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ANALYSING ENABLERS AND INCENTIVES OF ELECTION-RELATED FOREIGN INFORMATION MANIPULATION AND INTERFERENCE

A Global Methodology

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Contents

Abbreviations

adtech	Advertising technology
EEAS	European External Action Service
FIMI	Foreign information manipulation and interference
LGBTQIA+	Lesbian, gay, bisexual, transgender, queer, intersex and asexual
NATO	North Atlantic Treaty Organization
PR	Public relations
TTPs	Tactics, techniques and procedures

INTRODUCTION

The present methodology is designed to empower civil society actors to conduct analysis, build relevant operational and contextual knowledge, and ultimately formulate policy and practical action points tackling multiple aspects of election-related foreign information manipulation and interference (FIMI).[1]

The underlying rationale is that supporting context-specific research and mapping of the factors that shape information ecosystems and make them vulnerable to manipulation is a critical step to engage appropriate actors and develop effective responses.[2]

To compile and validate the methodology, the authors have drawn on a range of sources including grey and academic literature on FIMI's impact on democratic institutions and processes, consultations with FIMI experts, and direct insights and feedback gathered from civil society organizations working in selected countries.

The methodology consists of three main sections. The first introduces the problem of election-related FIMI—stressing its gender dimension—and elaborates on the potential role of civil society in addressing it. The second and third sections distil and explain the social, political, cultural, economic, technological and legal factors that make election-related FIMI activities possible (**enablers**) but also appealing and profitable (**incentives**) across contexts, illustrating them with real-world **examples** and suggesting **research questions** that can guide the analysis.

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1 The project 'Combating Election-related Foreign Information Manipulation and Interference' aims to support resilient and gender-sensitive democratic societies that can effectively counter election-related FIMI. One of the ways the project intends to achieve this goal is by increasing the involvement of civil society organizations in preventing and countering FIMI, in particular by improving their knowledge, skills and capacity to identify and analyse—from a gender-sensitive perspective—the main enablers and incentives of election-related FIMI. The present methodology has precisely this purpose.

2 See Arnaudo et al. (2021) on mapping the information environment as a first step in combating election-related information manipulation. See also EEAS (2024a) on risk and vulnerability assessment as a key component in the Identification & Preparation phase of the proposed Response Framework to FIMI threats (applied to elections).

Although election-related FIMI is the subject of a global discourse, the specific challenges that FIMI poses to election integrity and democracy may vary greatly from one context to another. The same is true for FIMI enablers and incentives, which may take different 'local' forms depending on unique combinations of historical, socio-political, economic and cultural factors. On top of this, reliable and accurate data might not always be available—especially in the Global South, where data scarcity poses significant limits on one's ability to investigate the information environment (Röttger and Vedres 2020).

To reflect this complexity, this methodology takes a global, holistic approach to the phenomenon of election-related FIMI, while at the same time incorporating elements and nuances that are specific to the areas of intervention.

Chapter 1

HOW TO USE THIS METHODOLOGY

The purpose of the present methodology is to inform and guide the process of writing analytical reports that capture the main enablers and incentives of election-related FIMI in contexts of interest.

The methodology lists and explains 16 factors that make electoral FIMI possible (enablers) and 6 factors that make it profitable for a range of actors (incentives). This is intended as a 'menu' of potential directions for researching and analysing FIMI across contexts. Not all of them may be equally relevant or worth exploring in every context. Users should therefore select and investigate only those factors that they see as most significant or promising for their specific context. Ideally, this selection should be justified based on criteria of relevance, data availability and practical feasibility.

When unpacking and assessing selected enablers and incentives, users should combine their expert knowledge and perceptions with data taken from trusted sources, in order to strengthen the validity of findings. Reference to established global indices of democracy and media freedoms—such as the Global State of Democracy Indices (by International IDEA), the World Press Freedom Index (by Reporters Without Borders) and the Corruption Perceptions Index (by Transparency International), to name a few—is therefore strongly encouraged.

Chapter 2

FIMI, ELECTIONS, GENDER AND CIVIL SOCIETY

This chapter introduces the concept of FIMI, explains FIMI's adverse impact on democratic and electoral processes—also from a gender perspective—and outlines the emerging role of civil society in strengthening resilience to it.

2.1. **WHAT IS FIMI?**

Foreign information manipulation and interference, usually referred to as FIMI, has emerged in recent years as a growing concern for its potential to disrupt democracies across the globe by undermining both reliance on evidence-based discourse and trust in democratic decision making. The European Union, as one of the key global actors in the FIMI debate and counter-FIMI community building, provided its currently most widely accepted definition:

Definition 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' (EEAS 2023a: 25).

The origins of the concept of FIMI can be traced back to Russian interference in the 2016 United States elections, which attracted extensive research and policy attention towards the dangers and threats posed by disinformation. Later on, the Covid-19 pandemic and the war in Ukraine exacerbated concerns over the role of FIMI in the context of geopolitical confrontations (mainly between Western actors and Russia and China) (EEAS 2022). In recent years, Russian influence operations targeting African societies have surged, especially in the Sahel, where Russia has used FIMI to legitimize its growing economic and military influence in the region amid political instability (African Center for Strategic Studies 2024).

Crucially, FIMI builds on but goes beyond the concept of disinformation,[3] considering the latter as just one among the many tools that malicious actors can deploy in orchestrated, professional, sometimes covert influence campaigns that target the information environment and are deliberately aimed at undermining democratic institutions and processes.

This conceptualization has also inspired a shift of focus from establishing the veracity/falsity of content—which was the primary goal of counter-disinformation activities—to detecting and classifying the patterns of behaviour that threat actors follow when they engage in FIMI.[4]

FIMI versus disinformation 'The deciding factor for whether something can be considered FIMI is not false or misleading content, but deceptive or manipulative behaviour' (EEAS 2023a: 25).

Accumulating evidence of FIMI's sophistication, scale and potential impact has led to a deeper understanding of FIMI as a complex threat, which might endanger areas from national and global security to democracy, social cohesion and human rights, but also serve as a potential instrument of warfare (EEAS 2024a).

2.2. **FIMI AND ELECTIONS**

As stated above, FIMI's overarching goal is to influence and disrupt political processes and democratic institutions. It is also clear that events are important catalysts for FIMI activity, because FIMI actors can strategically exploit the public and media attention created by key events and stress moments to advance their interests (EEAS 2024a). It follows from these two premises that elections and referendums represent critical opportunities for information manipulation and interference (Lambert 2024; UNDP 2022).

It comes as no surprise, then, that the global discussion on FIMI has mostly centred around its potential to undermine electoral processes. Concerns with Russian deliberate interference in the 2016 US elections gave enormous impetus to the emergence of FIMI as a concept, and 2024, as the biggest election year in human history (with some 3.7 billion voters involved) (UNDP 2024), has brought renewed attention to the threat of FIMI (and more broadly mis/disinformation) worldwide (Ecker et al. 2024; World Economic Forum 2024).

[3] Disinformation is generally defined as the spread of information that is false and deliberately created to harm a person, social group, organization or country. See UNDP (2022).

[4] One of the most promising attempts at classifying FIMI behaviour is the DISARM Framework, which advances an ever-expanding catalogue of tactics, techniques and procedures that FIMI actors may adopt to plan, prepare, execute and assess their manipulative actions. See DISARM Foundation (n.d.).

Although the risk of influence operations is undoubtedly real, the actual impact of misinformation and information manipulation on electoral processes is less clear (Adam 2024; Clarke 2025), and so is the effectiveness of counter-FIMI measures (Lambert 2024). There is wide agreement, however, that election-related FIMI is a complex phenomenon that can take many forms.

According to a 2024 European External Action Service (EEAS) report that examines 33 FIMI incidents in election contexts (EEAS 2024a), FIMI poses five macro-threats to elections. Specifically, FIMI may target:

1. Information consumption with FIMI actors seeking to control the information agenda on certain topics	**2. Citizens' ability to vote** in order to delegitimize election results	**3. Candidates and political parties** also by waging gender-based disinformation attacks against women politicians	**4. Trust in democracy** by portraying the electoral system as weak and open to manipulation[5]	**5. Election-related infrastructure** as part of larger hybrid attacks on key electoral infrastructure

What is more, election-related FIMI may begin months before the vote and continue well beyond it, with each of the above threats progressing differently depending on the specific period (EEAS 2024a). Hence, protecting elections from FIMI is a long-term process that requires the involvement of various stakeholders, from government and international organizations to civil society and private industry (EEAS 2024a).[6] The latter category includes social media platforms and search engines, whose role in ensuring election integrity has been increasingly recognized (Kumar 2024).

