Big Tech, Little Action: Social media companies are not ready to comply with new EU regulation

A preliminary analysis of Social Media Compliance with the EU’s new regulatory requirement on disinformation under the Digital Services Act and their commitments under the new EU Code of Practice on Disinformation

February 7, 2023

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Summary

In days, signatories to the EU Code of Practice on Disinformation will release their first reports showing which actions they have taken to tackle online disinformation. Ahead of those reports, Avaaz performed a data-driven analysis of the major platforms to see what progress they were (or were not) making in their efforts. This is especially important given that platforms reportedly only have seven months left to comply with their new obligations before the Digital Services Act (DSA) comes into effect - and under the DSA, inaction on disinformation can lead to sanctions and fines of up to 6% of their global turnover.

To understand how disinformation is tackled by the six major social media platforms - Facebook, Twitter, LinkedIn, Instagram, YouTube and TikTok - we analysed their performance tackling a “major disinformation event” - the release of Died Suddenly, a documentary produced by reported conspiracy theorist Stew Peters. The release of this film unleashed a wave of unfounded claims about mRNA vaccines on social media, which were promptly debunked by major fact-checking organisations.

In particular, we analysed a sample pool of 108 fact-checked pieces of content related to the debunked documentary:

- In total, these 108 pieces of content were shared a cumulative 194,829 times and received 731,836 interactions on the 6 platforms we analysed.
- Of the 108 pieces of content, 48 were videos - these videos received 22,752,920 views.

Key findings from our analysis:

- Most social media platforms largely failed to contain the flow of disinformation triggered by the release of Died Suddenly.
  - Overall, just 22% of disinformation content we analysed was either labelled or removed by the six major platforms, but there were big differences in how each platform performed. In particular:
    - Twitter was the only major platform hosting the full movie and an official Twitter account, and, following the suspension of their Covid-19 misinformation policy, 0% of tweets analysed were actioned for containing disinformation. Also, in the case of LinkedIn, no action was taken to inform users about false information being shared, although it must be noted that the spread of content related to Died Suddenly that we were able to identify on their platform is significantly smaller than on other platforms (see Table 1).
    - TikTok only took action on 17% of posts promoting Died Suddenly; whereas YouTube acted on 20% of posts. Also, even for the small percentage of disinformation content identified, both platforms simply removed it. We believe that such policies are problematic for the protection of freedom of expression and that instead, they should clearly label posts and links to fact-check articles.
    - Facebook acted on 35% of posts flagging them with false or misleading information labels.
    - Instagram was the only platform where a significant amount of disinformation was successfully identified, with 91% of posts flagged with information labels.

- The platforms have a big blindspot when it comes to disinformation in languages other than English.
  - In eight out of the eleven languages for which we were able to identify disinformation content, no posts received any moderation across any of the platforms. These languages included 6 EU languages - Italian, German, Hungarian, Danish, Spanish, Estonian - and also Japanese and Chinese.
  - The only two languages where we detected fact-checked posts that were actioned beyond English were Finnish (80% actioned) and Polish (29% actioned).

- Disinformation is still amplified by platform algorithms.
  - Using the Misinformation Amplification Factor, which measures how much platforms are amplifying disinformation, we found that:
    - TikTok performed the worst, amplifying disinformation content 31 times more than the other content posted by the same creators.
    - It was followed by Twitter where disinformation was amplified 17 times more and YouTube 6 times more.
    - Instagram amplified disinformation content 3 times more than other content, while Facebook did not amplify disinformation significantly more than other content.
  - Despite these numbers, when considering the total engagement on posts linking to the full documentary on Rumble (archive) or on Twitter (archive) or on Stew Peters’ website, Facebook might have been most responsible for the documentary’s spread. In regards to these links, our analysis shows Facebook racked up the largest number of interactions (469,658 interactions and 149,805 shares), followed by Twitter (206,760 interactions and 31,974 shares). TikTok and Instagram do not allow links to external content, while YouTube and LinkedIn do not allow a comprehensive analysis of the engagement on such external links.

