The 2022 Russian invasion of Ukraine: A critical juncture for EU policy on disinformation online?

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Abstract: External events can significantly impact policymaking. This paper explores European Union policymaking processes surrounding the Russian invasion of Ukraine to understand better the influence of such historic external moments in the EU context. More concretely the paper establishes whether the first year following the outbreak of the war created a critical juncture for EU policymaking on disinformation online. Furthermore, it analyses based on the findings, in more detail, either the impact of this critical juncture or the path-dependence on the EU's policymaking processes in this policy area. Employing the concepts of critical juncture and path-dependence and by triangulating EU documents and interviews with EU policymakers, the findings suggest that no critical juncture occurred. Instead, this paper goes on to analyse "strategies and choices of political leaders" and "decision-making processes" in the EU and establishes how the policymaking processes following the outbreak of the invasion are best characterised by an activity shift from Covid-19 to the war. Moreover, the analysis indicates that EU policymaking processes continue to follow a path-dependence that has been created progressively since the establishment of EU policy on disinformation online, after the Russian occupation of Crimea in 2014.

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Abbreviations

DV – dependent variable

DSA – Digital Services Act

EEAS – European External Action Service

EP – European Parliament

ESCTF – East StratCom Task Force

EU – European Union

FIMI – foreign information manipulation and interference

IMCO – Internal Market and Consumer Protection Committee

INGE – Special Committee on Foreign Interference in all Democratic Processes in the European Union, including Disinformation

ING2 – Special Committee on Foreign Interference in all Democratic Processes in the European Union, including Disinformation

IV – independent variable

MEP – Member of the European Parliament

US – United States

1.   Introduction

While technological advancements of the last decade have increased sharing of information and interconnectedness online through novel channels such as social media, these developments have not come without negative implications. Specifically, disinformation has come to the forefront in past years. The 2016 elections in the United States (US) and Brexit have highlighted the threat posed by disinformation on social media platforms to democratic societies (W. L. Bennett & Livingston, 2018). Some actors exploit social media channels to spread disinformation online. Researchers have identified Russia as a main actor employing deliberate disinformation tactics as a modern form of warfare (Tenove, 2020). The threat posed by this to democratic societies through actors like Russia, has prompted governments and international organisations to prioritise the issue. The European Union (EU) has addressed some of the risks of disinformation online. It has become a forerunner in tackling the issue through the 2018 EU Code of Practice on Disinformation, which sets out voluntary commitments for social media companies. Additionally, the EU's Digital Services Act (DSA) created concrete obligations such as mitigation measures for very large online platforms to lower the spread of disinformation. The Russian war against Ukraine since the 24th of February 2022 has seemingly renewed focus on policymaking regarding disinformation online. Historic moments like Russia's invasion often create transformations in policymaking processes on concrete issues. This paper, therefore, investigates this war as a pivotal event and its potential to stimulate heightened policymaking activity on disinformation online to understand effects of such moments on EU policymaking processes.

To this end, this paper poses the following research question: Did the first year of the Russian war on Ukraine create a critical juncture for EU policymaking on disinformation online? A) If yes, how did this critical juncture impact EU policymaking processes? B) If no, how did this path-dependence impact EU policymaking processes? The term of critical junctures coined by Lipset and Rokkan (1967) helps to understand heightened policymaking activity following pivotal geopolitical events. It is, therefore, used to analyse EU policymaking processes on disinformation online surrounding the Russian war on Ukraine. On the one hand, to understand the nature of critical junctures in the EU, I define critical junctures through a historical institutionalist lens in-line with Capoccia and Kelemen (2007) as "relatively short periods of time during which there is a substantially heightened probability that agents' choices will affect the outcome of interest" (p.348) and there is a contingency about the outcomes of these processes. On the other hand, "normal" policymaking processes are defined by a path-dependence in which a path is triggered by previous events and constrained by past choices,

limiting options in the present and making institutional structures evolve only over longer periods due to changing institutional circumstances (Rixen & Viola, 2015; Thelen, 1999). To this end, this paper takes an explorative approach. I establish first whether there was a critical juncture and, depending on the answer, either conduct a comparative case study of policymaking processes between the year before and the year after Russia's invasion if there is a critical junctue (sub-question A.) or, if there is not, a single case study chronologically analysing the impact of path-dependence on EU policymaking processes on disinformation surrounding the war (sub-question B.).

The study of critical junctures in the EU is of scholarly relevance. Carrapico and Farrand (2020) have previously considered the Russian occupation of Crimea in 2014 as a critical juncture for disinformation in their study of EU cybersecurity policy. The new context created by the recent Russian invasion of Ukraine makes it relevant to study the wider phenomenon of critical junctures in the EU again through disinformation policy. While Carrapico and Farrand (2020) focused on policy changes regarding disinformation, this paper offers new insights into changes to EU policymaking processes following external events and determines if there was a critical juncture after the Russian invasion. Furthermore, depending on the answer I analyse how either critical junctures or path-dependence impacts EU policymaking processes. As I am analysing EU policymaking processes on disinformation online, I employ the European Commission's definition of disinformation, which is: "verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm" (European Commission, 2018b, p.3).

To answer the research question I first reflect critically on academic literature reagrding disinformation online and theoretical writing that discusses external event's effect on policymaking processes. I then set out a theoretical framework for the analysis on the understanding of EU policymaking processes under path-dependence and critical junctures. Thirdly, I offer an overview and justifications for the chosen case and research and data collection methods. Lastly, I answer my research questions analysing EU policymaking processes on disinformation surrounding the Russian invasion of Ukraine and reflect on the findings.

2.   Literature Review

After laying out the research question and relevance, I present in this next section an overview of relevant literature for this research paper followed by a critical discussion. Firstly, I dive into academic discussions on the concept of disinformation online and policymaking on

the issue. Secondly, I reflect critically on theoretical literature that conceptualises policymaking processes and discuss its understanding of external events. This includes literature on the advocacy coalition framework, punctuated equilibrium theory and mulitple streams approach (Baumgartner & Jones, 1993; Kingdon, 1995; Sabatier, 2007; Zahariadis, 2008). Overall, my research fills the gaps identified in this literature by analysing EU policymaking processes on disinformation online following external events using the concepts of critical juncture and path-dependence.

2.1 Disinformation online: Conceptualisation, Implications and Policymaking

The term of disinformation has been discussed by researchers in many ways. Several have investigated suitable conceptualisations and its differentiation from other concepts (Fallis, 2015; Wardle & Derakhshan, 2017). In a Council of Europe report, Wardle and Derakhshan (2017) differed on a dimension of harm and falseness between different forms of information; misinformation, malinformation and disinformation. According to their definition, disinformation differs from the other two in that it is intentionally false information spread to cause harm (Wardle & Derakhshan, 2017, p. 5). While this literature is useful for a conceptual understanding, it pays little attention to disinformation as a policy issue. This is further investigated by my research of policymaking processes on disinformation.

Researchers have not only studied an appropriate conceptualisation of disinformation online but also its spread, strategic use and implications for demoratic societies (Allcott & Gentzkow, 2017; W. L. Bennett & Livingston, 2018; Humprecht et al., 2020). Bennett and Livingston (2018) identified an emerging disinformation order in their analysis of disinformation campaigns during the Brexit referendum and the 2016 US presidential elections. They characterised this order by a mix of alternative information systems created particularly by domestic alt-right groups, and of strategic information warfare measures by authoritarian actors, predominantly Russia, intending to spread propaganda and increase cleavages within democratic societies (p.132). Bennett and Livingston (2018) recognised disinformation as a threat to democratic societies and identify Russia as a central actor in spreading it. Russia's frequent involvement in disinformation campaigns makes this paper's focus on the period following the Russian invasion of Ukraine all the more relevant. However, researchers that recognise the Russian threat are less concerened with concrete policymaking processes surrounding disinformation policy. I address these shortcomings by analysing EU policymaking processes on disinformation online after the outbreak of the war.

Other authors have come up with more concrete policymaking approaches to address disinformation online and have noticed that governments perceive social media platforms as a threat to democratic societies (Durach et al., 2020; Nenadić, 2019; Tenove, 2020; Tucker et al., 2017). Durach et al. (2020) more closely examined available options to the EU. They outlined that policymaking activities are currently characterised by collaboration between EU institutions, national governments, big social media platforms, researchers and other important stakeholders (Durach et al., 2020). They stated that while the EU is taking a self-regulation and co-regulation approach between platforms and EU governments by introducing voluntary measures, some of its member states have pursued binding policies. In that way, they suggested that the EU should strengthen the co-regulatory approach, and propose a makeover of the ad-based business model of digital platforms. Durach et al.'s (2020) study informs the following research by identifying relevant actors in EU policymaking and available approaches to disinformation policy. However, they tell little on concrete policymaking processes and activities undertaken by EU policymakers, particularly, following external events. This will be addressed by this paper.

