Hertie School
Jacques Delors Centre

Policy Brief

The European Democracy Shield – Papering over the cracks

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The European Commission's new Democracy Shield proposes roughly 50 action points over three priority areas: information space integrity, media and elections, and societal resilience and citizens' engagement. Most of the points are commitments to strengthen voluntary coordination and prepare guidance. They are largely additions to past initiatives, continuing the Commission's outsized focus on disinformation, rather than an attempt at innovation. There is a clear mismatch between the ambitious rhetoric around the announcement of the initiative and the small-scale solutions it offers. Nevertheless, the Democracy Shield can make useful additions to existing frameworks once implemented. It should, however, be seen as complementary to the use of other available instruments. Protecting European democracy requires consistent commitment to democratic values both at EU and at national level – not just the creation of additional strategies.

"The core tenets of our democracy are under attack", Ursula von der Leyen warned in the run-up to the European elections in May 2024. She campaigned for her second term as Commission president with the promise of a 'Democracy Shield' to protect the EU from malign foreign interference, especially online. After her successful re-election, she tasked the new Commissioner for Democracy, Justice, and the Rule of Law Michael McGrath with working on a new European Democracy Shield to address "the most severe risks to democracy in the EU". Initially planned for the third quarter of 2025, the Commission finally presented its Communication on the European Democracy Shield on 12 November, together with an 'EU Strategy for Civil Society', aiming to support civil society organisations.

The Democracy Shield proposes roughly 50 action points over three priority areas: information space integrity, media and elections, and societal resilience and citizens' engagement. Most of these points are commitments by the Commission to strengthen voluntary coordination and information-sharing structures, prepare soft-law guidance or strengthen existing legislation, without providing much detail on how or when it plans to implement them. The central proposal in the Democracy Shield is the European Centre for Democratic Resilience to combat information manipulation campaigns. It is intended to be a new voluntary coordination structure for EU institutions and member states, but it resembles similar existing mechanisms.

This policy brief offers an overview and analysis of the action points proposed in the Democracy Shield. It identifies a clear mismatch between the ambitious rhetoric around the announcement of the initiative and its modest substance. The Democracy Shield is largely a continuation of past initiatives rather than an attempt at innovation. The Commission continues to position malign foreign interference and information manipulation as a central threat to EU democracy. Foreign disinformation in particular takes on a role that is likely outsized compared to its negative impact on EU democracy in reality.

The steps proposed in the Democracy Shield should be seen as useful additions to the EU's existing tools and frameworks – merely complementary to their use. To meaningfully protect the integrity of the information space and safeguard European democracy, the Commission should prioritise effective enforcement of the EU's existing digital rulebook. It should also apply democratic values consistently across its broader legislative agenda, including in proposals such as the Digital Omnibus. Any initiative that limits fundamental rights in the digital space for the benefit of foreign tech companies runs counter to the goals of the Democracy Shield.

What is in the European Democracy Shield?

In its introduction, the Commission mentions both internal and external pressures on EU democracies, but it primarily focuses on the efforts of foreign authoritarian regimes to undermine democratic institutions in the EU and its neighbourhood. The Democracy Shield specifically mentions Russia's escalating hybrid attacks. In addition, it stresses 'technological disruption' and a changing information environment as a challenge to European democracies. This focus on hostile foreign actors and the 'digital transformation' echoes how von der Leyen has framed the threats to EU democracy since the start of her first term in 2019. The Democracy Shield builds on the 2020 European Democracy Action Plan and the 2023 Defence of Democracy package, both communicated as the EU's response to tackling external threats in the online information space.

While the framing and communication of these democracy initiatives has focused on addressing external and online threats, they have also included a broader range of measures. The European Democracy Action Plan covered three main areas: elections and democratic participation, media, and disinformation. Similarly, the Democracy Shield features roughly 50 action points over the three priority areas:

1. Reinforcing situational awareness and support response capacity to safeguard the integrity of the information space,
2. Strengthening democratic institutions, free and fair elections and free and independent media,
3. Boosting societal resilience and citizens' engagement.

