

**REPUBLIC OF TÜRKİYE
ANKARA UNIVERSITY
INSTITUTE OF SOCIAL SCIENCES
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**DISINFORMATION IN THE POST-TRUTH ERA: A COMPARATIVE ANALYSIS
OF THE EUROPEAN UNION, TÜRKİYE, AND BRAZIL'S INSTRUMENTS AND
PRACTICES FOR COMBATING ONLINE DISINFORMATION**

Master's Thesis

İrem ŞARDAŞLAR

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**TÜRKİYE CUMHURİYETİ
ANKARA ÜNİVERSİTESİ
SOSYAL BİLİMLER ENSTİTÜSÜ
LATİN AMERİKA ÇALIŞMLARI ANABİLİM DALI**

**HAKİKAT SONRASI ÇAĞDA DEZENFORMASYON: AVRUPA BİRLİĞİ,
TÜRKİYE VE BREZİLYA'NIN ÇEVİRİM İÇİ DEZENFORMASYONLA
MÜCADELEYE YÖNELİK ARAÇ VE PRATİKLERİNİN KARŞILAŞTIRMALI
ANALİZİ**

Yüksek Lisans Tezi

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**Tez Danışmanı
Prof. Dr. Besime Pınar ÖZDEMİR**

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ABBVERATIONS

CIEDDE	: The Integrated Center for Confronting Disinformation and Defending Democracy (Centro Integrado de Enfrentamento à Desinformação e Defesa da Democracia)
DSA	: Digital Services Act
EU	: European Union
FGV	: Fundação Getulio Vargas
OAS	: The Organization of American States
SECOM	: The Secretariat of Social Communication (Secretaria de Comunicação Social)
TSE	: The Superior Electoral Court (Tribunal Superior Eleitoral)
UN	: United Nations

INTRODUCTION

The convergence in information and communication technologies has created a new social, cultural and economic system in which information has gained a new value by taking the form of a commodity, and the production, consumption and circulation habits of information have changed rapidly. The communication system that reveals the characteristics of this new social structure includes the function of circulating high-dimensional data or information quickly, interactively and easily over networks through online communication technologies. This has made information more accessible in today's world where information industries are on the rise. Thus, a serious information explosion has occurred in the communication environment of the new social structure. So much so that information, which is the basic requirement of the information society, has become a dominant mechanism that affects, dulls and easily evolves into disinformation by limitless communication, rather than being a liberating tool (Önen, 2023).

With the rise of the internet and social networks, the existing information ecosystem has become increasingly complex. The inherent characteristics of social networks, such as interaction, speed, massification and sharing, have led to the intensive use of these tools and the rapid production and dissemination of information. This has also led to the occurrence and increase of information pollution. Disinformation, as a type of information pollution or disorder, is a reality that has existed in every period of human history. However, the intensive use of online media tools has brought this phenomenon back to the agenda. The fact that politicians have resorted to disinformation, especially in the US 2016 elections, has made the dangers of disinformation, which is considered false or misleading information, visible, especially in the political arena and in other areas (Onuk, 2022).

Communication tools, both traditional and new media tools, have been effective in spreading the post-truth phenomenon. This effect goes beyond observing and copying deceptive behaviors in traditional media tools, while in new media tools it is effective in producing and spreading these behaviors. Although the disappearance of truth or deception has been a situation that has been going on for thousands of years, modern communication technologies have brought this situation to greater levels and effects.

In the early 21st century, the widespread use of high-speed internet and new media has radically changed the way people interact by replacing passive media consumption with user-generated content. As a result of global developments, the importance of information and communication has increased and new developments have occurred in the field of communication. Digitalization is the most important global development in the last two decades that has greatly affected the communication process. Due to digitalization, the communication activities of individuals and society have shifted to technological platforms. Digital technologies and new media, especially the Internet, have revolutionized the distribution of information and communication. Digital platforms significantly affect the flow of information and often promote certain viewpoints that align with certain political agendas.

Low barriers to entry and ease of use have made social media the most widely used tool for news and content consumption. However, this ease of access has also created a breeding ground for misinformation. A large amount of misinformation, often referred to as “fake news,” is produced and spread online for various purposes, such as financial gain or political influence (Shu, Wang, Lee, & Liu, 2020: 2). The quality of information, especially its accuracy, is very important. Exposure to false and misleading information can easily

lead to the formation of false beliefs, potentially resulting in significant emotional, physical, and financial consequences (Fallis, 2015: 1).

Political developments (such as the 2016 US Presidential Election results) have led to global debates about the dangers of disinformation. These debates have taken on a new dimension with the emergence of the coronavirus pandemic that has spread rapidly around the world in 2019. These debates have also extended to legal issues, sparking ongoing debates about whether current regulations adequately address the risk of online disinformation and, if new regulations are necessary, what form they should take.

The European Union stands out as the organization that creates leading policies in combating disinformation. The EU's implementation policies aimed at preventing disinformation have been changing periodically and containing more deterrent rules since 2015. The EU has developed certain policies because disinformation causes harm in terms of eroding trust in institutions and media in social life, jeopardizing elections, preventing citizens' ability to make informed decisions and harming freedom of expression. Disinformation has been described as a growing threat to European democracies. For this reason, the EU has developed its policies to combat disinformation in 2018 within the framework of the implementation rules such as "reviewing advertising placements", "transparency of political and issue-oriented advertisements", "integrity of services", "empowering consumers", "cooperation during elections" and "measuring the effectiveness of the code".

The EU's rules and policies to combat disinformation have paved the way for laws and practices planned to be implemented in other countries. For this reason, the scope and effectiveness of the EU's policies to prevent disinformation have attracted attention.

Because EU policies to combat disinformation have been revised in historical periods according to the requirements of the age and new measures have been developed.

Disinformation is considered a worrying issue for the future of individuals and societies. In this research, the aim is to reveal the disinformation combat policies and mechanisms implemented or planned to be implemented in Türkiye and Brazil, and the differences and similarities of the disinformation laws implemented in these countries, by taking the EU's disinformation combat rules as a reference. In this research, the results of which are considered to be important in terms of developing policies and ensuring the functionality of mechanisms to prevent and combat disinformation, document analysis, a qualitative research method, was used.

This study, which examines the legal application rules and institutions of Türkiye and Brazil in the fight against online disinformation, consists of three parts. The first and second parts of the study constitute the theoretical basis of the research. The third part constitutes the application part. In the first part of the study, the relationship between truth and reality, the concept of post-truth, post-truth and reality, abandonment of truth in the post-truth period and the relationship between deception and post-truth period and politics are discussed.

In the second part of the study, the information age and its characteristics, the cornerstones of the information age: data, information and knowledge, the theory and types of information distortion, the role of fake news in the process leading to disinformation, conscious information distortion in the information age: disinformation and its types, new media and online disinformation, the relationship between disinformation and politics, the

development process of disinformation policies in the European Union, the legal framework of the EU regarding the fight against disinformation are discussed.

The final section of the study focuses on the practical application of the research, structured under comprehensive headings that address key aspects such as the research problem, purpose, importance, scope, and limitations. It includes an in-depth examination of the sample and research questions, as well as analyses of Türkiye's efforts to combat disinformation and the criticisms of Brazil's regulatory approaches, including objections to its "Fake News Bill." This section integrates theoretical and empirical perspectives, offering a critical evaluation of the measures' effectiveness and the broader implications for democratic governance and information integrity.

CHAPTER ONE

BEYOND HONESTY: POST-TRUTH ERA

1.1. On the Relationship Between Reality and Truth

The concepts of “reality” and “truth” have been central to some of the most profound philosophical debates throughout history and their distinctions remain elusive. While “truth” and “reality” are often used interchangeably to denote the notions of what is factual, real or correct, there are both philosophical and linguistic nuances that differentiate these terms. The longstanding tendency to treat “truth” and “reality” as synonymous highlights the challenges inherent in distinguishing between them (İsi, 2015: 181).

According to the Turkish Language Association Dictionary, the concept of "real" is defined in the noun group as real, truth, something that is not a lie, something that is right; serious, truth; as an adjective, existing as a situation, an object or a quality, the existence of which cannot be denied, being in the state of fact, being pure, genuine, real, not a lie, bearing qualities that are in accordance with the original, genuine, basic, main, as in nature, reflecting nature as it is, not artificial; and in the adjective philosophy group as "existing as opposed to things that are thought, designed, imagined". The concept of reality is included as "all of the things that are real, that exist; real, original, truth, genuineness, authenticity, sagacity, reality, realness". The concept of "truth", a word of Arabic origin, is defined as "real" or "reality" in the noun group and "really" in the adjective group (TDK, 2024).

The concepts of "Reality" and "Truth" can be seen as words used interchangeably. However, it is emphasized that these two concepts have certain differences. According to Hancerlioğlu, "Reality is what exists concretely and objectively. Truth is the reflection of

reality in consciousness. The expression "Hakiki" expresses what is real and what is related to reality." (Hancerlioğlu, 1997: 215). Accordingly, reality is considered as the product of existing objective realities, and truth is considered as the reflection of reality in consciousness (İsi, 2015: 183).

The concepts of truth and reality are distinct both philosophically and linguistically, yet they are often used interchangeably in everyday language. In English, the term "truth" is commonly associated with "*hakikat*", whereas "reality" is typically translated as "*gerçeklik*." Consequently, the Turkish renditions of the term "post-truth", such as "*hakikat sonrası*", suggest a period in which truth or reality no longer holds. From a philosophical standpoint, the concept of reality refers to what exists objectively and independently, while truth, though often aligned with objective reality, also encompasses a deeper, more subjective dimension that is shaped by individual perception, experience and values. Truth thus represents a personal, subjective reality. The concept of post-truth challenges the conventional distinctions in between reality and truth, offering a fresh perspective on these concepts. While reality typically relies on objective, verifiable facts, the post-truth era reflects a shift where knowledge is increasingly influenced by emotional and personal beliefs. In this context, the factual reality of an event or situation becomes secondary, with emotional and subjective perceptions taking precedence (Avşar, 2024: 19).

The definitions of the concepts of reality and truth vary among countries, languages, cultures and social units. This is shaped by the country's or society's religious beliefs, social history, cultural structure and the meanings it gives to expressions in life. At the same time, since language is a living entity, the meanings of concepts can shift or change over time. For example, in English, the term "truth" connotes both reliability and factual certainty. In

German, "wahr" relates to factual accuracy, while "treu" connotes loyalty-based certainty. In Arabic, the term "haqq" connotes not only truth or reality, but also duty and obligation. In a manner similar to "wahr" in German, the Middle English term "trouthe" signified loyalty, devotion, and reliability. This term connoted a strong bond, potentially extending to the institution of marriage, as exemplified in the phrase "I plight thee my troth." The "true" person was one who maintained their promises and demonstrated reliability. Over time, the concept of truthfulness evolved to encompass both the veracity of one's words and the individual's integrity. Consequently, "truth" gradually became synonymous with righteousness (Lujic, 2014: 247).

Debates surrounding the meanings, boundaries, distinctions, and similarities of the concepts of reality and truth have persisted throughout human history. Historically, understanding the relationship between reality and truth as a reflective one has formed the foundation of traditional knowledge definitions. In this view, truth is seen as a mirror image of reality. Following the scientific revolution, scientific knowledge was regarded as the ultimate and sole truth within this framework. However, philosophical history also reveals significant skepticism toward the idea of a singular, objective truth. This skepticism challenges the notion that truth is merely a reflection of reality, instead asserting that truth is a social construct shaped by particular communities or traditions. As such, truth becomes relative, varying across different cultural or intellectual contexts. Under this perspective, science itself is viewed as one such tradition, with scientific knowledge being relative to the practices and conventions of the scientific community. Consequently, this position questions the once-privileged status of science as the definitive arbiter of truth (Anlı, 2011: 53).

The concepts of reality and truth have different meanings in science, politics, religion and philosophy. Everything that occupies space and time, independent of thought, is real. Reality is the existence of something without being dependent on the human mind. The notion of truth is defined as the reflection of reality in consciousness. In today's scientific age, there are phenomena that have an impact on the concepts of truth and reality. The most striking of these is the media phenomenon. Media, especially the new media tools called online or interactive media today, are the phenomena that feed the relationship and difference between these two concepts. Especially the intensive use of online media tools by all age groups has affected this situation more. The post-truth concept, which has existed in human history, has also become more visible. For this reason, the post-truth concept has become a topic of curiosity and the new area for interest of the researchers.

1.2. The Concept of Post-Truth and Its Development Process

The notion of post-truth has become widely prevalent in contemporary discourse. Initially, however, it was used in more specific contexts, particularly within politics and journalism. In politics, post-truth is understood as the presentation of a manipulated version of truth to appeal to the emotions and interests of a particular group, often involving "deliberate falsehoods" or "the distortion of facts for strategic purposes." In journalism, the term refers to information disseminated to the public without sufficient scrutiny or verification, news formats designed to maximize readership or followers, and the selective use of sources to serve particular agendas. Despite these applications in politics and journalism, the concept of post-truth is neither limited nor simplistic enough to be confined solely to these two domains (Selim, 2023: 505).

