Regional Security and Propaganda

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Introduction

The Organization for Security and Co-operation in Europe (OSCE) was created as a security organisation. Its comprehensive approach to security, developed in 1975, rests on the recognition that conflicts in Europe may arise not only from political or military threats but also from economic tensions, environmental degradation, and social insecurity, as well as deficiencies in relation to the rule of law and the protection of human rights and fundamental freedoms. Alongside with other human rights, freedom of expression, including freedom of information and freedom of the media, are now well established and recognised beyond question within the OSCE. This political framework stimulated many grassroots initiatives across the region. Among them are the "Helsinki Watch" groups that hold governments to account for the violations of human rights obligations.

I address the issue of the role propaganda plays in the security climate in the OSCE region from several standpoints. The first relates to the commitments that the OSCE participating States have made and/or have not made in this regard over the last 50 years. The second comes from the overall international, intergovernmental approach to propaganda, disinformation, "fake news", and, most recently, foreign information manipulations and interference (FIMI) – in the context of the fundamental human right to freedom of expression. The third is largely drawn on my personal experience as director (2011-2015), special adviser (on propaganda and freedom of the media, 2015), and senior adviser (2016-2022) of the OSCE Office of the Representative on Freedom of the Media (RFOM); it relates to the practical input of this key regional institution to address the issue in practice. Through an analysis of the feedback on advance in these three directions, in my individual capacity, I dare to suggest certain recommendations.

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To clarify, by security in the OSCE region, I mean that of the participating States' sovereignty, political independence, territorial integrity, and the security of their citizens.[2] It was in a "non-paper"[3] from the Office of the OSCE RFOM that the threat of propaganda and disinformation to the European security was for the first time, since the Balkan wars of the 1990s, brought up in the intergovernmental arena.[4] That publication warned that militant state propaganda can easily transform the local conflict "in and around Ukraine" (in the then OSCE terminology) into a World War III. It offered discussions on specific actions to diminish the threats.

It is not only about security. The current media environment and the widespread proliferation of disinformation confront professional traditional media entities with numerous new challenges, and place a heavier burden on journalists and their integrity. By blurring the lines between false and true, disinformation undermines public trust in journalism and its role in a democratic society.

OSCE Commitments

The basic document of the OSCE is the Helsinki Final Act (1975). Retrospectively, it laid the foundation to establish the Organization for Security and Co-operation in Europe (OSCE) once the Cold War was about to end. In Helsinki, the future participating States committed themselves, *inter alia*, to promote in their relations with one another "a climate of confidence and respect among peoples consonant with their duty to refrain from propaganda for wars of aggression" against each other.[5] Moreover, this commitment has been considered a measure related to giving effect to the famous Decalogue of Principles Guiding Relations between Participating States.

Beginning with the Helsinki Final Act, the now 57 participating States of the OSCE have adopted a significant number of politically binding commitments relating to what has become known as the human dimension of the organisation's comprehensive security concept.

The OSCE commitments on equality, tolerance and non-discrimination include provisions related to the role of the media in both preventing and countering acts motivated by prejudice, intolerance and hatred.[6] For example, following the first major security challenge of the OSCE, in Western Balkans, the Summit Declaration (para 27), adopted in Istanbul in 1999, says:

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[2] Andrei Richter, "International Standards and Comparative National Approaches to Countering Disinformation in the Context of Freedom of the Media (on the request of the Russian Federation)." Office of the OSCE Representative on Freedom of the Media. Vienna, March 2019. – p. 3. See: https://www.osce.org/files/f/documents/2/1/424451.pdf.

[3] A "non-paper" is an informal document used in diplomatic or policy discussions, particularly in Europe, to facilitate negotiations. It is typically unsigned, and serves as a discussion tool rather than an official statement.

[4] Andrei Richter, *Propaganda and Freedom of the Media. Non-paper of the Office of the OSCE Representative on Freedom of the Media*. Vienna: OSCE Representative on Freedom of the Media, 2015. – 78 p. See: https://www.osce.org/fom/203926

[5] Conference on Security and Co-Operation in Europe Final Act, http://www.osce.org/mc/39501, p. 7.