The types of action the Democracy Shield proposes can be grouped into three overarching categories: a) new information-sharing or coordination structures, strengthened coordination, and the extension of existing mandates, b) new guidance and strengthening of existing legislation and c) capacity building and support, new funding opportunities, strengthened communication, and events. The graph on the next page provides an overview of the actions listed and mentioned in the Democracy Shield. Attached to this paper is a full table.

First priority area: Integrity of the information space

Under the first priority area on the integrity of the information space, the Commission lists measures that focus on "improving situational awareness and the collective capacity to anticipate, detect and respond to threats and on building democratic resilience" in relation to information manipulation and disinformation campaigns. Its central proposal here is to set up a new European Centre for Democratic Resilience. While the European Parliament had demanded that the Centre be set up as an independent agency, it will be managed by the Commission. As a mere coordination structure, building on member states' expertise and their voluntary participation, the Centre resembles existing mechanisms such as the European External Action Service's Rapid Alert System – a system that has been deemed rather unsuccessful. The new structure is, however, open to EU candidate countries and potential candidates, which the European Parliament and other actors had demanded. The Commission also plans to set up a Stakeholder Platform within the Centre for non-institutional stakeholders. Details on how the Centre is supposed to work in practice remain unclear.

There are further measures planned that tackle disinformation, such as the preparation of an 'incidents and crisis protocol' under the Digital Services Act (DSA). This aims to "ensure swift reactions to large-scale and potentially transnational information operations", such as Russia's elaborate online influencing campaigns around European elections. Further, the Commission plans to set up an independent European Network of Fact-Checkers to boost "the detection and monitoring of FIMI and disinformation campaigns." A call for proposals with a funding envelope of 5 million euros for this network took place from April to September.

In the first priority area, the Commission focuses on online information manipulation rather than addressing foreign interference more broadly. The wording on the European Centre for Democratic Resilience, however, suggests some openness to the idea that this new forum could also be used for cooperation beyond disinformation, namely on the integrity of electoral processes, democratic resilience building, media literacy, and preparedness. This could be useful to facilitate greater exchange and encourage EU countries to take ownership in these areas. Increased efforts to demonetise disinformation on online platforms and labelling of AI-generated content in the framework of the DSA could also be useful additional steps to hold platforms to account for their role in proliferating disinformation.

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The European Democracy Shield: Overview of action points grouped by type of action