This study suggests that most of the major platforms are failing to comply with their Code of Practice commitments and might infringe upcoming DSA obligations, triggering sanctions of up to 6% of global turnover. In particular:

- Most of the major social media platforms are failing to flag and inform their users in a systematic way about fact-checked disinformation, even when it is repeatedly uploaded. The only platform that appears to act upon a significant percentage of fact-checked disinformation is Instagram.
- Despite explicit platform commitments in the Code to improve their services in all EU languages, our research found that in certain EU languages - Italian, German, Hungarian, Danish, Spanish and Estonian - no platform took any action against violating posts.
- While platforms have committed to minimising the spread of disinformation on their platforms, a meaningful system to achieve this goal does not seem to be in place. The only platform for which we did not detect a significant amplification of disinformation was Facebook. However, when looking at
total interactions on disinformation content analysed as well as interactions on posts linking to debunked videos, Facebook is responsible for a significant amount of the overall spread.

- Measures to 1. flag and inform users of disinformation, 2. address disinformation in all EU languages, and 3. address the spread of disinformation should be considered reasonable, proportionate and effective mitigation measures for the risk of amplifying harmful disinformation under the Digital Services Act. — Failure to implement them across Member States — by September should make the platforms non-compliant with such regulation and therefore trigger sanctions of up to 6% of their global annual turnover.

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Table 1. An overview of interactions, video views and labelling/takedown measures applied by platforms.

![Image 1](image1.png)

Image 1. The Misinformation Amplification Factor (MAF) measures the extent to which platforms amplify disinformation; we calculated the ratio between how much engagement a disinformation post gets and what engagement the same creator received on other posts. This methodology was developed by the Integrity Institute, which provided guidance and data processing support.

A Major Disinformation Event: Died Suddenly

Died Suddenly is a 70-minute documentary produced by reported conspiracy theorist Stew Peters. Launched on November 21, 2022, an early trailer for the documentary claimed that the world is witnessing “the greatest orchestrated die off in the history of the world”. The movie presents Covid-19 vaccines as the tool of this mass genocide, by claiming they cause completely healthy people to drop dead around the world.

The film presents a long list of bogus and recycled claims, ranging from theories about plans for global depopulation, to supposed links between Covid-19 vaccines and sudden deaths, blood clots and stillbirths - all of which have been debunked by a large amount of independent fact-checking articles. The launch of the documentary saw a new wave of these claims spread across social media platforms.

Some of the most egregious debunked claims include:

1. 5:45’ “Bill Gates publicly said that vaccines will kill enough people to reduce the world’s population by 10-15%”
   - The Journal Debunk: “In a 2010 TED speech, Gates said that with better vaccines, health care, and reproductive health services, the world population would grow by only 1.3 billion people by 2050, 10%-15% lower than it might otherwise. This projection is based on the hypothesis that people have smaller families when child mortality is reduced.

2. 1:00:58’ “Vaccines caused Australia’s birth rate to decline by 70%”
   - The Journal Debunk: “While the Australian birth rate had hit a record low during 2020, the first full year of the Covid-19 pandemic, the drop was about 6%, not 70%, and this drop occurred before...
Covid-19 vaccines were rolled out in the country. The 70% figure cited appears to come from a debunked claim by an Australian politician who did not realise that most births are not immediately counted in statistics, so recent months always appear to have dramatically low birth rates, as many babies still have to be registered. The fertility rate had “bounced back” in 2021, as vaccines were distributed in Australia, according to the Australian Bureau of Statistics.

3. 21:24: Movie pans on a news article that reads “Indiana life insurance CEO says deaths are up 40% among people ages 18-64”. Lt. Col. Theresa Long reacts suggesting that the excess deaths are due to the COVID-19 vaccines: “No one’s even, no one’s even calculated that. … It’s apocalyptic.”

   FactCheck.org Debunk: “The fact is that the increase in deaths was linked to COVID-19, not to the vaccines. The number comes from a presentation by J. Scott Davison, CEO of OneAmerica, during a news conference about a surge of COVID-19 cases in Indiana in December 2021.”