2.2 External Events and Policymaking Processes: Theoretical Explanations

As presented in my introduction, I analyse policymaking processes following an external event, the Russian invasion of Ukraine in February 2022. The concept of critical junctures offers the most comprehensive understanding of processes following external events. However, I reflect in the next section on other theories explaining policymaking processes following external shocks as they are relevant in providing robustness to the research. These are, among others, the advocacy coalition framework, multiple streams model, and punctuated equilibrium theory (Baumgartner & Jones, 1993; Kingdon, 1995; Sabatier, 2007; Zahariadis, 2008). They take similar events into account with an effect on policymaking processes including crises, shifting governing coalitions, and changes in administrative and legislative positions (Sabatier, 2007). More concretely, the multiple streams framework literature refers to focusing events which can generate heightened attention around an issue and open up policy windows (Birkland, 2020). Under this approach, the problems, policy and politics streams run relatively independent from one another until a window of opportunity occurs in which the streams start to converge, bringing about opportunity for policy action (Kingdon, 1995). It sees policy entrepreneurs as key figures in policymaking processes who act through intentional and strategic behaviour. In this understanding, policy entrepreneurs are individuals that couple problems, following focusing events, with solutions during windows of opportunity and move

their preferred objectives forward by seeking alliances with like-minded people (Zahariadis, 2008). Examples of moments analysed as focusing events in the EU through the multiple streams model, include, among others, the passing of liquid explosives through airport security in Britain or deterioration of public finances in Greece, which resulted in increased EU attention and action (Ackrill et al., 2013; Zahariadis, 2008).

The multiple streams literature could offer plausible insights of EU policymaking processes on disinformation online. I could take the Russian invasion as a focusing event and proceed towards an analysis of policymakers on disinformation as policy entrepreneurs and their reaction to the outbreak of the war. However, the multiple streams model does not seem fully suitable for explaining policymaking processes of this case study. It focuses too much on intentionality of policy entrepreneurs and the opportunities they use to couple policy problems and solutions rather than on novel dynamics for policy action arising from big external events and the immediately following policymaking processes. This is addressed by the critical juncture model. Moreover, scholars have often used the aforementioned theories interchageably borrowing concepts such as "focusing events" or "policy entrepreneurs" for their own theories. This creates conceptual travelling or stretching making a clear cut differentiation between theories more challenging (D. Collier & Mahon, 1993). Overall, combining the critical juncture model paired with path-dependece derived from historical institutionalism offers a clearer approach since its focus lies on policymaking processes following external events and the contrast to policymaking under "normal" conditions.

3.   Theoretical Framework

In the previous section, I undertook a critical discussion of theoretical approaches and their understanding of policymaking processes following external events. The next section constructs the theoretical framework based on the concepts of critical juncture and path-dependence derived from historical institutionalism which takes external events into account and helps to answer my research questions. Firstly, I provide an understanding of "normal" EU policymaking processes by referring to the concept of path-dependence which is closely linked to critical junctures. Secondly, I define the nature of critical junctures. Lastly, I explain how I will analyse EU policymaking processes under these two concepts.

3.1 Policymaking Processes under Path-Dependence

Historical institutionalism sees policymaking processes taking place within the long-term evolution of institutional structures. It explains institution-building over time shaped by

institutional and historical constraints (Thelen, 1999). Under "normal" conditions, institutional structures are not static but evolve over longer periods due to changing institutional circumstances and behaviours by actors constrained by path-dependent trajectories which makes change more difficult (Rixen & Viola, 2015). Path-dependece refers to a path triggered by previous events that is constrained by choices made in the past, limiting the options in the present (Thelen, 1999). Pierson (2000) uses in this context the economic term of "increasing returns". This way, policymaking processes are taking place within specific institutional constraints, making it harder to shift to a different path and causing policymakers to be reluctant to radical change under changing circumstances. In this way, policymakers "tend to be conservative and find ways of defending existing patterns of policy" (Peters et al., 2005, p. 1276). Therefore, "normal" policymaking processes are under path-dependence more incremental compared to under critical junctures.

Following this, I take the EU's institutional policymaking processes under "normal" times as relatively stable and sticky against changes. I characterise them by much deliberation and debate before decisions are taken and usually by refinement and expansion of pre-existing policies (McCormick, 2020). However, external shocks may create critical junctures that disrupt the EU's institutional stability. This may produce a "relaxation of the "normal" structural and institutional constraints on action" (Capoccia & Kelemen, 2007, p. 355). The nature of such junctures is defined in the following section.

3.2 Policymaking Processes under Critical Junctures

To analyse EU policymaking processes and critical junctures, I state what I understand under this concept. The idea of critical junctures in policymaking processes was coined by Lipset and Rokkan (1967). In line with Capoccia and Keleman (2007), I define critical junctures as "relatively short periods of time during which there is a substantially heightened probability that agents' choices will affect the outcome of interest" (p.348). Following this definition, I identify several characteristics of critical junctures. Scholars argue that they are often triggered by historical events, referred to as external shocks including wars and geopolitical conflicts, with the potential to significantly disrupt policymaking processes (Cortell & Peterson, 1999; Lipset & Rokkan, 1967). In their comparative case study of labour movements in eight Latin American states, Collier and Collier (2002) state that critical junctures are pivotal brief moments appearing between long periods of relative stability and little change of institutional processes. Furthermore, institutional configurations increase the importance of the role of agency within a critical juncture compared to periods under "normal" policymaking (Capoccia,

2016). In this sense, a critical juncture entails heightened opportunities, particularly for influential actors, to impact policymaking processes (Capoccia, 2016). Capoccia and Kelemen (2007), moreover, state that examining critical junctures involves exploring decision-making processes amid uncertain circumstances. Overall, I summarise the four defining characteristics of critical junctures as follows: relatively short periods of time, characterised by uncertainty, that follow pivotal events, and give rise to heightened opportunities for agents to influence policymaking processes.

Several scholars analysed critical junctures in the context of EU policymaking (Dupont et al., 2020; Greer, 2008; Verzichelli & Edinger, 2005). Regarding my paper's research, Carrapico and Farrand (2020) have explored Covid-19 as a potential critical juncture for EU cybersecurity policy. They provide a comprehensive overview of the evolution of the EU's cyber policy. Moreover, they conclude that it was not the onset of Covid-19 but rather the year 2016 that can be seen as a critical juncture for the EU's stance on social media platforms due to the information warfare conducted by Russia following the Crimean occupation (Carrapico & Farrand, 2020). As a consequence, the discourse on digital platforms changed in the EU, underscoring their negative impact on the dissemination of disinformation online (Carrapico & Farrand, 2020). Carrapico and Farrand's (2020) study shows that the Russian occupation of Crimea in 2014 was already considered a critical juncture for disinformation. Consequently, it seems relevant to study the same policy issue within the new context created by the recent Russian invasion of Ukraine. While Carrapico and Farrand (2020) focus on policy changes regarding disinformation, this paper focuses on changes to the policymaking processes on disinformation online to ascertain if there was a critical juncture following the Russian invasion. Depending on the answer I determine how either the critical juncture or the path-dependence impacted EU policymaking processes.

3.3 Critical Juncture and Path-Dependence: Analytical Framework

For exploring EU policymaking processes this paper looks at several aspects. For the first research question I analyse the four characteristics of critical junctures, namely whether there was a pivotal external event, followed by a period of uncertainty, that gives rise to heightened opportunities for agents to influence policymaking processes, in a relatively short period of time (Capoccia & Kelemen, 2007). This should help to establish whether there was a critical juncture following the Russian invasion in the first place. In the second part of the analysis, I dive deeper into the policymaking processes. Capoccia (2016) attributes a central role to politics of institutional formation in the context of critical junctures. He identifies

"strategies and choices of political leaders, decision-making processes, coalition-building, acts of political contestation, [and] waves of public debate" (Capoccia, 2016, p. 98) as decisive factors within policymaking processes. With the wide scope of these factors and time constraints of this research, I focus on "strategies and choices of political leaders" and "decision-making processes" because these two factors seem most relevant to answer my research questions. An examination of the two factors should help to better understand the impact of the period following the Russian invasion as either a critical juncture or path-dependence on EU policymaking processes. Therefore, the factors are closely examined in the period before and the year after the war in the second section of my analysis to answer either sub-question A) or B). Overall, the above outlined theoretical framework should allow me to determine if the first year of the Russian war on Ukraine created a critical juncture for policymaking on disinformation online and depending on the answer, how the critical juncture or path-dependence impacted EU policymaking processes.