[6] See more on these commitments in: *Propaganda and Freedom of the Media*, - p. 39-42.

> We commit ourselves to ensuring the freedom of the media as a basic condition for pluralistic and democratic societies. We are deeply concerned about the exploitation of media in areas of conflict to foment hatred and ethnic tension and the use of legal restrictions and harassment to deprive citizens of free media (...)

In their turn, the freedom of expression principles, also laid down in 1975, were expanded and strengthened as well. In a number of decisions taken at the regular OSCE Summits of Heads of State or Government and meetings of the Ministerial Council, the participating States have consistently reaffirmed that freedom of expression is a "fundamental" and "internationally recognised" human right and "a basic component of a democratic society". They take as their guiding principle to safeguard this right, as well as maintain freedom of information and freedom of the media.[7]

The culminating moment here was the 2018 Ministerial Council Decision "Safety of Journalists",[8] the first holistic OSCE document on freedom of the media at large, "a milestone... to achieve consensus on... a better understanding of current threats to safety of journalists and independent media" in the region.[9]

The post of the OSCE Representative on Freedom of the Media, established in 1997, was given the Mandate to help the participating States strengthen and further develop compliance with the relevant principles and commitments. The Representative, "an eminent international personality with long-standing relevant experience", thus "may forward requests, suggestions and comments to the Permanent Council, recommending further action where appropriate."[10]

Intergovernmental Approach beyond the OSCE

As stated in the Helsinki Final Act, there is a mutual interplay and reinforcement between it and other international instruments. In other words, OSCE commitments include notions and language which can only be properly interpreted and implemented through the extensive criteria and parameters provided by the international law standards.

There are several principles that guide intergovernmental organisations and institutions in the context of this paper. First, freedom of expression remains a fundamental human right and it includes freedom of the media. Any restrictions of free speech must align with the rules and tests, such as the three-part test, established decades ago and still valid in the current volatile situation.

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[7] See: Andrei Richter and Denis Yazici, "Pioneer decision on safety of journalists in the preceding context." In: *European Yearbook on Human Rights 2019.* P. Czech, L. Heschl, K. Lukas, M. Nowak, G. Oberleitner (Eds.). Cambridge University Press / Intersentia, 2019. P. 339-368.

[8] Decision No 3/18 of the Ministerial Council on "Safety of Journalists", Milan 2018, 7 December 2018, MC.DEC/3/18, available at https://www.osce.org/chairmanship/406538?download=true

[9] Richter and Yazici, op.cit., p. 367.

[10] Establishment of the Office of the OSCE Representative on Freedom of the Media; Mandate of the OSCE Representative on Freedom of the Media. Decision No. 193 of the OSCE Permanent Council 5 November 1997, para 6. See: http://www.osce.org/fom/99565?download=true

Second, the right to freedom of speech encompasses both truthful and false information (or content, to use modern language). That was recently confirmed by the UN Special Rapporteur,[11] and although there are several exceptions from this principle, it provides an important perspective on policies to counter disinformation.

Third, while there is a broad spectrum of expression that *may* be *restricted* or limited in dissemination (including for protection of national security and public order), there are only a few types of speech that *must* be *prohibited* internationally or regionally in Europe. They include: 1) propaganda for war (*Art 20 ICCPR,* 1966); 2) incitement to discrimination, hostility or violence based on national, racial or religious identity (*Art 20 ICCPR,* 1966); 3) propaganda based on ideas or theories of superiority of one race or group of persons of one colour or ethnic origin (*International Convention on the Elimination of All Forms of Racial Discrimination,* 1965; 4) a direct and public incitement to commit genocide (UN *Convention on the Prevention and Punishment of the Crime of Genocide*, 1948); 5) dissemination of racist and xenophobic materials (CoE *Convention on Cybercrime,* 2000); 6) public provocation to commit a terrorist offence (Directive (EU) 2017/541 *on combating terrorism*). As we can see, dangerous to security propaganda and disinformation are part and parcel of such prohibited speech.

