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# Content

NTRODUCTION	4
The Main Working Directions in Georgia	6
Challenges and Research Diretions for Georgia	7
Examples from International Practice	8

#### INTRODUCTION

Possession of and control over information have always been some of the most important weapons. In modern times, especially during a global pandemic, a considerable part of the informational environment is created and disseminated online. <sup>1</sup> In addition to the abundance of fully "born-online" news platforms, the traditional print and television media also intensively place information online, indicating an increasing scale and multifaceted nature of the information found online. <sup>2</sup> Studies show that society is more vulnerable to information manipulation if people receive it in the form of factual information. In addition to this, conflicting, sensational, or questionable news is much more prevalent and widely disseminated in online spaces than objective, analytical information. <sup>3</sup>

Thus, the negative impact of online information manipulation and disinformation campaigns covers the social, economic, education and health sectors, and negatively affects democratic participation as well as citizens' trust in democratic institutions. Similar trends also contribute to the formation of radical, violent, and extremist trends in cyberspace that subsequently shift to and are reflected in the physical space. While informational manipulation and disinformation cannot be considered the only sources of polarization, its instrumentalization by radical and populist forces has been simplified and made possible without any additional material resources. The growing use of online platforms as a (sole) source of information combined with declining trust in the media are fueling polarization and extremism. <sup>4</sup> In the case of Georgia, both of these consequences are seen, <sup>5</sup> affecting the socio-political and cultural polarization in the society. <sup>6</sup>

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<sup>&</sup>lt;sup>1</sup> "People Increasingly Turn to Social Media for News," accessed November 5, 2021, https://www.forbes.com/sites/mikevorhaus/2020/06/24/people-increasingly-turn-to-social-media-fornews/?sh=2c504bc63bcc.

<sup>&</sup>lt;sup>2</sup> "Traditional Media in the Digital Age," Nieman Reports, accessed November 5, 2021, https://niemanreports.org/articles/traditional-media-in-the-digital-age/.

<sup>&</sup>lt;sup>3</sup> Joshua A. Tucker et al., "Social Media, Political Polarization, and Political Disinformation: A Review of the Scientific Literature," *Hewlett Foundation* (blog), accessed November 4, 2021, https://hewlett.org/library/social-media-political-polarization-political-disinformation-review-scientific-literature/.

<sup>&</sup>lt;sup>4</sup> Tucker et al., "Social Media, Political Polarization, and Political Disinformation."

<sup>&</sup>lt;sup>5</sup> "NDI: Public Attitudes in Georgia, November-December 2019," accessed November 11, 2021, https://caucasusbarometer.org/en/nn2019ge/INFSOUF1/.

<sup>&</sup>lt;sup>6</sup> Tamta Gelashvili, Salome Kandelaki, and Lasha Kavtaradze, "Georgia's Political Crisis: Actors and Instruments of Polarization," *Caucasus Analytical Digest (CAD)* 123 (September 2021), https://doi.org/10.3929/ethz-b-000507160.

In addition, people tend to select information relevant to their ideological affiliation and preconceived notions. <sup>7</sup> In other words, what kind of information a segment of society will become vulnerable to depends largely on their pre-existing beliefs, political tastes, and values. Thus, according to the pattern of consuming information found online, the level of public awareness is increasing not uniformly, but selectively.

Against this background, the echo chumbers created in the online spaces deepen informational disintegration in the society, which, through a circular effect, is reflected in the increasing polarization. Without a degree of agreement over the nature of facts, it becomes difficult for the public to discuss policy issues and to engage or have a sense of involvement in decision-making process, which is vital to democratic development. Instead of verified and unbiased information, the public in the online spaces often receives politicized and factually incorrect information, which, naturally, is negatively reflected on its involvement in the democratic processes by several different factors: making fewer or completely uninformed political choices; enhancing polarization; strengthenin extremist and radicalist narratives, etc.