4. Methodology

4.1 Research Design

To answer the research questions, I propose a case study of EU policymaking processes on disinformation online. The literature review has shown that Russia is a main actor in spreading disinformation online systematically. Moreover, the EU is a forerunner when it comes to policymaking on the issue. Following these observations, it seems plausible to study the case of EU policymaking processes surrounding the Russian invasion of Ukraine. I take an explorative approach to the empirics. In this way, the first section of the analysis addresses the first research question, namely, whether the first year of the Russian war created a critical juncture for EU policymaking on disinformation online. This is operationalised through the four characteristics of critical junctures set out above, namely whether there was a pivotal external event, followed by a period of uncertainty, giving rise to heightened opportunities for agents to influence policymaking processes, in a relatively short period of time (Capoccia & Kelemen, 2007).

Following this, I propose for the second section two research designs corresponding to the sub-question that will be answered after the first part. If the answer to the first research question is "yes", then I operationalise sub-question A) through a comparative case study following a most similar systems design. Under this model analysed cases are similar in several aspects but different with regards to one independent variable (IV) which explains the difference in outcome or dependent variable (DV) (A. Bennett & Elman, 2007). Using this

approach, I would analyse two cases of EU policymaking processes on disinformation online under sub-question A). Both cases share similarities by taking place within a comparable environment of EU institutions and policymakers. However, the difference lies in one case comprising policymaking processes one year before and the other after the Russian invasion of Ukraine (IV). Through this difference I would explain the critical juncture (DV) and analyse more thoroughly how policymaking processes in the year before the invasion differ from the ones after. This would be done by comparing "strategies and choices of political leaders" and "decision-making processes" in the two periods.

If, however, the answer to the first research question is "no" then this paper deals with sub-question B). For this, I propose a single case study for the second part of the analysis. Single case studies have been criticised by some scholars as not useful for general inferences (King et al., 1994). However, they can give an in-depth understanding of the case that is being analysed. This would make this current case study still useful by elaborating in which way EU policymaking processes on disinformation online in the year after the Russian invasion followed a path-dependence. Like sub-question A), I operationalise this by further looking into the two factors, "strategies and choices of political leaders" and "decision-making processes", and by using my evidence to connect EU policymaking processes on disinformation online following the invasion to policymaking processes in the past. Overall, in either instance the study of either critical junctures or path-dependence aims to gain new insights into policymaking processes in the EU context.

4.2 Data Collection

Prior to discussing data collection methods, I identify influential EU actors, as analysing policymakers' activities is important to understanding variances between policymaking processes before and after the outbreak of the Russian invasion. Birkland (2020) categorises policymakers in official and unofficial actors. While official actors behave according to obligations derived from their governments position, unofficial actors are not incentivised by legal obligations and include researchers or experts (Birkland, 2020, p. 115). In that regard, my analysis looks at activities of relevant EU policymakers working on disinformation online policy. Official EU actors relevant for this research work within main EU institutions namely the European Commission, European Parliament (EP), and Council of the European Union (Wallace et al., 2015). They entail *inter alia* Commission policymakers working on disinformation policies, in the EP Special Committee on Foreign Interference in all Democratic Processes in the European Union, including disinformation (ING2) and in the European

External Actions Service's (EEAS) East StratCom Task Force (ESCTF). Furthermore, unofficial EU actors include interest groups, mainly big social media platforms like Facebook and civil society organisations like EU DisinfoLab (Wallace et al., 2015). By closely examining how these actors' policymaking activities on disinformation online have been affected by the invasion, I answer my research questions.

In line with the explanation of influential EU actors, I apply several data collection methods for the analysis. These merit closer justification. Firstly, I consult official EU documents including legislative and non-legislative acts, meeting agendas, speeches, and statements from the period before and during the first year after the Russian invasion on EU disinformation policy from the aforementioned EU policymakers. This could yield substantial information to map out if and if so, how EU policymaking processes were influenced by the war. Furthermore, conducting semi-structured interviews with relevant EU policymakers seems pivotal to support findings from EU documents and gain insights into policymaker's activities, establishing if the invasion disrupted day-to-day policymaking compared to the pre-war period and how policymaking processes proceeded. Considering time constraints and the number of potential interviewees the paper conducted four interviews with EU policymakers. All interviewees work on disinformation online policy but chose to be anonymised. Since it entails only a few members of an elite group, snowball sampling has been applied to get a representative sample (Bernard, 2006, p. 192). Overall, triangulation of different data collection sources increases validity of the findings.

5. Analysis

I previously set out my research purpose, theoretical approach, and research design. The following section finally transits into understanding EU policymaking processes on disinformation online, answering my research questions. Firstly, I establish whether there was a critical juncture following the invasion. In-line with the four defining characteristics of critical junctures set out in the theoretical framework, I analyse whether there was a pivotal external event, followed by a period of uncertainty, giving rise to heightened opportunities for agents to influence policymaking processes, and relatively short in time. Secondly, following the findings from the first section, the paper either conducts a comparative study of the first year before and the year after the invasion to show how the critical juncture impacted EU policymaking processes, or I conduct a single case study analysing how path-dependent processes before the war influenced policymaking processes after the invasion. Both are operationalised by looking

into "strategies and choices of political leaders" and "decision-making processes". Lastly, this paper reflects theoretically on the findings.

5.1 Russian Invasion of Ukraine: Assessment as a Critical Juncture

This next section is concerned with establishing whether the Russian invasion of Ukraine triggered a critical juncture for EU policymaking processes on disinformation online in-line with the four defining characteristics. The first characteristic of a critical juncture seems to be clearly fulfilled. The Russian invasion of Ukraine has been a pivotal external event with far reaching consequences felt globally. As previously established, Russia has been a main actor in spreading disinformation. This has also been reconfirmed by an open-source investigation following the recent invasion by the Brussels based civil society organisation EU DisinfoLab which exposed a Russian disinformation operation in Europe through a wide use of clones of authentic media, spreading lies about the invasion in Ukraine (Alaphilippe et al., 2022). Therefore, the war accounts for an external event under the criterion of a critical juncture and I further analyse the other characteristics concerning EU policymaking processes on disinformation online.

Regarding uncertainty, the invasion may have undoubtedly created a general atmosphere of uncertainty for EU policymakers, pivotally in the EU's energy or security policy. However, taking a focus on the EU's approach to disinformation online, policymaking processes were largely already in place or in development prior to the invasion. The EU had a wide existing network of policymakers working on disinformation, such as the EEAS' Strategic Communication Division, the INGE Committee or non-institutional stakeholders including social media platforms. A Commission official (personal communication, May 22, 2022) confirmed that the EU was aware of the risks before the war and an EU official (personal communication, May 26, 2022) argued that the response scope stayed unchanged with the invasion. This indicates that policymaking processes on disinformation had been well established before and the Russian invasion could be seen as a new context for the current policy framework. As a result, the period following its outbreak does not seem to be characterised by uncertainty for policymakers on disinformation and this criterion is not fulfilled. This is outlined in further detail in the second section.

While it does not seem like the invasion created a sense of uncertainty on disinformation policy, conclusions drawn on heightened opportunities for policymakers to act are twofold. Policymakers decided early after the outbreak of the war to sanction two big Russian media companies, namely Sputnik and RT. A Policy Advisor (personal communication, May 26, 2022)

to a Member of the European Parliament (MEP) confirmed that his MEP shifted the position quite significantly on supporting this measure. In this sense, the war seems to have brought about unprecedented opportunities for action. However, EU actions against disinformation generally had been taking place since 2015 following the Russian occupation of Crimea and had brought about measures such as EUvsDisinfo or the Code of Practice on Disinformation. A Commission official (personal communication, May 22, 2022) stated that the EU has currently the most advanced framework against disinformation worldwide and was aware of its risks prior to the war. Moreover, several interviewees agreed that Covid-19 in particular had put heightened attention on disinformation (MEP, personal communication, May 09, 2022; Commission official, personal communication, May 22, 2022; EU official, personal communication, May 31, 2022). Therefore, while the war may have prompted some opportunities for action, this criterion seems only partly fulfilled. There had already been heightened policymaking activities on disinformation and opportunities to tackle it existed not only due to the war.