4. “The vaccine can kill you two different ways. It can kill you in the short term; Now, there’s a longer term effect, and this takes five months to kill you, and this is when your veins are basically clogged”; “this was a bioweapon unleashed against Humanity with the intent to depopulate and control the population of the world”.

   FactCheck.org Debunk: “The roughly hourlong video repeatedly flashes across the screen what appear to be postmortem blood clots, which are often found in dead bodies. Although such clots are common, the video features nine embalmers and funeral directors who describe the clots as a new anomaly and surmise that they were caused by COVID-19 vaccines. The video suggests that this is part of a shadowy plot to depopulate the world. Like most conspiracy theories, this one contains a tiny grain of truth. One of the vaccines available in the U.S., made by Johnson & Johnson, can cause a particular kind of clotting combined with low platelets. But the condition is very rare — it has occurred in about 4 cases per 1 million doses administered — and in December, the Centers for Disease Control and Prevention recommended the two mRNA vaccines over Johnson & Johnson’s. Only about 3% of the vaccine doses administered in the U.S. have been from Johnson & Johnson.

   “And experts say the clots shown in the video appear to be a different type of clot.”

   “Just looking at those blood clots from the movie, they look like very common postmortem blood clots, and I feel like it was just the shock and awe value of using these images of blood clots taken out of context to scare people,” Dr. Eric Burnett, of Columbia University’s Irving Medical Center, told MedPage Today.”

   Health Feedback’s Debunk: “Without a pathological analysis that takes into account the clinical history of the person, images of blood clots alone don’t provide sufficient evidence of an association between these clots and COVID-19 vaccines. No evidence suggests that vaccines are causing a rise in mortality. Therefore, claims that they are used for depopulation are baseless.”

5. 7:15: “Somebody mentioned to go onto Google and then type in died suddenly and find the news articles that would pop up. And lo and behold, here’s a whole listing of articles of people within that last week who died suddenly.”

   FactCheck.org Debunk: “the video suggests that a Google search of the term “died suddenly” will reveal deaths related to the vaccines. But, of the 17 headlines that scroll across the screen in this segment, none of the deaths has been attributed to the vaccine, according to publicly available information. In one case, the person had died in a car crash in 2017 — three years before the pandemic began. His name was Eric Cruz, and his mother, Dolores Cruz, had written a piece about her journey with grief that was published on HuffPost. The only part of the story that showed up in “Died Suddenly,” though, was the headline from that essay: “My Kind, Compassionate Son Died Unexpectedly. This Is What I Want You To Know About Grief.”
How Platforms Initially Reacted to the Documentary

The full documentary was released on Rumble, Twitter and YouTube - with Twitter the only major platform to host an official account for the film. While YouTube removed the full movie within a few days, Rumble and Twitter took no such action, allowing the documentary to be shared across mainstream social media platforms, reaching 17,721,900 views on Rumble and 2,095,395 views on Twitter. Rumble also hosted versions of the movie in languages including Italian, Spanish, German, Polish, and Hungarian. The documentary was also circulated on other fringe platforms such as Bitchute, Odysee and on the Finnish video platform Kansantube.

The Stew Peters Network official Rumble video of Died Suddenly, gathering nearly 16 million views in just over one month.

The Role of Major Online Platforms in the Spread of Died Suddenly

1) TWITTER

Twitter was the only major social media platform to allow Died Suddenly to be shared without any visible restrictions on its platform. After Died Suddenly premiered on Twitter on November 21, 2022, the hashtag #DiedSuddenly began trending, with an over 260% increase in tweets mentioning #DiedSuddenly between late October and late December.

Twitter also allowed two accounts officially linked to Died Suddenly to stay on the platform and grow their audience, seemingly without any restrictions or warning. These accounts included the official Died Suddenly Twitter account, and the recently reinstated account of the film’s creator, reported conspiracy theorist Stew Peters.

