checks · número sobre la barra = total anual · 2026 excluded (partial year, Jan–Apr only)

2017–2022 (n = 101)

2023–2026 (n = 826)

*Source: Iberifier repository (Iberifier, 2026).*

While each of these episodes contains elements of foreign amplification, none presents the structured, multi-phase FIMI architecture that characterises the three cases selected for in-depth analysis. The following case studies were chosen because they meet three concurrent criteria: (a) documented involvement of information manipulation infrastructures linked to foreign states, (b) significant volume of disinformation detected in the IBERIFIER repository, and (c) the activation of formal institutional response mechanisms, including the Permanent Commission against Disinformation and the European coordination networks. Taken together, they illustrate the complete operational cycle of disinformation — from incubation and narrative seeding, through amplification, institutional response and post-event consolidation — in the Spanish context.

### 5.3.1. Electoral processes in Spain

Electoral processes provide a particularly revealing context in which disinformation dynamics intensify, illustrating how political competition, media fragmentation and platform logics converge to amplify disinformation during electoral periods. Our most recent report on the strategic information dimension within the IBERIFIER project was published in March 2023. In the intervening period, Spain has passed through a series of European, national, regional and local electoral cycles. These events have demanded rigorous monitoring and analysis from public authorities, media outlets, fact-checkers and the academic community. This multi-level calendar illustrates the complexity of Spain's "permanent campaign" environment. The concentration of local and regional elections in May 2023, followed

immediately by the General Elections in July, created a high-pressure scenario that tested the resilience of the Permanent Commission against Disinformation.

*Table 4. Electoral processes in Spain 2023–2026*

| <b>Year</b> | <b>European</b>                       | <b>National</b>                           | <b>Regional</b>                                                                                                    | <b>Local</b> |
|-------------|---------------------------------------|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------|--------------|
| 2023        | —                                     | July 23: General Elections (All of Spain) | May 28: Regional Elections (All CC.AA. except Andalusia, Catalonia, Galicia, Basque Country, and Castile and León) | May 28       |
| 2024        | June 9: European Parliament Elections |                                           | Feb 18: Galicia<br>Apr 21: Basque Country<br>May 12: Catalonia                                                     |              |
| 2025        |                                       |                                           | Dec 21: Extremadura                                                                                                |              |
| 2026        |                                       |                                           | Feb 8: Aragon<br>Mar 15: Castile and León<br>May 17: Andalusia                                                     |              |

Of the electoral processes listed above, the July 2023 General Elections and the June 2024 European Parliament Elections generated the most significant disinformation dynamics and are therefore analysed in detail below. The regional elections held during this period — Galicia, the Basque Country and Catalonia in 2024, Extremadura in 2025 — did not produce interference events of comparable scale or structural significance, although localised patterns of disinformation were observed. In Catalonia, residual narratives from the independence crisis were reactivated during the May 2024 campaign, while in the Basque Country fact-checkers identified targeted disinformation around coalition negotiations. The Permanent Commission against Disinformation activated its electoral security protocol for each of these cycles (DSN, 2024), but the volume of disinformation detected remained significantly below the thresholds observed during national or European elections. The 2026 regional elections in Aragon, Castile and León, and Andalusia fall outside the analytical window of this report, although preliminary monitoring is under way.

In each electoral cycle in Spain, the Coordination Network for Security in Electoral Processes mobilises a specialised working group to counter disinformation. This team draws on the member organisations of the Permanent Commission against Disinformation, with the Department of National Security (DSN, 2024) responsible for coordination.

According to the official structure of the network, the institutional core driving these efforts is composed of the following bodies (DSN, 2023):

- a. Presidency of the Government / Department of National Security (DSN).
- b. Secretariat of State for Communication (SEC).
- c. Ministry of Foreign Affairs, European Union and Cooperation (MAEC).
- d. National Intelligence Centre (CNI).
- e. Secretariat of State for Digitalisation and Artificial Intelligence (SEDIA).

This inter-ministerial framework is reinforced by the Ministry of the Interior. Under Royal Decree 207/2024 (of 27 February), the Ministry intervenes in disinformation matters through