There is widespread agreement regarding the significance of manipulating online information. However, when it comes to the issue of responsibility, i.e. who should develop and implement the necessary mechanisms to combat online information manipulation, there are mixed attitudes and dilemmas. In this regard, the narrative generally covers the following actors: the state, civil society organizations, tech companies, the media, and the courts. It should be noted that in the case of Georgia, the representatives of media and civil society express skepticism about governmental regulations, citing the danger of censorship and monopolization of the informational field by the state. Expectations that anti-disinformation and anti-information manipulation regulations will be misused for the purposes of restricting freedom of information and expression are particularly high in democratizing countries such as Georgia, where state institutions are unstable. On the other hand, potential restrictions on tech companies, ranging from the restriction of political advertising to the responsibility for verifying and disseminating information, depend on the availability of physical infrastructure of these tech companies in a particular country, a relevant legislation, and private, mostly business, interests.<sup>8</sup>

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<sup>&</sup>lt;sup>7</sup> Charles S. Taber and Milton Lodge, "Motivated Skepticism in the Evaluation of Political Beliefs," *American Journal of Political Science* 50, no. 3 (2006): 755–69, https://doi.org/10.1111/j.1540-5907.2006.00214.x.

<sup>&</sup>lt;sup>8</sup> "Facebook Whistleblower Exposes a Dark Reality: Right Wing Disinformation Is Popular — and Profitable | Salon.Com," accessed November 11, 2021, https://www.salon.com/2021/10/04/facebook-whistleblower-exposes-a-dark-reality-right-wing-disinformation-is-popular--and-profitable/.

### The Main Working Directions in Georgia

In the Georgian context, the following mechanisms are deployed in dealing with the online information manipulation and disinformation campaigns: fact checking, monitoring of online information, monitoring of social media content, combatting disinformation narratives, media literacy programs, and monitoring of the informational space during election periods. The mechanisms listed are, of course, used with varying frequency. It should be noted that these mechanisms are mainly developed by civil society organizations and are aimed at observing the informational space and raising public awareness.

The relevant organizations in Georgia monitor social media on a daily basis, especially during the preelection period. Such organizations also oversee political advertising trends and major disinformation narratives. In addition to monitoring narratives, other organizations pursue an investigation-based ecosystem-map that provides a complete picture of disinformation narratives, their target audience, and stakeholders. It is also important to study the "demand" side of information manipulation and, by monitoring corresponding trends, to develop informed mechanisms. Some Georgian organizations are implementing the latter by strengthening regional organizations and the media. It is also important to raise awareness and train media representatives to create a healthy information environment in the online space, which is the current focus of several organizations in Georgia. Bringing discussion into the academic space and research of historical narratives is also pursued by CSOs in Georgia.

Civil society representatives emphasize the fragmented approaches and research needs against disinformation and online information manipulation in Georgia. It is important to study the rapid variability of online spaces and to plan accordingly for the methods of research or intervention. Detection

<sup>&</sup>lt;sup>9</sup> "Social Media Monitoring | ISFED," isfed.ge, accessed November 11, 2021, http://isfed.ge/eng/sotsialuri-mediis-monitoringi;

 $<sup>\</sup>hbox{``Myth Detector,'' September 2020, /en/myth/myth-detector- and-fact check-georgia-have-partnered-facebook.}$ 

<sup>&</sup>lt;sup>10</sup> "USAID Launches Innovative Program to Counter Disinformation In Georgia," October 8, 2020, https://www.usaid.gov/news-information/press-releases/oct-8-2020-usaid-launches-innovative-program-counter-disinformation-georgia.

<sup>&</sup>lt;sup>11</sup> People in Need, "Media Literacy Training for Regional Journalists," People in Need, accessed November 11, 2021, https://georgia.peopleinneed.net/en/media-literacy-training-for-regional-journalists-7546gp.

<sup>12 &</sup>quot;Amplify, Verify, Engage," accessed November 11, 2021, https://iwpr.net/projects/focus/amplify-verify-engage.