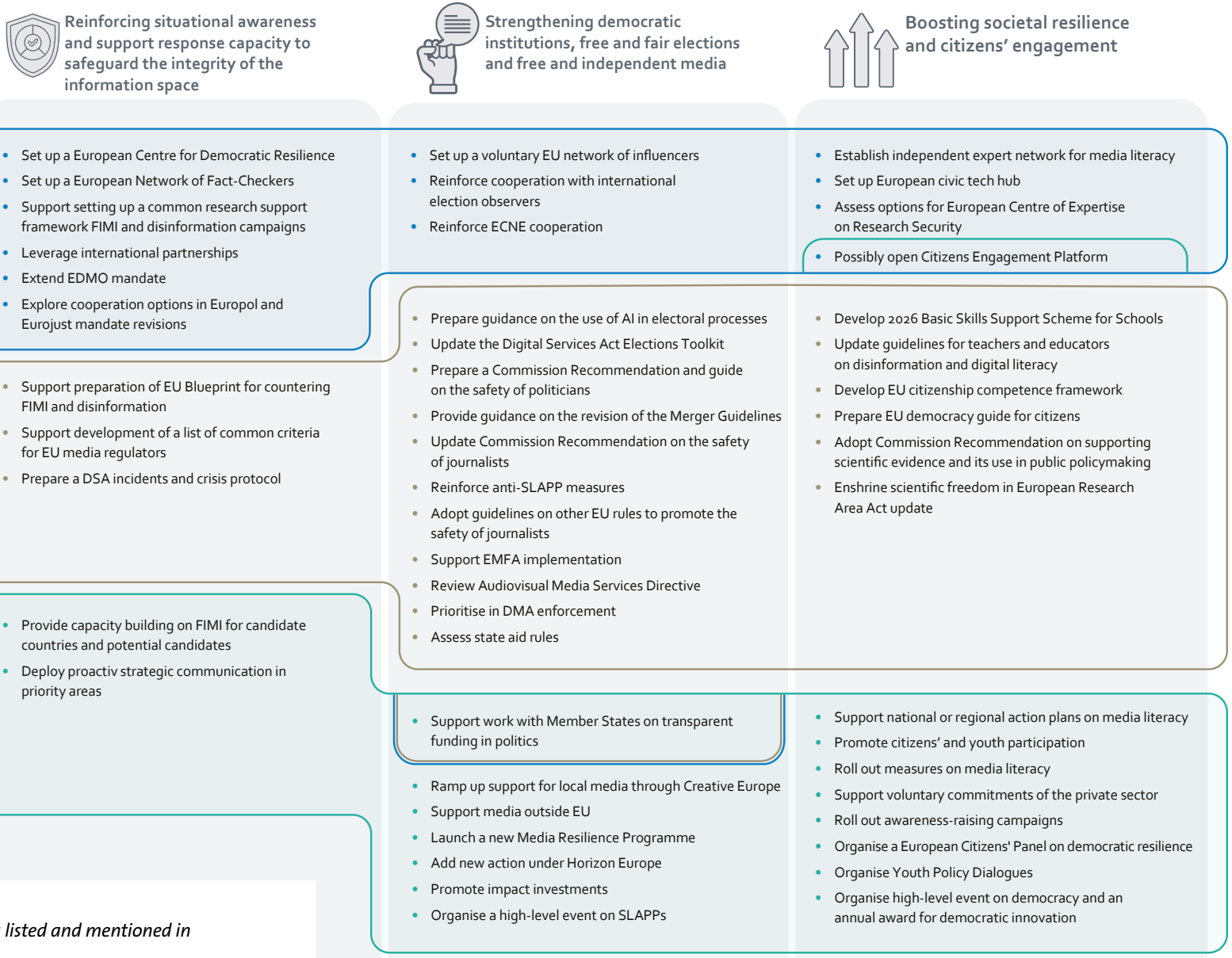

Table includes action points listed and mentioned in the Democracy Shield.
Source: European Commission, 2025. Own illustration.

Second priority area: Elections and media

In the second priority area on elections and media, the Commission focuses on strengthening its work in the European Cooperation Network on Elections (ECNE), which is a platform for exchange on election processes and integrity between competent national authorities. It plans to present a recommendation and a guide for EU countries on best practices for the safety of political actors and guidance on the responsible use of AI in electoral processes. The Democracy Shield stresses the importance of an independent and resilient media sector and proposes actions to protect its economic viability and the safety of journalists, and to address the risks posed by AI. To this end, the Commission plans to, among other things, support the implementation of the European Media Freedom Act (EMFA) and provide funding opportunities in a new Media Resilience Programme and the next Multiannual Financial Framework (MFF).

While many of the commitments on media in the Democracy Shield are merely promises to present non-binding recommendations such as on the safety of journalists, proposals to strengthen existing legislation such as the Audiovisual Media Services Directive and proposed funding opportunities could be significant steps in helping to strengthen the economic viability of the media sector.

Third priority area: Societal resilience and citizens' engagement

In the third priority area on societal resilience and citizens' engagement, the Commission proposes measures to foster the media and citizens' digital literacy. It also wants to support the development of participatory tools with a focus on the local level and youth, using measures to stimulate innovation in online platforms that enable participation in democracy (civic tech). Here, it plans to organise a civic tech hackathon and a civic tech hub. To make EU citizens more aware of their rights, the Commission plans to develop guidelines to strengthen citizenship education in schools and to present an EU democracy guide. It also plans to adopt a Recommendation for supporting scientific evidence in policymaking that will promote evidence-based decision-making and trust in public policies and scientific research.