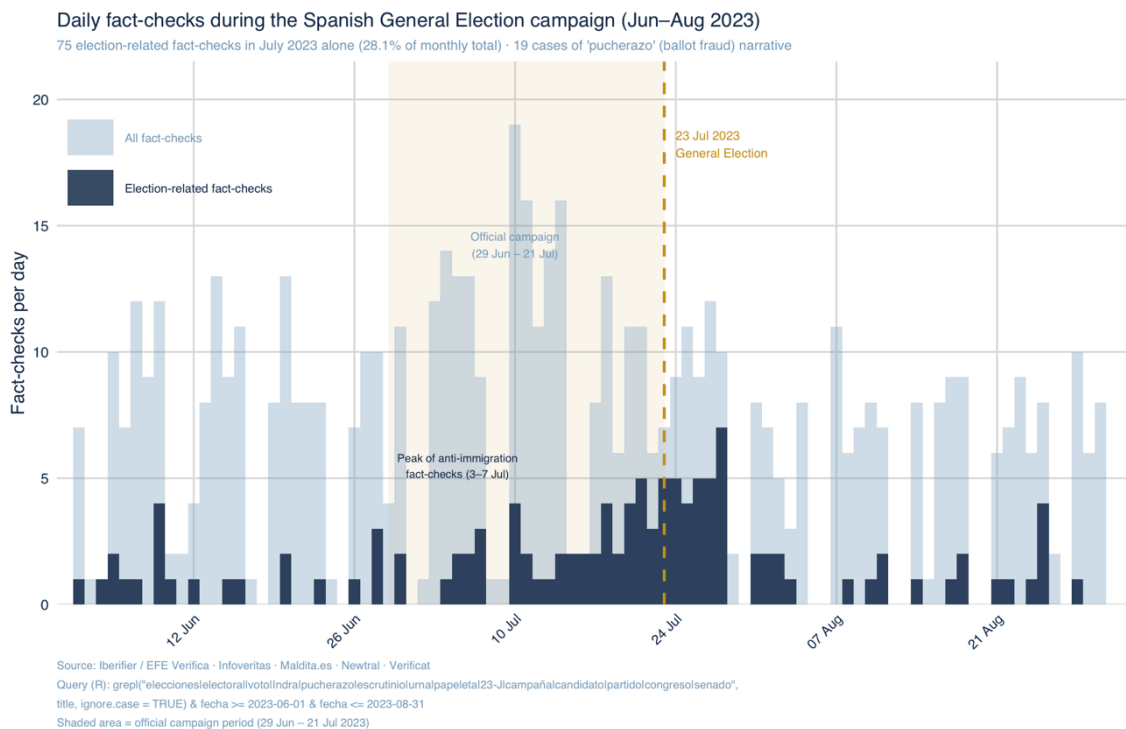
the Cybersecurity Coordination Office (OCC) of the Secretariat of State for Security, focusing specifically on cases with potential public security implications (DSN, 2025). This centralised structure ensures that disinformation is treated not merely as a communications problem, but as a formal security threat during the voting process.

### July 2023 General Elections

On 23 July 2023, Spain held its sixteenth parliamentary elections, marking the beginning of the 15th term of the Congress of Deputies. Interference in the Spanish General Elections of 23 July 2023 (23-J) operated as a hybrid and complex ecosystem, in which Foreign Information Manipulation and Interference (FIMI) infrastructures — primarily Russian clusters on Telegram — converged with domestic disinformation and polarisation dynamics.

A comprehensive analysis of this event reveals a maturation of the Tactics, Techniques and Procedures (TTPs) directed at the structural delegitimisation of the democratic process. Studies show that 24% of the disinformation content debunked during the month preceding the elections directly attacked the integrity of the electoral system. This metric saw an alarming escalation, reaching 74% of circulating disinformation on election day itself (Maldita.es & Democracy Reporting International, 2023).

*Figure 37. Daily fact-checks during the campaign for the Spanish General Elections (June–August 2023)*

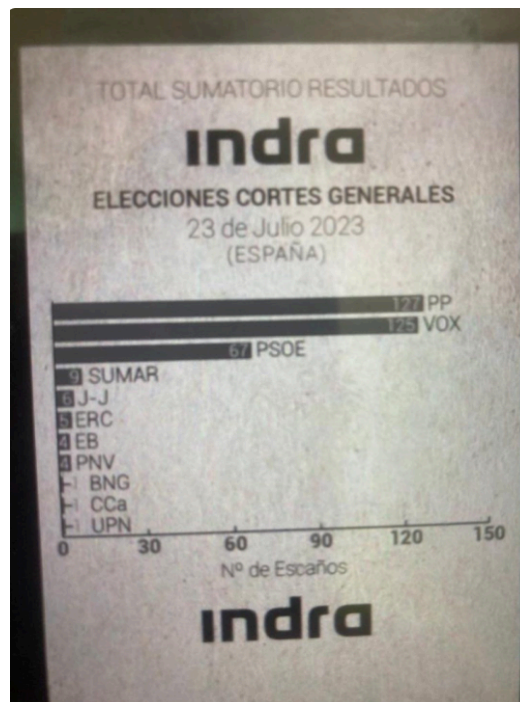


Source: Iberifier repository (Iberifier, 2026).

In the preparation and pre-campaign phases, the attack vectorisation was structured through dual networks. On the one hand, the Russian FIMI infrastructure orchestrated clusters of Telegram channels as distribution nodes (EEAS, 2024). In parallel and synergistically, organised actors within the domestic infosphere, such as the association Plataforma Elecciones Transparentes (APET), instigated recurring narratives of electoral fraud and systemic rigging (Rodríguez-Fernández, González-Fernández, et al., 2025). These operations focused on eroding trust in postal voting — which recorded an unusually high negative sentiment of 21% on social networks — and on launching discrediting campaigns against the state technology company Indra, accusing it without evidence of algorithmically manipulating the vote count under government directives (Maldita.es & Democracy Reporting International, 2023).