When the documentary was released, Twitter initially labelled the tweet as ‘misleading’, restricting it from being shared or interacted with. However, the label and the restrictions were removed the next day:

- October 2022 - The official account for Died Suddenly is created
- November 21, 2022 - The Died Suddenly account first posts the full documentary, prompting Twitter to add a ‘misleading’ label, aligning with independent fact-checkers. (archive)
The same day, @DiedSuddenly_ tweets at Twitter CEO Elon Musk, asking him to "unrestrict the most watched film on Twitter that is exposing a global genocide".
November 24, 2022 - The 'misleading' label is removed, prompting @DiedSuddenly to thank Elon Musk in its update.
UPDATE: Twitter has lifted censorship of #DiedSuddenly!

Thank you Elon Musk for staying committed to your pledge to allow free speech on this platform.
As a result, users could share, like and reply to the tweet, enabling virality that saw the single tweet containing the full documentary reach 2,000,000 views and 83,854 interactions, and @DiedSuddenly_ to amass 247,900 followers by the close of our research.

At the time of our research, the full documentary reached 2,000,000 views on Twitter.

#DiedSuddenly becomes viral

As the trailer and subsequently the movie were released, #DiedSuddenly started trending on Twitter, as tweets mentioning the hashtag exploded in volume.

To assess this change in volume of tweets and evaluate the impact of the documentary on tweets using the hashtag #DiedSuddenly, Avaaz studied two 30-day periods prior to release of Died Suddenly on November 21, 2022, and then the 30-day period following the release.

Our findings show that tweets mentioning #DiedSuddenly increased in volume by over 3000% between September 22 and December 20, 2022.

### Sep 22, 2022 - Oct 21, 2022
- Total Mentions: 9,38k
- Mentions/day average: 313

### Oct 22, 2022 - Nov 20, 2022
- Total Mentions: 85.7k
- Mentions/day average: 2.86k
- 816% increase compared to the period September 22 to October 21, 2022

### Nov 21, 2022 - Dec 20, 2022
- Total Mentions: 315k
- Mentions/day average: 10.5k
- 267% increase compared to the period October 22 to November 20, 2022.
"Died Suddenly" promoted on Twitter

The 29 tweets in our sample racked up 235,745 interactions and 2,095,395 video views. By January 13, 2023, none of the tweets we identified carried a false information label, nor had they been taken down since our team first started collecting evidence on November 21, 2022.

Convicted for computer fraud and reported conspiracy theorist Kim Dotcom promoted Died Suddenly to his 1.2M followers, gaining over 18,478 interactions. [archive]

Tweet promoting the link to Died Suddenly on Rumble, gaining over 23,287 interactions.

I just received a report that @elonmusk is allowing #DiedSuddenly to be kept off the trending list for #Twitter. Is this a #freespeech or not? Share this with Musk so he can fire whoever is responsible... (giving him the benefit of the doubt).

Tweet promoting Died Suddenly on Rumble, reaching 19,336 interactions.
2) YOUTUBE

While the documentary was uploaded to YouTube first, the platform took action and removed it for violating its Guidelines. According to the most recent available archive version of the video, it reached 162,621 views before it was removed from the platform.

However, YouTube allowed several shorter versions of the movie on its platform for longer, and also failed to take action on videos that echoed debunked claims related to Died Suddenly.

In particular:
- Of the ten YouTube videos in our sample only two of them were actioned, eight of them still remain on the platform.
- The ten YouTube videos clocked 96,525 interactions and 1,892,240 views.

### ACTIONED

The full movie of Died Suddenly was removed within a week, but not before the video reached over 162,621 views.

### UNACTIONED

Several versions, however, remained on the platform. This example is a video by Finnish commentators, sharing the link to the full documentary in the description and streaming the documentary via Rumble to YouTube.

3) FACEBOOK

In the case of Facebook, Avaaz analysed two datasets. The first dataset included 26 examples of content where Died Suddenly was uploaded on the platform. The second dataset instead included 180 posts where a link to the full movie was directly shared on the platform.