Fourth, the EU today leads in the world in providing new legal and practical pathways to counter disinformation and propaganda. Its experience in this regard is definitely worth an in-depth study by the intergovernmental organisations. In 2014, the EU basically added a new prohibited type of speech: foreign propaganda that clearly and directly endangers democracy and poses a threat to stability and national security.[12] It has later invented a FIMI concept to step away from the slippery road of propaganda content control (for the freedom of expression reasons) and to start looking into certain patterns of "behaviour that threatens or has the potential to negatively impact values, procedures and political processes." Such behaviour is expected to be "manipulative in character, conducted in an intentional and coordinated manner."[13] This approach might direct to an even more treacherous path. Countering FIMI hides – behind technical discussions on algorithms, platforms, dashboards – the intention to detect, judge and restrict specific speech, which in most cases may be otherwise quite legal. Moreover, manipulation does not necessarily come today from abroad, and now "FIMI" is often interchanged with "DIMI" (D for "domestic") or "RIMI" (R for Russia). The Digital Services Act (DSA) and

[11] "The right to freedom of expression applies to all kinds of information and ideas, including those that may shock, offend or disturb, and irrespective of the truth or falsehood of the content". See: "Disinformation and freedom of opinion and expression", Report of the UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression. 13 April 2021. – Para 38. See: https://www.ohchr.org/en/documents/thematic-reports/ahrc4725-disinformation-and-freedom-opinion-and-expression-report

[12] Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine. See: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014R0833-20250521

[13] See: Information Integrity and Countering Foreign Information Manipulation & Interference (FIMI), European External Action Service. https://www.eeas.europa.eu/eeas/information-integrity-and-countering-foreign-information-manipulation-interference-fimi_en

the European Media Freedom Act (EMFA) are in fact parts of the EU counter-FIMI Toolbox,[14] providing instruments to control the online field, specifically the social media and search engines.

The EMFA has developed an interesting concept of countering disinformation and propaganda through introducing a division of the media into "rogue" media service providers, "quality" media services ("quality journalism"), and the rest. The Act instructs to support, including financial support, "quality media services"[15], while the EU media market should be protected from the "rogue" content.

The attributions of "quality" media include editorial freedom, taking "public watchdog" role, provision of reliable (trustworthy) information, acting in an independent manner and in line with ethical and journalistic standards, acceptance of self-regulation and (in the case of public service media) being impartial.[16] Somewhat earlier, the Council of Europe adopted a similar decision – recommendation to support quality journalism in the member states.[17] It seems that the future policies on disinformation, propaganda and hate speech will take more into account the issues of the professional standards of journalism, irrespective of whether the journalism comes from the traditional media, modern media, or future media.

The "rogue" media services are on the opposite pole. They may be linked with foreign information manipulation and interference (FIMI), pose a serious and grave risk to public security and/or European values, they have problematic ownership, management and/or financing, do not enjoy editorial independence from "certain countries", nor adhere to co-regulatory or self-regulatory national mechanisms governing editorial standards within the EU. The EMFA envisions that the "rogue" media are to be dealt with by the already created, in 2025, European Board for Media Services and the national media regulators, assisted by a still to be defined list of criteria concerning media service providers established or originating from outside the EU.[18]

RFOM and threats of propaganda

For a number of years, the priorities of the OSCE RFOM were afar from the issues of disinformation and propaganda. It was considered that "dealing with media content is not at the core" of the RFOM's

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[14] See: *2nd EEAS Report on Foreign Information Manipulation and Interference Threats: A Framework for Networked Defence*. January 2024, p. 13. https://www.eeas.europa.eu/sites/default/files/documents/2024/EEAS-2nd-Report%20on%20FIMI%20Threats-January-2024_0.pdf

[15] See Andrei Richter, *Media pluralism in selected Black Sea countries: the influence of European standards. IRIS,* European Audiovisual Observatory, Strasbourg, 2024. P. 27-28. https://rm.coe.int/media-pluralism-in-selected-black-sea-countries-the-influence-of-europ/1680b22c05

[16] Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (*European Media Freedom Act*), OJ L, 2024/1083, 17 April 2024. Recitals 14, 19 and 27.