In order to understand the notion of post-truth, which is formed by the combination of the expressions "Post" and "Truth", it is necessary to look at the evaluations of both concepts. The Latin-origin word "post" is a prefix meaning "after". The prefix "post" can come before a situation or trend, and define that situation. Regardless of the situation, the prefix "post" generally qualifies a new and different formation and trend, but it carries the traces of the previous situation, trend or approach (Avşar, 2024: 4). Derived from the English word "true", meaning correct and real, truth means "being in harmony with a fact and reality" (Özçelik, 2022: 28-29).

The term post-truth was first used by Serbian-American author Steve Tesich in his article "Government of Lies (1992)" in The Nation magazine. The article provides convincing evidence regarding the pessimism that is widespread in American society and stems from successive government scandals, and the strategies used to counter this pessimism. In addition, the study notes that the Watergate scandal, which involved President Nixon and his administration following the turmoil created by the Vietnam War, led to a deep crisis of trust in society (Tesich, 1992:12). The text in which the concept of post-truth is first used is as follows:

"...All the dictators up to now have had to work hard at suppressing the truth. We, by our actions, are saying that this is no longer necessary, that we have acquired a spiritual mechanism that can denude truth of any significance. In a very fundamental way we, as a free people, have freely decided that we want to live in some post-truth world"
(Tesich, 1992:12).

In his book "The Post-Truth Era: Dishonesty and Deception in Contemporary Life," published in 2004, Ralph Keyes (2004) deals with the sociological determinations of the concept and shows how beliefs and motivations can change based on psychological foundations. Similar to Tesich, he talks about how the leaders of our age have accustomed society to lies. Keyes argues that the mechanism behind why lying politicians and many celebrities whose lies are exposed continue to be embraced by significant segments of society is related to the post-truth dynamics we live in (Keyes, 2021: 89-93). According to this, the most important reason for the birth of the post-truth phenomenon is that lying has become easier.

In 2005, a talk show host, Stephen Colbert, introduced the concept of "truthiness." According to him, truthiness is *"the quality of being truthful or appearing truthful, attributed to something not due to supporting facts or evidence, but because of a sense that it is correct or a wish for it to be true."* This word was chosen as the word of the year by Merriam-Webster dictionary in 2006 (Merriam-Webster, 2024).

In this regard, the concept of post-truth can also be expressed as a perception management system that is estranged from reality, which fakes the facts or directs life by glorifying these false realities. The concept came to the fore again in 2016 with the US elections and the Brexit Referendum and was chosen as the "International Word of the Year" by Oxford. According to Oxford Dictionary, "post-truth" means *"relating to circumstances in which people respond more to feelings and beliefs than to facts"* (Oxford, 2024).

Block divided the concept of post-truth into six different categories: "social construction of facts, conspiracy theories, lies, misleading statements, deceptive

misrepresentations, and ignorance." (Block, 2019: 70; quoted by; Çetin, 2023). These analyses provide a more nuanced understanding of the concept of "post-truth." These are:

- **Social Construction of Facts:** A perspective that focuses on how information is perceived and shaped by society.
- **Lies:** The overt and deliberate dissemination of false information.
- **Conspiracy Theories:** The tendency to associate information with complex conspiracies that are often untrue.
- **Deceptive Misrepresentations:** White lies that distort the truth by presenting information only from a certain perspective.
- **Misleading Statements:** The tendency to misrepresent information in a way that is misleading, despite being based on facts.
- **Ignorance:** The lack of information that results directly from a lack of information or misunderstanding.

Conspiracy theories emerge from society's attempt to make sense of complex events, yet they often conflict with objective reality. The social construction of facts highlights how information is shaped by prevailing social norms and values, leading to varying interpretations across different groups. Lies involve the intentional spread of false information, often for political or ideological ends. Misleading statements, although grounded in factual information, can create distorted perceptions by manipulating or selectively presenting data. Similarly, deceptive representations, despite being fact-based, can skew the truth by offering a narrow perspective, influencing public perception in the process. Ignorance plays a crucial role in post-truth environments, as a lack of knowledge or misunderstanding makes individuals more susceptible to accepting false or misleading

claims. These categorizations form a foundation for understanding and critiquing the post-truth phenomenon, offering a framework for assessing deviations from reality in both social communication and political discourse (Avşar, 2024: 7).

In addition to studies on the conceptual framework of post-truth, there have been studies on what influences it and how it is characterized. In fact, James Ball argues That the post-truth era is defined by "nonsense" rather than outright lies, and attributes this phenomenon to the new internet economy, which increasingly puts pressure on traditional media. According to Ball, the dominant force in today's media environment is "nonsense." As people increasingly access news online, the circulation and ratings of traditional media are decreasing. In contrast, websites that spread lies and fake news increase their advertising revenues with higher click-through rates. In this media environment, established organizations resort to similar tactics to simultaneously generate revenue while combating fake news and falsehoods (Ball, 2017: 9-14).

The distinction between lies and bullshit, as highlighted by Ball, is based on Harry G. Frankfurt's 2005 book, "On Bullshit." According to Frankfurt, telling a lie requires a precise understanding of the truth, as the lie must be constructed with reference to it. For the liar, the truth is significant. In contrast, for the braggart, the truth is irrelevant. The braggart can manipulate and distort any information to serve their interests, even altering the context as they see fit, and can mix truth and lies in any proportion within their narrative. Thus, a braggart is fundamentally unconcerned with the truth (Frankfurt, 2005: 52).

On the other hand, Lee McIntyre endeavored to elucidate the dynamics of post-truth within a philosophical framework. He elucidates post-truth by linking it to the phenomenon

where individuals, rather than conforming their beliefs to truth, opt to manipulate truth to align with their own perspectives, thus fostering a global trend. These endeavors do not necessarily imply that facts are inconsequential. Rather, the issue at hand is the recognition that truth is subject to interpretation, that certain interpretations may be privileged within specific political contexts, and that within such contexts, facts may be disregarded, manipulated, and presented selectively. What sets apart the post-truth era from ignorance, deception, cynicism, apathy, political maneuvers, and illusions prevalent in other periods is not the rejection of the concept of apprehending reality, but rather the denial of the existence of an objective truth itself. According to McIntyre, the repercussions of this situation, affecting a significant portion of society and its leaders, are grave enough to pose a serious threat to our world (McIntyre, 2019: 27-31).

In general terms, the discovery of the concept of “post-truth” can be analyzed from five main perspectives. First, it involves tracing the origins of the concept. Second, attention is drawn to the political and social landscape that feeds phenomena such as the rise of far-right ideologies, populism, hate speech, and social polarization; exemplified by things such as Brexit and the election of Donald Trump as US President in 2016. Third, the interaction between post-truth and the traditional concept of truth is examined. Fourth, there is an ongoing debate about the role of postmodernism as the philosophical precursor of the concept. Finally, a fundamental issue to be considered is the role of propaganda and mass media in obstructing truth, and they can potentially serve as precursors of the contemporary concept of post-truth. Efforts to define the concept generally revolve around these five definitions and emphasize one or more of these aspects (Altun, 2022).

Four synergistic areas where the concept of post-truth is found are underlined. These areas are expressed as “Technology and Attention Economy, Journalism, Promotional Culture and Professional Political Communication” (Harris, 2018; Yazıcı, 2021: 239).

1.3. The Relationship Between Post-Truth and Reality

In 2016, the Oxford Dictionary selected "post-truth" as its word of the year, reflecting the unprecedented and surprising events that defined the year. In fact, the political and social landscape after 2016 is considered a period dominated by post-truth consciousness, where objectivity and rationality are at the highest level, and the desire to follow beliefs rather than emotions or facts prevails (Alpay, 2017). Thus, it can be argued that the 2016 US elections witnessed the rise of post-truth.

Since events such as the election of Trump in the 2016 US election and the Brexit vote, known as the United Kingdom’s vote on EU membership, Western discourse has been dominated by concerns about a perceived “crisis” of reality. Many academics and public figures argue that society is drifting away from reality, which they attribute to postmodernism and the rise of a “post-truth” culture. Prominent voices such as Neil de Grasse Tyson and Richard J. Evans emphasize the erosion of factual integrity and the rise of misinformation (Overell & Nicholls, 2019: 5). The fake news caused by these events, the accusations about leaders and events shaping the public opinion, have brought the concept of "fake" to the agenda of the discussions.

The fact that the boundary between truth and lies has become unclear or has disappeared completely is considered the most important problem of the post-truth era. In this context, the decision to tell the truth or lie has become a matter of personal choice,

driven entirely by personal interests. As a result, ethical and moral considerations have lost their importance or value. The post-truth era has ushered in a time when lying has become extremely common and habitual.

Debates over the discourse of falsehood often frame truth as a moral issue, where truth discourse is seen as virtuous and compromised in contemporary society. The debate reflects a broader concern that reality, truth, and authenticity are in crisis and shaping contemporary political and social debates.

The most significant issue in the post-truth era is the blurring, or perhaps the complete erasure, of the boundary between the truth and falsehood. In this context, the decision to tell the truth or to lie has become a matter of personal choice driven entirely by self-interest. Consequently, ethical and moral considerations have diminished in importance or lost their value. The post-truth era has ushered in a time when lying has become exceedingly common and habitual.

In describing the characteristics of the post-truth era, McIntyre (2018:1) references George Orwell's quote, "Telling the truth at a time when lying is universal is a revolutionary act." McIntyre (2019) argues that the concept of post-truth and the discussions about the impossibility of accessing objective reality and correct information have made their presence felt in the academic field. Especially with social media tools, the manipulation of reality has fallen into the hands of right-wing politicians and policies are now formed according to emotions.

In this context, the post-truth period is characterized as an era which the foundations of democracy are eroded and the art of lying is on the rise (d'Ancona, 2017). Trump's victory, Brexit and discourses rejecting climate change science are seen as events that

characterize the post-truth era. In this process, social media has been used for the manipulation of metadata and polarization, and emotions have taken precedence over truth. People have come to value the emotional intentions of politicians' hearts over objective truths, leading leaders to appeal more to the emotions of their followers.

According to Sismondo, the turning point of the post-truth era was the steady flow of fake news and the proliferation of conspiracy theories that began during the US elections (2017: 3). Trump's election campaigns are cited as one of the defining examples of this era. In this era, information production is evaluated based on who said it and what kind of emotional impact it has, rather than its veracity. Moreover, the existence of fact-checking platforms on social media is considered as one of the solutions proposed to combat post-truth.

Postmodernism's criticisms of classical understandings of reason and reality are also associated with the post-truth era. While postmodern thought offers a perspective that is skeptical of the concepts of universal progress and singular reality, the post-truth era refers to a period in which emotions and subjective experiences take precedence over reality. With this transition, individuals no longer seek objective truths, but rather emotionally satisfying realities.

At the core of this crisis is the role of the media, which both mediates and shapes public perceptions of truth and falsehood. Figures like Donald Trump, with his public persona rooted in both reality TV and accusations of fakery, exemplify this dynamic. The media, along with social media platforms, plays a critical role in shaping ideological battles over what constitutes reality, reinforcing the perception of a crisis in truth. Ultimately, the

current fervor over the "real" highlights the need for deeper analysis of how truth is mediated and contested in the face of hegemonic power.

1.4. Abandonment of Truth in the Post-Truth Era and Deception

Deception and deceivers have been a constant throughout history. Deception has been a fundamental aspect of political behavior since the formation of early human tribes. Anthropological studies emphasize the importance of lying in primitive societies, especially in interactions with outsiders. In the past, however, lies were often expressed with feelings of anxiety, fear, and shame. In contemporary times, we increasingly rationalize concealing the truth, which allows us to avoid guilt and moral distress. When our behavior conflicts with our values, we often reevaluate those values. Few people are willing to perceive themselves as unethical, and even fewer are willing to admit it to others. As a result, we develop alternative understandings of morality. The term "lie" conveys a strong moral condemnation, so we develop mechanisms to avoid the label. Thus, we no longer "lie"; instead, we "exaggerate," "make false judgments," and "make mistakes in our speech." In the post-truth era, a third category has emerged alongside truth and falsehood, consisting of vague statements that do not fully convey truth and falsehood, but cannot be classified as lies. This phenomenon can be called "enriched truth." By concealing the truth in this way, we mitigate the seriousness of lying. Concealing the truth also emphasizes the ability to conceal the truth and demonstrates linguistic creativity. Terms such as "reframing," "factual knowledge," and "credibility gap" serve as examples of post-truth euphemisms, such as Winston Churchill's use of the phrase "terminological fallacy" in the House of Commons in 1906 (McCarthy, 2017: 1).

The increase in deception is more closely related to the disintegration of communities than to a decline in ethical standards. In a post-truth context, the weakening of interpersonal connections both causes and results from this phenomenon. A lack of connection to others facilitates dishonesty, as corrupt communities foster deceit. The distortion of truth is less condemned and more tolerated. As Francis Bacon argued, falsehoods can lead to corruption and moral decay (Bacon, 1982) Montaigne concludes that the habit of lying diminishes a person's integrity and degrades their character, making honesty an essential virtue for a good and harmonious life (Montaigne, 1580).

Immorality has always been present, and falsehoods will persist as long as individuals believe they can get away with the consequences of their deceit. An important question to consider is: under what circumstances do individuals face no repercussions for their lies? Conditions that tolerate lying are becoming more prevalent, while those that promote honesty are diminishing. The increase in dishonesty can be attributed to the insufficient repercussions for lying within the framework of contemporary society. (Keyes, 2017: 28).