<sup>&</sup>lt;sup>13</sup> "Memory and Disinformation Studies," accessed December 20, 2021, https://idfi.ge/en/pagel/category/researches/soviet-studies.

of trends and placement of the data from Georgia in regional databases of disinformation narratives<sup>14</sup> would also significantly contribute to the identification of the necessary mechanisms against external harmful influences and the establishment of response mechanisms.

### **Challenges and Research Directions for Georgia**

Developing effective tools for monitoring large-scale information disseminated online also remains an important challenge in the Georgian context. Usually, for small languages such as Georgian, such tools are rarely available, and existing monitoring tools require considerable human resources and time investment. In addition, the issue of public trust and authority of civil society as one of the most active sectors working against information manipulation, is noteworthy. A low level of trust has a negative impact on the efforts of the civil society sector to reduce the negative effects of information manipulation and disinformation campaigns in society and to prevent the socio-political polarization based on them. Along with the issue of trust, when it comes to mechanisms to combat online information manipulation, the issue of a unified evaluation and monitoring system remains challenging for civil society organizations in the country.

In terms of research, the development of the following areas is especially important in the Georgian context: a comparative analysis of the spread of disinformation narratives online and in the physical space; the study of the trends in information dissemination and basic communication behaviors in different segments of society, including minorities; finding ways to enhance media literacy in society through intergenerational dialogue; the study of the connection between sources of social polarization and disinformation narratives.

Given this context, it is also important to examine the results of different intervention methods as well as to analyze online information consumption habits of vulnerable segments. <sup>15</sup> Studies of this type are

<sup>&</sup>lt;sup>14</sup> "StratCom | NATO Strategic Communications Centre of Excellence Riga, Latvia," accessed November 11, 2021, https://stratcomcoe.org/.

<sup>&</sup>lt;sup>15</sup> "O. Executive Summary | Countering Disinformation," accessed November 11, 2021, https://counteringdisinformation.org/node/2749/.

important not only for better understanding the issue itself and analyzing the nature of the online-created narratives, but also for comprehending the effectiveness of the programs implemented. Examining online consumer behavior and information consumption trends is also important for developing specific response mechanisms. For example, such research would determine whether the counter-narratives reach the same target groups as do the disinformation narratives. <sup>16</sup> At the same time, it should be noted that Georgia's Soviet past is often a target of information manipulation. Politicized historical narratives are often created and disseminated by the Russian Federation in the post-Soviet space. <sup>17</sup> In this regard, it is important, through collaboration with the academy, to disprove manipulated historical narratives and rethink memory policies. The weaponization of such narratives often provides a solid basis for the spread of anti-Western propaganda as well.

The dialogue between the state and the civil society sector for improving the information environment and the level of media literacy in Georgia is an important challenge. International practice shows that the role of the state is not limited to drafting regulations, but also includes the development of mechanisms for media literacy and adaptation of existing legislation. It is noteworthy that the state has opportunities to expand educational programs and, in line with international best practices, <sup>18</sup> include media literacy in the national curriculum. Media literacy is crucial for the society to develop the necessary skills to navigate online spaces and critically evaluate received information. <sup>19</sup> Strengthening the STRATCOMs in state structures and the effectiveness of their work, from the perspective of civil society and media organizations, also remains challenging in Georgia.

## **Examples from International Practice**

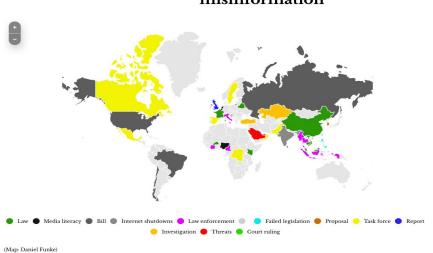
<sup>&</sup>lt;sup>16</sup> "4. Evaluative Research for Counter-Disinformation Programs | Countering Disinformation," accessed November 11, 2021, https://counteringdisinformation.org/topics/surveys/4-evaluative-research-counter-disinformation-programs.