The first dataset of 26 examples included several versions of the movie being shared in various languages, including Finnish, Polish, Italian, Danish, Hungarian and German.

Facebook only detected and labelled 35% of these posts, the rest remained unlabelled.
The second dataset included the top 180 publicly available posts that shared direct links to Died Suddenly on Facebook. These links were:
- Died Suddenly full movie on Rumble
- Died Suddenly full movie on Twitter
- Died Suddenly full movie on Stew Peters’ website

Our analysis found that, for this second dataset, Facebook applied labels or took down posts in 72% of the cases when a link to the full movie was shared. Around 28% of posts that shared direct links to Died Suddenly remained unlabelled on the platform.

The analysis revealed that direct links to the Died Suddenly documentary and related content generated at least twice as many interactions on Facebook compared to Twitter, and at least four times as many shares on Facebook as on Twitter.
Based on an analysis of 44 links promoting Died Suddenly, both interactions and shares were higher on Facebook, with Facebook racking up 469,658 interactions and 149,805 shares, compared to Twitter’s 206,760 interactions and 31,974 shares.

4) INSTAGRAM

According to our preliminary research, the spread of Died Suddenly on Instagram was less extreme than on some of the other platforms.

It is notable, however, that the Stew Peters Network runs an official Instagram account, and it appears to be promoting the movie without any visible restrictions, albeit with few interactions overall.

Stew Peters runs an Instagram account that promotes Died Suddenly.

In our sample of Instagram posts that either promote Died Suddenly or make fact-checked claims related to the movie, we found that 91% had false information labels applied.
5) TikTok

TikTok saw many individual users promoting the documentary and the search term Died Suddenly appeared to become popular around the launch date. However, TikTok did not have an official Died Suddenly account and the limit on the length of uploaded videos potentially prevented users from sharing the documentary in its entirety.

Avaaz identified 12 TikTok posts that promoted the documentary and reached significant interactions. TikTok only took action on two of these posts; the other ten posts remained on the platform at the close of our research.

- The 12 posts we sampled which promoted Died Suddenly racked up nearly 974,306 views and 57,743 interactions.
- TikTok only took action in the case of two posts, removing them from the platform. This amounts to only 17% of posts being actioned.

### Popularity of hashtags related to Died Suddenly

While we could not track increases in hashtag mentions on TikTok as we could for Twitter, as of January 2, 2023, views on three main hashtags on TikTok neared 20,000,000 views.

Popular hashtag views as per January 2, 2023:

- #diedsuddenly: 14.7M views (archive)
- #diedsuddenly22: 4.2M views (archive)
- #diedsuddenlydocumentary: 789.8K views (archive)

6) Linkedin

While LinkedIn did not have an abundance of posts promoting Died Suddenly and the numbers for user interactions are notably smaller than any other platforms in our sample data, we found that LinkedIn still
had several posts sharing the link to the full movie and asking viewers to watch it.

- We identified seven posts that directly promoted Died Suddenly.
- No action was taken by LinkedIn to either inform users about false information or to remove these posts.

Several LinkedIn users shared the direct link to Died Suddenly and asked viewers to watch the documentary.

The Stew Peters Network also operates a LinkedIn profile, and promoted the film on LinkedIn. (archive)
Methodology

The investigative team analysed disinformation content about the *Died Suddenly* documentary posted on nine different platforms between October 27, 2022 and December 28, 2022, that met the following criteria:
1. Were fact-checked by reputable fact-checking organisations.
2. Were rated “False,” “Misleading,” “Unsupported,” or “Incorrect.”
3. Could cause public harm by undermining public health. Avaaz has included content that impacts public health in the areas of:
   - Preventing disease: e.g., false information on diseases, epidemics and pandemics and anti-vaccination misinformation.
   - Creating distrust in health institutions, health organisations, medical practitioners and their recommendations: e.g., false information implying that clinicians or governments are creating or hiding health risks.
   - Fearmongering: health-related misinformation that can induce fear and panic, e.g., misinformation stating that the coronavirus is a human-made bio-weapon being used against certain communities or that Chinese products may contain the virus.