When we look at the historical roots of the ongoing debates on truth and deception/lie, we come across the works and thoughts of famous philosophers. For example, the term "noble lie" is a concept first introduced by Plato in his work "The Republic". It refers to a myth or lie/deception deliberately spread by the ruling class, designed to maintain social harmony and promote civic virtue among the people. Plato's idea suggests that such a falsehood can be useful if it helps to unify society, instill moral values and ensure stability. The noble lie is presented as a fiction essential for preserving social order and safeguarding the welfare of society. Similarly, in Chapter XVIII of "The

Prince", Niccolò Machiavelli discusses the importance of rulers being able to use deception and cunning to maintain power and achieve their political goals. He argues that a prince often has to be "a great fraud and hypocrite" to succeed in the complex and often morally ambiguous world of politics. Machiavelli argues that it is ideal for a ruler to be virtuous, but that the harsh realities of political life require the ability to adapt, manipulate appearances, and act unethically when necessary. Machiavelli writes that a successful ruler in particular must know how to be both a lion and a fox, for the fox represents the ability to detect pre-set traps and deceit, while the lion represents power and intimidation. Machiavelli argues that a prince must not only rely on his strength, but also be cunning and deceptive when circumstances warrant it.

It is possible to see examples of this issue in more recent history. In fact, in a speech broadcast on national television in the mid-1980s, US President Ronald Reagan accepted the critical findings of the Tower investigation board regarding the Iran-Contra affair and admitted that he had exchanged American weapons for American hostages. Reagan had previously denied such exchanges, but he acknowledged evidence contradicting his statements, saying, " My emotions and best intentions continue to suggest that it is true, yet the facts and evidence indicate that it is not." Although he did not apologize, Reagan took full responsibility for the initiative, which he said contradicted his policy of not negotiating with terrorists. He argued that the program initially began as a calculated move to establish a relationship with Iran, but eventually evolved into a transaction in which weapons were exchanged in exchange for the release of hostages (Cannon, 1987).

During the Enlightenment period, trust in reason became established, allowing the individual to occupy a central role as a natural process. Authority over knowledge of truth

and reality transitioned from the church to the liberated individual mind. This liberated mind, adopting an instrumental approach, would employ its superiority against the dogmas of tradition and the church, engaging in questioning and experimentation, valuing only scientific knowledge, and perceiving the world through laws derived from reason.

However, as this period progressed, the intellectual dominance of the subject over the object changed and led to the emergence of the dominance of the object over the subject. As a result, individuals began to struggle to survive in a social order where values were devalued, meaning was dispersed, and inequality reigned. Friedrich Nietzsche, who gave great importance to the concepts of truth and illusion in his philosophy of this period, stated that truth began to be abandoned by saying, "We have eliminated the visible along with the real world" (Nietzsche, 1954).

Theodor Adorno, who brings a perspective to the concept of truth through the social situation, problematizes the concept of truth in a social context dominated by escape to virtual worlds. He argues that the cultural apparatus, which includes media and institutions, pre-shapes and disseminates knowledge, blurring the lines between objective truth and constructed illusion. As a result, the search for truth is intertwined with the effect of cultural mediation, making the distinction between them a complex and potentially misleading endeavor (Adorno, 2007: 113). It can be said that Adorno evaluates the concept of truth, which he reads through culture, within the framework of the reconstruction of the media.

Jean Baudrillard, who looks at the concept of pure reality in a context where humanity is distant due to its era and its characteristics, argues that absolute and established truths such as rational order are unattainable in today's universe where everything is copied.

He sees the violation of the principle of reality as a significant violation in this era. The simulation universe, which is at the center of Baudrillard's thought system, corresponds to the universe of virtual realities and creates a serious crisis of representation that makes it impossible to represent reality in such a context. As a result, Baudrillard argues that no system of thought or ideology can be trusted and attributes the abandonment of the concept of reality to these reasons. He argues that it is now impossible to control reality and that this makes it a rare and enigmatic phenomenon. At this point, Baudrillard rejects the modern concept of universal and absolute reality and instead advocates a relative, plural and special understanding of reality.

In his best-known work, *Simulacra and Simulation* (1981), the thinker emphasizes the following: "We live in a world of more information and less meaning... Despite efforts to reinject messages and content, meaning is lost and consumed faster than it can be reinjected... Socialization is measured everywhere by exposure to media messages. Anyone who is not sufficiently exposed to the media is either unsocial or almost antisocial... Where we think that information produces meaning, the opposite happens" (Baudrillard, 1994: 79-80).

Matthew d'Ancona argues that it is vital that both producers and consumers of knowledge acknowledge that truth has become exceedingly elusive and that our perspectives as humans and communities have become so diverse that it is no longer useful to speak or pursue truth. 'Immeasurable values' is a term used by pluralists. In post-truth epistemology, we are encouraged to acknowledge the existence of 'immeasurable realities' and to recognize that intelligent behavior involves choosing a position rather than evaluating the evidence (d'Ancona, 2017: 98).

The erosion of trust, with all subsequent consequences flowing from this singular, pernicious source, establish the societal basis of the post-truth era. Successful societies depend fundamentally on relatively high levels of honesty to maintain order, support legal systems, and promote prosperity. As Francis Fukuyama argues in his book "Trust: The Social Virtues and the Creation of Prosperity", the social capital that emerges when citizens cooperate sincerely and ethically translates into economic success and reduces the costs associated with litigation, regulation, and contractual enforcement (Fukuyama, 1995). A society without trust eventually degenerates into a simple collection of isolated individuals, each imprisoned within their own fortifications (d'Ancona, 2017: 37).

Discussions on reality and deception have existed in every period of history and will continue to exist. However, in today's digital age, with individuals using media tools intensively and actively, discussions on how reality is lost more quickly or what kind of reality to talk about have become more visible. Because media, especially new media tools, are described as triggering the reconstruction of reality. According to some researchers, it is emphasized that reality is not possible in an age where opportunities such as storage, reproduction and dissemination are at a high level. Inferences that reality is lost with new media have become more debatable.

1.5. The Relationship Between Post-Truth and Politics

In politics, political discourse often revolves around manipulating emotions to persuade rather than engaging with audiences on an intellectual level. By evoking powerful emotions such as martyrdom, sanctity, fear, anger, hatred, and sadness, politicians create a distorted reality where perception trumps reality. Centered around concepts such as religion, nationalism, terror, economic crisis, and victimization, this emotional

manipulation distracts from real evidence and creates a public sphere based on myth rather than reality. As a result, the public's understanding of the world becomes disconnected from real events and circumstances.

In politics, the manipulation of public opinion is achieved through a combination of tactics such as disinformation, emotionally charged rhetoric, theatrical performances, incitement, and outright deception. By prioritizing emotional impact over factual truth, these strategies erode the public's ability to distinguish lies from lies. As a result, lies are easily accepted and critical thinking, ethical judgment, and moral compass are ignored. In the political arena, discourses that focus on reason and logic are less preferred than discourses that focus on emotion in order to shape public opinion.

Hannah Arendt, who explores the complex relationship between truth and the political sphere in her article "Truth and Politics," distinguishes between truth and rational truth. Arendt emphasizes that truths (truths based on verifiable events and truths based on formations) are particularly vulnerable to distortion and suppression by politicians. Arendt argues that power and truth are often in tension, with those in power frequently attempting to reshape or obscure facts to suit their agendas. Arendt discusses the crucial role of the public sphere in upholding truth, noting that a healthy democracy relies on the public's ability to debate and contest truths openly. She highlights the distinction between truth and opinion, warning against the relativization of truth in politics, where opinions can be mistaken for objective facts. This blurring of lines, she cautions, undermines the foundation of reality essential for informed political judgment and discourse (Arendt, 1967).

Arendt also addresses the moral responsibility of individuals and institutions to defend truth, stressing the importance of factual accuracy and intellectual integrity. She

warns of the dangers of devaluing truth, which may result in a diminished trust in institutions and societal fragmentation. Ultimately, Arendt's essay calls for a steadfast commitment to truth in the face of political pressures, underscoring its fundamental role in maintaining a just and stable society (Arendt, 1967).

The increasing use of social and new media platforms by states, politicians, and power centers has resulted in manipulation for political gain. A notable example is Cambridge Analytica, which, during the Brexit referendum and Donald Trump's election campaign, exploited Facebook data from 50 million users to influence voting behavior through algorithms targeting political and ideological preferences. Facebook's founder, Mark Zuckerberg, admitted the platform's role in his manipulation, acknowledging their mistakes. Algorithms on platforms like Facebook and YouTube personalize content, shaping users' perceptions by consistently showing material aligned with their preferences. This phenomenon leads to "filter bubbles," where users are isolated from dissenting opinions, and "echo chambers," where they repeatedly engage with like-minded individuals. These mechanisms played a significant role in both the Brexit and Trump campaigns (Şimşek & Yalı, 2019). While this algorithm-driven content increases profits for social media companies by keeping users engaged, it exacerbates societal polarization by dividing people into ideological camps. Political actors capitalize on this by using strategies like propaganda, misinformation, and disinformation to shape public perceptions, furthering political divides and fostering post-truth politics. As information technologies evolve, the constant influx of messages become a key tool in influencing public opinion and manufacturing consent. At this point, politicians and political communication units increasingly utilize social and new media platforms to shape public perceptions through methods such as propaganda, manipulation, disinformation, misinformation, and distortion.

These techniques are employed to exploit and deepened existing societal polarization, with the ultimate aim of securing votes. This approach contributes to the emergence of "post-Truth" politics, where emotional appeal and subjective beliefs often outweigh factual discourse. The continuous development of the internet and communication technologies had led to a constant flow of information, which is intentionally employed to shape public opinion and generate consent among the masses. According to Alpay (2017), another source of the problem of trivializing truth at the political level can be seen as the decrease in trust in democratic institutions and the intentional, strategic actions of undemocratic actors. In this way, it is among the possible situations that the erosion of trust in individuals occurs.

As mentioned earlier, the term "Post-truth" has been around for the last decade, but gained significant popularity in 2016, largely due to the EU referendum (Brexit) in the UK and the presidential elections in the US. Statistics show that the use of "post-truth" increased by 2000% in 2016 compared to 2015 (Alpay, 2017: 24-25). When this information is examined, a strong relationship between post-truth and politics is seen. Because the developments in the political field have made this concept more visible.

It is known as the period when the concept of post-truth rose, and the 2016 US Presidential elections are widely considered to be the beginning of the post-truth era, with Donald Trump often described as the first post-truth president. This is because a new era of political and intellectual conflict has begun, in which the fundamental principles and institutions of democracy have been fundamentally questioned by a wave of violent populism. Freedom is being jeopardized by emotional discourse, diversity by local

ideologies, and a tendency toward autocratic rule. The conduct of politics is increasingly seen as a zero-sum game rather than a competition of ideas (d'Ancona, 2017: 7-8).

In fact, during this period, the emotional discourse that has become a hallmark of the post-truth era has come to the forefront of public discourse. Craig Silverman of BuzzFeed News has provided concrete evidence to support these conversations, showing that the most widely circulated false articles are more widely circulated than the most prominent items in the mainstream media. “In the final three months of the U.S. presidential campaign, the top 20 false election stories from hoax sites and hyperpartisan blogs generated 8,711,000 shares, reactions, and comments on Facebook. During the same period, the top 20 election stories from 19 major news sites generated a total of 7,367,000 shares, reactions, and comments on Facebook” (Silverman, 2016). As both a Candidate and President, Donald Trump has undermined the expectation that the leader of the free world should possess at least a minimal adherence to the truth. According to a Pulitzer Prize-winning fact-checking website, 19% of Donald Trump's statements are categorized as mostly false, 38% as false, and 18% as "pants on fire" (Politifact, 2024).

There have been many claims that Donald Trump's achievement in the US election race was facilitated by Russian disinformation campaigns organized through online research agencies. In addition, the data of more than 87 million Facebook subscribers was used by Cambridge Analytica to ‘micro-target’ political messages and impact the decision of which candidate voting in the election and to know voter behavior in advance. In fact, the Oxford Computational Propaganda Unit, which reports that 70 countries have engaged in disinformation campaigns in the last two years, has also recorded that this number has doubled in that period. While most disinformation campaigns are conducted within

countries' own borders, some governments have struggled to influence the political processes and environments of foreign countries.

In response to this threat, new solutions have emerged. For this purpose, fact-checking units such as FullFact, PolitiFact and Fact-Check have been established. Major media organizations such as the Washington Post, CNN and BBC have established fact-checking departments. In addition to the establishment of institutions and organizations to combat disinformation, online support systems and games have been implemented to facilitate individuals' ability to cope with this situation. In the investigations conducted by the government, it has been suggested that the communication and information world, especially internet organizations and social media platform companies, should be regulated by legal means. Simultaneously, scientists have developed new algorithms to reveal the source of fake news and to deal with them. Therefore, it can be seen that disinformation has become an increasingly important problem and that intensive efforts are being made to deal with it. Because in the post-truth period, quite intense disinformation content has been shared in the political sphere. This situation has begun to wear down the political sphere and political actors.

As can be understood; the erosion of ethics and morality that the political institutions has suffered all over the world, the prioritization of personal interests over social interests, the distorted relations between the law and the state, the decline in the functions of democratic institutions, the detachment of the perceptions of the masses from reality by managing their perceptions with fake news and manipulative information, social polarizations turning the masses into volunteer soldiers in the consumption of misleading information, and the negative impact of national/international media professionals on the

global communication network for certain interests and purposes are the building blocks in the rise of the post-truth era.