2.3. **THE GENDER DIMENSION OF FIMI**

Gender has emerged as a distinct area of policy concern and action to combat identity-based disinformation, and more recently identity-based FIMI. Current definitions of gendered disinformation conceive it as deliberate dissemination of deceptive information on female figures, drawing on deep-seated stereotypes and aimed at deterring women from participating in public life (Judson et al. 2020; Martiny et al. 2024). Gendered disinformation can overlap with and be part of online gender-based violence including trolling, harassment and hate speech, be it in a clandestine or organized state-sponsored fashion (Nyst and Monaco 2018; Martiny et al. 2023). In particular, targeting of women politicians and attempts to dissuade them from participating in political life and elections have been well documented (Spring and Webster 2019; Guerin and Maharasingam-Shah 2020; Simmons and Fourel 2022; Martiny et al. 2024).

[5] A variety of false narratives may be deployed to serve this purpose, including fabricated claims of voter fraud, illegal vote tampering, flaws in electronic or mail-in voting, irregular registration practices or foreign interference. See Panizio (2024).

[6] For an overview of EU efforts in combating foreign interference in elections, see Clapp (2024).

Importantly, some of the applied research on the topic broadens the perspective beyond the binary conceptualization of gender and points to a disproportionate targeting of LGBTQIA+ individuals, rather than looking only at women (Jonusaite et al. 2022). When conducted in the scope of (foreign) influence operations, the diffusion of alarmist narratives and moral panic around gender, sexuality, reproductive rights and so on tends to serve higher political purposes, LGBTQIA+ rights and community per se usually not being the ultimate target (Judson et al. 2020).

Working definition Gendered FIMI involves deceptive and demonstrably coordinated activities in the information environment conducted by state and non-state actors that directly or indirectly cause harm to women and/or LGBTQIA+ individuals and communities by drawing on and reproducing deep-seated stereotypes and biases (EEAS 2023b).

Providing evidence of foreign actors (or proxies) perpetrating gendered information manipulation (or any other type of FIMI) requires significant resources and technical capabilities. This is why there are only a few solidified cases of gendered FIMI analysis that go beyond qualitative testimonies, and their focus is limited to Russia as a perpetrator of FIMI in democratic countries (She Persisted 2024).

Probably the most systematic cross-platform analysis of gendered FIMI so far was produced by the EEAS in 2023, and it points to some of the complexities involved in pinpointing and countering gendered FIMI. Specifically, while a significant number of incidents were attributed to the Russian FIMI ecosystem, almost half of these incidents could not be attributed to it directly (EEAS 2023b). In other words, clear-cut cases of gendered FIMI blend into a broader network of diffusion, citation and amplification of content denigrating LGBTQIA+ rights. Further, a review of other attacked entities (besides LGBTQIA+ individuals) and meta-narratives deployed in the scope of these gendered FIMI activities (EEAS 2023b) shows how gender tends to be used as a tool for higher ends, such as undermining democratic values in general.

However, it is important to note that the way in which foreign-led influence operations instrumentalize gender might vary depending on the foreign actor in question and the geopolitical context. Thus, for example, it was found that Venezuelan influence operations on Twitter (now X) mostly involved diffusion of clickbait sensationalist content on the feminist movement ('tabloid tweets') rather than more elaborate critique or direct attacks on movement and individuals. Iranian operations in English on the same platform, counter to what might be expected, involved celebrating solidarity with feminist figures and women's empowerment in the USA (Bradshaw and Henle 2021).

In conclusion, further insight into how narratives on gender identity and rights are deployed in the scope of influence operations is needed. While some features of gendered FIMI show general traits of contemporary influence operations,

there seems to be much variation in how gender is weaponized, depending on the actors, platforms and immediate context. Being hot button issues in many contexts, gender-related and LGBTQIA+ issues lend themselves to potential FIMI exploitation, especially during stress moments such as elections.

2.4. **THE EMERGING ROLE OF CIVIL SOCIETY IN BUILDING RESILIENCE TO FIMI**

In recent years, with the emergence of a global concern that FIMI could be a threat to democracy, the way FIMI experts and the defender community think about the role of civil society in countering information manipulation has changed considerably. Initially, when most research and policy efforts were focused on tackling 'fake news' and disinformation, civil society acted mainly in the areas of fact-checking, open-source intelligence and media literacy. Nowadays, civil society actors—including non-governmental organizations, think tanks, advocacy groups and informal citizens' networks—are increasingly seen as full-fledged stakeholders and essential players in the collective response to FIMI (EEAS 2024a).

The underlying reasoning is that the multidimensional nature of FIMI requires a whole-of-society approach (Lambert 2024; see also UNDP 2022), since the resources and capabilities required for countering FIMI are not found within any single entity but can only be mobilized across different societal domains (Miller 2025). The promising potential of such an approach in tackling information manipulation campaigns around elections is attested by a number of successful initiatives around the world (see examples from Mexico and Taiwan in Arnaudo et al. 2021).

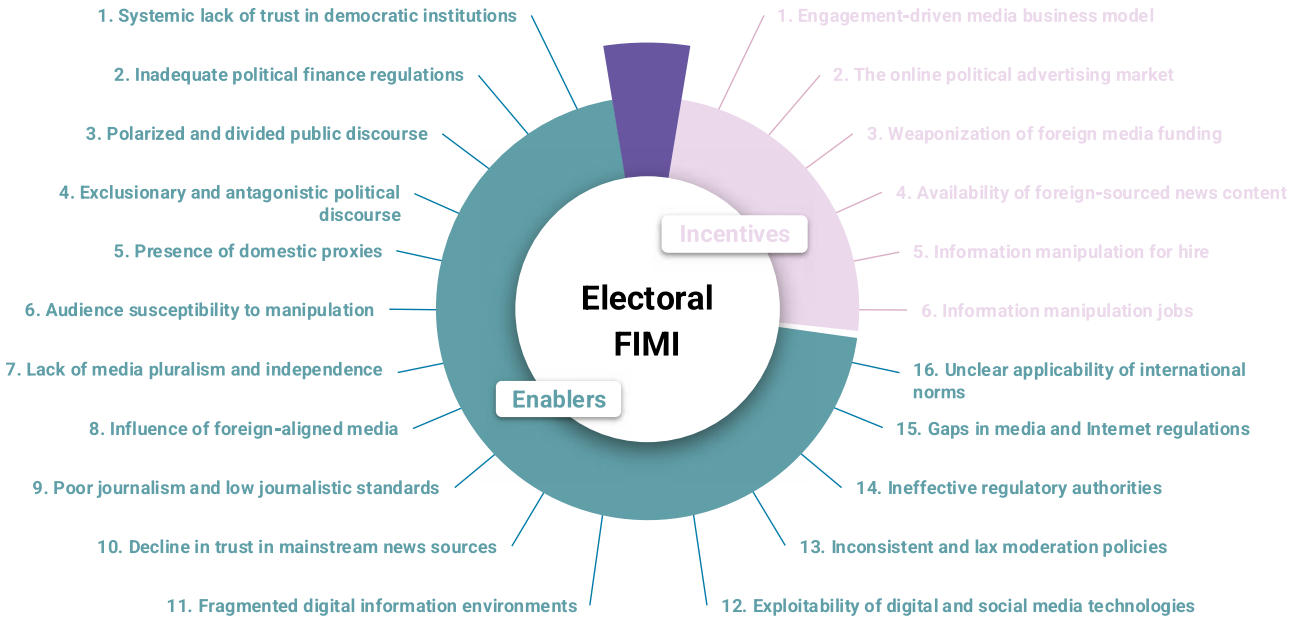
While there is no unified view of what civil society can and should do to counter FIMI, there is substantial consensus that civil society actors—alongside researchers and journalists—can be invaluable in strengthening societal resilience to FIMI (Lambert 2024). Civil society can also greatly help the defender community to move from crisis- and incident-based responses to a more comprehensive approach to countering FIMI that combines specific reactive measures in critical moments (such as elections) with preventive and long-term activities. The EEAS has strongly recommended such a shift (see EEAS 2024a).

In this respect, an important way in which civil society can contribute to tackling FIMI is by conducting research and analysis on vulnerabilities and driving factors of FIMI across contexts. The present methodology intends to support this effort by providing guidance to civil society actors on how to identify and analyse FIMI enablers and incentives across contexts.

Chapter 3

ENABLERS OF ELECTORAL FIMI

What are the factors that make election-related FIMI possible? This section unpacks the main enablers of FIMI, which are grouped into five distinct domains: political institutions and practices (enablers 1 and 2); the social, political and cultural environment (enablers 3 to 6); news media and journalism (enablers 7 to 10); social media (enablers 11 to 13); and the legal and regulatory sphere (enablers 14 to 16).



