



COMECE Secretariat contribution
European Commission public consultation
'European Democracy Shield'

1. Introduction

The **Catholic Church** in the EU **highly values democracy** and welcomes any effort to defend it from actions aimed at undermining its foundations and its fruits.

Already with the **Encyclical *Centesimus Annus***¹ at § 46 it was underlined that *“The Church values the democratic system inasmuch as it ensures the participation of citizens in making political choices, guarantees to the governed the possibility both of electing and holding accountable those who govern them, and of replacing them through peaceful means when appropriate. Thus she cannot encourage the formation of narrow ruling groups which usurp the power of the State for individual interests or for ideological ends. Authentic democracy is possible only in a State ruled by law, and on the basis of a correct conception of the human person. It requires that the necessary conditions be present for the advancement both of the individual through education and formation in true ideals, and of the ‘subjectivity’ of society through the creation of structures of participation and shared responsibility”*.

COMECE is **dialogue partner of the European Union institutions under Article 17(3)** of the Treaty on the Functioning of the EU. In this capacity, it represents the voice of EU-based Catholic Bishops Conferences on all aspects related to the European project and the relevant policies and legislation.

Through its Secretariat, COMECE has been closely following over the years all initiatives having an impact on democracy, contributing to multiple aspects related to this key topic. In this context, COMECE is therefore pleased to submit its **remarks and recommendations in view of the future ‘European Democracy Shield’**.

¹ The document is available at the link https://www.vatican.va/content/john-paul-ii/en/encyclicals/documents/hf_jp-ii_enc_01051991_centesimus-annus.html.

2. Countering disinformation & foreign information manipulation / interference (FIMI)

2.1 Key elements to address the matter

On a general level, given the global nature of the world we live in and the **interconnection between policy decisions in different countries**, FIMI in one country can obviously influence the political and social situation in other countries. This requires a sound coordination and joint effort within the European Union. It is of course necessary to bear in mind a clear **distinction** between undue ‘**foreign interference**’ and legitimate ‘**foreign influence**’.

Concerning ‘**fake news**’, the COMECE Secretariat, already in its contribution² to the relevant EU public consultation, supported the **definition provided by Pope Francis** in the Message for World Communications Day 2018³: he defined this phenomenon as “...*the spreading of disinformation online or in the traditional media. It has to do with false information based on non-existent or distorted data meant to deceive and manipulate the reader. Spreading “fake news” can serve to advance specific goals, influence political decisions, and serve economic interests*”.

When it comes to measures to detect and combat FIMI, a multi-factor approach is necessary to address the relevant risks. In general, the most important measures are in our view **cooperation and education** (on which cf. in particular paragraph 4 of this submission). Co-operation should be between Member States themselves and between Member States and EU institutions. This will ensure that details of any risks are shared across countries and platforms. Co-operation with the social media companies is also key, however challenging it is to maintain. Social and other forms of media should be held accountable for the information they publish and should be **transparent** in their policies. It is particularly important that **those who own or fund media** are publicly known: EU actions should also build upon and reinforce the impact of Commission Recommendation (EU) 2022/1634 of 16 September 2022 on internal safeguards for editorial independence and ownership transparency in the media sector.

At the **national** level, **initiatives** to study and help address the issue of disinformation have been established (cf. for instance the National Counter Disinformation Strategy Working Group created in Ireland⁴) but such tools will need fine-tuning and further development, while freedom of expression and information should continue to remain central in any approach to the issue (cf. paragraph 2.2 below).

² https://www.comece.eu/wp-content/uploads/sites/2/2022/01/pdf_20180412.pdf.

³ Cf. the link https://www.vatican.va/content/francesco/en/messages/communications/documents/papa-francesco_20180124_messaggio-comunicazioni-sociali.html.

⁴ Cf. the link <https://www.gov.ie/en/department-of-tourism-culture-arts-gaeltacht-sport-and-media/publications/national-counter-disinformation-strategy-working-group/#background>.

Data collection should be fostered, considering the complex nature of the problem and so is cooperation with the tech companies on enforcement of community guidelines on the spread of false, misleading and harmful content on social media platforms.

In addition, an **understanding of the algorithms** used is paramount, as well as solutions to combat the current practice according to which the more an individual views a topic, the more that topic is presented to them, thereby creating online '**echo chambers**'. This can lead users to believing that their way of thinking is the correct or most popular one.