CHAPTER TWO

THE VORTEX OF THE INFORMATION AGE: DISINFORMATION AND EUROPEAN UNION

2.1. Information Age and Its Characteristics

The Information Age, also referred to as the Digital Age or the Computer Age, represents a significant era in human history marked by transformative advancements in the creation, access, storage, and dissemination of information. This transformation has been driven by the widespread adoption and advancement of information technology, particularly the Internet and digital devices. Beginning with the emergence of the Internet and subsequent technological inventions in the late 20th century, this era has transformed the way societies disseminate, process, and use information. As information has become more accessible, it has democratized knowledge, promoting unprecedented communication and connectivity across the globe (Meyers, Erickson, & Small, 2013; Della, Eroglu, Bernhardt, Edgerton, & Nall, 2008).

A defining feature of the Information Age is the increasing knowledge intensity that has infiltrated all facets of society, including cultural, economic, ecological, and political domains. The development of a global information infrastructure, alongside a complex system of governance, has facilitated the widespread dissemination of information and the emergence of concepts such as the computer revolution and the scientific and technological revolution. Every minute, immense volumes of data are generated, shared, and consumed. While this abundance of information has the potential to democratize knowledge, it also results in information overload—a phenomenon in which the sheer volume of information

surpasses individuals' cognitive capacity to process it effectively (Eppler & Mengis, 2004). In the context of the Post-Truth Era, distinguishing between credible sources and those spreading misinformation becomes increasingly difficult, thereby amplifying the likelihood of misleading narratives gaining traction.

The widespread adoption of personal computers in the 1980s transformed the methods of information creation, sharing, and communication, marking the onset of the Information Age. The rapid advancements in information technology suggested that the digital world was on the brink of another "revolution," fundamentally altering how information is produced, distributed, and consumed (Della et al., 2008). The ability of effectively utilize digital resources to address information needs, a skill set that has evolved from earlier print-based information literacy practices, has become a hallmark of the digitally literate individual in the Information Age (Meyers et al., 2013).

The defining feature of the Information Age is the rapid advancement and widespread adoption of digital technologies, which have revolutionized the way information is generated, transmitted and accessed across various domains, from the economy to society at large. The internet, mobile communication and social media have created a highly interconnected global society where information flows rapidly and without traditional geographic limitations (Rifkin, 2000). Social media platforms, blogs and digital news sites democratize information access, enabling individuals to contribute public discourse, but also amplify misinformation. The speed and breadth of digital communication often hinder critical fact-checking processes, making it easy for false information to spread widely and rapidly (Vosoughi, Roy & Aral, 2018).

The digital landscape of the Information Age allows virtually anyone to create and disseminate content without institutional vetting. This rise in user-generated content has significantly reshaped media ecosystems, challenging traditional gatekeepers of information (Hermida, 2012). While user-generated content has empowered individuals, it also complicated the verification of information sources. Many people are more likely to encounter information through personal networks on social media rather than thorough traditional news sources, where accuracy checks are more rigorous. Consequently, this characteristic has contributed to the rise of concepts like “echo chambers” and “filter bubbles”, which reinforce pre-existing beliefs and hinder the objective evaluation of information (Pariser, 2011).

Algorithms play a central role in the Information Age, determining the content that individuals see online based on data profiles, preferences and behaviors. This personalized approach to information delivery has advantages, such as tailoring content to user interests, but it also contributes to selective exposure and reinforces confirmation biases (Bakshy, Messing & Adamic, 2015). In the context of disinformation, algorithms can inadvertently amplify misleading or false content if it aligns with a user’s pre-existing beliefs, thereby deepening divisions and reinforcing polarized viewpoints.

The characteristics of the Information Age contribute significantly to the spread and influence of disinformation, particularly in the Post-Truth Era, where emotional appeal often supersedes factual accuracy. As information flows freely and rapidly across borders, efforts to control or mitigate disinformation face numerous obstacles. Disinformation campaigns leverage the inherent features of the Information Age, including social media

algorithms, the viral nature of digital content and decentralized information sources, to propagate misleading narratives effectively.

2.2. Cornerstones of the Information Age: Data, Knowledge and Information

While one of the most important variables affecting humanity is the industrial revolution, the other is the information society. The most important element characterizing the information society is knowledge, particularly scientific knowledge (Özkan, 2009: 114). It is argued that the information society is the basic source for the production of information, the production and transmission of information has become widespread, the majority of those working in the production and distribution of information are indispensable, and that it indicates a new period of social and economic organization (Öğüt, 2003). Data, knowledge and information are the important elements that dominate the information age.

The concepts of data, knowledge and information are directly related to each other. Naturally, confusion may sometimes arise between these concepts due to this relationship; however, separating these complex relationships from each other and determining the specific meanings and boundaries of the concepts is important in order to eliminate conceptual confusion and ensure their correct use (Yılmaz, 2009: 101).

Data, often regarded as the foundational element of the information age, refers to symbolic representations that can be expressed in either numerical or non-numerical forms. On its own, data is abstract and lacks meaning; it becomes meaningful when symbolized. The process of symbolization gives data concreteness, which is shaped by the intended purpose and the analytical framework within which it is used. Essentially, data serves as the carrier of information that exists in the real world, but is initially unknown to the researcher

and is meant to be uncovered. It exhibits a cyclical nature, continuously evolving as it transforms into actionable information. Data is typically classified into two categories: numerical (or quantitative) and non-numerical (or qualitative). Numerical data consists of symbols that represent discrete units of information, whereas non-numerical data includes a variety of sensory inputs—such as written, verbal, visual, auditory, tactile, gustatory, olfactory, and even extrasensory data—which can all be analyzed for their underlying patterns (Zülfikar, 2022).

Data, which is a collection of text, numbers and symbols in its raw form, devoid of any inherent meaning, is the smallest piece of information that must be processed and contextualized in order to become meaningful. Information is the result of data processing, usually done by computers. This process transforms raw data into facts, allowing it to be applied in context and become meaningful. Essentially, information is data that has been given a purpose. At this point, data can be considered as the basic step used to reach information.

In its simplest form, information is processed "data." While data consists of raw facts represented through symbols such as letters, numbers, or colors, information is the result of organizing and interpreting data to provide context and meaning. For example, "John, 1985, Paris" represents data, while the statement "John was born in Paris in 1985" constitutes information, as it conveys a coherent explanation derived from the raw data.

Knowledge is meaningful information. This phenomenon arises as a result of the application of human experience and insight into data and information. It is possible to speak of knowledge when information and data are transformed into a set of rules that are used to assist in decision-making. To be more specific, we are unable to keep knowledge

because it necessitates a comprehension of a subject, regardless of whether it is theoretical or practical. The ultimate purpose of knowledge is to create value.

Knowledge is internalized by the individual and shaped by their experiences, perceptions, and cognitive processes, making it inherently personal and subjective. As such, it differs significantly from data and information. Knowledge can be categorized into two primary types: tacit and explicit. Tacit knowledge is deeply personal, context-dependent, and challenging to articulate or formalize. In contrast, explicit knowledge is more structured, can be codified, and is easily communicated through verbal or written expression (Aydın, 2015: 7).

The boundaries between the concepts of knowledge and information remain undefined, leading to ongoing conceptual confusion. While some experts use these terms interchangeably, others emphasize the distinction between them. In addition, Kogut and Zander (1992); Some experts, such as Stewart (1997), have used these two concepts synonymously.

Information is another important element of the Information Age, along with data and knowledge. Information is considered as data that has been given meaning or loaded. Data is scattered. Information is defined as shaping, organizing, serving a certain purpose and providing benefit (Laudon and Laudon, 1998: 8; cited by; Dervişoğlu, 2004: 23). The purpose of information exchange between a source and a receiver is to change the receiver's thoughts on a subject, to evaluate it or to affect their behavior. The information obtained must shape the receiver by affecting the receiver and create a difference in the receiver's perspective or understanding. Therefore, information can be called data that creates a difference (Yılmaz, 2009: 98-99).

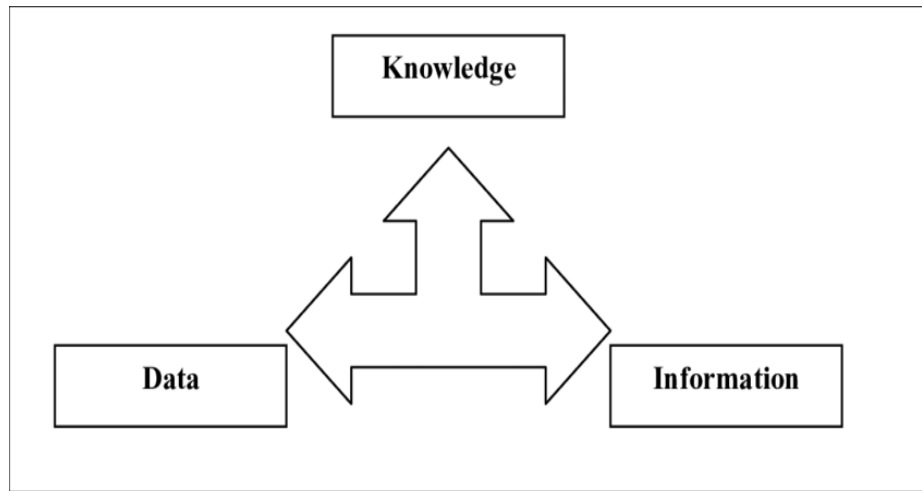


Figure 1: Interaction Between Technologies, Techniques, and People in Knowledge Management (Bhatt, 2001: 69)

1. The basis of knowledge consists of data and information.
2. Knowledge emerges through the rational filtering, interpretation and use of information.
3. Knowledge is the basis of actions and practices such as decision making, evaluation, analysis, planning, diagnosis and comparison, which form the basis of life (Çapar, 2005: 179).

Data, knowledge, and information are fundamental elements for the development and use of new media. As interactive platforms, new media produce and share vast amounts of data. In today's information age, these elements hold significant importance not only for new media but also for various other fields. One key conclusion drawn from the literature review on these concepts is that the effective management and processing of data, information, and knowledge are essential for establishing a solid foundation and enhancing the impact of new media. These concepts play a critical role in shaping how content is created, distributed, and consumed. (Karakaya & Genel, 2023).

In today's era, the media, particularly through the intensive use of new media tools and the vast amount of circulating data and information, raises questions about the accuracy of information. The overwhelming volume of data complicates efforts to control and verify the flow of information. However, sometimes, by using the features of media tools, false or incorrect information is circulated intentionally. With the combination of the difficulty of controlling data, information and information and the use of media tools, the problem of information disorder becomes more visible.

2.3. Information Disorder Theory and Types

Information disorder is a phenomenon older than the post-truth era and media history. Because it is possible to talk about the existence of messages based on false information in every period of history (Marcus, 1993). The concept of information disorder is one of the problematic communication types formed by the combination of many similar concepts such as disinformation, misinformation, mal-information and “fake” news. The first example of information disorder is seen as the “Great Moon Hoax” article, which found its place in traditional journalism and was published in the New York Sun Newspaper in 1835 (Allcott and Gentzkow, 2017: 214; Yalçinkaya, 2019: 34).

The widespread use of communication technologies has created the problem of information disinformation both nationally and internationally. The development and use of communication technologies is an issue that has become more important, such as socio-economic events and global health problems (Kara, 2022: 44). In fact, the concept of information disorder came to the fore again in 2017 with conceptual discussions on both developments in communication technologies and situations occurring in social areas (health, politics, disasters, etc.). Claire Wardle and Hossein Derakshan published a report

titled *"Information Disorder: Towards an Interdisciplinary Framework for Research and Policy Making"* for the Council of Europe. In the report, they challenged the notion that "fake news" is a straightforward and universally understood concept. To address this complexity, the authors proposed a new conceptual framework and model aimed at facilitating more structured and effective discussions in the field. Within this model, the researchers categorized information disorder into three distinct concepts: "misinformation," "disinformation," and "malinformation" (Wardle & Derakshan, 2017: 5).

In the information disorder model, misinformation refers to misleading information created and shared without malicious intent (Ireton & Posetti, 2018). Disinformation involves the deliberate dissemination of false information by official institutions to influence foreign powers or media (Oxford English Dictionary, 2024). Malinformation, as defined by Wardle and Derakhshan (2017: 21), includes factual information, such as personal correspondence, circulated to harm individuals, organizations, or countries. This framework is visually represented in a Venn diagram developed by Wardle and Derakhshan to illustrate these overlapping concepts.

