



CCIA contribution on Guidance on strengthening the Code of Practice on Disinformation

The Computer & Communications Industry Association (CCIA Europe) and its members are fully committed to tackling the dissemination of disinformation and we welcome the European Commission (EC) goal to strengthen the EU Code of Practice on Disinformation (“the Code”).

We believe that strengthening of the Code is an opportunity to promote a wider adoption of this important tool based on a clear scope and objectives; flexible, widely-recognized and future-proof definitions; and clear metrics. Clarifying those should be the first priority for the new iteration of the Code to ensure its consistent application and positive impact. It is, moreover, important to limit the incentives for establishing national initiatives that might increase legal fragmentation with potential negative effects on the Single Market.

Several CCIA members have signed the Code and they are committed to develop effective measures to reduce disinformation.

Since its adoption, the Code has proved to be an effective powerful risk-mitigating instrument to fight the spread of disinformation, reinforcing the responsibility and accountability of all the involved signatories.

We support the EC’s multilateral approach which creates room for discussions among different parties, notably the EU institutions and digital service providers.

We consider the ability to involve many different actors as a critical element for the success of the Code. It will therefore be key to maintain a certain level of flexibility within the Code and to take into consideration the differences (resources, capabilities, business models, reach, etc.) among all the possible signatories.

The ability to compare the results of the Code should not come at the expense of the signatories’ capability to draft and enforce policies that will be the most helpful in combating misinformation on their platforms. It should be pivotal to assess whether the signatories are meeting the objectives of the Code, rather than comparing quantitative and qualitative criteria and KPIs. Reporting requirements should also be agreed upon and predictable to ensure signatories invest resources into meeting the Code's objectives.

While providing more transparency is important, we believe that meaningful transparency should not come at the expense of users’ privacy or the risk of enabling bad actors to abuse the system. We also encourage the EC to avoid an overly prescriptive approach.

We also encourage the EC to work closely with the various players to refine some aspects of the Code by adopting a clear and proportionate Guidance. This should take into account the positive results already achieved and the Digital Services Act (DSA) proposal.

While we support a consistent and coordinated application of these two instruments (the Code and the DSA), some provisions of the DSA proposal would require further clarification. For example, it might be not appropriate to impose highly-prescriptive audit requirements on all the Codes of Conduct adopted within the DSA framework considering the voluntary nature of these tools and their specificities.

We also urge careful assessment to avoid contradictory reporting obligations. It will be very important, especially for the signatories of the Code falling into the scope of the DSA, to avoid



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inconsistent overlaps in terms of requirements and compliance processes. It is crucial to make sure that the Code will also be consistent with the European Democracy Action Plan and the upcoming proposal on political advertising.

To conclude, CCIA welcomes the objective of strengthening the Code of Practice on Disinformation and we stand ready to share industry experiences and provide constructive suggestions. We look forward to working with policymakers and to exchanging information on how to address disinformation in the most effective way.

About CCIA

CCIA is an international, not-for-profit trade association representing a broad cross section of communications and technology firms. For nearly fifty years, CCIA has promoted open markets, open systems, and open networks. For more, visit www.ccianet.org.