[17] Recommendation CM/Rec(2022)4 of the Committee of Ministers to member States on promoting a favourable environment for quality journalism in the digital age. See: https://www.coe.int/en/web/freedom-expression/committee-of-ministers-adopted-texts/-/asset_publisher/aDXmrol0vvsU/content/recommendation-cm-rec-2022-4-of-the-committee-of-ministers-to-member-states-on-promoting-a-favourable-environment-for-quality-journalism-in-the-digita

[18] *European Media Freedom Act*, Recital 49.

mandate.[19] This changed in 2014 with the Russian annexation of Crimea and invasion in Donbas. The danger of propaganda in the media, especially propaganda for war, made it clear, at least for the OSCE, that it facilitates the conflict to escalate into a full-scale war. Russian state propaganda became one of the major concerns for the RFOM. It was considered a detrimental factor for freedom of the media, and not only in Russia, because at that time it reached several neighbouring countries. It was accompanied, within Russia, by wiping out all independent media to make propaganda's work more effective. There were some futile attempts to counter disinformation and propaganda from the very beginning, e.g. by the national press council (now defunct), pointing that state TV propaganda had nothing to do with ethical journalism. It gave grounds for the RFOM to host, in 2014-2017, a dialogue "Two Countries – One Profession" between Ukrainian and Russian media associations on, among other issues, the need to cease hostile propaganda.[20]

The next big project on propaganda was the already mentioned "non-paper" followed by a discussion at the region-wide expert conference on propaganda for war and hatred (2016).[21] For a while, guiding free media against disinformation and propaganda became a priority for the RFOM.[22]

The three different Representatives on Freedom of the Media that I worked with, had three very distinct approaches to the problem of dealing with disinformation and propaganda. The first, Dunja Mijatovic, with her painful personal experience of the Balkan wars, clearly supported being pro-active in this regard. Starting with a passionate communique on propaganda in times of conflict that she approved as early as 15 April 2014,[23] it culminated with the "Joint declaration on freedom of expression and 'fake news', disinformation and propaganda", promulgated just days before the end of her mandate in 2017.[24]

During her time, there were efforts to build on the general consensus within the OSCE on rejection propaganda for war and propaganda of hatred. The idea at the time was to facilitate adopting a relevant decision of the Ministerial Council of the OSCE in 2016. That effort was blocked mostly because, at the 11th hour, two participating States said "no". One based its rejection on the contradiction of a ban of propaganda to its constitutional provision; another objected to the use of the word "propaganda", as so important for this particular State's *raison d'etre*. Then Lithuania opted for another tactic by

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[19] *Propaganda and Freedom of the Media*, p. 10.

[20] "Two Countries – One Profession: A dialogue between journalists' organizations from Russia and Ukraine." See: https://www.osce.org/representative-on-freedom-of-media/184881

[21] See conference materials here: https://www.osce.org/fom/217456

[22] "Free media against disinformation and propaganda", see: https://www.osce.org/representative-on-freedom-of-media/319286.

[23] See https://www.osce.org/fom/117701

[24] Joint declaration on freedom of expression and "fake news", disinformation and propaganda – by the United Nations Special Rapporteur on Freedom of Opinion and Expression, the Organization for Security and Co-operation in Europe Representative on Freedom of the Media, the Organization of American States (OAS) Special Rapporteur on Freedom of Expression and the African Commission on Human and Peoples' Rights Special Rapporteur on Freedom of Expression and Access to Information. It is probably today one of the most cited documents on the topic. See: https://www.osce.org/fom/302796

lobbying for a decision which does not demand consensus, that is the OSCE Parliamentary Assembly (OSCE PA) decision. Although it would not have the same force as the Ministerial Council decision, it would clearly say what the OSCE condemns and what it supports. This plan, however, failed as well due to the shortage of the number of parliamentary delegations to put it for discussion of the OSCE PA.