3.1. POLITICAL INSTITUTIONS AND PRACTICES

By definition, the primary target of electoral FIMI is elections. As outlined in the introduction, FIMI poses multiple macro-threats to elections. When political institutions are healthy and resilient, and democratic practices consolidated, such threats can be more effectively mitigated. But when political institutions suffer from weakness and shortcomings that make them vulnerable to undue influence, such threats are further exacerbated.

Enabler 1. Systemic lack of trust in democratic institutions

Let's start with an example

In the 2024 presidential elections in Romania, the precipitous rise and surprise victory of Călin Georgescu, a relatively unheard-of far-right candidate known for his Moscow-friendly remarks, raised concerns over the integrity of Romania's electoral process. After Georgescu declassified intelligence reports alleging a Russian interference campaign geared towards benefiting him on TikTok and Telegram, the country's Constitutional Court decided to annul the election results and ordered a rerun (Atlantic Council 2024).

Explanation

Electoral FIMI exploits the inherent openness of democratic institutions and their systemic vulnerabilities as entry points to undermine democracy's quality and legitimacy and thus achieve its manipulative intent. Unlike authoritarian regimes, which rely on tight control of narratives and public opinion as a central tool of power, modern democracies function as open, pluralistic and competitive arenas where diverse interests and groups compete for influence. This is democracy's main strength but also its main weakness, because its highly complex institutional structures require legitimacy—that is, citizens' consensus and trust—in order to function properly. Free and fair elections (and referendums) are a democracy's foundation and probably its most critical process. The challenge is to ensure electoral integrity, which means to guarantee the fairness of the entire process—from electoral campaigns to candidate selection, from voting to vote-counting procedures—and to protect it against undue interference from internal and external actors. FIMI threatens election integrity[7] by distorting citizens' understanding and perception of the legitimacy, transparency and accountability of the electoral process, thus undermining their trust in democratic institutions. Well-designed institutions, transparent procedures and an informed citizenry are therefore key drivers of a democratic system's resilience to FIMI—that is, its capacity to withstand and adapt successfully in the face of external manipulation threats (Terren, Van Aelst and Van Damme 2023).

[7] See the five macro-threats that FIMI poses to elections as listed in Chapter 2.

Guiding research questions

- What safeguards and mechanisms are in place to ensure transparency, fairness and accountability of democratic processes, especially in the context of elections?
- What challenges do democratic institutions face in terms of legitimacy and consensus? What could be aggravating and mitigating factors in this regard?
- Is there a history of either national or international actors denouncing irregularities during elections? If yes, what kind of irregularities might have taken place, and what measures have been adopted to address them?
- Are there known vulnerabilities of the election system? Have they been or could they be exploited by foreign actors or their proxies? How?

Enabler 2. Inadequate political finance regulations

Let's start with an example

A 2021 report by International IDEA highlighted a gap in Mexico's legislation on the use of influencers in political campaigning. While campaign spending limits are well regulated, the law does not contain clear provisions on paid partnerships with popular influencers promoting political parties and candidates on their social media channels. The commercial value of such partnerships could exceed campaign spending limits, but this is not reflected in the current political finance regulatory framework (Agrawal, Yukihiko and Fernández Gibaja 2021).

Explanation

Inadequate political finance regulations can create opportunities for foreign actors and their proxies seeking to manipulate political and electoral processes in a target country. Political finance regulations are norms that govern the funding of political parties and election campaigns, and are critical to promoting democratic integrity, transparency and accountability. When political finance is not adequately controlled, private interests—including foreign ones—can exploit gaps and loopholes to exert undue influence over political decisions (Hamada and Agrawal 2020; see also Panizio 2024). This practice is now commonly known as malign finance—an umbrella term for the funding of foreign political parties, candidates, campaigns, influential elites or politically active groups, often channelled through opaque structures intended to conceal links to a nation-state or its proxies (Rudolph and Morley 2020). The rise of digital technologies has added a further layer of complexity to the problem, creating opportunities (e.g. for increased transparency and accountability) but also significant challenges—notably in terms of controlling how political parties and candidates raise and spend money for

online campaigning. In principle, any expenditure incurred when creating, maintaining and spreading political messages online—including known digital campaigning strategies (Tham 2021) such as web pages, advertising and search engine optimization; the use of social media platforms and paid advertising; mobile services; data tools; political campaigning software; crowdfunding; and other digital fundraising tools—should fall under political finance regulations and oversight. However, the absence of an adequate normative framework governing funding management and disclosure, combined with gaps in digital capacity, makes it virtually impossible for many authorities to effectively track and verify expenditures in the online environment (Agrawal, Yukihiko and Fernández Gibaja 2021; see also International IDEA 2019). This is especially true for activities conducted in the frame of foreign-linked information operations, which often rely on paid-for digital campaigning to elicit, or masquerade as, organic campaigning.

Guiding research questions

- How comprehensive and detailed is the political finance regulatory framework of your country?
- To what extent are existing political finance regulations implemented and complied with?
- What does the legislation say about funding of parties and election campaigns by foreign actors? Are there known gaps in legislation on funding management and disclosure that offer entry points for foreign actors to exert undue influence?
- What provisions are there concerning how political parties and candidates raise and spend money for online campaigning, and how well are they enforced?
- To what extent does political finance legislation cover the affordances of digital and media technologies, including the most recent ones, especially when it comes to online political campaigning?
- What is the capacity of authorities to track and verify online expenditure for political purposes?

3.2. **THE SOCIAL, POLITICAL AND CULTURAL ENVIRONMENT**

Although it primarily targets political processes, election-related FIMI does not happen in isolation from broader social, political and cultural dynamics and trends. On the contrary, FIMI actors leverage, exploit and seek to shape such trends in order to achieve their manipulative purposes.

Enabler 3. Polarized and divided public discourse

Let's start with an example

The narratives employed by the Doppelganger campaign—a multifaceted FIMI operation originating from Russia and targeting the 2024 European elections in various EU countries—centred on polarizing issues specific to each country. In France, the focus was on migration and the war in Ukraine. In Germany, energy and climate issues were more prominent. In Poland, manipulative narratives were mostly about Ukrainian refugees (EEAS 2024b).

Explanation

FIMI aims to disrupt democratic political processes—primarily elections—by sowing distrust and fear and by manipulating voters' perceptions and preferences. The most efficient way for FIMI actors to achieve this goal is by exploiting and exacerbating existing wedge (or 'hot button') issues that are likely to generate strong opinions in the targeted communities. A divided public discourse is a feature of democratic societies. But when public discourse is deeply divided around contentious topics and deep-seated grievances, FIMI actors may exploit these to manipulate the debate to their own advantage. The problem is particularly acute in situations of frozen or unresolved conflict. In this sense, a polarized and divided public discourse is a paramount enabler of FIMI. There is both ample evidence and wide agreement—among the defender community and beyond—that this is indeed the case. To mention some, the United Nations Development Programme considers a highly polarized or divisive public discourse to be one of the key societal enablers of information pollution (UNDP 2022); the EU has shown how FIMI activities targeting its external engagement mobilize narratives that fit into existing political fault lines (Fridman, Baudais and Gigitashvili 2023); and North Atlantic Treaty Organization (NATO) has emphasized how influence activities can exploit contentious topics that have the potential to divide certain segments of society. A case in point concerns gender identity and LGBTQIA+ rights, which are contentious topics in many contexts and therefore lend themselves to being potentially exploited by FIMI activities. Moreover, the argument has been made that the more FIMI efforts incorporate and exploit organic (i.e. not foreign-planted) narratives, the greater their impact on audiences is likely to be (Morača et al. 2023).

Guiding research questions

- How polarized and divided is public discourse in your country? What are the main driving factors?
- What specific hot button issues and related narratives usually spark animosity and grievances among the population?
- Which of the above are amenable to be exploited by FIMI actors seeking to manipulate voters' preferences and beliefs? How?
- What issues related to gender identities and LGBTQIA+ rights have the potential to divide public opinion?

Enabler 4. Exclusionary and antagonistic political discourse

Let's start with an example

In 2024, the killing of three girls in a stabbing attack in the United Kingdom sparked a wave of unrest and riots across the country, fuelled by false claims circulated by far-right political parties and groups that the perpetrator was a Muslim and an asylum seeker. Islamophobic and anti-immigrant posts circulated widely on social media. Russian disinformation bot networks readily amplified such inflammatory content, pushing messages lambasting the governing party and the alleged double standards of UK police (Morley-Davies 2024).

