Hate Speech & Freedom of Information on Online Platforms



Public Awareness Campaigns and International Perspectives on Regulating Online Media Content



Bulgaria: National Context

- □ 43% of adults exposed to hate speech → persistently high since
 2013
- ☐ Shift in exposure: social media overtook television
- **□** Low reporting rates
- □ Chilling effect: vulnerable groups withdraw → audiences receive a poorer, distorted flow of information



Bulgarian Legal Safeguards

- □ RTA bans incitement to violence/hatred (Arts. 10, 17(2))
- □ CEM oversight: proportionate enforcement, respecting rights
- □ VSPs' duties (Art. 19e): reporting tools, complaints, age assurance, parental controls
- ☐ Users' rights: VSPs' terms coordinated with CEM; enforceable in court
- ☐ **Prevention**: media-literacy promotion alongside enforcement





Illegal vs. Harmful Speech

- ☐ Illegal hate speech calls to violence/hatred (e.g., racist/xenophobic)
 - → courts; sanctions; platform duties.
- □ Lawful-but-harmful offensive but legal → platform rules/design, counter-speech, media literacy.
- □ ECtHR closer to calls to violence/hatred → narrower Article 10 protection; non-inciting political speech protected.
- ☐ Clear boundary punish illegal hate and preserve freedom to receive information.



Bulgaria: Oversight & Awareness

- □ Elections: CEM monitors campaigns; flags spikes to CEC protects voters' access to plural, reliable information.
- ☐ Awareness: Bulgaria Faces Hate Speech; Check before you trust.
- □ Coalition: Bulgarian Coalition against Disinformation strengthens find-and-verify skills.



Civil Society Contribution

- □ EqualTogether (2023–25, EU-funded): Equal.bg reporting → ~140 cases → anonymised data to OSCE/ODIHR
- ☐ From Words to Stories (2024–26, EACEA-funded): training, dialogue,
 - advocacy
- ☐ Civil society ensures inclusive, accessible information flows



Europe's Combined Response

- □ Enforcement + education beyond takedowns: pair removals with prevention (design changes, counter-speech, media literacy).
- National initiatives:
 - o **Ireland** Be Media Smart ("Stop, Think, Check").
 - Finland Faktabaari materials for schools.
 - Netherlands & Croatia teacher training to recognise and respond to hate speech.
 - Austria & Germany counter-narrative digital campaigns.
 - Spain & Italy curricular integration in media-literacy programmes.





EU User-Protection Framework

- □ AVMSD: bans calls to violence/hatred; proportionate VSP safeguards.
- □ DSA: platform accountability for illegal content & systemic risks; transparency; minors-by-default.
- □ EU Guidelines (Art. 28): privacy-by-default; limit autoplay/live; proportionate age checks.
- □ Code of Conduct+ (2025, voluntary): faster handling of accredited notices; country-level transparency.
- EMFA (from 8 Aug 2025): Media Board; coordinated action on high-risk non-EU media services.
- ☐ Ireland's Online Safety Code: EU-wide impact via Irish jurisdiction over many VLOPs





Enforcement & Cooperation

- ☐ Commission enforcement: DSA proceedings vs Meta, TikTok, X.
- □ Cross-border: structured cooperation; EBDS mediation; expedited (≤14 days).
- Media Board: coordinated action on high-risk services established outside the EU.
- Purpose: uphold safe, plural access to information.





Systemic Risks and Gaps

- ☐ Gaps: local-language moderation under-served; slow notice handling; limited recommender redesign.
- □ Algorithms & Al: engagement-driven amplification; deepfakes distort what users receive.
- □ **Political cycles**: aggressive rhetoric normalises hate; chills participation.
- ☐ **Focus**: reduce exposure while protecting freedom to receive information.





Way Forward: Strategic Pillars

- □ Deterrence + resilience: empower users, not only remove content.
- □ Four pillars: platform design that slows amplification; public,
 comparable data on exposure/outcomes; local-language
 moderation; support & redress for victims.
- ☐ Goal: reduce hate while preserving plural, open, reliable access to information.

THANK YOU