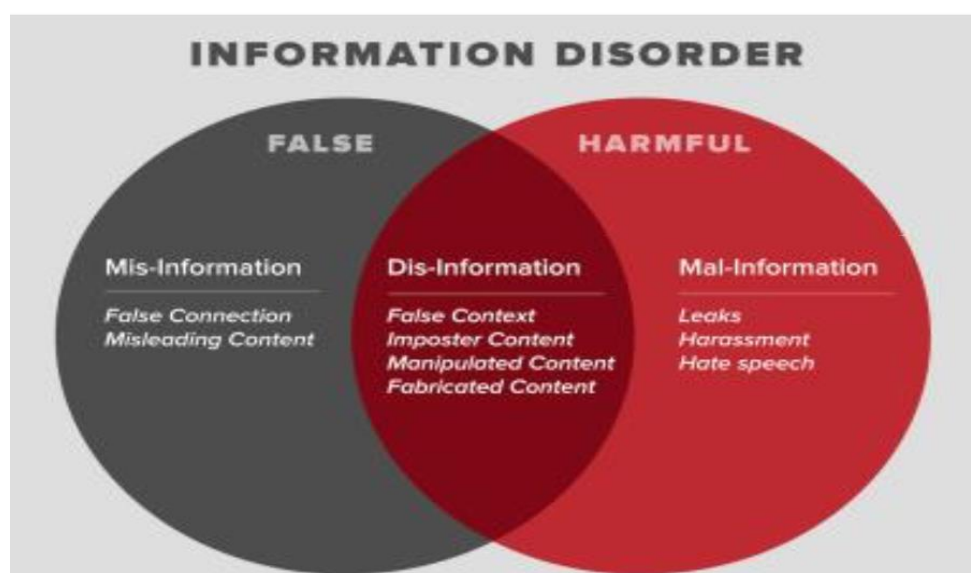


Figure 2: Analyzing the intersection of misinformation, disinformation and malinformation regarding falseness and harm (Wardle & Derakshan, 2017: 5)

In studies conducted on information disorder, the concepts of "agent", "message" and "interpreter" attract attention. Because researchers emphasize that in order to talk about the existence of information disorder in any situation, an evaluation should be made by taking these three elements into consideration. Of these elements, the agent should be evaluated by who the agents who produce and distribute information are and what the motivations of these agents are in spreading this information; in the message element, the content of the message that is spread, what its format is and what its features are; in the interpreter element, how the message is interpreted by the target audience and whether the recipients take any action will not be emphasized (Wardle and Darekhshan, 2017: 22).

The three components of information disorder are explained in detail below. These are;

Agent: Identify the entities responsible for the creation, production, and distribution of the example, accompanied by an examination of their motivations. Agents involved in each phase of the information chain—creation, production, and distribution—demonstrate varied motivations and characteristics, which can differ significantly depending on the stage of involvement. To understand an agent, it is crucial to consider: their type (official like political parties or unofficial like citizen groups), their level of organization (individuals, established organizations, or ad-hoc groups), their motivations (financial, political, social, or psychological), their target audience, whether they use automated technology, their intent to mislead, and their intent to cause harm.

Message: Determine the type and format of the message, and describe its key characteristics. When evaluating a message, it is beneficial to consider its durability (long-term relevance vs. short-term impact), accuracy (ranging from true information used harmfully to completely fabricated content), legality (compliance with laws on hate speech, intellectual property, privacy, and harassment), and whether it is 'imposter content' (falsely presenting as an official source). Additionally, differentiate between the intended audience (those the agent aims to influence) and the target (those being discredited), which can include individuals, organizations, social groups, or entire societies.

Interpreter: Examine how the message was interpreted by the recipient and what actions, if any, were taken in response. Audiences are not passive recipients of information; rather, each individual interprets messages based on their socio-cultural status, political positions, and personal experiences. It is crucial to understand the ritualistic aspect of communication, as our self-identity and social affiliations significantly influence how we process information. Social and performative forces, amplified by the visibility of our online interactions, play a powerful role in our reactions to messages. Accepting information that challenges our self-identity can be difficult, leading us to ignore or resist contradictory information despite its persuasiveness. Although fact-checking can improve knowledge, it does not completely eliminate misinformation. Solutions to information disorder must address these social and performative dynamics, exploring how to make sharing false information publicly embarrassing and leveraging theories of performativity. In today's world where social media dominates, an evaluator of information can eventually become an intermediary, as this person can choose how to frame and share that information on their own social media sites. This could potentially lead to the continued existence of an information disorder.

The process of information corruption, which is characterized as a combination of misinformation, disinformation and malinformation, is evaluated in three stages: creation, production and distribution. Of these stages, creation includes the initial formulation of the message. Reproduction refers to the process by which the message is transformed into a tangible media work. Distribution is related to the subsequent dissemination or public disclosure of the produced work (Wardle & Derakshan, 2017: 22).

The concept of information disorder is a reality that constantly exists in the social sense. However, with the media and especially the new media, also known as interactive media, it has made both its existence and its effect felt quite intensely. When we look at the literature on information pollution and information disorder, the phenomenon of fake news is a phenomenon that we constantly encounter in the formation of information disorder. Therefore, the relationship and effect of fake news in the process leading to disinformation, which is a type of information disorder, is a context that needs to be discussed.

2.4. The Role of Fake News in the Process Leading to Disinformation

The Cambridge Dictionary defines fake news as "false stories disguised as news, spread on the Internet or other media, often created as a joke or to influence political opinion" (Cambridge, 2024). Fake news refers to information that is intentionally and verifiably false, designed to mislead readers and is frequently used as a term to describe both misinformation and disinformation shared under the guise of credible news. The production of fake news typically stems from two primary motivations: financial and ideological (Tandoc et al., 2018). On one hand, some fake news stories gain virality due to their persuasive nature, enabling content creators to generate advertising revenue. On the other hand, fake news can be deliberately produced and disseminated to discredit specific individuals or entities and to advance particular ideas or agendas (Allcott and Gentzkow, 2017).

The existence of fake news dates back to the circulation of news in 1439, when Gutenberg invented the printing press. Therefore, the necessity of distinguishing between real news and fake news dates back to that date. Although there are numerous news sources and eyewitness testimonies from the public, as well as the publications of religious and political powers, the impartiality and ethics required by the journalistic profession have not yet been established (Soll, 2016).

The phrase "fake news" gained widespread attention in mid-2016 during the United States presidential campaign. Donald Trump, the Republican candidate, extensively employed unreliable news content to undermine the credibility of mainstream American media outlets. The same year, "fake news" was recognized as the most frequently cited

term by Oxford Dictionaries and was subsequently selected as the word of the year, alongside "post-truth" (Fabio, 2016).

"Fake news" is a big umbrella term that covers all sorts of inaccurate or misleading news stories. Disinformation, on the other hand, is much more specific. Disinformation is commonly examined along with misinformation and malinformation. We will study these terms under the concept "information disorder." Fake news is considered a type of disinformation that is presented as newsworthy by associating it with current events (Zimmermann and Kohring, 2018).

The widespread presence of fake news online poses a significant threat to both individuals and society at large. Firstly, it undermines trust in credible news sources. For example, during the 2016 U.S. presidential election, fake news articles frequently garnered more engagement on Facebook than legitimate news stories. Secondly, fake news can be exploited as a tool to manipulate public opinion. Lastly, repeated exposure to fake news diminishes individuals' ability to distinguish between truth and falsehood, impairing their capacity to comprehend authentic news. Consequently, it is essential to understand the mechanisms through which fake news spreads, develop effective detection tools, and implement measures to mitigate its adverse effects (Shu, Wang, Lee, & Liu, 2020: 2).

The creation and dissemination of fake news have not always been driven by political motives; some journalists have engaged in this practice systematically and without specific aims. A notable example is Jayson Blair, who was found to have fabricated or plagiarized content in many of the 673 articles he authored for the New York Times between 1999 and 2003. The extent of Blair's misconduct compelled the New York Times

to publish an extensive assessment detailing his abuses when the scandal came to light (New York Times, 2003).

"Journalistic malpractice" extended beyond the New York Times. Following Jayson Blair's dismissal, numerous newspapers terminated journalists who either fabricated their own material or plagiarized the work of others. One of the most notorious cases involved Jack Kelley, a prominent reporter for USA Today. Kelley's on-the-ground reporting from conflict zones earned him five Pulitzer nominations. However, an internal investigation revealed that Kelley had both fabricated content and prepared scripts to mitigate the fallout should his deceptions be exposed (Rosen, 2004).

The algorithms underpinning new media tools are designed to match users with content that aligns with their preferences or potential interests. While these algorithms are adept at identifying personal tastes, they largely disregard the accuracy of the information being presented. This inability of the internet to differentiate between truth and falsehood has positioned it as a central medium in the post-truth era, significantly contributing to the proliferation of disinformation, particularly on social media platforms.

Fake news refers to content that appears newsworthy but lacks a basis in reality, designed to capture public attention through misleading or sensational qualities. A key defining characteristic of fake news is the intent behind its creation. In other words, for fake news to emerge, the person or organization that produces the news must be aware that this news is not true and present this news to the target audience despite knowing this. Therefore, while news informs the public about a subject, fake news can lead to social problems. In this respect, fake news is considered to harm democracy, social conflict, violence and the reliability of state institutions. The decrease in political participation and

the loss of trust in the state are some of the social effects of fake news. Disinformation is the malicious distortion of information and its transmission to the relevant party. The distortion in disinformation occurs intentionally, with the intention of harming and deceiving, by sharing false information. In addition, disinformation is a more comprehensive concept than the concept of fake news. The concepts of fake news and disinformation do not fully replace each other. Disinformation is defined as content that includes fake news, even if it is not all lies, and is intended to cause harm (Aluç Demirel, 2023). Thus, although they differ on certain points, the fact that disinformation and fake news constitute information pollution is indisputable.

2.5. Conscious Information Disorder in the Information Age: Disinformation

The term "disinformation" has its roots in the Soviet concept of "dezinformatsiya" which described actions intended to mislead competitors during the Cold War era (Kux, 1985: 19). Disinformation is generally defined as "misinformation deliberately spread to influence public opinion or to conceal the truth" (Merriam-Webster, 2024; Oxford, 2024). Disinformation can be spread by government, news services, intelligence agencies or simply individuals (Fallis, 2015: 2). A comprehensive definition of disinformation in contemporary contexts is provided in the "European Union Action Plan against Disinformation." The plan characterizes disinformation as verifiably false or misleading information that is deliberately created, presented, and disseminated with the intent to deceive the public or achieve economic benefit. Such actions have the potential to cause public harm, which includes jeopardizing democratic processes and public goods such as health, the environment, and the security of Union citizens (European Commission, 2018: 1).

Disinformation frequently arises from meticulously orchestrated and technically adept deception. Yet, fabricating disinformation can be as simple as telling a lie. Disinformation can be written and oral and it is not necessarily sourced from the organization or the individual aiming to deceive. Disinformation is commonly spread through written articles, often paired with decontextualized images and audiovisual content. Several factors foster a conducive online environment for its dissemination, which serves three primary functions. First, digital platform algorithms prioritize content that aligns with the business model's emphasis on personalized and sensationalized material, maximizing user engagement and increasing clique formation among like-minded users. Second, the advertising model, driven by click-based metrics, relies on sensational and viral content. Advertising networks use algorithmic decision-making to place ads on websites featuring emotionally engaging or sensational content, reinforcing users' emotional responses and supporting the spread of disinformation. Finally, automated online techniques like "bots" and "troll factories" significantly accelerate the spread of disinformation through simulated profiles, encouraging users to share content without verification (Güner, 2021: 137).

"Fake news" and "disinformation" are related concepts with some differences. While fake news encompasses a broad spectrum of false and misleading news stories, disinformation specifically refers to intentionally fabricated information designed to distort the truth or deceive its audience. Disinformation is often used as a tool in broader propaganda campaigns to accomplish particular goals.

Disinformation frequently reaches a broad audience, extending to individuals with various means of information access, such as those with newspaper subscriptions, television viewers, and internet users. The effectiveness of disinformation and perception

management varies across societies, depending on factors such as levels of educational attainment, the robustness of democratic traditions, trust in institutions, the inclusivity of electoral systems, the role of money in politics, and the degree of social and economic inequalities (Güner, 2021: 140).

The forces responsible for disseminating disinformation often do not aim to persuade journalists or the general public of the validity of false claims. Instead, their objective is to undermine the credibility of verifiable information generated by professional journalists. This strategy fosters confusion, leading many news consumers to increasingly believe they are entitled to select or fabricate their own facts. Politicians sometimes exploit this tendency to shield themselves from legitimate criticism.

Disinformation is nothing new for sure. Forgeries, manipulated images, misleading advertisements, intentionally altered maps, and government propaganda have persisted for many years. Yet, disinformation has emerged as a significantly heightened menace to the integrity of information in recent times. Advancements in information technologies have facilitated the creation and distribution of deceptive content. For instance, individuals can deceive online users by crafting websites that mimic those of credible information sources. Additionally, they can adeptly manipulate visual content. Minimal technical expertise is now needed to generate and circulate disinformation widely. For example, anyone with internet access can anonymously inject misleading data into Wikipedia (Fallis, 2015: 2).

The contemporary media landscape, characterized by the emergence of a dynamic new media ecosystem, presents a significant challenge to discerning accurate information. This challenge is compounded by the inherent susceptibility of this open system to

disinformation, alongside the well-documented potential for manipulation within established media channels.

Further exacerbating this issue is the absence of standardized protocols for information dissemination, particularly prevalent within online social media tools. The ease with which information can be altered, plagiarized, and misrepresented within these unregulated and often anonymous environments fosters the creation of sensationalized fabrications and facilitates the rampant propagation of disinformation.

The topic, initially gaining traction post-Cold War (1992-1995), has emerged as a pivotal area of inquiry in scholarly literature, particularly since 2016. This surge in interest can be attributed largely to Russia's disinformation campaigns surrounding the 2016 United States Presidential Elections (Jensen, 2018: 115). A significant portion of academic research on disinformation comes from Western institutions. The United States leads with 3671 publications, followed by England (819), Australia (525), Canada (455), and Spain (416) (Bran, Tiru, Grosseck, Holotescu, & Malit, 2021: 10).