EU policymakers focus on disinformation policy prior to the war also refutes the last criterion of critical junctures, namely whether there was a relative short period of time in which policymaking processes stood out compared to previous activities. As will be shown in the second section with greater detail, the EU has worked for many years now on EU policies concerning disinformation online; from the Russian occupation of Crimea in 2015 to the European election as well as the Covid-19 pandemic up to the Russian invasion and progressively proceeds to do so. Certain events might have intensified policymaking processes. However, these processes seem to have been more gradual and building on an existing framework as this next section will discuss. Overall, my findings suggest, that it seems not plausible to argue that the Russian war has brought about a critical juncture as most characteristics are not or only partially fulfilled. Instead, this next section outlines based on EU documents and interviews how the time after the outbreak of the invasion forms a connection of "normal" processes to past activities through a path-dependence.

5.2 Path-Dependence before the Invasion

The first part of this analysis established that the Russian invasion seems to not have triggered a critical juncture for disinformation policy. Therefore, this second section proceeds with sub-question B) and identifies how path-dependence impacted policymaking processes based on an analysis of "decision-making processes" and "strategies and choices of political leaders".

To continue the analysis, I first show briefly how processes on disinformation online developed up to the war. EU policymaking processes on disinformation have progressively created an extensive policy framework against disinformation. In March 2015 the EEAS was tasked as the first EU body by the European Council to tackle disinformation and set up the East StratCom Task Force to counter Russian disinformation campaigns via strategic communication following the 2014 Crimean occupation (European Council, 2015). This launched its flagship project EUvsDisinfo through which the EEAS started to spread awareness for disinformation incidences, exposing pro-Kremlin disinformation with using data analysis and monitoring tools. Responsibilities were in the following two years extended in the Strategic Communication Division with two further StratCom Task Forces for the South and Western Balkans.

Following the kick-off of the EU's strategy and decision-making processes, the European Commission took up the issue in November 2017 *inter alia* as a reaction to the 2016 US elections. It set up a high-level expert group to protect the EU elections in 2019 which issued in March 2018 a report that called for expanding the EU's strategy through an EU Code of Practice to counter disinformation (European Commission, 2017, 2018a). The Commission supported this call and presented in October 2018 the Code of Practice on Disinformation, as the second part of the EU's strategic framework (European Commission, 2018b, 2018c). Several big platforms signed the Code including Facebook, Google, and Twitter as a voluntary and self-regulatory measure to counter disinformation online. Moreover, by publishing in December 2018 the Action Plan against disinformation, the European Commission and High Representative (2018) presented a more extensive strategic plan. This introduced a European Digital Media Observatory as a central network for researchers to collect and analyse information on the effects of disinformation and established a Rapid Alert System connecting EU institutions with its member states in their response. Therefore, the EU gradually expanded its strategies and decision-making processes before the elections.

After the EU elections in May 2019, the Commission began its preparations for a new horizontal legislation, the Digital Services Act, to regulate online platforms and tackle among other issues disinformation (von der Leyen, 2019). Most relevantly, however, the outbreak of Covid-19 beginning of 2020 accelerated EU policymaking processes as confirmed by a Commission official (personal communication, May 22, 2022). On 18.06.20 the European Parliament established its first Special Committee on Foreign Interference in all Democratic Processes in the European Union, including Disinformation (INGE) (European Parliament, 2020). This aimed to gather evidence, including on disinformation campaigns associated with

the Covid-19 pandemic. Additionally, EU member states agreed in June 2020 to develop a Strategic Compass for EU security and defence policy encompassing a section on hybrid threats, including disinformation (European Council, 2020). A Commission official (personal communication, May 22, 2022) highlighted that the pandemic led to heightened stakeholder engagement with additional reports by social media platforms on disinformation and Covid-19. This facilitated regular exchanges between the Commission and platforms due to the Code of Practice. In December 2020, the Commission eventually chose to announce a Democracy Action Plan with guidelines to review the Code of Practice and published on 15.12. a legislative proposal for the DSA to tackle disinformation under harmful content (European Commission, 2020a, 2020b). Lastly, Commissioners Věra Jourová and Thierry Breton presented a Communication titled "Guidance on Strengthening the Code of Practice on Disinformation", in May 2021, setting out more concrete expectations for a new Code (European Commission, 2021). In the following months, EU institutions proceeded to work on a Strengthened Code and the DSA. The pandemic, thus, brought about an acceleration in the EU's work.

Generally, since the kick-off of EU policymaking processes on disinformation online in 2015 before the Russian invasion seem to be characterised by moments of heightened activity that brought about additional measures. For example, prior to the 2019 EU elections or following Covid-19. Overall, however, they were not marked by clear breaking points but by an overarching path-dependence characterised by incremental changes triggered by changing circumstances. Following these processes this next section argues based on EU documents and interviews with EU policymakers that the outbreak of the Russian invasion of Ukraine has shifted activity of EU policymakers on disinformation towards the Russian aggression. I will show how these policymaking processes are not a critical juncture but continue to follow a path-dependence building on existing "decision-making processes" and "strategies and choices of political leaders".

5.3 Path-Dependence following the Invasion

This next section analyses chronologically "decision-making processes" and "strategies and choices of political leaders" following the Russian invasion. As the war created shockwaves throughout the geopolitical sphere, it also had consequences for EU policymakers. With regards to choices of political leaders on the EU's disinformation policy, four EU heads of state from Estonia, Latvia, Lithuania, and Poland, published a letter three days after the outbreak of the war, addressing big social media platforms (Kallas et al., 2022). This came as an immediate reaction to the invasion as they urged platforms to increase actions in tackling Russian

disinformation in the context of the war. The decision was supported in a resolution by the INGE Committee published on the 09.03.22 (European Parliament, 2022a). This reaction indicates a heightened urgency perceived by political leaders to address disinformation as further claimed by an EU official in an interview (personal communication, May 31, 2022). However, the swift reaction by the Baltic states does not signify a clear break to previous processes since their countries had been working on disinformation online policy for many years beforehand (EU official, personal communication, May 21, 2022). Therefore, the evidence suggests a continuation of past developments.

Paired with heightened urgency triggered by the invasion, EU policymakers opted for some additional targeted strategies to defend the EU against Russian disinformation. As a reaction, EU member states chose to sanction the two biggest Russian-controlled state media outlets RT and Sputnik, on the 27.02.22, by ordering to block all their channels off- and online in the EU to limit the spread of Russian disinformation around the Union (Council of the European Union, 2022). This was a strategic choice that EU policymakers had not taken before in that form. Several interviewees confirmed that these sanctions were an unprecedented strategy to tackle disinformation (Commission official, personal communication, May 22, 2022; Policy Advisor, personal communication, May 26, 2022; EU official, personal communication, May 31, 2022). In that sense, the Council's decision appears to be partly a departure from previous strategies of EU policymakers. However, the following analysis shows that most choices following the war were based on pre-existing strategies and took place within established decision-making processes.

Besides some new strategic approaches, policymakers' meeting frequency increased but within the framework of existing decision-making processes. Commissioner Thierry Breton, responsible for the DSA, joined on the 16.03.22 an Internal Market and Consumer Protection Committee (IMCO) meeting of the EP to discuss the Commissions recent efforts to tackle Russian disinformation and consequences for the DSA (European Parliament, 2022c). While he indicated a heightened activity by Commission officials, this occurred via existing decision-making processes with Ukrainian counterparts and communication channels with digital platforms through the Code of Practice. An EU official (personal communication, May 31, 2022) confirmed that the work of EU legislators increased through more meetings with Ukrainians, the existing Rapid Alert System and with the platforms. However, the official added this was also a result of the pandemic (personal communication, May 31, 2022). These initial reactions of EU policymakers indicate that the EU, while implementing some additional measures, primarily focused on utilising established strategies and decision-making processes,

and the ones currently in progress, to tackle disinformation online policy following the Russian invasion.

Other developments concerning strategies and decision-making processes in the European Parliament seem to confirm this trend. As mentioned previously on the 09.03.22 the INGE Committee published a resolution on foreign interference in all democratic processes in the European Union, including disinformation referring to hybrid threats of the Russian invasion (European Parliament, 2022a). However, this resolution mostly had been drafted before the invasion as a final report of the Committees work since June 2020 on collecting evidence about interference of foreign actors in democratic processes of the EU and its member states (European Parliament, 2020). Moreover, the EP extended a day later the Special Committees work by setting up a successor, ING2, intending to carry on INGE's work and follow up on the resolution (European Parliament, 2022b). In this way, ING2 seems to be a continuation of previously existing decision-making processes building on INGE's work and following its path, instead of forming a departure.