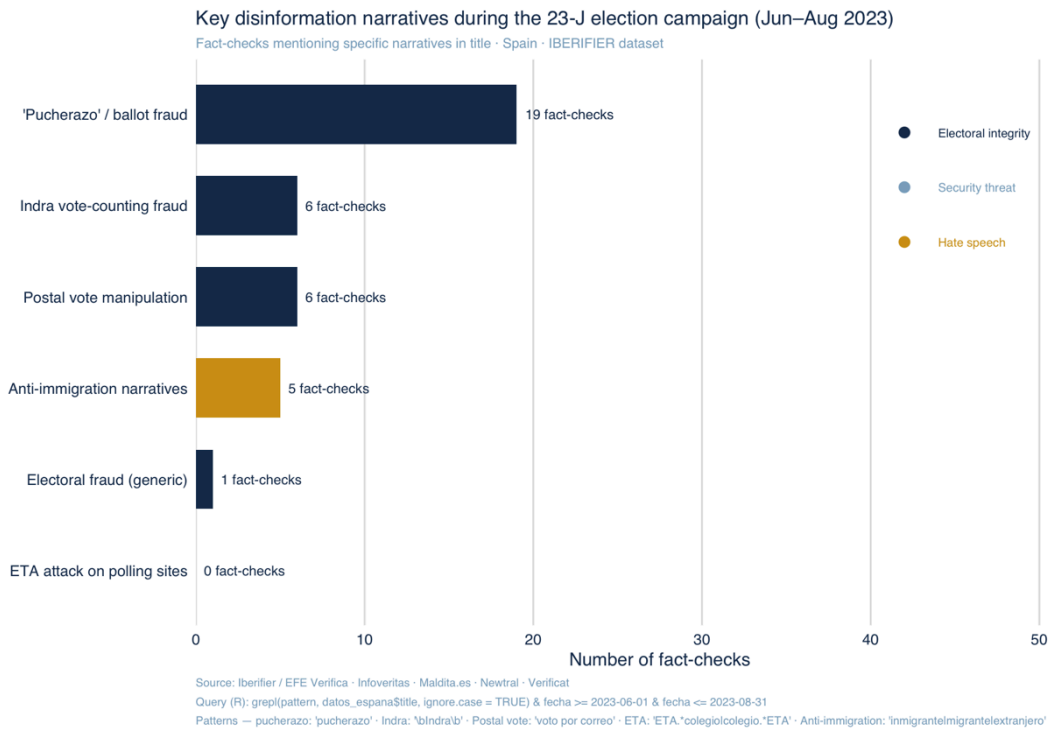
Figure 38 showcases a fabricated image that circulated on social media, displaying alleged real election results. According to them, both the PP and VOX would have obtained nearly double the number of seats as the PSOE. This image was used to claim that the actual outcomes had been manipulated and replaced by the officially published results. Indra assured that the image was false and that it did not correspond to information from its systems.

*Figure 38. False image that circulated on social media*



Source: Maldita.es (Maldita.es, 2023b).

Figure 39. Main disinformation narratives during the 23-J electoral campaign (June–August 2023)



Source: Iberifier repository (Iberifier, 2026).

During the campaign period, disinformation adopted a multidimensional approach of high emotional intensity. The narratives weaponised sociopolitical vulnerabilities such as climate denial, LGBTIQ+ rights (associated with the "Trans Act") and, predominantly, xenophobic hate speech (EDMO, 2024a). Throughout the campaign, information pollution exploited sociopolitical vulnerabilities intensively, with particular emphasis on xenophobic hate speech.

In the final 72 hours before and during election day, voter suppression tactics and swarming attacks materialised. At a technical level, the official website of the Community of Madrid was cloned, injecting a fabricated alert about an imminent ETA terrorist attack at polling stations (EEAS, 2024). Simultaneously, a conspiracy theory went viral on 23-J accusing the Government of having deliberately sabotaged the railway infrastructure between Madrid and Valencia to prevent voters from travelling to polling stations (Maldita.es & Democracy Reporting International, 2023).

Figure 40 illustrates this hoax. The first screenshot implies a hidden motive behind the railway infrastructure's technical failure, highlighting the "coincidence" that it occurred on the day of the national elections ("Que casualidad, ¿no?", "What a coincidence, right?"). In the second image, text overlaid on a news report explicitly claims that the incident was an act of sabotage designed to prevent passengers from reaching their polling stations in time to vote.

Figure 40. Screenshots to illustrate the hoax



Source: Maldita.es (Maldita.es, 2023a)

Finally, in the post-electoral consolidation phase, the interference machinery pivoted towards geopolitical dissonance. Inauthentic networks and Russian proxies, among other actors, promoted conspiracy narratives alleging that institutions such as the European Union (directly implicating Ursula von der Leyen), NATO, and even Morocco and the Spanish Crown, had operated in the shadows to force the electoral result in favour of the outgoing government. This projected an image of the Spanish State as lacking genuine sovereignty and democratic agency (EDMO, 2024a; EEAS, 2024). Beyond institutional fraud, 23-J stood out for the strategic use of hate: online disinformation against immigrants was the most common form of hate speech during the campaign, denigrating the foreign-born population to polarise the vote. The gravity of this domestic interference lay in the fact that prominent political figures themselves shared these hoaxes and misleading content, amplifying their reach and fostering social fracture (Maldita.es & Democracy Reporting International, 2023).