Explanation

Closely related to the previous point, another important enabler of FIMI, especially in the context of election campaigns, is the presence of exclusionary and antagonistic political discourse. When societal polarization is high and divisive rhetoric is pervasive, it becomes easier for foreign actors and their proxies to add fuel to that fire and achieve their manipulative aims. Political incivility and strong partisanship facilitate the spread of disinformation and pave the way for FIMI. In this respect, they constitute a systemic vulnerability of democratic and electoral processes. The reason is that hostile or disrespectful political discourse creates an environment where factual accuracy is overshadowed by emotional responses, which can lead individuals to seek out information that aligns with their views regardless of its truthfulness.[8] Antagonistic and exclusionary political discourse is most salient in contexts where populist identity-based politics is prevalent, and typically manifests as chauvinistic, racist and misogynist rhetoric. Based on discounting others, such rhetoric deployed by politicians has been shown to mix anti-immigrant tropes (Grzymala-Busse et al. 2020), pseudoscience and gendered slurs, sometimes bordering on abuse and hate speech (Judson et al. 2020; Grzymala-Busse et al. 2020). It has been argued

[8] Panizio (2024). See also Humprecht et al. (2024) on how online communications by populist politicians and parties, and hyper-partisan media, tend to generate elevated levels of angry reactions, which might further facilitate the diffusion of misinformation.

that populist rhetoric can open destabilization levers to hybrid threat activity and act as a vector for foreign interference (Lebrun 2023). Importantly, exclusionary and antagonist political discourse (and populism more broadly) may in turn benefit from foreign interference seeking to disrupt democratic processes (Grzymala-Busse et al. 2020). These two phenomena can thus be seen as mutually reinforcing.

Guiding research questions

- How widespread is exclusionary and antagonistic political discourse in your country?
- What are the factors that contribute to its diffusion and normalization?
- How prevalent is identity politics in your context of interest?
- To what extent do political actors engage in populist, chauvinistic, racist and misogynist rhetoric, particularly during election campaigns?
- Are there known or potential synergies between (populist) domestic political forces and FIMI actors?

Enabler 5. Presence of domestic proxies

Let's start with an example

In early 2023, claims of Chinese meddling in Canada's federal elections in 2019 and 2021 circulated widely in the media. According to leaked intelligence reports, Beijing had put pressure on its proxies in Canada in an attempt to sway election outcomes in favour of the Liberals. This included providing secret funding to certain candidates through Chinese diplomatic structures (Yousif 2023).

Explanation

FIMI actors can often rely on a range of domestic actors—like-minded politicians and subservient media, but also trusted community leaders, celebrities and influencers—to spread damaging content in the targeted information environment with the aim of influencing voters' behaviour and shaping election outcomes. These are the so-called FIMI proxies mentioned in the definition of FIMI provided in the introduction. In some cases, domestic proxies can be mobilized through various incentives (see Chapter 4: Incentives for electoral FIMI). In other cases, they will spontaneously—and unwittingly—take part in information manipulation activities on the basis of a perceived alignment with the FIMI actor's messaging and claims. Either way, the presence of domestic proxies acts as an enabler of election-related FIMI. Crucially, the strategy of using domestic proxies and recruiting domestic allies blurs the line between foreign and domestic interference (Ördén and Pamment 2021). What is more, foreign interests might coincide with those of certain domestic groups or

individuals—especially those with personal or financial ties to foreign powers—who do not necessarily act as proxies for the latter. FIMI actors have learned to deploy strategies and tactics that not only leverage but further cement this ambiguity (Morača et al. 2023). This makes any analysis of FIMI domestic proxies inherently challenging. Analysis of this enabler should do the utmost to uphold a 'do not harm' approach and focus on the different techniques, tactics, procedures and motivations that domestic proxies might engage with rather than on identification. It must be based on factual evidence and non-speculative application, and avoid unintended harms.

Guiding research questions

- Who are the main known or potential FIMI proxies in your country?
- In what sectors of society (politics, civil society, business, entertainment and so on) do these domestic proxies mainly operate?
- How strong and well documented are these proxies' ties with foreign actors and interests?
- Which of these proxies can be mobilized through specific incentives? Which are instead likely to spontaneously engage in FIMI activities?
- What information manipulation strategies do or could these proxies use in order to influence domestic democratic and electoral processes?

Enabler 6. Audience susceptibility to manipulation

Let's start with an example

Georgia's elderly population have spent a significant part of their life in the Soviet era. They speak Russian, maintain social connections within Russia, and many harbour a sense of nostalgia for the Soviet era. The mindset shaped during the Cold War provides fertile ground for fostering anti-Western sentiment and reinforcing loyalty towards Russia. They are therefore particularly vulnerable to Russian disinformation and interference (Disinformation Resilience Index 2018).

Explanation

FIMI campaigns seeking to manipulate democratic and electoral processes require receptive and susceptible audiences in order to be successful. They need target audiences not only to be exposed to the malicious content, but also to engage with it and possibly expand its reach further through amplification. Indeed, purveyors of disinformation often craft content intended to provoke anger or excitement in targeted users, hoping the audience will amplify the message themselves, lending it credibility and reach through their own social networks and personal influence (Wardle 2019). There are a number of factors

that make audiences more or less susceptible to information manipulation. The most crucial factor is the level of digital and media literacy—a broad concept encompassing the 'technical, cognitive, social, civic and creative skills' that enable individuals to access media, critically understand its content, and engage with it effectively (Panizio 2024). Indeed, low media literacy levels, low public awareness of disinformation and its risks, and low public capacity to verify information have been identified as posing a significant threat to information integrity (UNDP 2022). On a more general level, an audience's receptiveness to malicious content is largely shaped by cultural and other types of bias, which arise from an audience's specific background, values and beliefs. Crucially, bias is more often a precondition for effective information manipulation than a consequence of it. In fact, FIMI does not necessarily create bias against specific social groups; instead, it resonates with audiences where such biases are already deeply rooted (EEAS 2023b).

Guiding research questions

- What audiences or audience segments are particularly receptive to certain manipulative content in your country? Why?
- What demographic traits (such as age, gender, income level, education, occupation, group membership, religion, ethnic background, class, sexual orientation) define these audiences?
- What specific biases, cultural or otherwise, shape these audiences' susceptibility to malicious content?
- What is the level of digital and media literacy in your country? Are there particular groups or audiences that have significant lower levels of digital media literacy?
- What contextual factors may strengthen or limit audiences' ability to engage with media and digital technologies in a critical and responsible way?

3.3. **NEWS MEDIA AND JOURNALISM**

FIMI exploits and thrives on information poverty. Information poverty is defined as 'a situation in which individuals and communities do not have the requisite skills, abilities or material means to obtain efficient access to information, interpret it and apply it appropriately' (Britz 2004: 194). When media and journalism cannot ensure that the population has adequate access to free, plural, reliable and independent information, FIMI actors have a better chance of manipulating the conversation to their own advantage. News media are also a primary means of reframing current events and projecting influence (Elkjer Nissen 2016).

Enabler 7. Lack of media pluralism and independence

Let's start with an example

A 2024 study on Russian information operations found that South Africa's robust free media landscape limits Russia's ability to shape dominant narratives. Conversely, the media ecosystems of other African countries such as Egypt, Kenya and Mali were found to be much more vulnerable to foreign anti-Western manipulation due to lower levels of media pluralism and independence from political influence (Morley-Davies, Thomas and Baines 2024).

Explanation

Several aspects of the media and journalistic landscape may contribute to information poverty and hence serve as enablers of election-related FIMI. The first and most general one is a lack of media pluralism and independence. A plural and independent media sector is one in which a public service broadcaster exists and operates freely from political influence, where media ownership is transparent and does not suffer from excessive concentration, and where media outlets enjoy editorial autonomy from owners, advertisers and interest groups and are not subject to strict political or state control (Panizio 2024). Where these prerequisites are only partially or not at all met, the integrity of the information environment is jeopardized, and a hyper-partisan and highly politicized media landscape is likely to emerge. Adverse effects include reduced trust in mainstream news, reduced quality of news and reduced public access to news—especially for certain segments of the population (UNDP 2022). Together, these systemic vulnerabilities of the media landscape pose significant threats to electoral integrity, insofar as they provide an avenue for FIMI and disinformation actors to disseminate and amplify malicious content across the media spectrum.

Guiding research questions

- What is the level of media pluralism in your country? To what extent does the media system enable a plurality of perspectives, voices and analyses?
- How independent are the media of political and/or corporate interests?
- Is there a public service broadcaster, and how free is it from government or state control?
- What is the level of media concentration? How transparent is media ownership?
- What is the level of trust in mainstream news outlets among the population?
- Are there segments of the population that do not enjoy unrestricted access to information? Why is that?

Enabler 8. Influence of foreign-aligned media

Let's start with an example

In several African countries, Russian media content is widely shared, cited and discussed within communities, to the extent that Russian sources have effectively become a key part of the local media and information landscape (Limonier 2019; Mihoubi 2019). In India, Chinese state-owned media outlets exert a notable influence by operating Facebook and YouTube pages in several Indian languages (University of Navarra and XKDR Forum 2023).