Simultaneously, the EU introduced further strategies to address disinformation, which had mostly been in development prior to the war. On the 21.03.22 the EEAS presented the Strategic Compass which addressed many security and defence related issues, including disinformation under threats through foreign information manipulation and interference (FIMI) (European External Action Service, 2022). This strategy aimed to enhance the EU's response against FIMI, including disinformation, through a FIMI toolbox. The Council in July drew its conclusions on the toolbox and supported the action (European Council, 2022). Although the timing of publishing the Strategic Compass might imply a direct reaction to the Russian aggression, the EEAS had been tasked with this work in June 2020 by the Council (European Council, 2020). An EU official confirmed (personal communication, May 31, 2022) that preparations for the legislation had been taking place already for some time before. Therefore, it suggests that this new strategy was a result of overarching policymaking processes that commenced long before the war.

Other developments illustrate continued reliance on existing strategies and choices by EU policymakers. Firstly, for the DSA, Council and EP policymakers agreed on a compromise on the 24.03.22 (European Parliament & Council of the European Union, 2022). Two days before, the Commission had chosen to add a so-called crisis mechanism, granting it additional powers to request specific information from platforms in exceptional crisis situations to combat disinformation (Bertuzzi, 2022). This amendment, which the DSA legislators approved, could be perceived as a direct reaction to the war as confirmed by a Commission official (personal

communication, May 22, 2022). Nevertheless, it was only one of many amendments to the DSA legislation which had been in negotiations for over a year. Therefore, it indicates an incremental change due to altering circumstances building on an existing framework in-line with path-dependence. Parallel developments happened within the drafting phase of the Strengthened Code of Practice which was published on the 16.06.22 signed by 34 stakeholders (European Commission, 2022). A Commission official (personal communication, May 22, 2022) stated that similar measures were added for addressing crisis situations in response to the Russian aggression. However, negotiations of the Strengthened Code had started before the war and simply signified an update to pre-existing strategies with the 2018 Code of Practice. Therefore, similarly to the DSA policymaking processes on the Strengthened Code of Practice on Disinformation point to a continuation of pre-existing EU processes.

As EU policymakers carried on their work, there is more evidence that policymaking processes shifted from heightened activity on disinformation online policy and Covid-19 towards a focus on the Russian aggression. In this way, the ING2 Committee organised for their meeting on the 29.09.22 a discussion on the impact of disinformation and propaganda in light of the Russian aggression (European Parliament, 2022d). ING2 invited stakeholder experts and official EU policymakers such as the Head of Strategic Communication Division in the EEAS. While talks focused on Russian disinformation concerning Ukraine, they occurred within the network of pre-existing decision-making processes, namely the ING2 Committee (successor of the INGE Committee), the Strategic Communication Division of the EEAS working on disinformation since 2015, and relevant stakeholders. Similar talks also took place throughout the year in the EP regarding Covid-19 (European Parliament, 2023). A Commission official (personal communication, May 22, 2022) argued that awareness had already been for long on disinformation especially since Covid-19. In connection, an MEP (personal communication, May 09, 2022) described that it was a change of prioritisation. While previously policymakers had been focusing on pandemic-related policies, activities moved towards Russian propaganda following the invasion. In this way, it can be argued that an activity shift is taking place away from Covid-19 to the war but within previously existing decision-making processes.

Subsequent developments seem to confirm activities shifted towards the invasion within existing decision-making processes. On the 10.10.22, High Representative Josep Borrel (2022a) urged the EEAS staff at the annual EU Ambassadors Conference to intensify efforts in combating Russian and Chinese narratives outside the EU through strategic communication offline and online. Similar demands were expressed by European Council President Charles Michel (2022) and EP President Roberta Metsola (2022) at the conference. Furthermore, on the

08.12.22, the ING2 Committee invited Borrel for a meeting to discuss the EEAS efforts to fight disinformation, including the FIMI toolbox (European Parliament, 2022e). MEPs endorsed Borrell's calls at the Ambassadors Conference for strengthening the EU's diplomatic services' efforts against disinformation through better strategic communication. Borrel, moreover, emphasized the EEAS' work on disinformation since 2015 and reiterated the need for increasing capacity while continuing current efforts. Furthermore, he highlighted the EEAS's priority on Russia, and China since Covid-19 and outlined recent developments since the war, particularly by expanding strategies through the FIMI toolbox. However, he also acknowledged that the EEAS capacity remained unchanged with the invasion, as the work continued with the same tools and approaches as before. Therefore, while high-ranking policymakers called for increased action, it simultaneously reflects a continuation of previous strategies and decision-making processes, emphasising the EEAS's strategic communication regarding disinformation and focusing on actors like Russia and China. Hence, it mainly builds on existing approaches adding new layers to policymaking processes with a focus on the Russian invasion.

Most recent developments of the year after the invasion further indicate a gradual intensification of EU efforts, building on existing strategies and decision-making processes. Firstly, ING2 prepared a second report giving updates on the INGE resolution's implementation and drawing conclusions from the war (European Parliament 2022c). It, thus, continued the path of its predecessor. Secondly, the EEAS organised a conference on the 07.02.22 to engage stakeholders and discuss responses to FIMI, including disinformation. Borrel (2023) announced during the conference the EEAS's plans to establish an "Information Sharing and Analysis Centre" for better coordination against Russian and Chinese disinformation with member states and civil society. An EU official (personal communication, May 31, 2022) concluded that the EEAS is consolidating the current processes and expands when feasible. This further indicates EU policymakers' efforts to enhance capacities while using established EU networks and decision-making processes to counter disinformation. Finally, a notable statement by a Commission official (personal communication, May 22, 2022) captures best policymaking processes in the first year after the outbreak of Russian aggression in Ukraine, by stating: "I think we have built the engine, now we should let the car running for a while to see the performance of the car, the performance of the car in the current context which is dominated when we speak about disinformation by the war." This confirms my overall observations that although context and policymaking activities might have shifted to the war, strategies and decision-making processes largely pre-existed or were in development. In that way, EU

policymaking processes following the invasion appear to be best characterised by path-dependence, strengthening and building on existing policymaking processes.

5.4 Discussion of Findings

The analysis suggests that the impact of the Russian invasion of Ukraine on EU policymaking processes on disinformation online can be described through a historical institutionalist lens and path-dependence. I acknowledge that some immediate reactions, particularly blocking Russian media outlets within the EU, were unprecedented and may account for more than an incremental change of EU policymaking processes. However, most of the EU processes do not fall under the definition of a critical juncture but are best characterised by path-dependence.

Firstly, political leaders' choices to add amendments to the DSA or the Strengthened Code of Practice and increasing strategic communication efforts in the EEAS form a continuation of intensifying EU policymaking on disinformation online. The Strategic Compass, DSA and Strengthened Code of Practice had been under development prior to the invasion. Moreover, the Strengthened Code marks not a break but merely an update from its initial version. These progressively increasing activities have been going on since 2015 with alterations in speed and intensity (e.g. through Covid-19) and transitioning from a voluntary to more regulatory approach over time.

Secondly, activities occurred within existing decision-making processes. The ING2 Committee continues the work of INGE, the Commission its focus on implementing the Code of Practice and the DSA, and the EEAS, through its Strategic Communication Division including the ESCTF and the Strategic Compass. Undeniably, adjustments have been made to previous policymaking processes, such as new sub-groups to delve deeper into implications of the war for EU policy on disinformation online. However, these adjustments build on established institutions and seem to reflect a reaction to the changing circumstances created by the war. Therefore, overall policymaking processes on disinformation online seem to be impacted by path-dependence, shifting activities to the war while maintaining institutional continuity connecting current policymaking processes to "normal" overarching activities in intensifying efforts on the policy within the EU.

6.   Conclusion

The new context created by the recent Russian invasion of Ukraine makes it relevant to study the wider phenomenon of critical junctures in the EU through the policy issue of

disinformation and offers new insights into EU policymaking processes following external events. For this purpose, I proposed to research whether the first year of the Russian war on Ukraine created a critical juncture for EU policymaking processes on disinformation online and, depending on the answer, how either this critical juncture or continuing path-dependence impacted EU policymaking processes. Based on EU documents and interviews with EU policymakers, I first analysed if there was a critical juncture, considering the four characteristics identified in the theoretical framework: a pivotal external event, followed by a period of uncertainty, giving rise to heightened opportunities for agents to influence policymaking processes, in a relatively short period of time. While the Russian invasion is a pivotal external event with far-reaching consequences, the invasion seems to not have created substantial uncertainty on EU disinformation policy. There was already a well-established policy framework and the response scope stayed relatively unchanged. Regarding the findings on heightened opportunities for policymakers I concluded that the criterion is only partly fulfilled. The invasion generated unprecedented EU activities with sanctioning two big Russian media companies, Sputnik and RT. However, policymaking activities existed since 2015 and policymakers' activity had already been high, particularly since Covid-19. Lastly, the EU's long-standing work on the policy issue also refutes the last criterion.