In the upcoming multi-annual funding period, a creative use of **funds** should be encouraged to counter the phenomenon of disinformation, including to **finance innovative solutions and technologies** to fight it in an effective way; as well as **research** of cases of FIMI to help predict how future cases will arise.

2.2 Fundamental rights implications

For COMECE, it is essential that any policy to fight against disinformation has a **strong fundamental rights and rule of law dimension**. In particular, full respect must be ensured, not only for **freedom of expression and information**, but also for **freedom of thought, conscience and religion**: already in 2007, PACE Assembly Resolution 1535 (2007) on *Threats to the lives and freedom of expression of journalists* rightly affirmed that "...to make democracy meaningful, freedom of expression and freedom of religion should go hand in hand" (§ 4)⁵.

In the last few years, we have noticed a shift from the traditional setting of freedom speech as a classical fundamental human right, to a greater **role for public institutions** in the Member States **in ensuring pluralism**. In the view of COMECE, any measure entailed by the 'European Democracy Shield' should not be at the expense of freedom of expression and of information or imply restrictions on **dissenting voices** in the EU public square: **chilling effects** on expression and censorship must be strictly prevented. **Political authorities** should **not** be the instance **deciding on what is trustful/truthful** (or not) and the possibility for social actors to freely exchange information and opinions, inside and outside the EU, has to be ensured.

A full promotion and protection of freedom of expression of information is also a way of allowing all **creative forces within society** to give strength and vitality to our countries and to the European Union itself.

⁵ The text is available at the link <https://pace.coe.int/pdf/aa9ea35aae317f8e1541e5b223131fb33c0fe6400bb089c576d17d24b309c3b4/res.%201535.pdf>.

From the Church's perspective, **pluralism also means** facilitating an environment where **religious points of view** are fully accepted and welcomed in public and private media. Only "*...any propaganda for war*" or "*...any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence*" shall be prohibited by law, in accordance with Article 20 of the International Covenant on Civil and Political Rights.

Pope Leo XIV has **emphasised** from the beginning of His pontificate the key role media play, underlining that "*...communication is not only the transmission of information, but it is also the creation of a culture, of human and digital environments that become spaces for dialogue and discussion*" (Meeting with the media representatives, 12 May 2025)⁶; and that "*Truly peaceful relationships cannot be built, also within the international community, apart from truth. Where words take on ambiguous and ambivalent connotations, and the virtual world, with its **altered perception of reality**, takes over unchecked, it is difficult to build authentic relationships, since the objective and real premises of communication are lacking*" (Audience with the Diplomatic Corps accredited to the Holy See, 16 May 2025)⁷.

COMECE would also like to restate the importance of **precise legal concepts and definitions** for this context. This aspect is crucial in ensuring that legitimate initiatives to prevent undue foreign interferences do not empower public authorities to control public opinion/debates or to marginalise non-mainstream opinions and views. No legitimate democratic expression of any political colour should get 'trapped' in the relevant mechanisms.

Persons are often **stigmatised in the media due to their belonging to a certain religion** and some content-management tools may lead to unduly flagging religious contents as inappropriate. Diversity is essential for the healthy functioning of a democratic system, and this includes the **full inclusion of religion in the public space**, without excluding anyone who wishes to defend Church teaching in public or negatively impacting on Catholic media institutions (e.g. forcing them to adopt lines that are not in accordance with their ethos): they too are **actors of democracy and promoters and defenders of fundamental rights**.

Fact-checking is another essential aspect of the debate: it is made even more so by rapidly evolving technologies, but relevant systems for detecting and reporting **must be transparent**. Furthermore, measures should ensure that fact-checkers are not only of **high quality**, but also **independent and impartial** (e.g. not funded directly or indirectly by the State or public entities) **as well as accountable**. By definition and nature, fact-checkers are not free of potential biases or subjective perspectives and can be driven by interest-based narratives.

⁶ <https://press.vatican.va/content/salastampa/it/bollettino/pubblico/2025/05/12/0309/00533.html>.

⁷ <https://press.vatican.va/content/salastampa/it/bollettino/pubblico/2025/05/16/0319/00546.html>.

The UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression stated in his Report of 16 May 2011 to the Human Rights Council (A/HRC/17/27), § 43 that “... *censorship measures should never be delegated to a private entity*”⁸. On the other hand, the abolition of fact-checkers by some online platforms is a cause of concern, as in the absence of fact-checkers it can be assumed that inauthentic use of social media by foreign and domestic actors will increase.

As already stressed by COMECE in previous EU public consultations, **the answer must also come from within society**: the disinformation problem is also driven and enhanced by the growing tendency for users to group together only with other ‘like-minded’ users. This is also a question of **responsible citizenship**. The Social Doctrine of the Church stresses that “*Professionals in the field of media are not the only people with ethical duties. Those who make use of the media also have obligations*” (Compendium of the Social Doctrine of the Church, § 562).

2.3 Security aspects and the external dimension

Effectively addressing **hybrid threats**, including foreign information manipulation and interference (FIMI), highlights the need for an **integral and comprehensive understanding of security**, requiring a multi-layered and multi-stakeholder approach. Currently, efforts to fight FIMI vary across Member States and thus the overall response is very fragmented.

Besides strengthening the capacities to counter FIMI at both EU and national levels, **cooperation with EU Delegations** in third countries could also be further reinforced in this respect, encouraging them to systematically engage with local non-governmental stakeholders, including civil society and religious actors. The involvement of such **grassroots stakeholders** may not only help the EU to better understand the local political, societal and cultural context, but also contribute to preventive measures, to identifying challenges and threats, and to crafting effective, culturally appropriate information and awareness-raising programmes.

In an increasingly opaque field, such as cyberspace, building confidence between States becomes a necessity. Trust can be promoted bilaterally and multilaterally. A **diplomatic policy of trust-building and cooperation should be prioritised over the imposition of sanctions or other coercive measures** in order not to foment an atmosphere of hostility which may bear the risk of further escalation.

⁸ https://www2.ohchr.org/english/bodies/hrcouncil/docs/17session/a.hrc.17.27_en.pdf.

2.4 Economic and financial aspects

Addressing the **economic tools and financial incentives** behind the spreading of foreign information manipulation and interference and disinformation (e.g. hiring of influencers, manipulation of algorithms, use of bots or fake accounts etc.) is a **very important** issue, as foreign information manipulation, interference and disinformation can pose serious challenges to democracy in the EU and in its Member States.

However, these challenges to democratic processes should be addressed with **equal determination, openness and lack of bias regardless of the political sides involved**. In some cases, a concerning tendency has been noticed to overlook such undue interferences when they emerge in the context of so-called 'progressive' causes (for instance in case of national consultations on abortion). In general, one notices a worrying silence on foreign interference in democratic processes when it comes to sensitive societal issues such as abortion or family/marriage.

2.5 International religious freedom: a case study

Not providing relevant information to the public can also be seen as a type of **manipulative practice**, or at least a malpractice. In this regard, discouraging dissenting opinions and 'shutting down' information about certain '**uncomfortable**' topics that are not aligned with mainstream politics, or that are not considered politically relevant, should be addressed too. **Persecution of Christians in the world is a striking example** of this practice (e.g. lacking reporting on regular massacres of Christians in Nigeria). As a result, anti-Christian hatred and crimes against Christian communities are nearly invisible for European societies, although the European Parliament has recognised in some of its Resolutions that Christians are the most persecuted groups worldwide (e.g. Resolution of 14 December 2016⁹ and of 20 January 2021¹⁰ on Annual Reports on human rights and democracy in the world).

Religious literacy is also **lacking in media** (and more and more within society): this leads to a misunderstanding about the role of religion in society, and in the geopolitical landscape, misrepresenting the reality and relevance of religious actors and their positive contribution to the well-being of societies, to social cohesion and to order.

⁹ Cf. § 146 of the Resolution at the link <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016IP0502>.

¹⁰ Cf. Recital C and § 104 of the Resolution at the link https://www.europarl.europa.eu/doceo/document/TA-9-2021-0014_EN.html.

3. Fairness and integrity of elections and strengthening democratic frameworks

Concerning electoral processes, COMECE would like to stress that only when the individual **citizens** become **collectively conscious and conscientious of the importance of their active involvement** in the democratic process does participatory democracy become a reality¹¹. Citizens have to acknowledge their power to vote in (or out) members of parliaments according to their conscience, ethical standards and political convictions. It is necessary to advocate for a **transparent and accessible EU electoral system** and to support measures that increase voter turnout. Because of these requirements, European political parties have to be established as strong extra-parliamentary organisations and they need to increase their visibility in electoral campaigns. The introduction of **transnational lists of political candidates for the European Parliament** should be studied further.