Explanation

A fundamental FIMI-enabling factor is the capacity of foreign (and foreign-aligned) media to shape and influence the domestic media sphere in terms of news content production, dissemination and consumption. In order to foster a FIMI operation, it is necessary to establish a local media presence with infrastructures that allow for maximizing the reach of the message to be transmitted (Mihoubi 2019). Media outlets that are owned by or aligned with foreign state actors are therefore key assets for FIMI activities conducted in the interest of those same actors. An analysis of the role of foreign media as FIMI enablers, however, cannot be separated from a consideration of the symbiotic relationship that often exists between foreign and domestic information activities, which FIMI actors largely exploit (Morača et al. 2023). Indeed, evidence shows that information manipulation campaigns often rely on systematic orchestration of foreign-owned and domestic media channels. Moreover, using or posing as local voices to project authenticity—via franchising, subcontracting or 'sock-puppeting'—is a well-known FIMI strategy (Arenstein 2022). Additionally, FIMI ecosystems may also provide a platform for the spread of locally produced manipulative content, which further blurs the above distinction.

Guiding research questions

- What foreign-owned or foreign-affiliated media operate in your country? How established and pervasive is their presence in the local media landscape?
- How and to what extent do these media serve the interests of the foreign actor to which they are tied?
- Are these media known to spread manipulative content or peddle election-related narratives that can potentially undermine democratic institutions and processes in your country?
- Do synergies exist between certain domestic and foreign media channels? What specific media strategies are being deployed, especially in the context of elections?
- Is there evidence of local voices being used by foreign actors or proxies to project authenticity?

Enabler 9. Poor journalism and low journalistic standards

Let's start with an example

In the late 2010s and in 2020, more than 20 journalists worldwide—including people looking for freelance jobs during the pandemic lockdowns—were tricked into joining a Russian influence operation. Peace Data, a fake news website set up by the St Petersburg-based Internet Research Agency and masquerading as an independent media outlet, paid them to write and promote articles on controversial topics, including global human rights issues. The goal was to give credibility to stories that would deepen divisions in democratic societies, including the USA (Wanless and Walters 2020; McFarland and Somerville 2020).

Explanation

Information poverty is less prevalent where and when journalism does its job of delivering citizens the quality information they need to make informed decisions in a democratic society. Conversely, poor journalism and low journalistic standards contribute to a compromised information environment and work to the benefit of malicious actors seeking to interfere in democratic decision making. Indeed, poor-quality journalism has been acknowledged as one of the prime enablers of disinformation (UNDP 2022), and multiple reports on FIMI emphasize both the need to train journalists in detecting and counteracting false and manipulative narratives (see, e.g., Lambert 2024) and the need to encourage ethical reporting and responsible journalism as a way to increase the credibility of news sources (see, e.g., EEAS 2023a). At the same time, the weaknesses of journalistic practice cannot be understood without taking into account the conditions in which journalists conduct their work. Low compensation and precarious jobs make journalists more vulnerable to unethical practices, including being forced or bribed into distorting coverage to favour the sponsors and their agendas (Sampaio-Dias et al. 2019). Furthermore, journalists and fact-checkers may become targets of intimidation, harassment or violence, affecting their ability to ensure a quality information flow (Panizio 2024). This problem has a pronounced gender dimension, with female journalists often being targeted (Posetti et al. 2021), including in state-aligned operations (Judson et al. 2020).

Guiding research questions

- What is the general level of information poverty in your country, based on national and international reports and standards?
- To what extent are journalistic standards upheld? What are the main factors that support or undermine the ability of journalists to pursue ethical and responsible reporting practices?

- Are journalists trained in detecting, checking and responding to false information and manipulative narratives?
- What are the working conditions of journalists? To what extent are they vulnerable to unethical practices and subject to external influence?
- Have journalists, especially women, been the target of harassment or intimidation, particularly in the frame of foreign influence operations?

Enabler 10. Decline in trust in mainstream news sources

Let's start with an example

Based on evidence from Estonia, Lithuania and Taiwan, both China and Russia were found to seed narratives in local forums and fringe messaging sites, where they are more likely to appear to be grassroots organizations and thus convince intended audiences of their supposed authenticity. This can lead to 'information laundering', as these narratives can then be unwittingly amplified by mainstream media channels (Lambert 2024).

Explanation

A key FIMI enabler within the media domain is the observed decline in trust in mainstream news sources, which are rapidly being supplanted by social media platforms and influencers as the main source of news for large segments of the world population. The rise of mobile-first users, especially in the Global South, where mobile phones are often the only means of accessing the Internet, has facilitated this trend, further diminishing the credibility and editorial power of traditional media outlets (Röttger and Vedres 2020). In response, many established outlets have adopted breaking news strategies and committed resources to instantaneous coverage of news events rather than more in-depth reporting, which has led to the gradual erosion of journalistic standards of transparency and accountability (Röttger and Vedres 2020). This situation poses a twofold risk. On the one hand, the public is increasingly led towards alternative, often less reliable information channels, and thus more exposed to potential disinformation (Bencherif and Carignan 2023). This trend is especially troubling during election periods, as it can heavily influence voters' perceptions and decision making (Panizio 2024). On the other hand, FIMI actors may try to legitimize and accelerate this trend by fuelling general distrust in official sources and mainstream news channels, thereby encouraging reliance on fringe or unverified sources that serve those actors' interests or support their agendas (EEAS 2024a).

Guiding research questions

- What are the main sources of news in your country?
- What is the status of mainstream media outlets? To what extent are they being supplanted by social media channels as the main source of news and information, especially in the context of elections?
- How widespread is the adoption by the media of breaking news strategies and instantaneous coverage as opposed to in-depth reporting?
- Is there a general tendency to increasingly rely on alternative sources of information? What are the driving factors?
- Do narratives fuelling distrust in official and established sources circulate in the domestic information environment? Where do they typically originate, and what means are used for their diffusion?

3.4. **SOCIAL MEDIA**

FIMI campaigns largely exploit the powerful means provided by online social media platforms and apps and are often designed to take advantage of the specific ways in which social media users are exposed to and engage with information content.

Enabler 11. Fragmented digital information environments

Let's start with an example

Russian interference in the 2016 elections in the USA relied on the extensive use of targeted Facebook ads to manipulate specific audiences, including pro- and anti-LGBTQIA+, with misleading narratives (Jones 2020).

Explanation

On social media platforms, access to news systematically differs across individual users and is tailored to their preferences and attributes by algorithmic design. This results in an increased fragmentation and polarization of digital information environments, whereby users tend to be selectively exposed to so-called 'congenial' information and conversely grow unaccustomed to engaging with information they disagree with (Röttger and Vedres 2020). The concept of echo chambers describes such closed-off information environments, in which users associate with like-minded others and reinforce their pre-existing beliefs (Sunstein 2001). The closely related concept of filter bubble emphasizes the role of algorithms in selecting which content users are exposed to based on previous behaviour (Pariser 2011).

A polarized digital space, in which access to news is socially and algorithmically curated rather than universal and unfettered, is particularly susceptible to being manipulated by FIMI and disinformation actors, who can target specific audiences with tailored malicious content. The risk is particularly acute in election contexts.

Guiding research questions

- Is there evidence of existing fragmentation and polarization of the digital information environment of your country?
- Have studies been conducted on the presence of specific echo chambers that can be targeted or mobilized during elections? What are the main findings?
- Has research been done on the impact of algorithmic filter bubbles on political conversations in your country? What are the main findings?
- Have there been public initiatives aimed at limiting or mitigating the fragmentation of the online information sphere? How effective have they been?

Enabler 12. Exploitability of digital and social media technologies

Let's start with an example

The Russian-coordinated FIMI campaign known as Doppelganger, which targeted the 2024 European elections, relied on a network of coordinated inauthentic accounts to amplify the reach of cloned websites' content on social media platforms. The process involved four stages: (a) a group of inauthentic accounts published original posts that included links directing users to cloned websites; (b) a larger group of inauthentic accounts reposted the original posts in order to boost the content's visibility and potential impact; (c) amplifiers reshared the posts as comments on the timelines of users with large numbers of followers, thus increasing the penetration of the manipulative content within new audiences; and (d) the malicious network employed multistage URL redirection techniques to evade platform restrictions on posting web links to blacklisted domains (EEAS 2024b).