<sup>&</sup>lt;sup>17</sup> Juurvee, Ivo, Vladimir Sazanov, Kati Parppei, Edgars Engizers, Ieva Palasz, and Malgordzata Zawadzka. "Falsification of History as a Tool of Influence." StratCom | NATO Strategic Communications Centre of Excellence Riga, Latvia, January 2021. <a href="https://stratcomcoe.org/publications/falsification-of-history-as-a-tool-of-influence/16">https://stratcomcoe.org/publications/falsification-of-history-as-a-tool-of-influence/16</a>.

<sup>&</sup>lt;sup>18</sup> About the Author Lucie Stastna Lucie Šťastná is a PhD c et al., "Journalists and Schools Work Together to Teach Media Literacy," *European Journalism Observatory - EJO* (blog), December 24, 2017, https://en.ejo.ch/ethics-quality/journalists-schools-work-together-teach-media-literacy.

<sup>&</sup>lt;sup>19</sup> "Teaching Media Literacy in Europe: Evidence of Effective School Practices in Primary and Secondary Education," NESET, accessed November 11, 2021, https://nesetweb.eu/en/resources/library/teaching-media-literacy-in-europe-evidence-of-effective-school-practices-in-primary-and-secondary-education/.

Poynter, an organization working on quality journalism and information verification, has compiled a database of the mechanisms that states have developed against disinformation campaigns. These mechanisms include: special legislative measures, media literacy programs, internet access restrictions, specialized bills, adaptation of existing legislation, failed legislative proposals, special working groups, principles of investigative action, threats, reports, and litigation. <sup>20</sup>



Here's where governments are taking action against online misinformation

Source: <a href="https://www.poynter.org/ifcn/anti-misinformation-actions/">https://www.poynter.org/ifcn/anti-misinformation-actions/</a>

The last section of this report reviews media literacy and some of the legislative practices from international cases.

The importance of media literacy is recognized both in the EU and in the domestic educational recommendations of various countries. The European Commission defines media literacy as "as the ability to access the media, to understand and to critically evaluate different aspects of the media and media content and to create communications in a variety of contexts." The media literacy component is part of the digital competences and is reflected in the European framework - for personal, social, and core competencies. The Paris Declaration, endorsed by the Brussels "Declaration on Promoting Inclusion and Fundamental Values through Education," calls for the development of youth media literacy in the fight

<sup>&</sup>lt;sup>20</sup> "A Guide to Anti-Misinformation Actions around the World – Poynter," accessed November 11, 2021, https://www.poynter.org/ifcn/anti-misinformation-actions/#kenya.

<sup>&</sup>lt;sup>21</sup> "A European Approach to Media Literacy in the Digital Environment," CEDEFOP, November 27, 2009, https://www.cedefop.europa.eu/en/news/european-approach-media-literacy-digital-environment. <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52007DC0833&from=el">https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52007DC0833&from=el</a>

against extremism, racism, and discrimination, with a special focus on the proper use of social media. <sup>22</sup> In addition, the EU Council Recommendation of 22 May 2018 on promoting common values, inclusive education, and the European dimension of teaching emphasizes the importance of developing media literacy and critical thinking skills. <sup>23</sup> Thus, the EU's attitude towards media literacy is not limited to specific tools and information verification techniques, but also includes various approaches for developing critical thinking, reasoning, analysis, and discernment skills.

Recently, as part of the European Democracy Action Plan, attitudes of the European institutions towards information manipulated in the digital space have become more targeted and include, along with public media awareness, the issue of responsibility of tech companies for providing a secure information environment. The EU initiative for the years of 2021-2027 on this matter is reflected in the Digital Education Action Plan.<sup>24</sup> In the latter, the problem of disinformation is declared as a major issue. The strategy also provides an overarching guidance for teachers and other educators working on the issues of digital literacy and information manipulation.<sup>25</sup> Thus, the issue of media literacy at the EU level has always been recognized as relevant, although its activation as an essential mechanism against disinformation has incepted throughout the recent years with the establishment of specialized recommendations, directives, and expert groups.