Obviously, **sound national rules on transparency of financial contributions to political parties** are also part of the answer to the challenges. **Standards on the funding of political activities** are extremely important, as is **transparency** regarding the individuals or organisations behind **lobby groups**.

FIMI and disinformation also play a role in **integrity of elections**. It is vital that the effect external actors have on our democratic processes is kept to a minimum.

Ethics and transparency should begin with the candidates themselves - this should be underpinned by national legislation requiring disclosure of interests/donors etc.

A **better coordination at EU and national levels** may also help to preserve the integrity of electoral processes, since election interference often transcends national boundaries. Moreover, Member States could also benefit from a greater consistency in democratic safeguards and from the technical expertise offered by EU **institutions like ENISA**.

In recent times, **violence, harassment and threats against political candidates and elected officials** have been on the rise across Europe both online and offline. This phenomenon is driven by growing polarisation, the rise of extremist movements and a decline in trust in democratic institutions, creating an environment marked by the inability to respect different political opinions and conduct dialogue in a civilised manner. While promoting measures to reverse this trend, political candidates and elected representatives should be granted **adequate protection against threats both online and offline**.

¹¹ On the topic of democracy and ethics, cf. the Position paper elaborated by the COMECE Commission for Ethics 'Strengthening the Culture of Democracy through Values' of 31 May 2024 at the link <https://www.comece.eu/wp-content/uploads/sites/2/2024/05/PP-31052024-Strengthening-the-Culture-of-Democracy-through-Value.pdf>.

Finally, since election interferences affect fundamental values of a democratic society, they must be prevented and countered effectively, including through **enhanced cybersecurity** measures and the protection of critical infrastructures. At the same time, any legislation aimed at **regulating the design and use of information and communication technologies** should **respect human dignity and universal human rights**, including the right to freedom of thought, conscience and religion.

4. Strengthening societal resilience and preparedness: the crucial role of education

COMECE is pleased to note the follow-up the Commission intends to give to previous initiatives such as the **European Democracy Action Plan** and the **Defence of Democracy Package**, by directly addressing key topics such as strengthening societal resilience and preparedness, as well as fostering citizens' participation and engagement (on which cf. paragraph 5 below).

It is essential that **public awareness and resilience against FIMI** is developed. In this sense, **education** must be approached from many angles - at school level, through public information campaigns and education through as many media as possible e.g. using the arts as an education tool.

Democracy cannot help but rely on education to equip young Europeans with the tools to tackle today's challenges. **Critical thinking** is crucial in identifying misinformation - a force that often fuels polarisation. This polarisation is amplified by the spread of fake news and digital manipulation, which deepens societal divides and erodes trust in differing viewpoints, marking the necessity for education to focus on media literacy and discerning judgment, as well as for promoting **interreligious and intercultural understanding** to bridge gaps and strengthen social cohesion and deter against societal polarisation within EU Member States.

With regard to societal preparedness, we would stress the urgency of educating the public to understand **how social media algorithms work** and 'who is behind' the information they are viewing.

Fake news - and the polarisation they fuel - are just two of the many challenges posed by **digitalisation**, which has had a great **impact on younger generations**. The EU must continue to reflect on how the digital environment can either strengthen or weaken democratic engagement, as it was clearly highlighted in the contributions¹² of the **COMECE Youth Net** in 2024.

¹² <https://www.comece.eu/wp-content/uploads/sites/2/2024/07/Annual-Contribution-05072024-COMECE-Youth-Net.pdf>.

Promoting **media** and **information literacy** - particularly among children and families - is key to helping individuals critically engage with digital content while grounding their understanding in ethical principles like truthfulness, conscience formation, and good judgment.

Campaigns like *Media for Encounter* further demonstrate how digital tools can be used to promote real human connection. By encouraging individuals to share meaningful experiences and insights, the initiative fosters a **culture of empathy and community**, it counters the alienation and negative social comparison often found online by promoting authentic interaction and reminding users that technology should serve human dignity and well-being.