Disinformation has always been dangerous in the human age. However, with the developing communication technologies in the 21st century, both the speed of spreading and the number of times fake news is produced and consumed has increased. Especially new media tools are quite effective in the production, sharing and consumption of disinformation. The unique technical features of new media, along with the various types and widespread use of social media applications, have provided fertile ground for the intensive dissemination of deliberately false information or news in social production and distribution processes. The vast number of users and prolonged engagement with new media tools have further accelerated the circulation of disinformation. In this context, the

role of social media applications becomes particularly significant, highlighting the relationship between new media and disinformation as a prominent area of research.

2.6. New Media and Online Disinformation

“Don't Believe Everything You Read on The Internet”

Thomas Jefferson (McIntyre, 2019: 91).

The decline of traditional media is primarily due to the Internet. While the circulation of newspapers has decreased and television news has been exhausted due to biased news, the public has turned to social media to learn the news. When Facebook was founded in 2004, it was a social networking site that gave users the chance to connect with existing friends and make new ones. Users could share their thoughts and join online groups based on topics of interest. As Facebook grew, it became more powerful by aggregating news. This didn't happen just because people shared news on their own pages. The "highlights" column created by Facebook, which consisted of "likes," contributed to this process. As a result, other companies have taken action to create an alternative network for news collected from different sources in addition to user-generated content. YouTube was founded in 2005, and Twitter was founded in 2006. The rise of social media as a news source has further blurred the line between news and opinion (McIntyre, 2019:95). People started sharing content from unknown sources on blogs as if it were true. Although traditional media continues to exist in some form, it is becoming increasingly difficult to tell what is trustworthy. Some people prefer to read and believe news that only tells them what they want to hear. Therefore, if we acquire our news via social media, we can eliminate from our lives those who hold different political opinions from us and remove sources we do not like from our homepage.

The internet and social technology have fundamentally transformed information production, communication, and distribution. The modern information environment is characterized by easily accessible, inexpensive, and advanced editing and publishing tools that enable anyone to create and share content. Information consumption has shifted from a private activity to a public one due to social media. The dissemination of information has been significantly accelerated by the fast-paced news cycle and mobile devices. Additionally, information is now exchanged in real-time among trusted peers, making it less likely to be critically examined.

Technology companies operate as commercial entities, driven by the imperative to satisfy shareholders by maximizing user engagement on their platforms, thereby increasing exposure to advertisements. This goal is pursued through algorithmic adjustments that prioritize content similar to users' past preferences, interactions, and behaviors such as likes, shares, and comments. While some measures have been taken to combat disinformation on these platforms, significant alterations to algorithms that would challenge users' existing perspectives and burst filter bubbles are unlikely. Such changes could potentially reduce user time spent on the platforms, as users may be less inclined to engage with more challenging content that prompts reconsideration of established worldviews.

There are so many news sources these days that it's almost impossible to tell which ones are reliable and which ones have been carefully scrutinized. We cannot tell what is true when we present lies and propaganda alongside content that has been audited and whose information has been confirmed.

English historian Jo Fox highlights that factors such as the desire for entertainment, the need to feel informed, and the inclination to seek information that aligns with pre-

existing beliefs significantly contribute to the spread of misinformation (Fox, 2020). She proposes potential solutions, including the establishment of fact-checking organizations, government regulation, and education in digital literacy. However, Fox warns against relying on simplistic, quick-fix solutions and underscores the need to address the human factors driving misinformation. She advocates for a critical examination of individual biases and the prioritization of scientific facts over opinions in public discourse.

The history of disinformation is as old as human existence, but it has become more widespread through media tools. Online disinformation is particularly effective today. The following key concepts are important in the realization of online disinformation. According to Sessa, these concepts are as follows:

Bots: Automated user accounts that are commonly found across social media and other online platforms. Despite their potential for usefulness, some bots are designed with harmful intentions, like manipulating and deceiving social media users.

Troll: An individual who purposefully provokes others online by sharing content that is inflammatory, insulting, or disruptive with the aim of garnering attention, causing distress, or inciting a reaction.

Spammer: Individuals who create deceitful profiles on social networks with the intention of exploiting innocent community members and contaminating these online communities. The primary distinction between a troll and a spammer lies in their motives. A troll aims to elicit a reaction or inflict harm, whereas a spammer aims to advertise or endorse their product or service.

Astroturfing: A set of actions aimed at creating the impression that there is such support for a person, product or policy and manipulate searching engines, even though there is not actually widespread support at the grassroots level.

Algorithmic Bias: In the context of online disinformation, algorithmic bias can pertain to the equilibrium of ideological viewpoints within the content displayed on a user's social media feed. It can also refer to social media platforms utilizing algorithms that prioritize engaging posts over trustworthy ones.

Deepfake: A type of manipulated and altered image or video through a form of machine learning, convincingly modified and manipulated (unlike cheap fakes) to falsely represent someone as doing or saying something that hasn't actually occurred.

Filter bubble: It is an application in which the website's algorithm determines the content to be displayed based on the users' personal information, based on the web searches made by the users. This process creates a self-reinforcing feed that is exclusively based on content that correlates with the user's preferences.

Echo Chamber: A closed ecosystem in which participants are exposed exclusively to opinions that serve to bolster or fortify their pre-existing beliefs on a range of topics. Filter bubbles directly contribute to the formation of echo chambers.

Infodemic: A phenomenon where a significant volume of information about an event, whether accurate or misleading, disseminates rapidly both online and offline, resembling the spread of a disease outbreak. This simultaneous proliferation of true and false information creates challenges in discerning credible information sources (Sessa, 2023).

2.7. The Relationship Between Disinformation and Politics

In today's digital landscape, the intersection of disinformation and politics has become a pressing concern. Political movements widely use new communication tools to influence public opinion. Disinformation has been increasingly weaponized by political actors to sway public opinion, undermine democratic institutions, and gain political advantage. This poses a significant threat to the integrity of the political process and the public's trust in democratic institutions. Users can participate in diverse political activities on digital platforms. These activities include accessing information and news related to political matters, expressing political views, sharing politically oriented content, promoting voter participation, following political parties or figures and mobilizing others to address political or social issues.

Different social media platforms provide unique possibilities and opportunities for individuals to engage in political activities, which are being utilized with increasing frequency. Social media, widely utilized by political actors, serves as both a source of political information and disinformation. During election periods, the proliferation of political communication posts significantly amplifies information pollution. Political communication actors often intentionally disseminate and amplify false or misleading information to influence public opinion (Ayhan & Erkan, 2018: 209).

Extant research indicates that the deliberate dissemination of disinformation through social media networks has been extensively or relatively extensively engaged in by government entities or major political parties across a wide range of countries, with data showing such activity in at least 80 countries over the period of 2000-2017 (Piazza, 2021). The impacts of disinformation on the political process can be severe. Disinformation

campaigns can undermine public trust in democratic processes, delegitimize political institutions, and erode the integrity of elections. This dynamic poses a concerning dilemma for democratic societies, as it threatens to undermine the very foundations of representative governance. Addressing the interplay between politics and disinformation is thus a critical challenge for policymakers, social media platforms, and citizens alike. Developing effective strategies and policies to combat disinformation and safeguard the integrity of the political process is essential for upholding the core principles of democracy.

The transparency of political and issue-based advertising is a key factor in combating disinformation. Governments and policymakers have sought to introduce measures to enhance the transparency of online advertising, requiring platforms to disclose the sources of political advertisements and the targeting of specific audience segments (Transparency Rules in Online Political Advertising, 2023).

Moreover, the integrity of digital services, particularly social media platforms, has become a central concern. Platforms have been criticized for their role in the amplification and spread of disinformation, with concerns raised about the algorithms and recommendation systems that may prioritize sensational or polarizing content. In the studies conducted, researchers have emphasized that it is used to influence public discourse and disrupt democratic processes, especially in disinformation campaigns supported by governments. It has been pointed out that these include political elections and national critical situations (Lin et al., 2022).

The empowerment of consumers is another key aspect in combating the influence of disinformation in the political sphere. Public education initiatives focusing on media literacy and critical thinking are essential for enabling individuals to navigate the digital

environment more effectively, identify potential sources of disinformation, and make informed decisions. Programs such as fact-checking initiatives, digital literacy training, and the creation of technological tools to detect and flag suspicious content play a crucial role in equipping users with the skills needed to critically assess the information they encounter online.

Platforms designed to combat disinformation are well-positioned to limit its spread due to their access to relevant content, data, and the expertise to analyze and act on it. However, relying solely on platforms is insufficient to fully address the issue, highlighting the need for a multi-stakeholder approach that combines technological, educational, and regulatory efforts. Along with platforms developed to minimize disinformation and individual blocking efforts, limiting popular content circulating in the social sphere is costly, as it impacts user engagement and advertising revenues (Khan & Wright, 2021).

The impact of disinformation on the political landscape is a complex and multifaceted challenge. Dealing with it requires a multifaceted approach that combines transparency, empowerment and the integrity of digital services. Therefore, it is recommended that users receive empowering and awareness-raising training on media use, especially new media. In particular, the policies of the state or unions established by states (such as the EU) to raise awareness and implement disinformation are seen as a reference at this point.

2.8. The Development Process of Disinformation Policies in the European Union

The European Union stands out as the most effective and institutionalized international organization in addressing disinformation. The EU'S need to combat

disinformation arose primarily in response to a growing recognition of foreign influence operations, particularly from Russia, aiming to disrupt European democratic processes and influence public opinion. This threat became increasingly evident around 2015, as online disinformation campaigns were identified as tools used to undermine democratic institutions, foster division and erode trust in media and government. According to European Commission, threats to democracy in any member state have the potential to harm the entire Union. Furthermore, disinformation frequently targets European Institutions and their representatives, aiming to weaken the European project as a whole (European Commission, 2018: 2).

The European Union combats digital disinformation with a multi-layered strategy. At its core lies a collaborative network. This network brings together experts, national governments, social media platforms, traditional media outlets, and researchers. Each group contributes their specific strengths: researchers analyze disinformation tactics, media provides fact-checking, and platforms develop detection tools. Equally important is empowering citizens. The European Union places significant emphasis on media literacy initiatives to empower individuals with critical thinking skills, enabling them to recognize and avoid disinformation in their everyday online interactions. This two-pronged approach – building a collaborative network and fostering media literacy – aims to tackle disinformation at its source and equip citizens to be active participants in a healthy information space (Alaphilippe et al., 2019: 44-45).

Addressing disinformation requires finding the appropriate equilibrium between protecting democracy within the EU while upholding fundamental rights such as freedom of speech and media diversity (European Court of Auditors, 2020).

Within the European Union, various institutional and legal measures have been established to combat disinformation. This effort primarily falls under the purview of the European External Action Service (EEAS). Although this service traditionally manages the Union's foreign relations, it has taken on a central role in organizing and executing the EU's anti-disinformation efforts, particularly following the formation of the East StratCom Task Force in 2015 (Hedling, 2021: 841-842).

On 1 January 2011, the EU External Action Service (EEAS) was established to improve EU foreign policy. This organization is the first step taken by the EU to tackle disinformation.

The EEAS, which operates in Brussels, Belgium, to organize diplomatic relations of non-EU countries and to regulate EU foreign security policy, is headed by Josep Borrell, High Representative for Foreign Affairs and Security Policy. It works to enhance Europe's global influence by supporting peace-building efforts, ensuring security, maintaining diplomatic relations, providing development aid, and addressing humanitarian crises, among other tasks. Comprising expert staff from various EU institutions and member states, as well as a network of EU delegations worldwide, the EEAS operates under the guidance of the High Representative, who also serves as a Vice-President of the European Commission. This structure facilitates consistency in EU foreign policy and representation abroad. (European External Action Service [EEAS], n.d.)

The European Council acknowledged the threat posed by online disinformation campaigns for the first time in 2015, urging the High Representative to counter disinformation efforts originating from Russia. In response, the East StratCom Task Force was established that same year to address the challenge and enhance public awareness.

Since its inception, the East Stratcom Task Force has actively conveyed the Union's policies to Eastern Neighbour countries, primarily through a campaign-oriented approach. Additionally, the Task Force has cataloged, analyzed and publicized thousands of instances of disinformation originating from the Russian Federation. Through this work, it has identified numerous disinformation narratives, exposed the tools, techniques and objectives of disinformation campaigns.

The EUvsDisinfo initiative was launched in 2015 as part of European Union's effort to combat disinformation. It was established by the European External Action Service (EEAS), under the East Stratcom Task Force, with the initial goal of countering pro-Kremlin disinformation campaigns targeting EU member states and neighbouring countries. EUvsDisinfo provides fact-checking, reports and tools to help citizens and organizations identify and counter false information and propaganda. While EUvsDisinfo was initially focused on countering Russian disinformation, especially pro-Kremlin narratives targeting EU countries and Eastern Europe, its scope has since broadened. Today EUvsDisinfo addresses a wider range of disinformation threats impacting the EU, though Russian disinformation remains a primary focus. This expansion includes monitoring and debunking disinformation on issues like: COVID-19 misinformation, elections and political interference and climate change and other global issues (EUvsDisinfo, 2023). EUvsDisinfo primarily uses its own website (euvsdisinfo.eu) as the main platform to publish reports, fact-checks and analyses on disinformation. In addition to the website, it leverages social media platforms to extend its reach and engage with the public. The main platforms EUvsDisinfo actively uses include X (formerly Twitter), Facebook, and YouTube under the handle @EUvsDisinfo. These platforms help EUvsDisinfo increase visibility and provide

accessible resources for the public to better understand and counteract disinformation campaigns, particularly those impacting Europe.