The examples of the Czech Republic and Ukraine deserve special emphasis in regards to media literacy. These examples are also of special importance to Georgia, due to shared historical and structural features. In these countries, media literacy is part of the national education program and enables an increasing involvement of media or civil society organizations in the process.

In the case of the Czech Republic, media literacy is included in the curriculum of primary and secondary schools. While various media organizations do not have such an obligation, they are still actively involved

<sup>&</sup>lt;sup>22</sup> Eurydice (European Education and Culture Executive Agency), *Promoting Citizenship and the Common Values of Freedom, Tolerance and Non-Discrimination through Education: Overview of Education Policy Developments in Europe Following the Paris Declaration of 17 March 2015* (LU: Publications Office of the European Union, 2016), https://data.europa.eu/doi/10.2797/396908.

<sup>&</sup>lt;sup>23</sup> "Council Recommendation of 22 May 2018 on Promoting Common Values, Inclusive Education, and the European Dimension of Teaching ST/9010/2018/INIT," accessed November 11, 2021, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018H0607%2801%29.

<sup>&</sup>lt;sup>24</sup> EAC A3, "Digital Education Action Plan (2021-2027)," Text, Education and Training - European Commission, September 14, 2018, https://ec.europa.eu/education/education-in-the-eu/digital-education-action-plan\_en.

<sup>&</sup>lt;sup>25</sup> A3, "Digital Education Action Plan (2021-2027)."

in working with schools and helping students to better understand the process of creating news as well as the dangers of manipulated information online.<sup>26</sup>

In this case, the journalists themselves perceive the development of media literacy in the society as a precondition for the improvement of the level of trust in media as well as in democratic development. The Czech Public Broadcaster is also actively involved in training teachers and civil society representatives. Thus, in the case of the Czech Republic, media literacy programs focus on two main objectives: raising public awareness (about the history, function, and role of the media) and improving skills (filtering information in a digital environment, identifying trends of dissemination, and taking a critical approach to information online). <sup>27</sup>

The role of the state in the Czech context is important insofar as it recognizes the importance of media literacy at the national level and has established a national strategy [the Digital Czech Republic v. 2.0] and special directives [School for the 21st Century] for the educational programs. The practice of non-governmental and media sector's involvement in this case is also noteworthy: although the Ministry of Education, Youth, and Sports is responsible for implementing national directives and incorporating media literacy into the school curriculum, other specialized organizations have the opportunity to engage in the curriculum development as well.<sup>28</sup>

In the case of Ukraine, infomedia literacy issues are included in Ukrainian language lessons for 8th and 9th graders. According to the relevant methodology, teachers discuss media literacy and online information management skills with the students.<sup>29</sup> Experts in the fields of linguistics, journalism, fact-checking, and pedagogy have all participated in the development of the program in question. In terms of state involvement, the role of the Ukrainian Language Commission of the Educational and Methodological Council of the Ministry of Education and Science of Ukraine, which approved the program, is noteworthy.<sup>30</sup>

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<sup>&</sup>lt;sup>26</sup>., "Journalists and Schools Work Together to Teach Media Literacy."

 $<sup>^{\</sup>rm 27}$  c et al., "Journalists and Schools Work Together to Teach Media Literacy."

<sup>&</sup>lt;sup>28</sup> "6.8 Media Literacy and Safe Use of New Media | YouthWiki," accessed November 4, 2021, https://national-policies.eacea.ec.europa.eu/youthwiki/chapters/czech-republic/68-media-literacy-and-safe-use-of-new-media.