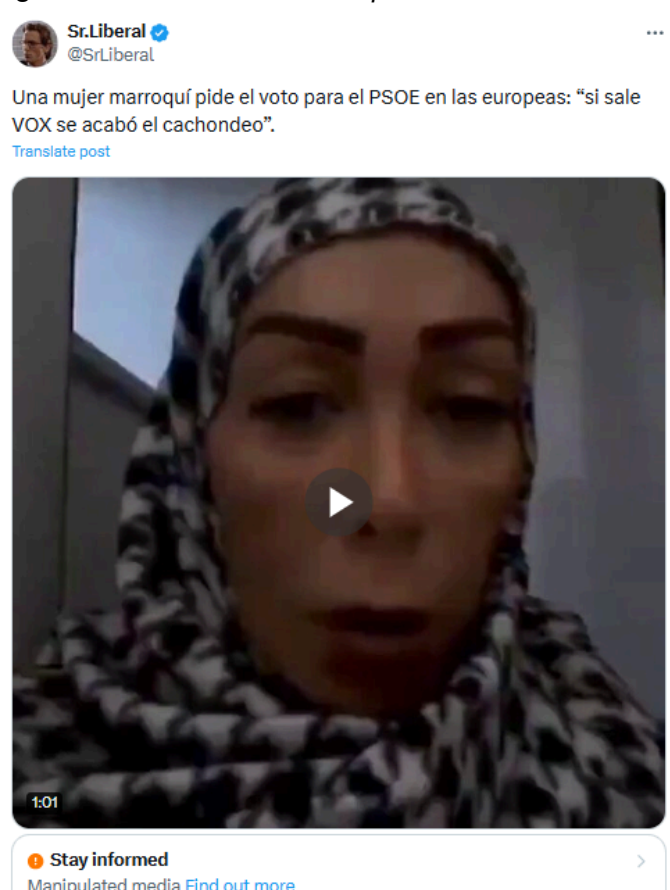
A singular feature of the 23-J campaign was the recoding of insults. The term "Perro Sanxe" (Sánchez's dog), initially a pejorative attack on Prime Minister Pedro Sánchez, was co-opted by his supporters and turned into a viral meme. This "narrative jiu-jitsu" strategy partially neutralised the impact of organised digital smear campaigns, demonstrating that humour and cultural agility can sometimes be as effective as institutional rebuttal.

### *The 2024 European Parliament Elections*

In June 2024, the European electoral landscape served as a critical stress test for institutional resilience following the full implementation of the Digital Services Act (DSA). Security assessments revealed a heightened threat environment, identifying more than 40 distinct Russian FIMI operations specifically targeting the European Parliament elections. These campaigns were meticulously designed to sow distrust and delegitimise EU institutions (DSN, 2025). Nevertheless, the European Commission's final review concluded that no information interference operation reached a level of severity sufficient to disrupt or alter the integrity of the vote (European Commission, 2024a).

Figure 41 shows an example of disinformation in this period. It displays a tweet featuring a video in which a Moroccan woman allegedly urges people to vote for the PSOE in the 2024 European elections. She warns that otherwise, "the free ride in Spain is over," implying that social welfare benefits for Moroccans would be cut and they would no longer be able to live without working. In reality, the video had been circulating since 2019, and X flagged it as "manipulated media."

*Figure 41. Screenshot of the post that circulated on X*



Source: Díaz Moreno (Newtral, 2024)

The European Board for Digital Services published a comprehensive report providing empirical validation of these preventive measures. Drawing on data collected by EDMO, false narratives about the European Union experienced a significant surge and represented fifteen per cent of the total fabrications detected in the month prior to the vote (EBDS; EDMO, 2024b). However, despite this aggressive escalation, the specific task force concluded that no serious manipulation incident occurred during the electoral days (EBDS, 2024; EDMO, 2024b). This empirical balance demonstrates that the stress tests and new regulatory framework established by the Digital Services Act successfully protected the integrity of the European electoral process.

Spanish civil society and fact-checking organisations — most especially Maldita.es — were central to this successful containment effort. As key members of the pan-European "Elections24Check" initiative, coordinated by the European Fact-Checking Standards Network (EFCSN), they produced more than 300 specialist articles on electoral disinformation (Maldita.es, 2025b). Throughout the campaign, these agencies provided comprehensive monitoring and trend analysis, with a strategic emphasis on prebunking (preventive inoculation). This proactive approach sought to equip the public with the critical thinking tools needed to recognise and neutralise manipulated narratives before they achieved viral diffusion (Maldita.es, 2025b).

Maldita.es also led a study entitled "Platform Response to Disinformation during the EU Election 2024", assessing how major technology companies reacted to more than 1,300 posts already flagged as false by European fact-checkers (Maldita.es, 2025b). The findings were stark: the platforms took no visible action against half of the debunked content.

Specific data from the report showed that YouTube ignored 75% of the disinformation, while X followed closely with 70% inaction. By contrast, Facebook intervened on 88% of the flagged posts, Instagram on 70% and TikTok on 40% (Maldita.es, 2025b). These results were presented before the full session of the Permanent Working Group on the Code of Practice to demand accountability from specific networks for their failure to intervene during the campaign (Maldita.es, 2025b).

Democracy Reporting International (DRI) established a Social Media Monitoring Centre in the months prior to the vote. This centre integrated a team of eight specialist researchers, including representation from Spain, to identify online threats and country-specific issues (Democracy Reporting International, 2025). To address the growing threat of synthetic media, the major platforms signed the "Tech Accord to Combat Deceptive Use of AI in 2024 Elections", focused on the deployment of technological safeguards to counter harmful AI-generated content designed to deceive voters.

Meta launched an EU Election Centre available in all 24 official languages of the bloc, including Spanish, to provide best practices to government partners, political parties and authorities (Meta, 2025a). Drawing on the real-time work of its Spanish partners (EFE Verifica, Maldita.es and Newtral), Meta reported that its "verified content" labels significantly suppressed the spread of disinformation.