By June 2017, the European External Action Service (EEAS) had established two additional task forces: the Western Balkans Task Force, which focuses on the Western Balkans region, and the Task Force South, which is dedicated to addressing issues in the Middle East, North Africa, and the Gulf region.

In November 2017, the European Commission established a cross-disciplinary expert group composed of high-level representatives from the news media, civil society organizations, academia, and online platforms (European Commission, 2017). Their combined expertise fueled a report released in March 2018 titled "A Multi-dimensional Approach to Disinformation" (The Directorate-General for Communications Networks, Content and Technology, 2018). Building on this report, further public consultations, and a multi-stakeholder conference, the Commission unveiled a self-regulatory Code of Practice for platforms in September 2018 (European Commission, 2018). In October 2018, the Code of Practice was endorsed by online platforms such as Facebook, Google, Twitter, and Mozilla, along with advertisers and the advertising industry. Signatories unveiled their implementation roadmaps for the Code. Microsoft became a participant in May 2019, and TikTok followed suit by signing the Code in June 2020 (European Commission, 2018). In 2019, The EU launched WeVerify.eu, an independent fact-checking network, an online platform dedicated to disinformation, and media literacy initiatives.

The regulatory rules against disinformation were announced in September 2018. The scope of these regulatory rules includes the advertising space and online platforms. Its

objectives include enhancing transparency in political advertising, strengthening measures against fake accounts, and removing financial incentives for disseminating disinformation.

The implementation rules, introduced in September 2018, were also adopted by the Action Plan Against Disinformation, the European Commission and the High Representatives in December 2018 (European Commission, 2018). The Action Plan was developed in response to the European Council's 2018 request for a unified approach to counter disinformation, particularly in preparation for the European elections. Its objective extends to addressing disinformation both within the EU and in neighboring regions. A pivotal element in this effort was the strengthened Strategic Communications Task Forces of the European External Action Service, deemed essential for achieving the plan's goals. The plan aligns with the European Council's mandate to "protect the Union's democratic systems and combat disinformation during the European Parliament elections." The coordinated response detailed in the Action Plan is organized around four central pillars:

- (i) Increasing the capacity of EU institutions to identify disinformation, investigate its content and publicise it;
- (ii) Increasing cooperation and collective responses to disinformation;
- (iii) Engaging the private sector in preventing and combating disinformation;
- (iv) Raising awareness among individuals and strengthening social awareness against disinformation (European Commission, 2018).

Fighting disinformation and making individuals more resilient is considered the primary goal of the European Union and its neighboring countries. Achieving this objective necessitates sustained support for education, journalism, research, fact-checking, media literacy, and civil society as a whole.

Current initiatives by the European Commission build upon the efforts of the European Union External Action Service's East Stratcom Task Force. The Plan also considers the Union's key partners, such as NATO and the G7. The initiative highlights the essential contributions of civil society and the private sector, aiming to improve online transparency while ensuring the long-term protection of European citizens.

Between January and May 2019, the European Commission actively monitored Facebook, Google, and Twitter to evaluate their compliance with commitments during the European Parliament elections. As signatories of the Code of Practice on Disinformation, these platforms were required to submit reports outlining their approaches to managing advertisement placements, ensuring transparency in political advertising, and addressing the misuse of fake accounts and bots. In October 2019, the Commission published its annual self-assessment report, which acknowledged the efforts made by the signatories to fulfill their obligations (European Commission, 2019). One of the primary objectives of the Commission's issuance of these guidelines was to prevent disinformation and perception management operations on digital platforms during political elections in Europe, particularly the European Parliament elections and to facilitate the development of transparent, fair and credible digital campaigns.

In order to enhance co-operation and co-ordination between all parties involved in dealing with disinformation, in March 2019 the Commission and the High Representative of the Union for Foreign Affairs and Security Policy, in agreement with Member States, set up "Rapid Alert System." A collaborative system comprised of all member countries supports both the member states and the European Union in two key areas of fighting disinformation. First, it fosters cooperation and coordination to develop EU-wide strategies.

Second, it analyzes active disinformation campaigns from both technical and political angles, presenting its findings to EU institutions and member states. Rapid Alert System relies on open-source data and incorporates insights from academic research, verifies sources, online platforms and international stakeholders.

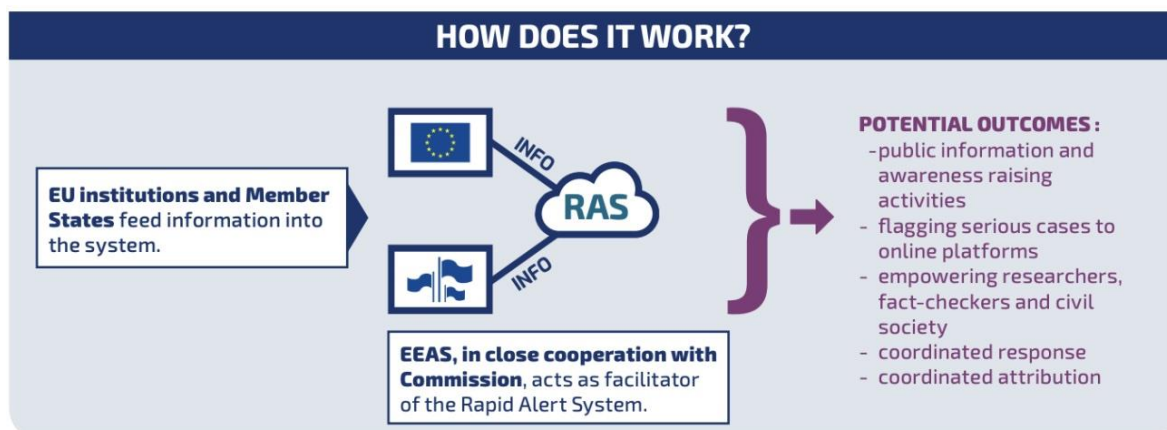


Figure 3: Overview of the Rapid Alert System (RAS) (The Free Internet Project, 2019)

The main purpose of the Rapid Alert System in the fight against disinformation is to facilitate the sharing of experiences and good practices against disinformation, to organize intervention actions, and to ensure more efficient use of time and resources.

The Social Observatory for Disinformation and Social Media Analysis (SOMA) and the European Digital Media Observatory (EDMO) are other platforms established under the EU umbrella in the fight against disinformation. SOMA aims to provide useful infrastructure and a basis for establishing relationships and connections with a wider community with which to work, in order to raise awareness of disinformation in the European community (SOMA Disinfobservatory, n.d.).

The European Digital Media Observatory (EDMO) was established to facilitate co-operation between various partners to address online disinformation. It includes media centres and online environments as well as fact-checkers, researchers and media literacy

experts to effectively analyse and tackle disinformation. With a network of 14 Hubs across 28 EU and EEA countries, EDMO is well-positioned to identify and respond to digital media vulnerabilities within specific regions (European Digital Media Observatory, n.d.)

Following a revision process, a strengthened Code of Practice on Disinformation was signed and unveiled on June 16, 2022. This new Code, building on the 2018 version, has garnered a total of 44 signatories, demonstrating a growing commitment to fight online disinformation. It aligns with the European Commission's 2021 Guidance by outlining a wider range of actions to counter this threat. The signatories included social platforms such as Google, Meta, Microsoft, Twitch and TikTok (European Commission, 2022).

While more than 16 signatories signed the 2018 Code of Practice in the fight against disinformation, the number of signatories to the 2022 Reinforced Code of Practice against disinformation has increased to 44. This can be considered a sign that regulation against disinformation is increasingly being accepted.

The basic rules and concepts that the European Union has been implementing since 2018 in the fight against disinformation are as follows:

- Scrutiny of Ad Placements:

Ensuring that advertisements do not fund or support the dissemination of disinformation by implementing stricter controls over where ads are placed.

- Transparency of Political and Issue-Based Advertising:

Increasing transparency by clearly labeling political and issue-based ads and providing information about their sponsors and targeting criteria.

- Integrity of Services:

Reducing disinformation by addressing fake accounts, bots, and other manipulative techniques that undermine the integrity of online platforms.

- Empowering Consumers:

Enhancing media literacy and equipping users with tools to identify and counter disinformation, fostering a more informed and resilient public.

- Cooperation During Elections

Enhancing cooperation among platforms, public institutions, and other stakeholders is essential to prevent disinformation from compromising the integrity of electoral processes and eroding public trust during elections.

- Measuring the Code's Effectiveness

Monitoring and evaluating the implementation and outcomes of the Code's commitments to ensure its impact is measurable and significant.

The thesis will analyze these concepts and their implementation in the European Union, Türkiye, and Brazil, assessing their effectiveness in combating online disinformation within the broader context of the post-truth era.

2.9. The EU's Legal Framework for Combating Disinformation

The legal basis of the fight against disinformation in the EU, which stands out as an important institution with its policies in the fight against disinformation, is based on the right to freedom of expression and information in Article 11.1 of the European Union

Charter of Fundamental Rights (2000/C 364/01) (European Union Agency for Fundamental Rights, n.d.) and Article 10 of the European Convention on Human Rights (Council of Europe, 1950).

In addition to creating an institutional framework to address disinformation, the development of legal infrastructure and the promotion of coordinated efforts within the Union constitute a core component of the EU's strategy against disinformation. To support this objective, the European Commission launched the "Action Plan on Countering Disinformation" and the "Code of Practice on Disinformation" in 2018, anchoring these initiatives in appropriate legal instruments. (Bayraklı & Filiz, 2020)

In 2018, European Union adopted the Disinformation Action Plan and the Disinformation Code of Practice. Following these initiatives, agreements were established in which major social media platforms, including Facebook, Google and Twitter, along with advertisers and the advertising industry, committed to self-regulation. Although these companies have recognized their responsibility for addressing disinformation content as stipulated in the Code of Practice, evidence indicates that during the 2019 elections, systematic disinformation campaigns were actively organized and propagated via social media platforms (European Commission, 2020). European Commission President Ursula von der Leyen emphasized that disinformation during the coronavirus pandemic constitutes a significant threat to public health, with potentially fatal consequences (von der Leyen, 2020). Despite extensive efforts to counteract it, disinformation continued to proliferate.

Similarly, James Pamment (2020) argues that the European Union has initiated several actions to combat disinformation but faces significant challenges in effectively addressing adversarial activities in the information space. He emphasizes that existing EU

policies face significant challenges due to the absence of terminological clarity, ambiguous legal foundations, a limited evidence base, and an unstable political mandate. These shortcomings have led to the organic, rather than systematic, development of counter-disinformation tools such as the Code of Practice on Disinformation and the Rapid Alert System. Furthermore, Pamment notes that differing approaches among member states complicate the issue, with many states either failing to recognize the problem or hesitating to publicly attribute malign activities to specific adversaries due to political pressures. While the establishment of these instruments is viewed as a bureaucratic success, Pamment warns that adversaries may exploit the EU's inconsistent approach, ultimately undermining the effectiveness of its overall counter-disinformation efforts.

The Digital Services Act (DSA), officially enacted on October 19, 2022, and implemented across the European Union (EU) as of August 25, 2023, represents a significant regulatory framework aimed at ensuring the safe and transparent operation of digital services within the EU. This legislation covers a wide spectrum of online platforms, from basic internet service providers to major social media networks, thus impacting all entities offering "information society services." DSA implements key measures aimed at enhancing the online ecosystem, including the removal of illegal goods, services, and content, as well as imposing stricter obligations on very large platforms to mitigate risks associated with disinformation, privacy violations, and hate speech. Noteworthy provisions of the DSA include enhanced transparency requirements, obligations to safeguard minors, and measures ensuring the traceability of commercial users.

The regulation aims to create a more harmonized digital market by ensuring uniform rules for digital services across the EU, thereby facilitating the seamless

functioning of the Digital Single Market. DSA underscores the importance of creating a secure digital environment for EU citizens, with a particular focus on safeguarding fundamental rights and upholding Union values. Following its implementation, 19 major platforms and search engines operating within the EU are now obligated to comply with enhanced regulations concerning data collection, privacy safeguards, and the handling of harmful content. These measures aim to establish a safer and more accountable digital ecosystem, ensuring that the provision of digital services aligns with the EU's foundational principles of transparency, accountability, and respect for individual rights.

CHAPTER THREE

TRACING TÜRKİYE AND BRAZIL’S TOOLS AND PRACTICES TO COMBAT ONLINE DISINFORMATION

3.1. Methodology

Under this title of the study examining the practices of Türkiye and Brazil regarding online disinformation policies; the subject and problem of the research, its purpose and importance, scope and limitations, research method, research questions, research universe and sample, research findings and comments are included.