<sup>&</sup>lt;sup>29</sup>Kitsoft. "Міністерство освіти і науки України - Навчально-методичні матеріали для вчителя «Інфомедійна грамотність на уроках української мови» для 8–9 класів." Accessed November 11, 2021. <a href="https://mon.gov.ua/osvita/zagalna-serednya-osvita/navchalni-programi-pidruchniki-ta-navchalno-metodichni-posibniki-rekomendovani-mon/navchalno-metodichni-materiali-dlya-vchitelya-infomedijna-gramotnist-na-urokah-ukrayinskoyi-movi-dlya-89-klasiv.

 $<sup>^{30} \</sup>underline{\text{https://mon.gov.ua/storage/app/media/zagalna}} \\ 20 \underline{\text{serednya/2021/Infomediyna}} \\ 20 \underline{\text{hramotnist}} \\ 20 \underline{\text{na}} \\ 20 \underline{\text{urokakh}} \\ 20 \underline{\text{urokakh}} \\ 20 \underline{\text{urokakh}} \\ 20 \underline{\text{gryf.pdf}} \\ 20 \underline{\text{roy/Ukrainian}} \\ 20 \underline{\text{language}} \\ 20 \underline{\text{gryf.pdf}} \\ 20 \underline{\text{urokakh}} \\ 20 \underline{\underline{\text{urokakh}}} \\ 20 \underline{\text{urokakh}} \\ 20 \underline{\underline{\text{urokakh}} \\ 20 \underline{\underline{\text{urokakh}}} \\ 20 \underline{\underline{\text{uroka$ 

In addition to the Ukrainian language, the Media Literacy program is also included in the 9th grade art lessons of Ukrainian public schools, with assignments adapted according to the educational program.<sup>31</sup>

The legislative mechanisms that extend existing rules of information or campaigning to the online environment are also noteworthy. This is the case, for example, in Germany, where the state requires social media companies to delete broadly defined "manifestly illegal" content within 24-hour and 7-day periods. Otherwise, the regulation imposes high fines on tech companies. Thus, in the case of Germany, the existing regulations on hate speech and other unlawful conduct (calls for violence, slander, distribution of personal footage, etc.) have been adopted to the digital space and the enforcement mechanism has been imposed on social media companies. Such a mechanism is primarily defined by the presence of tech companies in the country with physical infrastructure (to enable litigation to take place in court), the number of registered users within the state, and the degree of judicial independence in the country. However, in this case, the increased responsibility of tech companies covers the privilege of judging content of the information disseminated online.<sup>32</sup> More dangerous is the trend when regulations similar to the German model have been adopted by other countries with considerably lower rates of freedom and democracy, pointing to the potential threats to freedom of speech and expression.<sup>33</sup> The French Constitutional Court rejected such a regulation in 2020 and cited the threat of the establishment of conservative standards of filtering information in online spaces.<sup>34</sup>

A law passed in Turkey in October 2020, which obliges social media companies (with more than 1 million users) to store consumer data in the country and to place an official representation that will allow local governing actors to block information of so-called "degrading" content, is particularly problematic. Through this regulation, significant threats were posed not only to the companies facing high fines and restrictions, but also to the general standards of freedom of expression. The regulation followed the announcement of the Turkish president that declaried social media "immoral", which is ought to be "controlled or blocked". Several large tech companies, such as Facebook, refused to comply with the

<sup>&</sup>lt;sup>31</sup> Kitsoft. "Міністерство освіти і науки України - Навчальні матеріали 'Інфомедійна грамотність на уроках мистецтва' для учнів 9 класу." Accessed November 11, 2021. <a href="https://mon.gov.ua/osvita/zagalna-serednya-osvita/navchalni-programi-pidruchniki-ta-navchalno-metodichni-posibniki-rekomendovani-mon/info-medijna-gramotnist-na-urokah-mistectva">https://mon.gov.ua/osvita/zagalna-serednya-osvita/navchalni-programi-pidruchniki-ta-navchalno-metodichni-posibniki-rekomendovani-mon/info-medijna-gramotnist-na-urokah-mistectva</a>.