Beyond legislation, religious communities offer important **grassroots support**, helping to extend ethical education into everyday life. An important role is played by the **family**, which provides the first space where cardinal virtues can be taught and lived by young generations. These values not only strengthen family bonds but also help children develop the **moral discernment** in conjunction with religious education that allows to democratic principles to become part of one's life. Creating a nurturing home environment - through open discussions, religious, formal, and informal education, and shared reflection - helps reduce young people's reliance on superficial content by offering them a sense of belonging, security, and tools for discernment.

Civic education assumes a cardinal role in shaping citizens of the future. Programmes like CERV (Citizens, Equality, Rights and Values) and the European Solidarity Corps are concrete examples in which young people actively engage in democracy-building processes, assuming a shared responsibility towards the future of the Union. Coupled with faith-based education, civic education ensures a cultivation of *ethical reflection, respect for human dignity, and responsibility to others*: **core values of the European identity**.

As Pope Francis noted¹³ in a speech to members of the movement of educational commitment of Catholic Action in October 2024, education must be able to cultivate "*interiority, transcendence, and spirituality, as essential elements for the integral development of the human person in all his or her dimensions: the spiritual, existential, affective, cultural, social, and political dimensions*".

¹³ <https://www.vatican.va/content/francesco/en/speeches/2024/october/documents/20241031-mieac.html>.

Furthermore, education institutions should allow the **right for parents to freely educate their children in line with their beliefs**, as part of broader efforts to safeguard fundamental rights in a democratic society.

The Commission should therefore work with Member States to ensure that parental involvement in the education system is actively supported, providing them tools to guarantee this right, and allowing them to grow alongside a community, in which students can engage and develop into active and responsible citizens.

Equally important is the **protection of academic freedom** and the autonomy of higher education institutions. To foster balanced and diverse academic research, it is crucial to ensure that universities and research bodies remain free from undue political influence. As such, Member States should strive to create an environment where democratic principles are applied, new ideas explored, convictions respected without fear of suppression.

Dissenting or minority voices in academia should not be considered a-scientific or counter-scientific. This is particularly important in socially controversial issues with a moral dimension. The EU or its Member states should not exclude dissenting voices from access public funding. At the same time, indiscriminate **cuts to public funding** for research and academia or **conditionality to certain policy and educational lines** can also have a negative impact, including risks of spill over in case of actions taken by key countries, especially if driven by exploitation on social media.

Finally, **public service broadcasting** can also play a relevant role in education, awareness and supporting a healthy and democratic information space. On the other hand, some actors note the challenge of having citizens, especially younger ones, engaging with traditional media/news sources.

5. Fostering citizens' participation and engagement

In a highly complex world, **participation requires discernment** to take appropriate decisions on many challenging and thorny issues. A free media landscape and freedom of expression in the public square are essential for safeguarding truthful information. However, a **highly digitised public opinion** is also susceptible to the pitfalls of networks that foster a **post-truth culture**. It is to be noted, in this regard, that the **Digital Services Act** positively enhances the transparency, accountability and oversight of social networks to limit the adverse effect of disinformation. The continuation of its **effective enforcement** should be fully encouraged.

We also need an open, transparent and honest discussion on how to **balance the safeguarding of democratic processes, the protection of individual freedoms and the progressive digitalisation of information.**

Furthermore, subsidiarity is an essential prerequisite for the success of the Union's democratic process. This principle has its roots in Christian social ethics. As an expression of the need for the greatest possible participation of the local and national communities, **prudent respect for the principle of subsidiarity** is required. The institutional and political protection of subsidiarity should be strengthened by reinforcing both the participation of national parliaments in EU legislative and political processes as well as the role of European Parliament's committees.

The future of participatory democracy depends on **genuine, inclusive engagement**. It is essential to **strengthen citizens' panels, youth consultations, and Commissioners' dialogues**, ensuring these platforms are more than just symbolic. A policy of formally complying with efforts to achieve a goal by making small, token gestures - such as hiring a minimal number of ethnically diverse or disadvantaged people - must be avoided. They must lead to meaningful action and ensure that the voices of those in **rural and isolated areas** are heard.