Explanation

Information manipulation and FIMI make use of a variety of tactics, techniques and procedures (TTPs) (EEAS 2023a). Many of these TTPs exploit specific features of digital and networking technologies to spread, amplify or target messages at different audiences on social media and beyond.[9] Therefore, a key enabler of FIMI is the exploitability of digital and social media technologies for malicious purposes. Known FIMI tactics that exploit the affordances of digital technologies

[9] See concrete examples of TTPs in: Foreign Information Manipulation and Interference—Information Sharing and Analysis Centre (FIMI-ISAC 2024: 14ff).

include generative artificial intelligence tools for creating fake profiles and content (such as deepfake videos), manipulated visual content, search engine manipulation and the exploitation of data voids (Golebiewski and boyd 2019), the creation of fake websites, trolling, computational propaganda via bots and other forms of automated technologies, sock-puppet accounts run by real people but generating inorganic engagement, micro-targeting strategies and so on (Arnaudo et al. 2021). The ease of access to such tools has made it easier to design, launch and wage powerful FIMI and disinformation campaigns.

Guiding research questions

- What specific digital and social media technologies could be exploited by malicious actors seeking to manipulate the domestic information environment, in particular during elections?
- Is there evidence of known strategies and tactics that FIMI actors have deployed? What specific technological features and affordances were exploited?
- Have there been any attempts to promote the development of digital and social media features that could help limit information manipulation in your context? How successful have they been?

Enabler 13. Inconsistent and lax moderation policies

Let's start with an example

In 2023, Facebook was found to have allowed Ilan Shor, a Moldovan oligarch with ties to the Kremlin, to place political ads seeking to exploit anger over inflation and rising fuel prices to destabilize Moldova's pro-Western government. Facebook eventually removed the ads, but not before they had reached millions of viewers (Klepper and McGrath 2023).

Explanation

For the reasons explained above, online media platforms and advertising technology (adtech) companies[10] could play, at least in principle, a key role in preventing, mitigating and combating FIMI and information manipulation at large. However, research has shown that social media companies are largely unable and/or unwilling to prevent manipulators from undermining platform integrity (Fredheim et al. 2023), while adtech companies continue to monetize disinformation content (Atkin 2023) including gendered disinformation (Global Disinformation Index 2023). Incentives or pressure to reverse these trends are generally insufficient, and this has resulted in social media companies doing less than they could to curb the spread of malicious content. In particular, inconsistent and lax moderation policies, coupled with a lack of accountability

[10] Adtech companies are businesses that develop and provide digital tools, platforms and services used to manage, deliver and analyse online advertising campaigns.

and transparency of social media and Internet companies, have been acknowledged as posing a serious challenge to the integrity of the online information space (UNDP 2022). Indeed, as some platforms update their content moderation policies in an attempt to curtail manipulative activities, FIMI actors are increasingly shifting their focus to social media platforms and messaging apps that provide lax content moderation, closed groups and strong encryption (Arnaudo et al. 2021; Lambert 2024; see also NewsGuard's Reality Check 2024), for which there are no effective ways to monitor or proactively remove malign information. This also encourages newly established social media platforms to either provide unmoderated spaces or implement moderation policies that openly favour one ideology over others, frequently prioritizing fringe or extremist political perspectives (Arnaudo et al. 2021). The issue of inconsistent moderation is especially pronounced in non-English content moderation, as platforms' efforts in this domain tend to be proportionate to market size rather than risk of harm, which results in digital spaces operating in lesser-used languages being far more exposed to potential manipulation (Martiny et al. 2024). What is more, under-resourcing and reliance on automation for content moderation may lead to decontextualized and wrong interpretation of content and even increase polarization of online spaces (Rolfe et al. 2024), and thus potentially enable FIMI.

Guiding research questions

- How have developments in social media platforms' moderation policies affected the domestic information environment in your country?
- Have there been demands, incentives or pressure on online platforms and adtech companies to enforce stricter moderation policies tackling information manipulation? How effective have they been?
- Is there a clear tendency among users to migrate to platforms and messaging apps that offer unmoderated environments and/or that are explicitly aligned with a certain ideology?
- Is there any evidence on the effectiveness (or lack thereof) of content moderation by platforms in the language(s) used in the domestic information environment?

3.5. THE LEGAL AND REGULATORY SPHERE

Legal and regulatory frameworks represent an important barrier and safeguard against FIMI and electoral information manipulation in particular. But the constant evolution of technology and Internet communication makes it challenging to ensure impartial and effective governance of any information environment, especially on social media. FIMI actors can and do exploit existing gaps and weaknesses in the normative frameworks of the targeted countries to their advantage.

Enabler 14. Ineffective regulatory authorities

Let's start with an example

Georgia's 2024 parliamentary elections were highly contested. The opposition rejected the official results as fraudulent amid allegations of Russian interference, while the EU and the USA voiced concerns over procedural irregularities. The Office for Democratic Institutions and Human Rights of the Organization for Security and Co-operation in Europe stated in its final report that the steps taken by the government to diminish the independence of regulatory institutions were among the factors that negatively affected the integrity of the Georgian elections and eroded public trust in the election process (OSCE/ODIHR 2024).

Explanation

A number of regulatory authorities are involved, to a greater or lesser extent, in governing the information environment and mitigating risks of manipulation and interference. These include legislative bodies, law enforcement, independent oversight bodies (e.g. anti-corruption agencies, political finance oversight bodies, media oversight bodies) and other regulatory agencies, as well as the judicial system (Arnaudo et al. 2021). Their tasks may range from the restriction of certain media content and behaviours (e.g. hate speech, smear campaigns, character attacks) to the promotion of transparency, equity and democratic information. Any dysfunction, inability or failure of these authorities to fulfil their purposes and to cooperate effectively opens avenues for FIMI actors to manipulate the information space. Ineffective regulatory authorities therefore constitute an enabler of electoral FIMI. The effectiveness of regulatory authorities depends on a variety of factors. The most important ones are their level of autonomy from the central administration, the financial and technological resources that the state allocates to them, the extent of the powers granted to them and the experience of the staff (De la Brosse and Frère 2012). In the specific case of electoral management bodies (such as election commissions, councils or boards), effectiveness is often hindered by lack of

resources, structures and mechanisms for addressing election-related information manipulation, including for protecting themselves and the electoral process from damaging narratives (Arnaudo et al. 2021).

Guiding research questions

- What regulatory authorities (including electoral management bodies) are involved in governing the information environment in your country? What are their mandates, capacities and resources?
- How effective are they in mitigating risks of manipulation and interference?
- What specific factors drive the effectiveness (or lack thereof) of these authorities in tackling FIMI threats, especially in the context of elections?
- What is the level of cooperation between these agencies, and what obstacles exist in this regard?
- Are these authorities (likely to be) targeted by damaging narratives calling into question their integrity, neutrality and reliability? How widespread are such narratives?

Enabler 15. Gaps in media and Internet regulations

Let's start with an example

The political consulting firm Cambridge Analytica harvested the data of more than 80 million Facebook profiles in the 2010s and used them to support Donald Trump's 2016 electoral campaign in the USA. The firm was also widely accused of meddling with the UK's 2016 EU membership referendum, commonly known as the Brexit referendum. The 'dirty methods' of the Brexit referendum apparently did not involve illegal activities but rather sought to manipulate public opinion through legal means. This highlighted the lack of adequate media and Internet regulations tackling disinformation and electoral interference and gave impetus to new legislation aimed at filling this gap, particularly at the EU level (Boffey 2020).

Explanation

Information manipulation activities, including those targeting elections, can effectively exploit weaknesses and gaps in existing laws and regulations to achieve their purposes. Examples of such normative gaps include ineffective disinformation legislation, lack of norms ensuring transparency and accountability of Internet companies, weak political finance regulations (see Enabler 2: Inadequate political finance regulations) and inconsistent enforcement policies, among others (UNDP 2022). The problem is particularly acute when it comes to social media platforms' measures for mitigating information manipulation and reducing their commercial viability, which have been assessed as largely inadequate

(Fredheim et al. 2023; see Enabler 13: Inconsistent and lax moderation policies). The absence of public dialogue on issues related to Internet governance and social media accountability further compounds the problem (UNDP 2022). Recent normative developments, especially at the EU level, have brought to the fore the role and responsibility of big tech companies—that is, social media platforms and online search engines—in establishing a safe and trusted online environment and in maintaining election integrity, including by addressing systemic risks of foreign information manipulation, interference and disinformation (see Kumar 2024). While regulatory efforts are much needed, it is equally important to be aware that heavy-handed regulatory responses, including disinformation laws, may be weaponized by state and non-state actors against civil society activists, political opponents and media professionals in an attempt to curb or even repress freedom of expression.

Guiding research questions

- How advanced, detailed and comprehensive is the current media and Internet regulatory framework in your country?
- Are there any major gaps and weaknesses that could be or have been exploited by malicious actors, especially foreign-aligned ones?
- Do existing regulations adequately address the role and responsibility of social media platforms and online search engines in maintaining election integrity?
- Are Internet governance and social media accountability the subject of an open and productive public dialogue? What are the main issues being discussed, and what have been the most important outcomes?
- Is there a risk (or a history) of regulations being used by state and non-state actors to control, restrict or even suppress civic or political dissent, including in the media sphere?