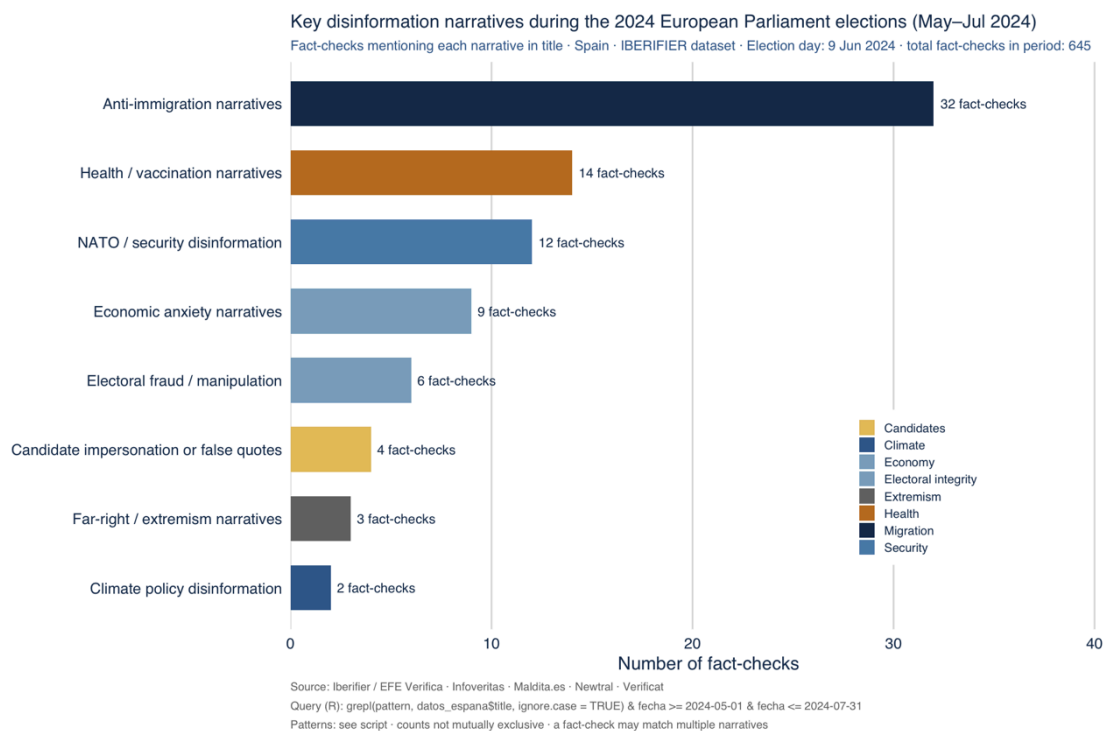
In Spain, the friction created by these labels proved effective (Meta, 2025a):

- a. 56% of Facebook users abandoned their attempts to share labelled content before posting it.
- b. 48% of Instagram users similarly chose not to share after seeing the warning label.

In June 2024, NewsGuard launched its Disinformation Tracking Centre for the European Parliament Elections to monitor false claims and misleading narratives across the continent (NewsGuard, 2025). At the local level, NewsGuard conducted media literacy workshops across Spain targeting journalists, teachers and librarians, focused on detecting unreliable sources and the weaponisation of Artificial Intelligence in campaigns (NewsGuard, 2025).

Similarly, TikTok maintained ongoing media literacy and critical thinking campaigns across the EU. These initiatives included sustained activations in Spain, developed in direct collaboration with local fact-checking partners (TikTok, 2026).

*Figure 42. Main disinformation narratives during the 2024 European Parliament elections (May–July 2024)*



Source: Iberifier repository (Iberifier, 2026).

Beyond the specific dynamics of each electoral cycle, these episodes point to a recurring pattern in which political competition, media fragmentation and platform logics mutually reinforce one another. Disinformation does not emerge as an external disruption, but as an

embedded feature of the electoral environment, shaped by the same structural conditions that govern visibility, attention and strategic communication.

### 5.3.2. Politicisation and polarisation of climate crises: the case of the 2024 Valencia DANA

The upper-level isolated depression (DANA — *depresión aislada en niveles altos*) that devastated eastern Spain in late October 2024 has become a paradigmatic event with regard to the politicisation of disasters and the impact of climate disinformation. On 29 October 2024, a DANA produced torrential rainfall across eastern Spain; in localities such as Turís, 771.8 litres per square metre were recorded in 24 hours, breaking the record for maximum precipitation in a single hour with 184.6 millimetres. The water surge concentrated in rivers such as the Magro, the Júcar and the Turia, causing sudden and disproportionate flooding — such as the flash flood in the Rambla del Poyo, which went from carrying no water to exceeding a flow of 200 m<sup>3</sup>/s in barely half an hour. More than 300,000 people suffered direct or indirect consequences of the storm, and 230 lost their lives.

Far from generating a unanimous response of cohesion, the tragedy unleashed an unprecedented infodemic capable of weaponising grief to exacerbate social vulnerability and public chaos (López Carrión & Llorca-Abad, 2025).