In conclusion, the **European Democracy Shield** should aim to not only protect democracy from external and internal threats but also empower citizens by providing them with the tools, knowledge, and opportunities to actively participate in the democratic process. By focusing on education, participation, and the protection of fundamental rights, this initiative **can help strengthen the EU's democratic principles** and foster a more engaged, cohesive participation for all European citizens **by investing in education.**

*Brussels, 26 May 2025,
COMECE Secretariat*

European Democracy Shield - Open public consultation

Fields marked with * are mandatory.

Introduction

Democracy, the rule of law and fundamental rights are founding values of the European Union. They underpin EU's achievements in fostering peace, prosperity, economic competitiveness, social cohesion and stability. The essence of democracy is that citizens can freely express their views and participate in democratic life, choose their political representatives, and have a say in their future. Citizens should be able to form their own opinions in a public space where they have access to reliable information from a plurality of sources, where different views can be expressed, where they have a right to disagree and to cast their votes in elections that are free from interference, either foreign or domestic.

In the [2024 Flash EB 550 survey](#), out of a list of ten threats to democracy, growing distrust and scepticism towards democratic institutions (36%) and false and/or misleading information in general circulating online and offline (34%) were the two greatest threats mentioned. The [Standard EB 102](#) also showed that 82% of Europeans agree that the existence of news or information that misrepresent reality or is even false is a problem for democracy in general.

The EU has taken significant steps to address pressing threats to European democracy under the European Democracy Action Plan (2020) and the Defence of Democracy Package (2023). But recent experience has shown an intensification and wider spread of these threats. The methods used are now harder to track, more damaging and easier to deploy using digital tools and social media. This reflects a deep change in the information space, shifting from editorial media sources to user-generated content mediated on platforms and pushed by algorithms. This enables new freedoms and opportunities but also makes it easier for hostile actors, both internal and foreign, to manipulate information and step up information warfare. This new information landscape also poses challenges to equal opportunities for political participation and to European security to democracy more broadly.

Recent developments, including during electoral processes in Europe, show that the threat landscape is increasingly complex, with interference and distortions in the information space, as well as hybrid threats, attempting to both impact on election results as well as lower public trust in democratic processes. This highlights the need to ensure an efficient toolbox to help withstand such challenges. They also underline the need for better cooperation to effectively address the new realities affecting democratic processes, including in the online sphere. This means improving the overall situational awareness and the capacity to respond to threats and manage crisis situations, as well as promoting democratic resilience across the EU.

That is why the Commission is preparing the European Democracy Shield, as announced in the

Commission's Political Guidelines for 2024-2029. It will provide a strategic framework to better protect and promote democracy in the EU, underpinned by concrete initiatives, ensuring respect for democratic values and fundamental rights, including the EU's enduring commitment to preserving and promoting freedom of expression.

The Commission would like to consult the general public and stakeholders on the key issues that the Shield should address, structured around four themes:

- Countering disinformation and foreign information manipulation and interference (FIMI);
- Ensuring the fairness and integrity of elections and the strengthening of democratic frameworks and checks and balances, including media and civil society organisations;
- Strengthening societal resilience and preparedness;
- Fostering citizens' participation and engagement.

Stakeholders likely to be interested in this initiative include:

- individual citizens
- Member States' national authorities
- EU institutions and bodies, including the European Parliament, the Council, the European Economic and Social Committee, the European Committee of the Regions
- international organisations, such as the Council of Europe, OSCE-ODIHR, the OECD, and NATO
- European and national political parties
- relevant EU-level networks
- civil society organisations (including youth organisations) and human rights defenders
- representatives of academia and researchers
- media representatives, journalists and their federations
- online platforms
- online communities
- influencers

About you

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- French
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- Trade union
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Alessandro

* Surname

Calcagno

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alessandro.calcagno@comece.eu

* Organisation name

255 character(s) maximum

Secretariat of COMECE (Commission of the Bishops' Conferences of the European Union)

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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- Curaçao
- Cyprus
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen

- Czechia
- Lebanon
- Saint Helena
- Zambia
- Democratic Republic of the Congo
- Lesotho
- Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Zimbabwe
- Denmark
- Liberia
- Saint Lucia

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, ‘business association’, ‘consumer association’, ‘EU citizen’) country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* **Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

1. Foreign information manipulation and interference and disinformation

Democracies within the EU are confronted with increasing threats, arising both from within and from outside the Union, driven by various hostile actors that aim to erode social cohesion and to undermine citizens' trust in democracy and democratic institutions. These threats can take various forms, including foreign information manipulation and interference (FIMI), disinformation and other forms of hybrid threats.