Following this, my findings overall indicate that the first year after the Russian invasion did not create a critical juncture for EU policymaking processes on disinformation online. Therefore, I answered, in the next section, sub-question B) and illustrated in greater detail how path-dependence impacted EU policymaking processes by analysing "decision-making processes" and "strategies and choices of political leaders". Firstly, I gave a brief overview of EU policymaking processes on disinformation prior to the invasion. These commenced with the EEAS's work setting up the East StratCom Task Force to counter Russian disinformation campaigns via strategic communication following the Crimean occupation in 2014. After this, the EU Commission began its activities in 2017 gradually expanding EU strategies and decision-making processes to safeguard EU elections by introducing the Code of Practice on Disinformation and an Action Plan. Following the elections Covid-19 accelerated policymaking processes as member states instructed the EEAS to develop a Strategic Compass, addressing disinformation among other issues, and the Commission announcing a Democracy Action Plan demanding a revision of the Code of Practice, and publishing a proposal for the DSA. Overall, while the Covid-19 pandemic caused an acceleration in EU policymaking processes before the war, the processes largely created an overarching path-dependence characterised by incremental changes triggered by changing circumstances.

Policymaking processes after the invasion seem to have followed this overarching path-dependence. The strategic choice to block the broadcast of RT and Sputnik in the EU was unprecedented. However, strategies and choices of political leaders and decision-making processes were mostly building on existing structures. With regards to strategies, EU policymakers introduced the Strategic Compass, agreed on the DSA and the Strengthened Code of Practice on Disinformation. However, policymaking activities on these measures happened largely prior to the invasion, with relatively small changes to the three instruments following it. Decision-making processes similarly continued previous trends with the ING2 Committee following the work of INGE. The Commission also maintained its efforts on the Strengthened Code of Practice and the DSA with its regular contact with stakeholders. Furthermore, the EEAS intensified its strategic communication. Moreover, the findings suggest that policymaking processes had already heightened activity on disinformation since Covid-19 and the invasion merely shifted activity from the pandemic to the Russian invasion. Overall, it was not a critical juncture but rather path-dependence that impacted policymaking processes leading to an activity shift towards the invasion. Path-dependence created institutional continuity of overarching processes that occurred with changing speed since the Russian occupation of Crimea in 2014. With regards to additional research, my theoretical framework could be applied to a study that compares how the Russian invasion affected EU policymaking processes in other areas such as energy or security and provide further insights into EU policymaking processes following external events.

Reference List

Ackrill, R., Kay, A., & Zahariadis, N. (2013). Ambiguity, multiple streams, and EU policy. *Journal of European Public Policy*, *20*(6), 871–887. https://doi.org/10.1080/13501763.2013.781824

Alaphilippe, A., Machado, G., Miguel, R., & Poldi, F. (2022). *Doppelganger: Media Clones serving Russian Propaganda*. EU DisinfoLab. https://www.disinfo.eu/wp-content/uploads/2022/09/Doppelganger-1.pdf

Allcott, H., & Gentzkow, M. (2017). Social Media and Fake News in the 2016 Election. *Journal of Economic Perspectives*, *31*(2), 211–236. https://doi.org/10.1257/jep.31.2.211

Baumgartner, F. R., & Jones, B. D. (1993). *Agendas and Instability in American Politics*. University of Chicago Press.

Bennett, A., & Elman, C. (2007). Case Study Methods in the International Relations Subfield. *Comparative Political Studies*, *40*(2), 170–195. https://doi.org/10.1177/0010414006296346

Bennett, W. L., & Livingston, S. (2018). The Disinformation Order: Disruptive Communication and the Decline of Democratic Institutions. *European Journal of Communication*, *33*(2), 122–139. https://doi.org/10.1177/0267323118760317

Bernard, H. R. (2006). *Research Methods in Anthropology: Qualitative and quantitative Approaches* (4th ed). AltaMira Press.

Bertuzzi, L. (2022, March 23). DSA: European Commission pitches crisis management mechanism, supervisory fees. *EURAKTIV.* https://www.euractiv.com/section/digital/news/dsa-european-commissions-pitches-crisis-management-mechanism-supervisory-fees/

Birkland, T. A. (2020). *An Introduction to the Policy Process: Theories, Concepts, and Models of Public Policy Making* (5th ed.). Routledge.

Borrel, J. (2022, Oct. 10). *EU Ambassadors Annual Conference 2022: Opening speech by High Representative Josep Borrell* [Keynote speech]. EU Ambassadors Annual Conference 2022. https://www.eeas.europa.eu/eeas/eu-ambassadors-annual-conference-2022-opening-speech-high-representative-josep-borrell_en

Borrel, J. (2023, Feb. 07). *Disinformation: Opening speech by High Representative/Vice-President Josep Borrell at the EEAS Conference on Foreign Information Manipulation and Interference* [Speech]. Beyond disinformation: EU responses to the threat of foreign information manipulation. https://www.eeas.europa.eu/eeas/disinformation-opening-speech-high-representativevice-president-josep-borrell-eeas-conference_en

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Capoccia, G. (2016). Critical Junctures. In O. Fioretos, Tulia G. Falleti, & A. Shanegate (Eds.), *The Oxford Handbook of Historical Institutionalism* (1st ed.). Oxford University Press.

Capoccia, G., & Kelemen, R. D. (2007). The Study of Critical Junctures: Theory, Narrative, and Counterfactuals in Historical Institutionalism. *World Politics*, *59*(3), 341–369. https://doi.org/10.1017/S0043887100020852

Carrapico, H., & Farrand, B. (2020). Discursive Continuity and Change in the Time of Covid-19: The Case of EU Cybersecurity Policy. *Journal of European Integration*, *42*(8), 1111–1126. https://doi.org/10.1080/07036337.2020.1853122

Collier, D., & Mahon, J. E. (1993). Conceptual "Stretching" Revisited: Adapting Categories in Comparative Analysis. *American Political Science Review*, *87*(4), 845–855. https://doi.org/10.2307/2938818

Collier, R. B., & Collier, D. (2002). *Shaping the Political Arena: Critical Junctures, the Labor Movement, and Regime Dynamics in Latin America*. University of Notre Dame Press.

Cortell, A. P., & Peterson, S. (1999). Altered States: Explaining Domestic Institutional Change. *British Journal of Political Science*, *29*(1), 177–203. https://doi.org/10.1017/S0007123499000083

Council of the European Union. (2022, March 01). Regulation (EU) 2022/350 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine. *Official Journal of the European Union,* L65/1-4.

Dupont, C., Oberthür, S., & von Homeyer, I. (2020). The Covid-19 Crisis: A Critical Juncture for EU Climate Policy Development? *Journal of European Integration*, *42*(8), 1095–1110. https://doi.org/10.1080/07036337.2020.1853117

Durach, F., Bârgăoanu, A., & Nastasiu, C. (2020). Tackling Disinformation: EU Regulation of the Digital Space. *Romanian Journal of European Affairs*, *20*(1), 5–20.

European External Action Service. (2022). *A Strategic Compass for Security and Defence: For a European Union that protects its citizens, values and interests and contributes to international peace and security.* https://www.eeas.europa.eu/sites/default/ files/documents/strategic_compass_en3_web.pdf

European Commission. (2017). *Next steps against fake news: Commission sets up High-Level Expert Group and launches public consultation.* https://ec.europa.eu/commission/ presscorner/detail/en/IP_17_4481

European Commission. (2018a). *A multi-dimensional Approach to Disinformation: Report of the independent High Level Group on fake news and online disinformation.*

https://digital-strategy.ec.europa.eu/en/library/final-report-high-level-expert-group-fake-news-and-online-disinformation

European Commission. (2018b). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Tackling online disinformation: A European Approach.* https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52018DC0236

European Commission. (2018c). *EU Code of Practice on Disinformation.* https://digital-strategy.ec.europa.eu/en/library/2018-code-practice-disinformation

European Commission. (2020a). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: On the European Democracy Action Plan.* https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A790%3AFIN&qid=1607079662423

European Commission. (2020b). *Proposal for a Regulation of the European Parliament and of the Council on a Single Market for Digital Services (Digital Services Act) and amending Directive 2000/31/EC (2020/0361 (COD)).* https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020PC0825

European Commission. (2021). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: European Commission Guidance on Strengthening the Code of Practice on Disinformation.* https://digital-strategy.ec.europa.eu/en/library/guidance-strengthening-code-practice-disinformation

European Commission. (2022). *The Strengthened Code of Practice on Disinformation 2022.* https://digital-strategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation

European Commission, & High Representative of the Union for Foreign Affairs and Security Policy. (2018). *Joint Communication to The European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions: Action Plan against Disinformation.* https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018JC0036