A very significant proportion of the hoaxes focused on attacking institutional management and the state of hydraulic infrastructure. Through coordinated campaigns, numerous messages accused the State Meteorological Agency (AEMET) and the Júcar River Basin Authority of concealing data or issuing late warnings, while political leaders publicly questioned the official alert system (Sánchez Torres et al., 2025). Alongside this, the falsehood circulated that the Spanish Government had demolished dams and reservoirs prior to the flooding (Iberifier, 2024; Maldita.es, 2024d). To amplify outrage and panic, another predominant narrative consisted of inflating the death and missing persons toll, particularly in the case of the car park at the Bonaire shopping centre. A multitude of content creators claimed without evidence that hundreds of bodies lay in that underground facility, an assertion that the National Police categorically denied after the complete pumping out of the water (EFE Verifica, 2024c; Maldita.es, 2024c).

For example, as shown in Figure 43, Bertrand Ndongo, a prolific activist for the far-right party VOX, posted a tweet on X implying that 700 people had died in the parking lot during the DANA disaster. He claimed this figure represented the number of registered entry tickets that had not cleared the exit. However, the parking lot was free of charge and lacked any ticketing system. The tweet's credibility relied on a generic source (“según nuestra fuente”, “according to our source”), the inclusion of a supposed verbatim quotation (“ya han informado a las autoridades”, “they have already informed the authorities”), and a video showing Ndongo at the entrance of the parking lot broadcast by the Spanish pseudo-media outlet “Periodista Digital”.

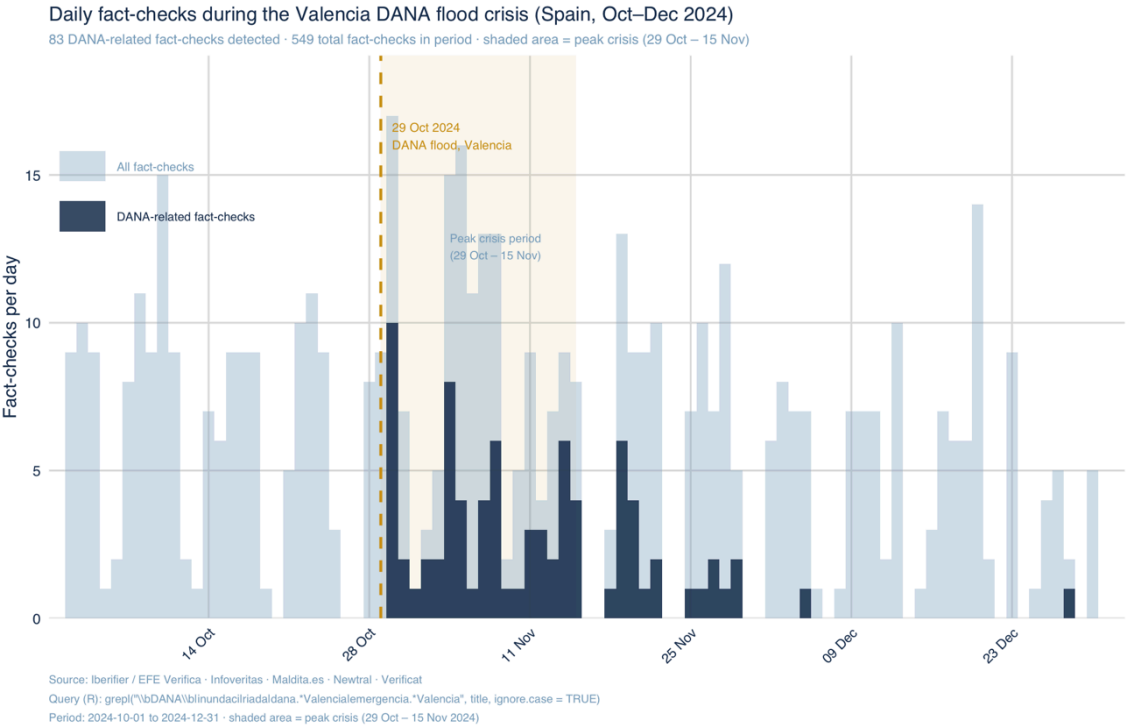


Figure 43. Post by Bertrand Ndongo on X



Source: EFE Verifica (EFE Verifica, 2024d)