Enabler 16. Unclear applicability of international norms

Let's start with an example

The Joint Declaration on Freedom of Expression and 'Fake News', Disinformation and Propaganda, adopted in 2017 by the Special Rapporteurs on freedom of expression of various international organizations and human rights bodies, covers the substance of state obligations and stakeholder responsibilities when it comes to tackling disinformation operations and lays out fundamental safeguards in the fight against those operations. This is regarded as an important step towards building an international legal framework for FIMI (EEAS 2023c).

Explanation

Despite ongoing legal efforts, the question of what international legal rules and principles are applicable to FIMI is still an open one. A 2023 study commissioned by the EEAS provides some guiding insights into the matter (EEAS 2023c). It argues that, in order for international law to be applicable to FIMI, the current focus on manipulative behaviour should be extended to include a consideration of the actors involved—since international law is state-centric—and of the content that is being disseminated—since this is central to the freedoms of information and expression enshrined in human rights law (EEAS 2023c). The study then explores the extent to which the international legal principles (i.e. sovereignty, non-intervention, due diligence and international humanitarian law) can be applied to FIMI and information operations at large. Special attention is devoted to international human rights law, which is said to provide a universal language that can guide the behaviour of state actors as well as of private companies and civil society. While these insights do outline promising directions for legal progress, the reality is that a general consensus on an international legal framework for FIMI is yet to be reached. Until then, FIMI actors will continue exploiting and benefiting from the differences in legislation across countries and regions, along with weak enforcement mechanisms.

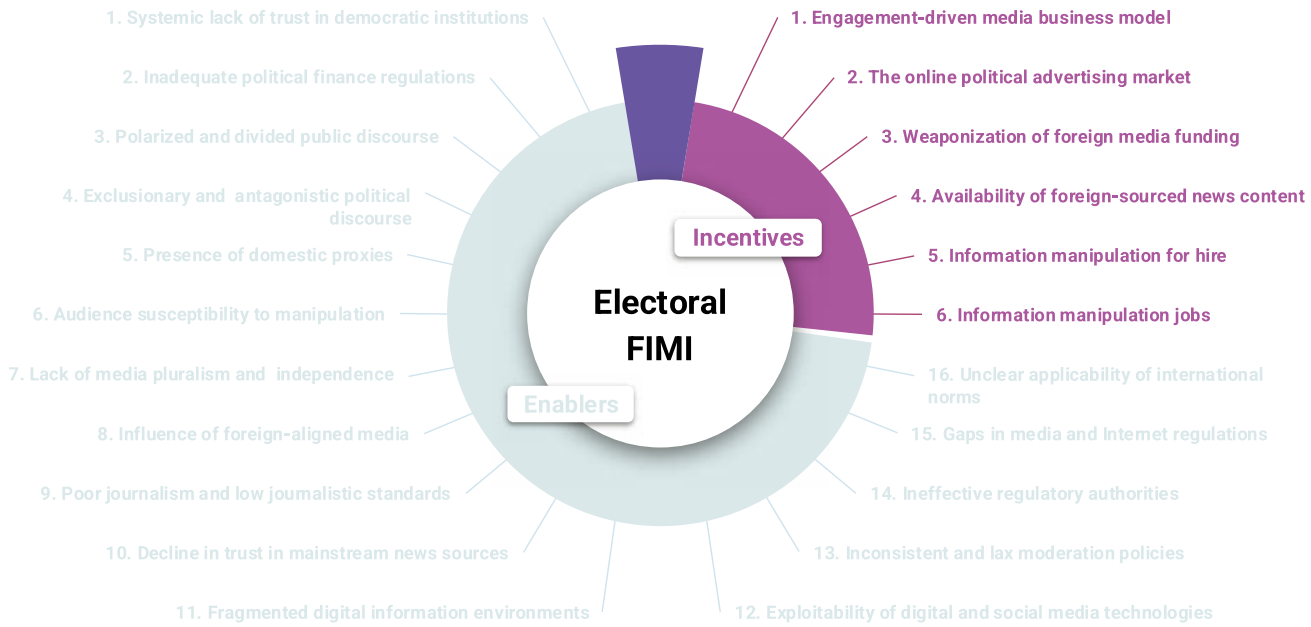
Guiding research questions

- Is there any public discussion in your country on the need to develop an international legal framework for FIMI? What are the main aspects being discussed, and what have been the outcomes?
- Is there evidence of FIMI actors exploiting the differences of legislation that may exist between your country/region and other ones? What measures have been proposed to address this problem, and how effective have they been?

Chapter 4

INCENTIVES FOR ELECTORAL FIMI

The previous section addressed the question of what makes election-related FIMI possible. This section focuses instead on what makes it appealing and profitable for a range of actors—that is, its incentives. These are grouped into three domains: profiting from the attention economy (incentives 1 and 2); access to foreign sources and resources (incentives 3 and 4); and the information manipulation industry (incentives 5 and 6).



4.1. **PROFITING FROM THE ATTENTION ECONOMY**

Across the globe, the media industry increasingly operates in what experts refer to as the attention economy, where consumers' attention is the real value and companies use various strategies to capture it in an effort to maintain profitability. This also creates economic incentives for engaging in information manipulation and FIMI.

Incentive 1. Engagement-driven media business model

Let's start with an example

During the 2022 presidential election in Brazil, supporters of then-President Jair Bolsonaro amplified false claims that the electronic voting system was rigged against him. These claims, largely unsupported by evidence, spread widely on Facebook, YouTube, TikTok, Telegram and WhatsApp (Downie 2020).

Explanation

In the online sphere, information is automatically and algorithmically ranked to keep users engaged and connected, and this model favours 'borderline' sensationalist, emotive or divisive content over accuracy and editorial integrity (Rolfe et al. 2024; UNDP 2022). Engagement thus creates economic value and acts as a reward system. A similar trend has also been noted for traditional and more established news outlets (Röttger and Vedres 2020). This burgeoning engagement-driven media business model not only facilitates disinformation and information manipulation but also makes them profitable and lucrative for those who engage in them, offering market incentives for viral content that generates revenue through monetization and advertising. Election campaigns are critical in this regard, since politically salient content tends to be emotionally charged and hence generates higher levels of user engagement, which in turn drives revenue. While these market incentives are not the primary reason these threat actors engage in election-related FIMI, they certainly drive the diffusion and amplification of malicious content across the information environment.

Guiding research questions

- Is there evidence of engagement-driven media business models working in the service of information manipulation campaigns in your country?
- What kind of market incentives exist for purveyors of malicious content in the domestic information environment, especially in election contexts?

Incentive 2. The online political advertising market

Let's start with an example

According to a recent study, in the 2024 election cycle in the USA, political advertisers spent more than USD 619 million on the two largest digital ad platforms, Meta and Google, with nearly half the total coming from spenders that may hide some or all of their donors (Brennan Center for Justice 2024).

Explanation

The core business of most online platforms is based on advertising. Designed to collect user data and prioritize content that generates engagement, they provide advertisers with precision targeting and advanced campaign optimization. The use of online ads for political purposes—that is, online political advertising—is on the rise and plays a key role in shaping perceptions of political parties and candidates, especially before elections (European Parliament 2023). A profitable market has emerged for third-party companies offering paid-for online political campaigns that leverage online platforms' large sets of user data and micro-targeting capacities. Online political advertising can also create value for the platforms (see Incentive 1: Engagement-driven media business model). On top of this, the online political advertising market is not as strictly regulated as the offline one (see Enabler 2: Inadequate political finance regulations) and platforms often fail to label political ads as such, which results in opaque practices and low levels of scrutiny. These conditions are highly conducive for FIMI activities. Malign actors, including foreign powers, may channel funds to domestic proxies (such as third-party companies or affiliated groups) that can buy ads online and thus pursue their manipulative aims while escaping oversight and accountability.

Guiding research questions

- How developed and widespread is online political advertising in your country?
- Has legislation been put in place to regulate online political advertising?
- Do social media companies have transparent ad libraries for online political advertising in the country?
- Do political forces rely on third-party companies offering paid-for online political campaigns?
- What market policies and practices exist in this domain? How transparent are they?
- Is there evidence of FIMI campaigns leveraging the online ad market to manipulate the domestic information sphere? What strategies have been used?

4.2. **ACCESS TO FOREIGN SOURCES AND RESOURCES**

FIMI requires influence assets to be established in the targeted contexts. This is done through investment and development aid, which creates incentives for the local media industry as well as for other sectors of content and knowledge production to serve FIMI actors' agendas and interests.