Along with the Democracy Shield, the Commission presented an EU Strategy for Civil Society, for which civil society actors had called for years. Here, the Commission acknowledges civil society's role in supporting democracy and the shrinking civic space in the EU. To improve its engagement with civil society on EU policies, a new Civil Society Platform will be established by 2026. The platform will facilitate a regular and structured framework for the Commission's engagement with CSOs, although mainly centred on topics related to EU values. A new online Knowledge Hub on Civic Space will make it easier for civil society to access protection and support tools.

In both the Democracy Shield and the Civil Society Strategy, the Commission stresses that it has proposed a significant funding increase in the next MFF. At a proposed 8.6 bn euros, the new AgoraEU programme is intended to promote shared values, including democracy, equality, and the rule of law, and to support cultural diversity, the audiovisual and creative sectors, media freedom, and civil society involvement. In the last MFF, the Citizens, Equality, Rights and Values (CERV) programme was budgeted with 1.56 bn euros. The new proposal allocates around 3.6 bn euros to the CERV+ programme, which is intended to support the implementation of the Democracy Shield. Similarly, roughly 1.47 bn euros were allocated for media under the Creative Europe programme in the last MFF. The Commission now proposes a budget of 3.2 bn euros for the Media+ programme. While those numbers are not directly comparable because of different price levels, this allocation would present a significant funding increase. The Commission's budget proposal is now being negotiated and must ultimately be adopted by member states in the European Council and consented to by the European Parliament.

Papering over the cracks

With the Democracy Shield, the European Commission has presented a catalogue of ideas to strengthen existing frameworks. These could be useful additions once implemented. They are, however, unlikely to deliver significantly better results than the existing tools. In addition, the Commission continues its focus on malign foreign interference, which risks leaving other threats deprioritised and under-resourced.

Viewing democracy through a security lens leaves other threats unaddressed

In her mission letter to Commissioner McGrath, Ursula von der Leyen tasked him to work on a Democracy Shield that would address "the most severe risks to democracy in the EU". In the Democracy Shield communication, the Commission cites an increasingly adversarial geopolitical landscape, Russia's escalating hybrid attacks, a disruptive, deep digital transformation of society, rising extremism, and polarisation. It offers no explanation of how it arrives at these challenges or the priority areas that follow from them. Instead, the Democracy Shield is a continuation of the EU's past democracy agenda under von der Leyen's leadership, which has centred on threats from hostile foreign actors in the online information space – without offering much evidence for this narrow focus. Placing security issues such as malign foreign interference so prominently in the democracy agenda risks leaving internal threats to democracy in the EU unaddressed, deprioritised and under-resourced.

The Commission's continued security lens on democracy is particularly evident in the Democracy Shield's first priority area. This focuses on external threats and places societal resilience, situational awareness, and preparedness at the centre of democratic resilience. While the Democracy Shield states that it should be implemented "in synergy with the EU's agenda on security, defence, preparedness, and in coherence with EU external action more broadly", this approach risks a duplication of existing structures. For example, it is not clear how the new measures such as the European Centre for Democratic Resilience would improve, rather than duplicate, the existing European External Action Service's Rapid Alert System. The EU's democracy initiatives are also arguably insufficient for comprehensively addressing interference by foreign actors, who rely on a variety of strategies beyond disinformation, such as cyberattacks, covert funding of political parties, lobbying, and bribery.