METHODOLOGY FOR MEASURING LABELLING AND REMOVALS

For the purpose of measuring the fact-checking efforts of major social media platforms, the Avaaz investigative team analysed a sample of 108 posts about *Died Suddenly* based on the above criteria.

For each of the false and misleading posts and stories sampled based on the above criteria, the team recorded and analysed, using both direct observation and CrowdTangle:
- The total number of interactions it received.
- The total number of views it received in the case of video.
- Whether each had a warning label as false or misleading, or whether the given platform took down the piece of content.
- When misinformation posts would receive a fact-check warning label or be removed.

METHODOLOGY FOR CALCULATING THE SPREAD OF THE OFFICIAL DOCUMENTARY LINKS ON FACEBOOK

On December 6, 2022, the Avaaz research team studied the spread of the three following official movie links created by the *Died Suddenly* official accounts on Rumble, Twitter and on the Stew Peters official website.

- *Died Suddenly* full movie on Rumble
- *Died Suddenly* full movie on Twitter
- *Died Suddenly* full movie on Stew Peters’ website

Using CrowdTangle, Avaaz selected the 180 publicly available posts that had shared one of the above mentioned links and had garnered a minimum of ten interactions.

METHODOLOGY FOR CALCULATING THE SPREAD OF LINKS ABOUT THE DOCUMENTARY ON FACEBOOK AND TWITTER

Science Feedback, a fact-checking organisation, provided Avaaz with a dataset of 52 different links to the official *Died Suddenly* full movie, trailer or articles reporting on the documentary. This dataset included 38,977 tweets that shared these links.

We selected the 44 links that were shared on Twitter between November 21, 2022 and January 10, 2023 and then calculated the engagement they received on that platform.

For Facebook, we were then able to calculate likes and shares for those 44 links using CrowdTangle.

METHODOLOGY FOR CALCULATING MISINFORMATION AMPLIFICATION SCORE (MAF)

To measure the extent to which platforms amplify disinformation, we applied the methodology developed by the Integrity Institute to track the average Misinformation Amplification Factor (MAF) for social media platforms. The Integrity Institute also provided guidance and data processing support. The MAF is the ratio between how much engagement a disinformation post gets and what is the historical engagement of content from the creator.

The MAF for a specific piece of disinformation content is

\[ \text{MAF} = \frac{\text{Engagement on disinformation post}}{\text{Average engagement on posts from creator prior to disinformation post}} \]

We compute the average engagement on all content from the creator who uploaded the disinformation content for the two weeks prior to them posting disinformation, or the 15 posts they made prior to the disinformation post when there is limited content in the two week window (in the rare case we can’t get 15 pieces of content for the baseline, we remove that specific piece of misinformation content from consideration). This may include disinformation posts, if the creator is a serial poster of disinformation, which is one bias that can cause us to underestimate the MAF.

This gives us a MAF for every disinformation post that fact-checkers identify. To compute the MAF for each platform, we average the MAF for every post we collect on it. (Specifically, we average the logarithm of the MAF, since engagement on content generally follows a log-normal distribution.)
GENERAL NOTE ON METHODOLOGY

It is important to note that, while we collect data and compute numbers to the best of our ability, this analysis is not exhaustive as we looked only at a sample of fact-checked disinformation posts regarding the documentary *Died Suddenly*.

Moreover, this research is made significantly more challenging because social media platforms do not provide investigators with access to the data needed to measure the total response rate, moderation speed, number of fact-checks and the amount of users who have seen or been targeted with disinformation.

We also recognise the hard work of employees at social media platforms across different sub-teams, who have done their best to push the companies to fix their disinformation problem. This report is not an indictment of their personal efforts, but rather highlights the need for much more proactive decisions and solutions implemented by the highest levels of executive power at each of the companies.

Cooperation across fields, sectors and disciplines is needed more than ever to fight disinformation. All social media platforms must become more transparent with their users and with researchers to ensure that the scale of this problem is measured effectively and to help public health officials respond in a more effectual and proportional manner to both the pandemic and the infodemic.