FIMI refers to 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[1].

Disinformation refers to false or misleading content that is spread with an intention to deceive or secure economic or political gain, and which may cause public harm[2].

[1] https://www.eeas.europa.eu/eeas/tackling-disinformation-foreign-information-manipulation-interference_en

[2] <https://digital-strategy.ec.europa.eu/en/policies/online-disinformation>

General

1.1. Please indicate your perception of the risks posed by the following techniques:

technique	very high	high	neutral	low	very low	don't know
Foreign information manipulation and interference and disinformation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inauthentic use of social media by foreign and domestic actors to impact the EU democratic sphere (e.g. through fake accounts, bots, opaque amplification techniques including through exploitation of algorithms, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Covert funding of political activity (parties, campaigns etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Interference in research and academia	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Threats and attacks against political actors	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Threats and attacks against the media and journalists	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Corruption, fraud, etc. in politics	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

3500 character(s) maximum

For comments please refer to the uploaded supporting document.

Other (please explain):

1500 character(s) maximum

1.2. Please indicate which of the following measures would in your view be most important to detect and combat foreign information manipulation and interference and disinformation (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Information sharing and cooperation among Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information sharing and cooperation between Member States and EU institutions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gathering of information, knowledge sharing and cooperation between governmental actors (at Member State and EU level) and non-government stakeholders (fact-checkers, researchers, civil society organisations...)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dedicated structure(s) at EU level to better detect these threats and react to them	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforcement of the capacity for national authorities to react to such threats	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for non-governmental stakeholders (fact-checkers, researchers, civil society organisations...)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stronger monitoring and enforcement of existing rules	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Raising awareness and building resilience	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to a more pluralistic landscape of online platforms	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing the economic tools and financial incentives behind the spreading of foreign information manipulation and interference and disinformation (e.g. hiring of influencers, manipulation of algorithms, use of bots or fake accounts etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the transparency of algorithms and recommender systems (i. e. provision of personalised suggestions to users based on their preferences, behaviors, or other data inputs) on online platforms and more broadly the accountability and transparency of online platforms and other online services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting the development and use of technologies (such as Artificial Intelligence) to better detect and address these threats	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased transparency on the use of new technologies (such as Artificial Intelligence) when disseminating political content online	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Empowering media to respond to such threats (including trainings for journalists etc...)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforced involvement of independent and trustworthy experts and scientists (in Information Technology (IT), Artificial Intelligence (AI), socio-political and other relevant disciplines) to advise on issue impacting the EU democratic sphere	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sanctions for actors involved in foreign information manipulation and interference and disinformation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforced EU cooperation with partner countries outside the EU and international organisations (such as NATO, the G7 and others)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stronger diplomatic measures (such as politically exposing and calling out the perpetrators, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

3500 character(s) maximum

For comments please refer to the uploaded supporting document.

Other (please explain):

1500 character(s) maximum

1.3. Are you aware of the following regulations and policies?

regulation/policy	well aware	somewhat aware	unaware
The EU Regulation on the transparency and targeting of political advertising	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU Digital Services Act (DSA)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU Artificial Intelligence Act (AI Act)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU Code of Conduct on Disinformation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Self-commitments and ethical standards by political parties	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Self-commitments and ethical standards by other political actors (campaign organisers etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU policies supporting digital and media literacy and critical thinking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

National policies and/or measures to prevent, counter and raise awareness of FIMI and disinformation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Platforms' own policies (terms of service/guidelines, etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

1.4. What further measures could be considered to reinforce the current EU framework and tools to fight disinformation and information manipulation in the EU, while safeguarding freedom of expression?

1500 character(s) maximum

For comments please refer to the uploaded supporting document.

1.5. In addition, please indicate which of the following measures would in your view be most important to support a healthy and democratic information space across the EU to (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
More initiatives to support media and digital literacy and critical thinking among the whole population	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More support for free, plural and independent media	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More support for trusted, impartial and open-source information (reliable information)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More support for scientific research on disinformation and information manipulation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Involvement of independent and trustworthy scientific advice in the fight against these phenomena	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More support for fact-checkers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
More support for civil society organisations active in fighting disinformation and information manipulation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stronger measures to address inauthentic and manipulative dissemination of information on online platforms	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote innovative structures for fair, safe and transparent democratic debates, including online	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

3500 character(s) maximum

For comments please refer to the uploaded supporting document.