The Commission is overly focused on disinformation

Most of the action points in the first priority area, such as the new European Network for Fact-Checkers, aim to counter information manipulation and disinformation, in particular by foreign actors. This is afforded an outsized role compared to its likely negative impact on EU democracy in reality. The research on disinformation has shown that its reach is often overestimated, as most sources of false information are regularly consumed by only a small percentage of social media users. In contrast, repeated warnings about disinformation increase general mistrust of the media, both untrustworthy and trustworthy. While von der Leyen has claimed that "nothing is more powerful as unveiling information manipulation", tools such as fact-checking, as proposed in the Democracy Shield, have proven largely ineffective. Focusing on disinformation also risks treating a symptom of what are actually broader challenges to democratic discourse in the digital information space and, in particular, on social media platforms.

Soft policy measures are ineffective tools where democratic values are deliberately undermined

There is also a mismatch between the adversarial source of the problems the Democracy Shield claims to tackle and the soft-measure solutions it offers. About 15 action points in the Democracy Shield are commitments to prepare new guidance and Commission Recommendations – non-binding instruments without legal consequences. There are also action points to strengthen cooperation that strongly rely on member states' and other actors' voluntary commitment.

Soft measures can help in situations of involuntary noncompliance but are unlikely to be effective when noncompliance is deliberate. The Democracy Shield relies on soft policy measures, but most of the issues it aims to address are those where democratic values are not incidentally, but rather deliberately, undermined. For example, the Commission proposes encouraging political parties to make voluntary commitments on the use of AI in elections. This is unlikely to be effective in changing the behaviour of the many European far-right parties that deliberately use AI-generated content to whip up voter engagement. Similarly, guidance on the application of the EMFA or the Merger Guidelines to foster media plurality are unlikely to be effective if a member state's government deliberately seeks to undermine a free and independent media sector.

The Commission's focus on external threats and use of soft policy measures could be attributed to its limited competence in the area of democracy. It may also reflect some deference to EU countries' limited enthusiasm for the Commission to become active in what many view as a matter of national sovereignty. In the past, the Commission has relied on its competence to regulate the internal market as a basis for legislative initiatives such as the Transparency and Targeting of Political Advertising Regulation and the Directive on Transparency of Foreign Interest Representation. This constraint to regulate only in areas where internal market and democracy issues overlap makes it difficult to formulate a fitting policy and has led to mixed results. With these legislative initiatives, the Commission has also arguably exhausted that overlap – which leaves only non-binding recommendations and other soft policy measures at its disposal.

Where the Commission's proposals aim to build capacity or improve coordination between committed actors, soft policy measures can be useful. They should, however, be seen as complementary to the consistent enforcement of existing legislation to protect democracy.

The European Commission needs to use existing tools more effectively

In the Democracy Shield, the Commission makes commitments to use existing legal frameworks, particularly in the first and second priority areas. Among other things, the Commission vows to prioritise an independent media landscape in the enforcement of the Digital Markets Act, to ensure the enforcement of the EMFA, and to use the Digital Services Act to work towards recommender system transparency and demonetising disinformation, for example.

While these commitments are right, the Commission should prioritise enforcement with a view to protecting democratic values. It has become increasingly apparent in recent months that the Commission struggles with this role, especially as an independent enforcer of the EU's digital rulebook. Commission decisions against US big tech companies such as Google have reportedly been delayed so as to not upset the Trump government during trade talks. The first fine under the DSA, in a case against X, was only issued on 5 December, two years after the start of the investigation against the US-based social media platform, and was reportedly delayed for months for political reasons.

The EU's efforts to regulate big tech and fight disinformation have been a thorn in the side of the US government and discredited by Republican lawmakers as attempts to stifle free speech. Reports claim that the Commission even softened the language of the Democracy Shield itself – its flagship initiative to shield the EU from foreign interference – to appease the US government. This issue is exacerbated by the alignment between the US government and tech companies. Some of the measures suggested in the Democracy Shield under the DSA rely on the cooperation and voluntary engagement of tech companies – something they appear less and less inclined to do. Given the current trajectory of the Trump administration, it is likely that the Commission will continue to face headwinds in the future on decisions concerning US tech companies. EU countries should put pressure on the Commission to act here, as political leaders have in the past on the enforcement of the DSA.