European Council. (2015). *European Council meeting (19 and 20 March 2015) – Conclusions.* https://www.consilium.europa.eu/media/21888/european-council-conclusions-19-20-march-2015-en.pdf

European Council. (2020). *Council Conclusions on Security and Defence.* https://www.consilium.europa.eu/media/44521/st08910-en20.pdf

European Council. (2022). *Council conclusions on Foreign Information Manipulation and Interference (FIMI).* https://data.consilium.europa.eu/doc/document/ST-11429-2022-INIT/en/pdf

European Parliament. (2020). *European Parliament decision of 18 June 2020 on setting up a special committee on foreign interference in all democratic processes in the European Union, including disinformation, and defining its responsibilities, numerical strength and term of office (2020/2683(RSO)).* https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DP0161

European Parliament. (2022a). *European Parliament resolution of 9 March 2022 on foreign interference in all democratic processes in the European Union, including disinformation(2020/2268(INI)).* https://www.europarl.europa.eu/doceo/document/TA-9-2022-0064_EN.pdf

European Parliament. (2022b). *European Parliament decision of 10 March 2022 on setting up a special committee on foreign interference in all democratic processes in the European Union, including disinformation (INGE 2), and defining its responsibilities, numerical strength and term of office (2022/2585(RSO)).* https://www.europarl.europa.eu/doceo/document/TA-9-2022-0070_EN.pdf

European Parliament. (2022c, March 16). *Committee Meeting: Committee on Internal Market and Consumer Protection* [Webstreaming]. https://multimedia.europarl.europa.eu/en/webstreaming/imco-committee-meeting_20220316-0945-COMMITTEE-IMCO

European Parliament (2022d, Sept. 29). *Committee Meeting: Special Committee on foreign interference in all democratic processes in the European Union, including disinformation*[Webstreaming].
https://multimedia.europarl.europa.eu/en/webstreaming/ing2-committee-meeting_20220929-0900-COMMITTEE-ING2

European Parliament (2022e, Dec. 08). *Committee Meeting: ING2 - LIBE - AFET - SEDE* [Webstreaming]. https://multimedia.europarl.europa.eu/en/webstreaming/ing2-sede-libe-afet-committee-meeting_20221208-1330-COMMITTEE-ING2

European Parliament. (2022f). *Draft Report: On foreign interference in all democratic processes in the European Union, including disinformation (2022/2075(INI)).* https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/ING2/PR/2023/01-12/1269845EN.pdf

European Parliament. (2023). *Public Hearing: The impact of disinformation, misinformation and propaganda on democracy during the pandemic.* *https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/COVI/OJ/2023/01-30/1271336EN.pdf*

European Parliament and Council of the European Union. (2022, Oct. 19). Regulation (EU) 2022/2065 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act). *Official Journal of the European Union*, L 277/1-102.

Fallis, D. (2015). What Is Disinformation? *Library Trends*, *63*(3), 401–426. https://doi.org/10.1353/lib.2015.0014

Greer, S. L. (2008). Choosing Paths in European Union Health Services Policy: A Political Analysis of a Critical Juncture. *Journal of European Social Policy*, *18*(3), 219–231. https://doi.org/10.1177/0958928708091056

Humprecht, E., Esser, F., & Van Aelst, P. (2020). Resilience to Online Disinformation: A Framework for Cross-National Comparative Research. *The International Journal of Press/Politics*, *25*(3), 493–516. https://doi.org/10.1177/1940161219900126

Kallas, K., Kariņš, K., Šimonytė, I., & Morawiecki, M. (2022). *Letter to online platforms and social networks from the Prime Ministers of Estonia, Latvia, Lithuania and Poland.* https://www.mk.gov.lv/en/letter-online-platforms-and-social-networks-prime-ministers-estonia-latvia-lithuania-and-poland

King, G., Keohane, R. O., & Sidney Verba. (1994). *Designing social Inquiry: Scientific Inference in Qualitative Research*. Princeton University Press.

Kingdon, J. W. (1995). *Agendas, Alternatives, and Public Policies* (2nd ed.). HarperCollins College Publishers.

Lipset, S. M., & Rokkan, S. (1967). *Party Systems and Voter Alignments: Cross-National Perspectives*. Free Press.

McCormick, J. (2020). *European Union Politics* (3rd ed.). Macmillan Education.

Metsola, R. (2022, Oct. 11). *EP President Roberta Metsola Keynote Speech* [Keynote Speech]. EU Ambassadors Annual Conference 2022. https://www.eeas.europa.eu/eeas/ep-president-roberta-metsola-keynote-speech-euambassadors-conference_en

Michel, C. (2022, Oct. 10). *Address by President Charles Michel to the annual EU Ambassadors' conference* [Keynote speech]. EU Ambassadors Annual Conference 2022. https://www.consilium.europa.eu/en/press/press-releases/2022/10/10/discours-du-president-charles-michel-lors-de-la-conference-annuelle-des-ambassadeurs-de-l-ue/

Nenadić, I. (2019). Unpacking the "European approach" to Tackling Challenges of Disinformation and Political Manipulation. *Internet Policy Review*, *8*(4). https://doi.org/10.14763/2019.4.1436

Peters, B. G., Pierre, J., & King, D. S. (2005). The Politics of Path Dependency: Political Conflict in Historical Institutionalism. *The Journal of Politics*, *67*(4), 1275–1300. https://doi.org/10.1111/j.1468-2508.2005.00360.x

Pierson, P. (2000). Increasing Returns, Path Dependence, and the Study of Politics. *American Political Science Review*, *94*(2), 251–267. https://doi.org/10.2307/2586011

Rixen, T., & Viola, L. A. (2015). Putting Path Dependence in its Place: Toward a Taxonomy of institutional Change. *Journal of Theoretical Politics*, *27*(2), 301–323. https://doi.org/10.1177/0951629814531667

Sabatier, P. A. (Ed.). (2007). *Theories of the policy process* (2nd ed). Westview Press.

Tenove, C. (2020). Protecting Democracy from Disinformation: Normative Threats and Policy Responses. *The International Journal of Press/Politics*, *25*(3), 517–537. https://doi.org/10.1177/1940161220918740

Thelen, K. (1999). Historical Institutionalism in Comparative Politics. *Annual Review of Political Science*, *2*(1). https://doi.org/10.1146/annurev.polisci.2.1.369

Tucker, J. A., Theocharis, Y., Roberts, M. E., & Barberá, P. (2017). From Liberation to Turmoil: Social Media And Democracy. *Journal of Democracy*, *28*(4), 46–59. https://doi.org/10.1353/jod.2017.0064

Verzichelli, L., & Edinger, M. (2005). A Critical Juncture? The 2004 European Elections and the Making of a Supranational Elite. *The Journal of Legislative Studies*, *11*(2), 254–274. https://doi.org/10.1080/13572330500166618

Von der Leyen, U. (2019). *A Union that strives for more My agenda for Europe*. https://commission.europa.eu/system/files/2020-04/political-guidelines-next-commission_en_0.pdf

Wallace, H., Pollack, M. A., & Young, A. R. (2015). *Policy-making in the European Union* (7th ed.). Oxford University Press.

Wardle, C., & Derakhshan, H. (2017). *Information Disorder: Toward an Interdisciplinary Framework for Research and Policy Making* (DGI(2017)09). Council of Europe. https://rm.coe.int/information-disorder-toward-an-interdisciplinary-framework-for-researc/168076277c

Zahariadis, N. (2008). Ambiguity and choice in European public policy. *Journal of European Public Policy*, *15*(4), 514–530. https://doi.org/10.1080/13501760801996717

Annex A. Interview Questions and List of Interviewees

Interview Questions:

Question 1: Could you tell me a bit about your role and how you became aware of disinformation online as a policy issue?

Question 2: How were the EU's policymaking processes on disinformation online progressing before the start of the invasion?

Question 3: How has the Russian invasion of Ukraine impacted policymakers' perception of disinformation online as a threat?

Question 4: To what extend do you perceive that the sense of urgency to address the issue of disinformation online has been affected by the Russian invasion? Has the war increased opportunities for policymakers to act on the issue or has it translated into any policy action?

Question 5: How has the EU's approach to disinformation online been impacted by the Russian invasion of Ukraine? Has it changed?

Question 6: Has there been a significant increase in meetings and debates between policymakers in the EU and with stakeholders debating the issue of disinformation compared to the pre-war period and if so, what are some issues that have been raised?

Question 7: Do you think that the ban of RT and Sputnik was a departure from previous actions against disinformation?