It is important to note that although fact-checks from reputable fact-checking organisations provide a reliable way to identify disinformation content, researchers and fact-checkers have a limited window into disinformation spreading in private groups, on private profiles and via messaging apps such as WhatsApp, Telegram or Facebook Messenger.

Similarly, engagement data for posts analysed in this study are only indicative of wider engagement with, and exposure to, disinformation. Consequently, the findings in this report are likely conservative estimates.
Endnotes


2. Within this briefing we use the definition of disinformation included in the EU Code of Practice on Disinformation which “is considered to include misinformation, disinformation, information influence operations and foreign interference in the information space.”

3. Article 35 of the Digital Services Act. “When assessing the systemic risks identified in this Regulation, those providers should also focus on the information which is not illegal, but contributes to the systemic risks identified in this Regulation. Such providers should therefore pay particular attention on how their services are used to disseminate or amplify misleading or deceptive content, including disinformation.”

4. Total Mentions of #DiedSuddenly increased by 3258% between September 22, 2022 and December 20, 2022, according to Data retrieved via the Monitoring & Social Listening Platform Meltwater.

5. The Avaaz research team monitored disinformation posts between December 1, 2022 and January 13, 2023.

6. These numbers were computed on the basis of the methodology for the Misinformation Amplification Factor developed by the Integrity Institute.

7. Commitment 18. Relevant Signatories commit to minimise the risks of viral propagation of Disinformation by adopting safe design practices as they develop their systems, policies, and features.

8. Article 35.1 of the Digital Services Act: “Providers of very large online platforms and of very large online search engines shall put in place reasonable, proportionate and effective mitigation measures, tailored to the specific systemic risks identified pursuant to Article 34, with particular consideration to the impacts of such measures on fundamental rights.”

9. Article 35 of the Digital Services Act: “Those reports shall present systemic risks broken down by the Member States in which they occurred and in the Union as a whole, as applicable.”

10. Stew Peters runs a recently reinstated Twitter, as well as LinkedIn and Instagram, Getter, Gab, Telegram profiles.


13. Total Mentions of #DiedSuddenly increased by 3258% between September 22, 2022 and December 20, 2022, according to Data retrieved via the Monitoring & Social Listening Platform Meltwater.

14. The links were flagged by independent fact-checking organisations that have flagged potential Disinformation, as well as warning labels from other authoritative sources.

15. Article 35.1 of the Digital Services Act: “Providers of very large online platforms and of very large online search engines shall put in place reasonable, proportionate and effective mitigation measures, tailored to the specific systemic risks identified pursuant to Article 34, with particular consideration to the impacts of such measures on fundamental rights.”

16. Within this briefing we use the definition of disinformation included in the EU Code of Practice on Disinformation which “is considered to include misinformation, disinformation, information influence operations and foreign interference in the information space.”

17. Science Feedback is a not-for-profit organisation verifying the credibility of influential claims and media coverage that claims to be scientific, starting with the topics of climate and health.

18. Science Feedback is a not-for-profit organisation verifying the credibility of influential claims and media coverage that claims to be scientific, starting with the topics of climate and health.

19. Full list available upon request.

20. Engagement on Facebook was calculated between November 21, 2022 and January 13, 2023.


22. See Footnote 7.

23. Article 34 of the Digital Services Act: “Those reports shall present systemic risks broken down by the Member States in which they occurred and in the Union as a whole, as applicable.”

24. Full sample available upon request.

25. 8 posts shared on Facebook.

26. 23 posts shared on Facebook.

27. 139 posts shared on Facebook.

28. 87,500 #DiedSuddenly Total Mentions (Oct 22, 2022 - Nov 20, 2022)

29. 315,000 #DiedSuddenly Total Mentions (Nov 21, 2022 - Dec 20, 2022)


32. For this reason we have excluded the @DiedSuddenly account from this analysis, since most of the posts from that account are disinformation or about the “died suddenly” narrative, and so we were not able to compute a baseline for non-disinformation content from that account.