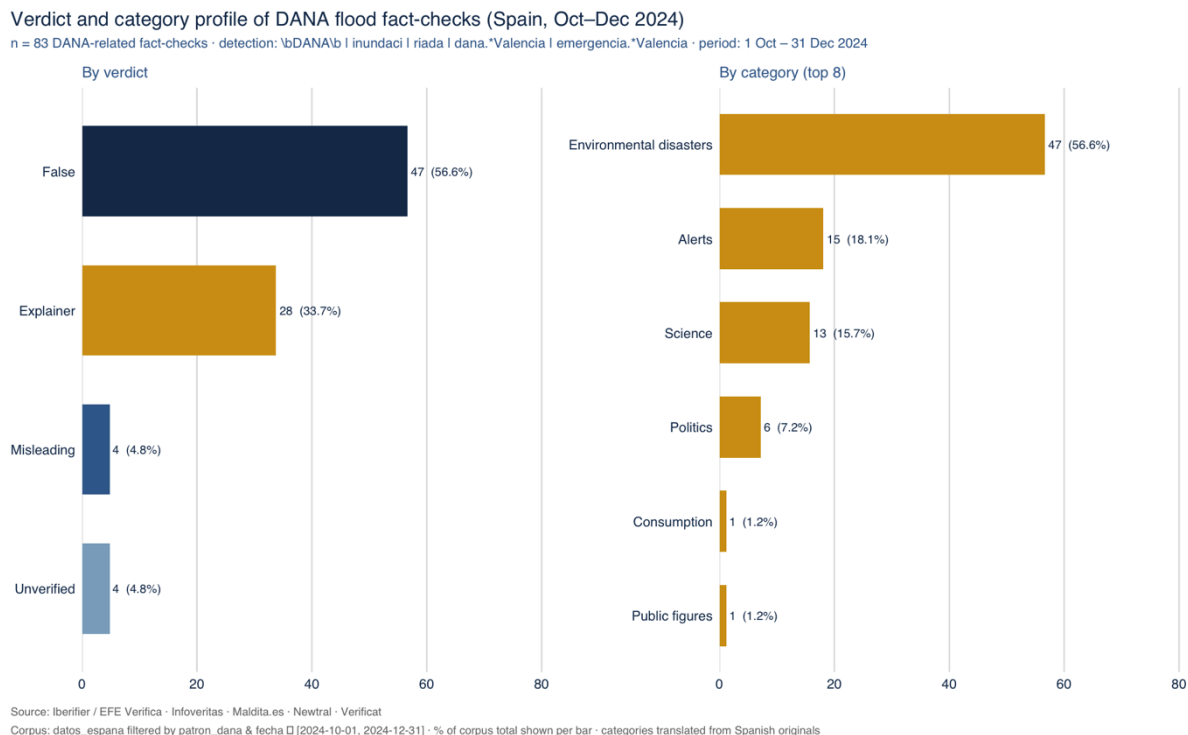
Figure 44. Daily fact-checks in Spain during the Valencia DANA crisis (October–December 2024)



Source: Iberifier repository (Iberifier, 2026).

In parallel, deep climate disinformation proliferated, aimed at decoupling these extreme rainfalls from anthropogenic global warming. Various conspiracy theories attributed the rainfall to alleged geoengineering attacks, chemtrails or the US military project HAARP (EFE Verifica, 2024c). Fiction also served as a manipulation tool through the tactic of "negative priming", whereby fragments from a television series were extracted to convince audiences that global elites had planned the tragedy in order to build "smart cities" (Maldita.es, 2024d). This conspiratorial disinformation was complemented by social polarisation strategies and hate speech, criminalising the migrant population with false accusations of looting and attacking the reputation of essential humanitarian organisations such as the Red Cross and Cáritas (EFE Verifica, 2024a, 2024b; Maldita.es, 2024a).

*Figure 45. Thematic and editorial profile of fact-checks related to the DANA (Spain, October–November 2024)*



*Source: Iberifier repository (Iberifier, 2026).*

The success of the propagation of all this false content is attributable to the actions of superspreader accounts and media figures who capitalised on the panic for economic or political ends (Sánchez Torres et al., 2025). The DANA crisis thus became a textbook case of the diagonalism dynamic described in this report: extremist actors channelled legitimate public outrage over institutional failures towards anti-elitist conspiracism, blurring ideological boundaries to maximise emotional reach (Klein, 2023). This entire process was facilitated by the inaction of Very Large Online Platforms (VLOPs). Despite the legal obligations in crisis situations stipulated by the European Digital Services Act (DSA), networks such as TikTok allowed the circulation of fake videos that accumulated more than 120 million views without applying effective moderation filters (Maldita.es, 2024c).



In the face of the digital ecosystem's vulnerability, the democratic response required an unprecedented effort from science journalism and fact-checking agencies. Platforms such as Maldita.es, EFE Verifica and Newtral led the systematic rebuttal of hundreds of information frauds, demonstrating that rigorous scientific information acts as the primary antidote against manipulation (Moreno-Castro, 2025; Sánchez Torres et al., 2025). Confronted with the lack of control on social networks, the Government itself was compelled to open exclusive institutional communication channels to debunk hoaxes in real time — an unprecedented crisis management tactic (La Vanguardia, 2026). This conjunction of events underscores the urgent need to strengthen media literacy and to demand accountability from technology corporations in order to protect information integrity in future disaster scenarios.

Despite these extensive fact-checking efforts, recent academic literature identifies a crucial methodological limitation in current forensic assessments. Researchers warn that the true reach and actual impact of fabricated narratives about the catastrophe remain severely underrepresented (Sánchez Torres et al., 2025). This distortion occurs because fact-checkers primarily analyse content accessible on open public networks, such as X or TikTok. As a result, this approach leaves out the massive volume of toxicity that malicious actors distribute through closed and encrypted channels, such as private Telegram groups or WhatsApp broadcasts (Sánchez Torres et al., 2025). The actual penetration of disinformation may therefore be significantly worse than official reports indicate.

The dynamics observed during the DANA crisis reveal how moments of uncertainty and urgency do not create disinformation ex nihilo, but rather accelerate and intensify pre-existing information distortions. In this context, the circulation of false or misleading content reflects the interaction between structural vulnerabilities, emotional saturation and platform amplification, rather than a purely episodic breakdown of information integrity.

## 6. Conclusions

The analysis conducted across the preceding chapters describes an Iberian information environment that has changed substantially since the foundational IBERIFIER report of 2023, and that now sits at the intersection of three converging dynamics: the operational maturation of generative artificial intelligence as a vector of manipulation, the consolidation of the European regulatory architecture around the Digital Services Act, and the coordinated withdrawal of major digital platforms from the co-regulatory model that had structured European action against disinformation since 2018. These three dynamics are not independent. They reinforce one another, and their interaction defines the terrain on which Spain, Portugal and the European Union must now operate.