The Democracy Shield can only complement the use of existing tools

"We urgently need the Democracy Shield", Ursula von der Leyen said in her State of the Union speech in September 2025. There is a clear mismatch between the high expectations for the Democracy Shield and the small-scale solutions it offers. The proposed action points, to be gradually rolled out by 2027, can augment the EU's existing tools. They cannot fundamentally change the state of democracy in the EU.

The Democracy Shield should be seen complementary to the use of other instruments for protecting European democracy. The Commission should prioritise the effective and timely enforcement of relevant legislation such as the DSA, regardless of external pressure. It should also apply democratic values consistently across its broader legislative agenda. Just days after it presented the Democracy Shield, the Commission proposed a new Digital Omnibus Regulation that risks sacrificing fundamental rights in the digital space to further foreign commercial interests. This would run counter to the goals of the Democracy Shield. Similarly, EU countries committed to democratic values should uphold them consistently. They should prioritise funding in this area in the MFF negotiations, refrain from undermining democratic values in the name of simplification, and they should hold the Commission accountable for enforcement action.

As the Commission notes in the Shield, "democracy is a daily commitment". Protecting European democracy requires consistent commitment to democratic values both at EU and at national level – not just the creation of additional strategies.

The European Democracy Shield: Overview of action points grouped by type of action

Reinforcing situational awareness and support response capacity to safeguard the integrity of the information space	Strengthening democratic institutions, free and fair elections and free and independent media	Boosting societal resilience and citizens' engagement
New information-sharing or coordination structures		
Set up a European Centre for Democratic Resilience and Stakeholder Platform		
Set up a European Network of Fact-Checkers, including an independent repository for fact-checking and protection scheme for fact-checkers	Support the setting up of a voluntary EU network of influencers	Establish a new independent expert network for media literacy
Support setting up a common research support framework to strengthen monitoring of information manipulation and disinformation campaigns		Set up a European civic tech hub to support the civic tech sector
		Assess options for the set-up of a European Centre of Expertise on Research Security
Strengthen coordination		
Leverage international partnerships for collective responses against FIMI, including through the G7 Rapid Response Mechanism, EU-NATO cooperation and Security and Defence Partnerships	Support reinforced cooperation with Member States under the European Cooperation Network on Elections (ECNE) to enhance electoral integrity and preparedness • prepare a repository of common references and standards for electoral processes • promote the use of the joint mechanism for electoral resilience • encourage peer-to-peer exchanges, mutual voluntary assistance, common training and tabletop exercises • promote short-term exchanges of national experts among Member State • Organise dedicated meeting with EU candidate countries and potential candidates	
	Reinforce cooperation with international election observers to strengthen capacities to monitor disinformation on social media during election observation outside the EU	
Expand existing mandates		
Extend the mandate of the European Digital Media Observatory to develop new independent monitoring and analytical capabilities to support situational awareness in particular around elections or in situations of crises		Explore possibilities to open its Citizens Engagement Platform or to enable its interoperability with national, regional and local public administrations
In the planned revision of the Europol and Eurojust mandates, explore ways to further enhance efforts to reinforce EU cooperation on certain forms of FIMI and disinformation activities covered by the EU criminal law acquis		
New guidance		
Support the preparation of an EU Blueprint for countering FIMI and disinformation	Prepare guidance on the use of AI in electoral processes. Based on the guidance, encourage voluntary commitments on the responsible use of new technologies (notably AI) in political activities by European and national political parties	Develop the 2026 Basic Skills Support Scheme for Schools, including citizenship and digital skills