Other (please explain):

1500 character(s) maximum

2. Fairness and integrity of elections and strengthening democratic frameworks

Elections

2.1. Please indicate which of the following measures would in your view be most important to strengthen the fairness and integrity of elections at EU, national, regional and local level (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Sharing of good practices among Member States' authorities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased cooperation among Member States and between them and the EU institutions on the integrity of elections taking place in the EU, including in crisis situations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A European repository of good electoral practices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU standards or rules on the funding of political activities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforced national rules and frameworks on equality of opportunities for political parties and candidates	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures at EU or national level to better protect political candidates and elected representatives against threats and attacks (online and offline)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the responsible use of Artificial Intelligence in democratic processes (campaigns, voting, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to enhance cyber-security and the protection of critical infrastructure in the context of elections	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ethical frameworks and voluntary commitments by political actors on integrity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to protect voters from online manipulation and disinformation campaigns threatening the integrity of the electoral process	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Involvement of independent and trustworthy experts and scientists in IT, AI, socio-political and other relevant disciplines	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

3500 character(s) maximum

For comments please refer to the uploaded supporting document.

Other (please explain):

1500 character(s) maximum

The media and information sphere

2.2. Are you aware of the European Media Freedom Act (EMFA)?

- Yes
- No

2.3. Please indicate which of the following measures would in your view be most important to strengthen media freedom and pluralism and independent journalism in the EU (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Promote media freedom, pluralism and independence of the media	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhance citizens' access to diverse media content and reliable information	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support media sectors of relevance to democracy (such as local media and investigative journalism)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the resilience and viability of professional journalism and media companies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhance innovation in the media sector	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Foster the responsible use of new technologies by the media (e.g. Artificial Intelligence)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring a safe and enabling environment for journalists, building on the work done to protect them from abusive lawsuits (SLAPPs) and other acts of pressure and unethical behaviour	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

3500 character(s) maximum

For comments please refer to the uploaded supporting document.

Other (please explain):

1500 character(s) maximum

2.4. What measures could be considered to reinforce the current EU framework and tools to protect free, plural and independent media?

1500 character(s) maximum

For comments please refer to the uploaded supporting document.

3. Societal resilience and preparedness

3.1. Please indicate which of the following measures would in your view be most important to support societal resilience and preparedness (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Enhancing digital and media literacy and critical thinking for all age categories, starting from an early age	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fostering exchange of best practices within the media literacy community in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to EU-wide media literacy initiatives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for civic education	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for transparent and accountable public administration	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Raising people's awareness about narratives and techniques used in spreading disinformation to enable them to better recognise them and resist to them	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Relying on responsible and independent science advice	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

3500 character(s) maximum

For comments please refer to the uploaded supporting document.

Other (please explain):

1500 character(s) maximum

4. Citizens' participation and engagement

4.1. Please indicate which of the following measures would in your view be most important to support citizens' participation and engagement (ranking from 1 to 5, 1=most important):

measure	1	2	3	4	5
Reinforce frameworks for citizens' participation in public policymaking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Capacity-building for public authorities to engage with citizens on public policymaking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase communication and access to information about possibilities for citizens' participation in public policymaking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Foster people's interest and knowledge of politics and policymaking, starting at an early age	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the life-long participation in the democratic life and policy-making processes, starting at an early age	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support training and education on citizenship and democratic participation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforce citizens' trust in democratic institutions and the political sphere	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting EU citizenship and the rights deriving from it	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment, if needed:

3500 character(s) maximum

For comments please refer to the uploaded supporting document.

Other (please explain):

1500 character(s) maximum

Concluding remarks

If you wish to add further information, within the scope of this consultation, please feel free to do so here.

1500 character(s) maximum

Please feel free to upload a supporting document (only 1 document up to 15 pages will be taken into consideration):

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

ff08d59c-d707-4051-beb2-8d4aebaa2cec/COMECE_EU_Democracy_Shield.pdf

Contact

JUST-CITIZENSHIP-ELECTIONS@ec.europa.eu