Question 8: Finally, how do you envision the EU's approach to combat disinformation online evolving in the following years, particularly in light of the ongoing war in Ukraine?

List of interviewees (anonymised):
Member of the European Parliament
Commission official
Policy Advisor to a Member of the European Parliament
EU official

Appendix B. List of Documents consulted

Documents:

Bertuzzi, L. (2022, March 23). DSA: European Commission pitches crisis management mechanism, supervisory fees. *EURAKTIV.* https://www.euractiv.com/section/digital/news/dsa-european-commissions-pitches-crisis-management-mechanism-supervisory-fees/

Borrel, J. (2022, Oct. 10). *EU Ambassadors Annual Conference 2022: Opening speech by High Representative Josep Borrell* [Keynote speech]. EU Ambassadors Annual Conference 2022. https://www.eeas.europa.eu/eeas/eu-ambassadors-annual-conference-2022-opening-speech-high-representative-josep-borrell_en

Borrel, J. (2023, Feb. 07). *Disinformation: Opening speech by High Representative/Vice-President Josep Borrell at the EEAS Conference on Foreign Information Manipulation and Interference* [Speech]. Beyond disinformation: EU responses to the threat of foreign information manipulation. https://www.eeas.europa.eu/eeas/disinformation-opening-speech-high-representativevice-president-josep-borrell-eeas-conference_en

Council of the European Union. (2022, March 01). Regulation (EU) 2022/350 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine. *Official Journal of the European Union,* L65/1-4.

European Commission. (2017). *Next steps against fake news: Commission sets up High-Level Expert Group and launches public consultation.* https://ec.europa.eu/commission/presscorner/detail/en/IP_17_4481

European Commission. (2018a). *A multi-dimensional Approach to Disinformation: Report of the independent High Level Group on fake news and online disinformation.* https://digital-strategy.ec.europa.eu/en/library/final-report-high-level-expert-group-fake-news-and-online-disinformation

European Commission. (2018b). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Tackling online disinformation: a European Approach.* https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52018DC0236

European Commission. (2018c). *EU Code of Practice on Disinformation.* https://digital-strategy.ec.europa.eu/en/library/2018-code-practice-disinformation

European Commission. (2020a). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the*

Committee of the Regions: On the European Democracy Action Plan. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A790%3AFIN&qid=1607079662423

European Commission. (2020b). *Proposal for a Regulation of the European Parliament and of the Council on a Single Market for Digital Services (Digital Services Act) and amending Directive 2000/31/EC (2020/0361 (COD)).* https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020PC0825

European Commission. (2021). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: European Commission Guidance on Strengthening the Code of Practice on Disinformation.* https://digital-strategy.ec.europa.eu/en/library/guidance-strengthening-code-practice-disinformation

European Commission. (2022). *The Strengthened Code of Practice on Disinformation 2022.* https://digital-strategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation

European Commission, & High Representative of the Union for Foreign Affairs and Security Policy. (2018). *Joint Communication to The European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions: Action Plan against Disinformation.* https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018JC0036

European Council. (2015). *European Council meeting (19 and 20 March 2015) – Conclusions.* https://www.consilium.europa.eu/media/21888/european-council-conclusions-19-20-march-2015-en.pdf

European Council. (2020). *Council Conclusions on Security and Defence.* https://www.consilium.europa.eu/media/44521/st08910-en20.pdf

European Council. (2022). *Council conclusions on Foreign Information Manipulation and Interference (FIMI).* https://data.consilium.europa.eu/doc/document/ST-11429-2022-INIT/en/pdf

European External Action Service. (2022). *A Strategic Compass for Security and Defence: For a European Union that protects its citizens, values and interests and contributes to international peace and security.* https://www.eeas.europa.eu/sites/default/files/documents/strategic_compass_en3_web.pdf

European External Action Service. (2023a). *2022 Report on EEAS Activities to Counter FIMI.* https://www.eeas.europa.eu/sites/default/files/documents/EEAS-AnnualReport-WEB_v3.4.pdf

European External Action Service. (2023b). *1st EEAS Report on Foreign Information Manipulation and Interference Threats: Towards a framework for networked defence.* https://www.eeas.europa.eu/sites/default/files/documents/2023/EEAS-DataTeam-ThreatReport-2023..pdf

European External Action Service. (2023c). *Beyond disinformation: EU responses to the threat of foreign information manipulation.* https://www.eeas.europa.eu/eeas/beyond-disinformation-–-eu-responses-threat-foreign-information-manipulation_en

European Parliament. (2020). *European Parliament decision of 18 June 2020 on setting up a special committee on foreign interference in all democratic processes in the European Union, including disinformation, and defining its responsibilities, numerical strength and term of office (2020/2683(RSO)).* https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DP0161

European Parliament. (2022a). *European Parliament resolution of 9 March 2022 on foreign interference in all democratic processes in the European Union, including disinformation(2020/2268(INI)).* https://www.europarl.europa.eu/doceo/document/TA-9-2022-0064_EN.pdf

European Parliament. (2022b). *European Parliament decision of 10 March 2022 on setting up a special committee on foreign interference in all democratic processes in the European Union, including disinformation (INGE 2), and defining its responsibilities, numerical strength and term of office (2022/2585(RSO)).* https://www.europarl.europa.eu/doceo/document/TA-9-2022-0070_EN.pdf

European Parliament. (2022c, March 16). *Committee Meeting: Committee on Internal Market and Consumer Protection* [Webstreaming]. https://multimedia.europarl.europa.eu/en/webstreaming/imco-committee-meeting_20220316-0945-COMMITTEE-IMCO

European Parliament (2022d). *Agenda - PE736.516 - Meeting of ING2 on Thursday, 29 September 2022.* https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/ING2/OJ/2022/09-29/1263537EN.pdf

European Parliament (2022e, Sept. 29). *Committee Meeting: Special Committee on foreign interference in all democratic processes in the European Union, including*

disinformation[Webstreaming].

https://multimedia.europarl.europa.eu/en/webstreaming/ing2-committee-
meeting_20220929-0900-COMMITTEE-ING2

European Parliament (2022f, Dec. 08). *Agenda - PE739.605 - Meeting of ING2 of Thursday, 8*
December   2022.
https://emeeting.europarl.europa.eu/emeeting/committee/en/agenda/202212/ING2?me
eting=ING2-2022-1208_1&session=12-08-13-30

European Parliament (2022g, Dec. 08). *Committee Meeting: ING2 - LIBE - AFET - SEDE*
[Webstreaming].   https://multimedia.europarl.europa.eu/en/webstreaming/ing2-sede-
libe-afet-committee-meeting_20221208-1330-COMMITTEE-ING2

European Parliament. (2022h). *Draft Report: On foreign interference in all democratic*
processes in the European Union, including disinformation (2022/2075(INI)).
https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/ING2/
PR/2023/01-12/1269845EN.pdf

European Parliament. (2023). *Public Hearing: The impact of disinformation, misinformation*
and   propaganda   on   democracy   during   the   pandemic.
https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/COVI/O
J/2023/01-30/1271336EN.pdf

European Parliament and Council of the European Union. (2022, Oct. 19). Regulation (EU)
2022/2065 on a Single Market for Digital Services and amending Directive 2000/31/EC
(Digital Services Act). *Official Journal of the European Union*, L 277/1-102.

Goujard, C. (2023, Feb. 07). EU to launch platform to fight Russian, Chinese disinformation.
Politico.   https://www.politico.eu/article/eu-to-launch-platform-to-fight-russian-
chinese-disinformation/

Kallas, K., Kariņš, K., Šimonytė, I., & Morawiecki, M. (2022). *Letter to online platforms and*
social networks from the Prime Ministers of Estonia, Latvia, Lithuania and Poland.
https://www.mk.gov.lv/en/letter-online-platforms-and-social-networks-prime-
ministers-estonia-latvia-lithuania-and-poland

Metsola, R. (2022, Oct. 11). *EP President Roberta Metsola Keynote Speech* [Keynote Speech].
EU Ambassadors Annual Conference 2022. https://www.eeas.europa.eu/eeas/ep-
president-roberta-metsola-keynote-speech-euambassadors-conference_en

Michel, C. (2022, Oct. 10). *Address by President Charles Michel to the annual EU*
Ambassadors' conference [Keynote speech]. EU Ambassadors Annual Conference
2022.   https://www.consilium.europa.eu/en/press/press-releases/2022/10/10/discours-

du-president-charles-michel-lors-de-la-conference-annuelle-des-ambassadeurs-de-l-ue/

Von der Leyen, U. (2019). *A Union that strives for more My agenda for Europe.* https://commission.europa.eu/system/files/2020-04/political-guidelines-next-commission_en_0.pdf