Development by the European Board for Media Services, in consultation with the Commission, of a list of common criteria for EU media regulators when they act against rogue non-EU media operators presenting risks to public security	Update of the Digital Services Act Elections Toolkit	Update the Guidelines for teachers and educators on disinformation and digital literacy
	Prepare a Commission Recommendation and a dedicated guide of best practices on the safety of political candidates and elected representatives, and support capacity-building, practical support, collection of data and voluntary commitments (e.g. pledges and codes of conduct) and ethical standards in this field	Develop an EU citizenship competence framework along with guidelines to strengthen citizenship education in schools
	Provide guidance to maintain competition and foster media plurality and diversity in the context of the revision of the Merger Guidelines	Prepare an EU democracy guide for citizens, emphasis on young people
	Update the Commission Recommendation on the safety of journalists	Adopt a Commission Recommendation on supporting scientific evidence and its use in public policy-making
	Reinforce measures on the safety of journalists and combating abusive litigation (SLAPP)	Enshrine the freedom of scientific research in EU law under the European Research Area Act
	Adopt guidelines to support the implementation of relevant EU rules (Such as the DSA, the Regulation on political advertising or the AI Act) to promote safe harbours for journalists, researchers and civil society organisations active in analysing the information environment and its evolutions (e.g. the impact of AI)	
Strengthen existing legislation		
In the framework of the Digital Services Act • Prepare a DSA incidents and crisis protocol • Continue its engagement with signatories of the Code of Conduct on Disinformation to strengthen measures to tackle manipulative techniques online » Strengthen efforts on recommender systems transparency; demonetise disinformation » explore further: labelling of AI-generated and manipulated content; voluntary user verification tools	Support Member States in the application of the EMFA, including through guidelines, and ensure its enforcement. Maintain an active dialogue with relevant industry players and civil society organisations to ensure that the safeguards and mechanisms provided by the EMFA are effectively applied across the EU	
	Review the Audiovisual Media Services Directive • Assess ways to strengthen the prominence of media services of general interest • Modernise advertising rules with a view to foster the sustainability of EU media • Consider the role of influences; also in the forthcoming Digital Fairness Act	
	Under the Digital Markets Act: Include amongst the Commission's priorities enforcement actions that promote an independent and diverse media landscape, including by increasing transparency of online advertising	

	Assess the fitness of existing State aid rules for public services broadcasting in the evaluation of the 2009 Broadcasting Communication	
Capacity building and support		
Provide targeted capacity building and support to EU candidate countries and potential candidates to reinforce resilience to FIMI and hybrid interferences, including through CSDP missions	Support common work with the Member States on the transparency and integrity of funding in politics, e.g. on anonymous donations and cryptocurrency, to exchange best practices, prepare possible guidelines and foster joint actions	Support Member States in developing, extending or implementing national or regional action plans on media literacy
	Ramp up support provided to local media through Creative Europe by fostering projects focusing on the viability of independent and local journalism; add a new action on upskilling news media professionals to the existing calls for proposals on skills in 2027	Promote citizens' and youth participation, including by reinforcing a network of national authorities on citizens participation, with a training package and a multilingual portal for resources at EU level
	Support quality independent media and journalism beyond EU borders	Support building voluntary commitments of the private sector to build a business coalition for democracy
		Roll out measures on media literacy, with new priorities and a reinforced media literacy community
New funding opportunities		
	Launch a Media Resilience Programme to support independent journalism and media literacy	
	Add a new action under Horizon Europe to further support the digital transformation of the media industry by, inter alia, designing new innovative tools for media to reach new users and revenue sources	
	Promote impact investments in the news media sector and start engaging with potential investors alongside the EIB Group	
Strengthen communication		
Deploy proactive strategic communication campaigns in priority regions		Roll out dedicated awareness-raising campaigns by the Commission
Events		
	Organise a high-level event on combatting SLAPPs to support the review of the anti-SLAPP Recommendation	Organise a European Citizens' Panel on democratic resilience
		Organise Youth Policy Dialogues between Commissioners and young people on the implementation of the European Democracy Shield. Adapt the EU Youth Dialogue Participation Toolkit, created with national youth councils to reach more young people and promote via the European Youth Portal to boost youth engagement more broadly
		Organise a High-Level Event on democracy and an annual award for democratic innovation

Table includes action points listed and mentioned in the Democracy Shield.
Source: European Commission, 2025. Own illustration

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