Incentive 3. Weaponization of foreign media funding

Let's start with an example

The Chinese party-state understands the importance of controlling foreign media as a means to project Chinese power and promote a positive image of the country, particularly on sensitive topics such as territorial disputes and human rights. China's efforts to shape media content abroad involve mergers and acquisitions of media outlets, applying pressure on these acquired outlets to steer clear of China-critical coverage and withholding advertising to punish media that criticize China (Karásková and Šimalčík 2020).

Explanation

Foreign investment (whether direct or indirect) and media development aid are pivotal catalysts for growth in the global media industry. Reliance on foreign funding and support has become a common strategy for media organizations to make their business viable and sustainable. In Mali, for instance, local media outlets received equipment donations from China, France, Libya and Russia (Diakon and Röschenthaler 2017; Audinet 2021). Foreign media funding, however, can also be weaponized for manipulative purposes. In the language of influence operations, this is referred to as the acquisition of 'influence assets' (Miller 2025). This happens when ill-intentioned actors tie investment into the local media sector to specific objectives and agendas, de facto inducing (or forcing) the recipient media organizations to work in their service. This can range from adopting biased editorial lines that favour the funders' interests to active participation in adversarial FIMI campaigns. It is important to note that this does not apply to media organizations only. FIMI actors may rely on seemingly independent think tanks, research entities or influencers producing manipulated content (e.g. in the form of biased policy analysis, fake academic reports, misleading statistics) that lends credibility to their claims and goals. The weaponization of foreign media funding thus creates incentives for the establishment of a network of subservient voices that FIMI actors can utilize to control and manipulate the information agenda on certain topics. This poses a serious threat to democratic and electoral processes.

Guiding research questions

- What is the scope of foreign investment (and development aid) into the domestic media sector?
- To what extent do domestic media organizations, think tanks and research entities rely on foreign funding for their sustainability?
- To what extent and in what forms is foreign media funding tied to foreign donors' own interests and agendas?
- Do domestic media organizations have other avenues to achieve sustainability while ensuring editorial independence?
- Have there been documented cases of foreign media funding being weaponized for information manipulation purposes? What strategies were deployed? What vulnerabilities were exploited?

Incentive 4. Availability of foreign-sourced news content

Let's start with an example

A 2023 NATO report on the Sahelian information environment points out how African media organizations can easily pick up and share content from Sputnik—a Russian state-owned news website, news agency and radio broadcast service—since it is royalty-free. This practice fosters the circulation of Russian discourse within the Sahelian media sphere (Bencherif and Carignan 2023).

Explanation

The availability of foreign-sourced news content constitutes a potential incentive for local media channels to take part, whether knowingly or not, in foreign-led activities aiming to manipulate the information environment. In addition to receiving foreign funding (see Incentive 3: Weaponization of foreign media funding), local media outlets can extend their limited budgets by using content provided by foreign-affiliated media that is frequently and often freely available for republishing, rather than buying content from international news agencies (Morača et al. 2023). The republishing of foreign-sourced content—a practice known as content syndication—is advantageous for both parties involved, as it allows local media to expand coverage and retain their value to customers, while helping foreign media sources increase the reach of content by introducing it to new audiences. When the foreign media sources are linked to FIMI actors, such practices of content syndication become a powerful asset for those polluting the information environment with harmful and manipulative content. This can severely hinder citizens' ability to access reliable and accurate information, which constitutes a paramount threat to the integrity of democratic and electoral processes.

Guiding research questions

- Do foreign-linked media make news content freely available in the domestic information environment?
- To what extent do domestic media outlets engage in republishing foreign-sourced news content? How established and widespread are such content syndication practices?
- What specific benefits and advantages do such practices offer to domestic media?
- What audiences or audience segments are exposed to foreign-sourced news content as a result of content syndication? What are the possible repercussions?
- Is there evidence of FIMI actors exploiting content syndication to disseminate manipulative content in the domestic information sphere? What forms has this taken? What have been the responses?

4.3. THE INFORMATION MANIPULATION INDUSTRY

Information manipulation has grown into a massive and lucrative industry that offers economic incentives to a range of actors, from companies to private individuals.

Incentive 5. Information manipulation for hire

Let's start with an example

Private firms increasingly provide manipulation campaigns for political and electoral purposes. A 2020 report by the Oxford Internet Institute found evidence of firms deploying computational propaganda to manipulate public opinion online, domestically and abroad, on behalf of political actors in 48 countries. The report estimates a market share of nearly USD 60 million (Bradshaw, Bailey and Howard 2021).

Explanation

Private companies offering influence operations and information manipulation for hire are important players in the electoral FIMI ecosystem. Commercial actors such as public relations companies or strategic communication firms often work with political campaigns, government or foreign states to spread disinformation in support of particular goals (Arnaudo et al. 2021). Such businesses are incentivized by profits, while offering an important benefit of deniability to their clients. Substantial evidence has been gathered showing just how diffused this modality of influence operations for hire is, be it for domestic purposes or FIMI proper. Although it is difficult to pinpoint the exact value of the information manipulation market, evidence and informed estimates indicate that the

business is very lucrative. Looking at information manipulation through the lens of profit is useful to add more nuance to the dominant geopolitical framing of FIMI based on a clear-cut dichotomy between Western and authoritarian actors. The business of information manipulation for hire cuts across the usual geopolitical cleavages, as evidenced by Russian providers of information manipulation artificially amplifying pro-Ukrainian messaging (Fredheim et al. 2023). Besides the motivations of so-called threat actors, it is therefore critical to consider the whole ecosystem that sets the ground for FIMI, including profit incentives for communication firms. From this point of view, information manipulation can be regarded as a 'hyperextension' (Ong and Cabañes 2019: 5779) of the marketing and public relations (PR) industry into the sphere of political communication (rather than solely a geopolitical issue).

Guiding research questions

- How established and widespread is the information-manipulation-for-hire market in your country?
- What are the main players in this market, and what strategies have they adopted?
- In your context of interest, does the information manipulation business run along (geo)political boundaries, or does it rather cut across them? Why is that?
- What mechanisms and resources exist that have been or could be leveraged to minimize commercial incentives for information manipulation?

Incentive 6. Information manipulation jobs

Let's start with an example

A town in North Macedonia became famous for hosting troll farms and spreading fake news (via hundreds of clickbait websites posing as conservative US news outlets) ahead of the US presidential elections in 2016 and again in 2020, allegedly under Russian influence. The industry gathered substantial online advertising revenue and became the largest single source of income for the town's inhabitants (Synovitz and Mitevska 2020; Dickerman 2021).

Explanation

In close relation to the profit incentives of companies, there are individual-level incentives for people to make an income in the information manipulation industry. This perspective focuses on the social conditions of workers in the manipulation industry. Indeed, those that are hired for information manipulation operations might be precarious (gig) workers with short-term arrangements in the scope of digital influence campaigns (Ong and Cabañes 2019; Graham et al. 2017). Furthermore, there is evidence of public servants being engaged in artificial content

amplification praising the government as part of clientelist arrangements (Rujevic 2017; Judah 2024; Milivojevic 2020). Yet another potential profile engaged in information distortion, for domestic or foreign use, is that of entrepreneurial individuals thriving due to platform monetization incentive programmes (Lewis 2018; Hughes and Waismel-Manor 2020). Adopting this perspective of individual-level incentives provides a more nuanced understanding of information manipulation (and FIMI proper). Indeed, more insight is needed into the social conditions and motives of those that engage in deceptive online activities, beyond ascribing them the one-dimensional role of villain (Ong and Cabañes 2019). Focusing on individual-level incentives allows the possibility of situating information manipulation and FIMI within the context of a global digital labour market (Graham et al. 2017), the advertising and PR industry, and platforms' affordances—rather than treating it only as the realm of 'bad actors'.

Guiding research questions

- What incentives exist for people to work in the service of the information manipulation industry in your country?
- What segments of the population are more at risk of becoming part of this industry? What factors make them particularly vulnerable?
- What measures have been taken to minimize individual-level economic incentives to take part in the information manipulation industry? How effective have they been?

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This global methodology provides a structured, in-depth framework for analysing the enablers and incentives behind election-related foreign information manipulation and interference (FIMI). Developed with and for civil society actors, it is designed to support context-specific research, strengthen analytical capacity and inform practical responses to FIMI threats that undermine democratic processes.

Drawing on expert insights, real-world examples and global research, the methodology is structured around two main analytical pillars: enablers—the political, social, cultural, technological, media and legal conditions that allow FIMI to take root; and incentives—the economic, strategic and operational factors that make FIMI appealing and profitable to malign actors. Each factor is accompanied by real-world examples, explanatory notes and guiding research questions to support users in identifying the most relevant risks and vulnerabilities in their own contexts.

By mapping these drivers of electoral FIMI across diverse settings, the methodology aims to build a stronger evidence base, foster cross-sector collaboration and equip civil society to develop tailored evidence-based responses that enhance electoral integrity and democratic resilience.

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