<sup>&</sup>lt;sup>32</sup> H. Tworek and P. Leerssen, "An Analysis of Germany's NetzDG Law," April 15, 2019, https://dare.uva.nl/search?identifier=3dc07e3e-a988-4f61-bb8c-388d903504a7.

<sup>&</sup>lt;sup>33</sup> "Germany's Online Crackdowns Have Inspired Russia, Venezuela, and Other Undemocratic Countries," accessed November 11, 2021, https://foreignpolicy.com/2019/11/06/germany-online-crackdowns-inspired-the-worlds-dictators-russia-venezuela-india/.

<sup>&</sup>lt;sup>34</sup> "French Court Strikes Down Most of Online Hate Speech Law - The New York Times," accessed November 11, 2021, https://www.nytimes.com/2020/06/18/world/europe/france-internet-hate-speech-regulation.html.

regulation and, in response, received high fines from the Erdogan's government.<sup>35</sup> It should be noted that the regulation adopted in Turkey sets an important example of the implementation of censorship in the online sphere.<sup>36</sup>

In the case of the UK, the governing actors described "online harm" as an activity in the digital space that could harm a person physically or emotionally. This also includes information disseminated or sent personally online. The British regulatory framework legally requires tech companies to protect its customers and appoints an independent, non-governmental regulator to oversee the process. In other words, the regulatory document is based, on the one hand, on creating a secure digital environment, and ensuring freedom of speech and expression on the other. The independent regulator oversees the enforcement mechanism and the imposition of fines. In addition, tech companies will be required by the regulator to provide detailed information about the logic of their operation and to facilitate the sharing of data with researchers. However, the regulator will not be responsible for determining the accuracy of information disseminated online.

In addition to social media, the British mechanism also includes public discussion forums, search, and communication servers. This mechanism is also based on the European Union's E-Commerce Directive<sup>37</sup>. Furthermore, the UK Government is taking on a commitment, together with a group of experts, to develop a National Plan for Online Media Literacy. <sup>38</sup>

Thus, in a consolidated democracy, discussions about filtering and reviewing information disseminated online is more conceivable in the light of an independent judiciary system and self-governing regulators. However, in countries like Georgia, where the discussion still concerns weak state institutions and a low degree of judicial independence,<sup>39</sup> a state regulation is seen as a direct threat to freedom of speech and expression. Consequently, the role of the state, in this case, ought to be represented by the development of a media literacy program, the strengthening of STRATCOMs, and engagement in a dialogue with civil society.

<sup>&</sup>lt;sup>35</sup> Hürriyet Daily News. "Turkey Fines Facebook, Others over New Social Media Law - Turkey News." Accessed November 12, 2021. <a href="https://www.hurriyetdailynews.com/turkey-fines-facebook-others-over-new-social-media-law-159732">https://www.hurriyetdailynews.com/turkey-fines-facebook-others-over-new-social-media-law-159732</a>.

<sup>&</sup>lt;sup>36</sup> Pitel, Laura, and Hannah Murphy. "Facebook to Defy New Turkish Social Media Law." *Financial Times*, October 5, 2020. https://www.ft.com/content/91c0a408-6c15-45c3-80e3-d6b2cf913070.

<sup>&</sup>lt;sup>37</sup> "E-Commerce Directive | Shaping Europe's Digital Future," accessed November 11, 2021, https://digital-strategy.ec.europa.eu/en/policies/e-commerce-directive.

<sup>&</sup>lt;sup>38</sup> "Online Harms White Paper," GOV.UK, accessed November 11, 2021, https://www.gov.uk/government/consultations/online-harms-white-paper/online-harms-white-paper.

<sup>&</sup>lt;sup>39</sup> "Georgia: Nations in Transit 2021 Country Report," Freedom House, accessed June 20, 2021, https://freedomhouse.org/country/georgia/nations-transit/2021.