The first conclusion is that the production of disinformation has been industrialised. AI-based tactics were involved in 27% of foreign information manipulation and interference (FIMI) incidents detected at European level in 2025, an approximately 260% increase over the previous year. Hostile state actors — most notably Russia-linked clusters such as Doppelgänger, Portal Kombat and Storm-1516, and China-linked networks such as Spamouflage and False Friends — no longer aim primarily at persuasion. Their strategic objective is presence: flooding the information space with sufficient volume of synthetic content to erode the epistemic foundations on which democratic deliberation depends. The Spanish and Portuguese chapters document how this logic materialises in practice, from the mass cloning of national media brands and the cross-border circulation of recycled hoaxes through the Lusophone and Hispanophone spheres, to the convergence between disinformation and cybercrime that has turned media impersonation into a profitable criminal industry.

The second conclusion concerns the European response. The EU has built, in the period under analysis, the most comprehensive regulatory architecture against disinformation of any democratic bloc: the Digital Services Act, the European Media Freedom Act, the AI Act, the European Democracy Shield, and the operational instruments of the FIMI Deterrence Playbook and the FIMI Galaxy. The institutional ambition is real and the impact already quantifiable — online platforms have reversed almost 50 million content or account decisions in the first two years of the DSA. Yet implementation gaps persist: the transparency obligations of Article 50 of the AI Act do not become fully applicable until August 2026, and the practical capacity of national authorities to monitor semi-closed platforms such as Telegram or WhatsApp remains structurally limited.

The third conclusion is the most consequential. The European regulatory framework is being actively contested. X's withdrawal from the voluntary Code of Practice in May 2023 inaugurated what this report has termed the Great Retreat. By the close of 2025, Meta had dismantled its US third-party fact-checking programme; Google and Microsoft had formally exited the fact-checking chapters of the Code of Conduct; only TikTok and Meta retained these specific obligations in the EU. The withdrawal of platform funding has left the global fact-checking sector in critical condition, with 89.3% of organisations identifying financial sustainability as their greatest threat. This retreat is no longer purely commercial: it has been



politically reframed, particularly from Washington, as a defence of free speech against European overreach, generating a transatlantic clash that places the EU regulatory project under sustained external pressure.

The national chapters demonstrate how these European dynamics interact with country-specific vulnerabilities. Portugal experienced four elections in twenty-three months between March 2024 and February 2026, a compressed cycle that accelerated the consolidation of immigration as the dominant frame of electoral disinformation, displacing corruption, and confirmed the structural dominance of Chega and its leader André Ventura in the social media attention economy. The institutional landscape has improved with the designation of ANACOM as Digital Services Coordinator, but the pace of regulatory institutionalisation continues to lag the pace of disinformation innovation. Spain has confronted a different combination of pressures: the weaponisation of the Spanish language as a transnational FIMI vector, the proliferation of pseudo-media and superspreaders, the convergence of disinformation with cybercrime, and a paradigmatic infodemic during the October 2024 Valencia DANA crisis. On the institutional side, the Action Plan for Democracy, the forthcoming National Strategy against Disinformation Campaigns, and the activity of the Forum against Disinformation Campaigns represent the most ambitious Spanish response to date, although their effectiveness depends on parliamentary majorities in a highly fragmented Congress.

Taken together, these findings point to a single underlying assessment. The diagnostic capacity of the Iberian information ecosystem — the work of fact-checkers, regulators, academic researchers and civil society organisations — has improved markedly since 2023. What is now at stake is not the capacity to identify disinformation, but the political and institutional will to sustain a regulatory framework that the platforms, an increasingly hostile transatlantic environment, and the hostile state actors themselves are actively working to weaken. The resilience of democratic deliberation in Spain, Portugal and the European Union in the years immediately ahead will depend less on detecting the next campaign than on defending the architecture that has been built to respond to it.

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## IBERIFIER – Iberian Digital Media Observatory

IBERIFIER is a digital media observatory in Spain and Portugal funded by the European Commission, linked to the European Digital Media Observatory (EDMO). It is made up of thirteen universities, five fact-checking organizations and news agencies, and five multidisciplinary research centers.

Its main mission is to analyze the Iberian digital media ecosystem and tackle the problem of misinformation. To do this, it focuses its research on five lines of work:

1. Research on the characteristics and trends of the Iberian digital media ecosystem.
2. Development of computational technologies for the early detection of misinformation.
3. Fact-checking of misinformation in the Iberian territory.
4. Strategic reports on threats of disinformation, both for public knowledge and for the authorities of Spain and Portugal.
5. Promotion of media literacy initiatives, aimed at journalists and informants, young people and society as a whole.

For more information, look at the project website and its social media accounts:

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Website: [iberifier.eu](https://iberifier.eu)

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X: [@iberifier](https://twitter.com/iberifier)

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Instagram: [@iberifier](https://www.instagram.com/iberifier)

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the European Union

**Iberifier – Iberian Digital Media Observatory** has received funding from the European Commission under the Call DIGITAL-2023-DEPLOY-04, European Digital Media observatory (EDMO) — National and multinational hubs, with the reference IBERIFIER Plus - 101158511