Following the overall focus on this issue, even in the interim period when (in 2017) the RFOM Office had no leader, it conducted a regional media conference on the topic. The event concluded with a call to the incoming Representative to develop an "appropriate response" to disinformation and "fake news" in line with the freedom of the media commitments.[25]

The next RFOM to deal with the issue and the changing focus from specific propaganda for war to a more general problem of the then wide-spread disinformation, Harlem Desir, initially lukewarmly agreed to promulgate the second "non-paper" – on disinformation and freedom of the media. The non-paper was written, but never published. Instead, a couple of years later, in 2019, a 57-page document based on the non-paper and titled "International Standards and Comparative National Approaches to Countering Disinformation" was suddenly and quietly released on the website of the RFOM. That was an analysis provided upon request of the Russian Federation (*sic*!).[26] Neither the Russian Federation nor any other country reacted to it. Although guidance of the participating States in this regard was still a priority of the RFOM, no other activity was practically held.

The next Representative, Teresa Ribeiro, started in late 2020 and decided that instead of public activity in this regard or even diplomatic interaction, she would have a series of expert roundtables, so that participating States, if interested, could note the relevant activity from the RFOM website. She required that the topics of the roundtables be novel and pertinent to freedom of the media. The topics had been already developed for the previous RFOM and approved again. Six closed-door roundtables were conducted, in 2021-22, on international legal standards on disinformation, elections and disinformation, media self-regulation and disinformation, artificial intelligence and disinformation, the role of independent national media regulatory authorities in regaining trust in the media, public service media and disinformation. The final paper, that was based on the discussions and the individual reports prepared for the sessions, was never approved or dismissed, although the available materials of these roundtables were published online. Still, in line with the RFOM policy of "quiet diplomacy", there was no follow-up to this activity. Even though most of her term was used to promote the chosen motto "There can be no security without media freedom" (which even became, in 2022, part of the OSCE RFOM logo[27]), this RFOM stopped activity on this crucial aspect of security and media freedom. Moreover, this topic of "Free media against disinformation and propaganda" was quietly

[25] Conclusions. 14th South Caucasus Media Conference "Fake news", disinformation and freedom of the media, 10-11 May 2017, Tbilisi, Georgia. See: https://www.osce.org/files/f/documents/b/5/318536.pdf

[26] Andrei Richter, "International Standards…", *op.cit*.

[27] See https://www.osce.org/representative-on-freedom-of-media

taken off the list of the RFOM priorities[28] making all relevant materials and statements impossible to find, unless one goes through the Google search. The topic seemingly became too poisonous to adhere to in view of keeping the Office under stable leadership.

This cautious tradition is still in place.

Conclusion and recommendations

Although the OSCE RFOM remains a unique institution centred in the policy-making process on balancing security with freedom of the media, it is silent for years on the most pertinent, though sensitive, modern issue in this equilibrium: whether and how harmful for security propaganda and disinformation can and may be countered while strictly observing the fundamental right to freedom of expression. Not that the answer to this question is already provided in the intergovernmental debate or decisions, not that any other international organisation leads the debate, and not that the question becomes less important on the background of what almost all OSCE participating States face today online and offline.

Therefore, my main recommendation is to come back to the core of the problem and facilitate a discussion of the governments, civil society and academia on the nature of the impact of propaganda and disinformation both on security and on freedom of the media.

There is (seemingly) no government in the region that would declare: "We stand for propaganda for war, for hatred among nations, for dissemination of lies and for manipulating the public". An OSCE-led discussion in this regard could at least fix the minimum commitments in this regard, or if there is no consensus – at least demonstrate which nation is against them.

There are no major media outlets or platforms in the region that would declare: "We work to promote propaganda for war, hatred among nations, dissemination of lies and manipulation of the audiences." An OSCE-led discussion in this regard could at least fix the delineation between propaganda and journalism and develop recommendations to the media and CSOs in this regard.

There is no government, major CSO, or media outlet in the region that would declare: "We stand against freedom of expression and freedom of the media". An OSCE-led discussion in this regard could at least find an appropriate balance between restrictions of harmful propaganda and freedom of speech.

That will not happen though by itself. The participating States need to attempt – perhaps under pressure from civil society – to reinvigorate relevant work of the RFOM, and of the OSCE at large.

[28] See: https://www.osce.org/fom/what-we-do. Interestingly enough, the topic of Digital Switchover (which is irrelevant in the region for the past 10 years or so) remains a priority of the RFOM.