3.1.1. The Subject and Problem of the Research

Disinformation, defined as deliberately disseminated false or inaccurate information intended to mislead, has been a persistent phenomenon throughout human history. The widespread adoption of new media technologies in the field of communication has led to the emergence of novel channels for information flow. Social media platforms, as a subset of these technologies, have become significant tools for the production, dissemination, and consumption of information, driven by the increasing number and engagement of users. These platforms have, in fact, evolved into instruments that shape and influence social, economic, and political dynamics.

The interactive nature of new media tools has blurred the lines between information producers and consumers, making it challenging to control the flow of news and information. In these platforms, where the source often overlaps with the target audience, news and information are disseminated without undergoing editorial oversight. This lack of control facilitates the creation and spread of disinformation across political, economic, and

other societal domains. Furthermore, the widespread use of digital media tools, both in terms of the number of users and the time spent on these platforms, amplifies this issue.

In the age of digital or online media where disinformation is prevalent, disinformation has become an urgent concern for democracies around the world. This situation has led researchers to conduct research on online disinformation. This study focuses on examining the policies implemented by Türkiye and Brazil to address disinformation, using the European Union's disinformation practices as a framework. The primary research problem involves analyzing the disinformation policies of Türkiye and Brazil, the legal institutions established to counter disinformation, and the similarities and differences between the strategies adopted by these two countries. This analysis is conducted with reference to the European Union, which stands out for its tools and strategies for combating online disinformation.

3.1.2. The Purpose and Importance of the Research

With digital media tools, every individual has also become a content producer. The lack of an audit and control mechanism in social media, which is among the online media, has paved the way for users to share news and information without confirmation. This situation has led to the formation of disinformation by causing a lot of misinformation or fake news content to be produced and circulated. In this age of post-truth, where facts are distorted, fake news spreads rapidly on social media in a short period of time, causing people to change their perceptions (Aydın, 2023).

Information and news whose accuracy is not checked cause negative consequences for the current period and the future of societies. Therefore, fighting against disinformation is very important for the future of people and societies. The European Union draws

attention with the policies it has developed and the measures it has taken in the fight against disinformation. The framework of the EU's policies against disinformation is drawn with six rules: “ensuring the transparency of political and issue-oriented advertisements,” “examining ad placements,” “empowering content consumers,” “ensuring the integrity of services,” “cooperation during elections,” and “measuring of the effectiveness of the developed code.”

The objective of this study is to analyze the policies and strategies implemented to counter disinformation in Türkiye and Brazil, with a focus on the practices established by the European Union as a point of reference. Additionally, the study aims to identify the similarities and differences between the disinformation policies of these two countries. The findings are expected to serve as a valuable reference for the development of future policies and interventions by providing insights into effective practices for addressing disinformation.

3.1.3. Scope and Limitations of the Study

The scope of this research is to examine the disinformation policies implemented in Türkiye and Brazil, the institutions implementing these policies, and the similarities and differences of the disinformation policies implemented in both countries within the framework of the anti-disinformation rules that form the basis of the European Union's anti-disinformation policies.

Among the limitations of this research is that the written sources on the disinformation policies implemented in Türkiye and Brazil were investigated using the document analysis method and the results were based on the existing practices of both countries. For this reason, inferences regarding the information contained in the research

results are limited to the relevant countries and the processes in which policies are implemented.

3.1.4. Method of Research

The research adopted a qualitative methodology, which posits that individual and social phenomena cannot be reduced to variables limited by environmental factors and other influencing elements. It is a type of research that has a more complex data pattern based on highly complex and interconnected epistemological assumptions (Denzin & Lincoln, 2008). Based on the literature, qualitative research examines people's individual and in order to explain the basic characteristics of social events and phenomena, the researcher examines the formation processes of events and phenomena. The research method he conducted for his review is described (Creswell, 2013; Mertens, 2014). Although qualitative research is conducted within the framework of available resources, it enables the discovery of contradictory situations that can contribute to scientific knowledge. Qualitative data collection methods utilize various approaches, such as observation, interviews, and document analysis, to explore the existence of a problem or situation and work toward its solution (Baltacı, 2018; Baltacı, 2019).

This study, which examines the disinformation mechanisms and policies of Türkiye and Brazil as well as the similarities and differences between these policies, employs the document analysis method, a type of qualitative research. Document analysis involves obtaining data by examining and evaluating printed and electronic resources (Bowen, 2009). Document analysis is the process of finding, reading, and finding all kinds of written sources for a certain purpose in the social field. It is the process of taking notes and evaluating (Karasar, 2005). This process also involves written documents that provide

information about the phenomenon or phenomena under investigation. It is further defined as the analysis of materials (Yıldırım & Şimşek, 2013). In summary, information about the research subject by other persons or institutions the collection and collection of various writings, documents, works or remains written, prepared or created Its examination is considered as document analysis (Seyidoğlu, 2016).

In this research, printed and electronic sources regarding the disinformation practices and legal procedures of Türkiye and Brazil were analyzed using document analysis.

3.1.5. Universe and Sample of the Research

Türkiye and Brazil constitute the universe of this research, which investigates the disinformation processes and policies of Türkiye and Brazil, and the similarities and differences of the relevant policies in both countries. The sample of the research consists of written and electronic works containing the policies and regulations developed for disinformation in Türkiye and Brazil. The information contained in these works bears the traces of both countries' disinformation regulations and is considered as official written sources on the relevant subject.

3.1.6. Research Questions

Control mechanisms in the production of information and news have become less effective due to the use of new media tools, which are central to the digital age, where users serve as both the source and the target audience. Now all users have become information producers. This situation has paved the way for an increase in social disinformation. Thus, the importance and necessity of fighting against disinformation for countries has emerged.

So much so that the European Union stands out as a leading organization in the fight against disinformation. In this research, the similarities and differences of the disinformation policies and institutions implemented in Türkiye and Brazil were examined, taking as a reference the measures in the EU's disinformation policies. This research aimed to address the following research questions:

Research questions:

- ✓ What legal frameworks are currently implemented in Türkiye to combat disinformation?
- ✓ How does Brazil's legal approach address disinformation, and what laws have been enacted?
- ✓ What specific measures have Türkiye and Brazil implemented to combat disinformation effectively?
- ✓ In what ways are the anti-disinformation practices of Türkiye and Brazil similar?
- ✓ What are the key differences in the disinformation policies adopted by Türkiye and Brazil?
- ✓ Are there any preventive practices regarding disinformation in Türkiye and Brazil?
- ✓ How have the European Union's anti-disinformation policies influenced or provided examples for Türkiye and Brazil?

3.2. Türkiye's Fight Against Disinformation

In recent years, Türkiye has experienced a remarkable surge in internet penetration and digital engagement, driven by its youthful and dynamic population. As of 2024, over

80% of the population is active on the internet (Household Information Technology [IT] Usage Survey, 2024), with an overwhelming majority utilizing social media platforms such as Instagram, X (formerly Twitter) and TikTok. This digital ubiquity has transformed communication, commerce and governance, but it has also brought challenges, particularly in the realm of online disinformation. With nearly half of its population under the age of 35 (Turkish Statistical Institute, n.d.), Türkiye's demographic composition creates fertile ground for the rapid dissemination of information, both accurate and misleading.

The rise of online disinformation in Türkiye can be attributed to several factors. Firstly, the widespread reliance on social media as a primary source of news has made it easier for false narratives to circulate unchecked. Secondly, heightened political polarization has amplified the impact of digital falsehoods, as rival factions often weaponize disinformation to undermine opponents or shape public opinion. Thirdly, Türkiye's geopolitical significance as a bridge between Europe and Asia makes it a frequent target of coordinated disinformation campaigns by both state and non-state actors. These dynamics underscore the urgent need for robust strategies to combat online disinformation, which threatens not only the integrity of democratic processes but also the social cohesion of the nation. In fact, according to the Digital News Report 2018 conducted by the Reuters Institute for the Study of Journalism at Oxford University, 49% of the respondents in Türkiye reposted encountering "stories that are completely made up for political or commercial reasons," placing Türkiye at the forefront of countries most exposed to disinformation. This figure is significantly higher than the average across all 37 countries surveyed, which stands at just 26%. According to the report, one out of every two people in Türkiye has come across unfounded news, highlighting the pervasive nature of disinformation in the country (Reuters Institute for the Study of Journalism, 2018). This

widespread exposure to false information reflects the increasing challenges posed by digital media in the modern age. In response to these concerns, Türkiye has historically enacted various laws to regulate traditional media. Since 1925, numerous laws have been enacted to regulate the press and broadcasting; however, the rapid expansion of the internet necessitated new measures. As a result, the first legal regulation specifically addressing the internet was introduced with Law No. 5651, dated May 4, 2007 (Law No. 5651, 2007). Within the scope of this law, the obligation and responsibilities that internet access providers have to fulfill, as well as the procedures and principles related to the fight against certain crimes committed through the internet in terms of content and access providers were also regulated. Law No. 5651 was amended in 2008, 2011, 2013, 2014, 2015 and 2016. With these amendments; the responsibilities of hosting and content providers, administrative fines, removal of the content related to those whose personal rights have been violated and the right of reply have been regulated. Considering aforementioned explanation on the Law, the section addressing the "removal of the content related to personal rights violations and regulation of the right of reply" can be interpreted as a measure aimed at preventing the spread of disinformation and false information, particularly within the context of this study. Notably, this provision aims not only to prevent disinformation but also to facilitate the dissemination of accurate information by granting the affected individuals the right to reply. This approach enables those who have been wronged to have the opportunity to express themselves and correct the record.

As internet and social media usage has grown, there has been a parallel rise in crimes committed on these platforms. Consequently, Law No. 7253 was enacted in 2020 to amend and address gaps in Law No. 7253, titled "Law Amending the Law on the Regulation of Publications on the Internet and Combating Crimes Committed through

These Publications" include provisions such as the introduction of the concept of social network providers, the requirement for social network providers with over one million daily users in Türkiye to appoint a representative, obligations to respond to user applications, to store data within Türkiye, to provide reports, and to block access or remove content. Additionally, the law establishes the "right to be forgotten." (Law No. 7253, 2020). Furthermore, the law expands on Article 9 of Law No. 5651 by adding the option to remove content, enabling competent authorities to delete content upon request by individuals whose personal rights have been violated. Judicial and administrative fines are also imposed on social network providers for non-compliance with decisions to block or remove content.

In response to growing threats to Türkiye's borders and national security, the Turkish Armed Forces conducted several military operations between 2016 and 2021, invoking the right to self-defense under Article 51 of United Nations Charter. Media coverage of "Operation Peace Spring" in 2019 varied, influenced by each outlet's and ownership structure, leading to differing representations of the event. Additionally, during Covid-19 pandemic in late 2019, disinformation, particularly on social media, hindered efforts to combat the virus. These factors likely prompted lawmakers to introduce mentioned Law to maintain social order and ensure state functionality.

Between July 29 and August 11, 2021, forest fires affected several regions of Türkiye, particularly the Aegean and Mediterranean areas. An analysis of news and social media posts about the fires revealed that much of the information shared was disinformation, often propagated by anonymous accounts (Kobak & Soğukdere 2021: 167). Disinformation in such events can lead to harmful consequences, potentially disrupting efforts to address crises. In response, "Law Amending the Press Law and Certain Laws," as

known as, "Disinformation Law" was enacted in 2022 to combat the spread of false and misleading news and posts.

The relevant articles of Law No. 7418, titled "Law Amending the Press Law and Certain Laws," adopted on 31.10.2022, are as follows:

- Article 1: The first paragraph of Article 1 of the Press Law No. 5187, dated 9/6/2004, has been revised as follows: the term "publication" in the second paragraph has been changed to "publication and internet news websites", and the following paragraph has been incorporated into the article: "The purpose of this Law is to determine the procedures and principles regarding the freedom of the press, the exercise of this freedom, and the press card."

- Article 29: The following article has been included in the Turkish Penal Code, dated 26/9/2004 and numbered 5237, after Article 217:

- Article 217/A- (1) Any individual who publicly spreads false information regarding the country's internal and external security, public order, or public health, with the intent to create anxiety, fear, or panic among the public and disrupt public peace, shall be sentenced to imprisonment for a period of one to three years.

- (2) If the perpetrator commits the offense by concealing their true identity or as part of an organization's activities, the penalty specified in the first paragraph shall be increased by fifty percent. (Law No. 7418, 2022: Article 29).

The law serves as a significant measure to combat disinformation, urging social media users to be cautious about potential issues arising from their posts. Failure to exercise this foresight could compel users to either abandon social media -an essential platform for expressing ideas and thoughts- or face the anxiety associated with legal

repercussions stemming from their expressions. Ultimately, the law seeks to reduce the spread of potentially misleading and false information on social media platforms.

Article 34 of the same law introduces significant amendments regarding the advertising ban for social network providers. Under the new regulations, if social network providers fail to comply with decisions to remove content or block access, they are prohibited from advertising for up to six months. Additionally, the internet bandwidth of the provider will be reduced by 50% until the required actions are completed, with a further reduction to 90% if the provider does not comply within 30 days. Violations of the advertising ban may result in administrative fines ranging from 10,000 TL to 100,000 TL. Furthermore, the regulation mandates that if a social network provider identifies content that poses a risk to the safety of individuals' lives or property, it must promptly share information about the content and its owner with law enforcement authorities if delaying such action is deemed inappropriate. This requirement ensures prompt action in safeguarding public safety. In addition, social media providers are required to submit transparency reports to the regulatory authority, detailing their content moderation practices, algorithms, advertising policies and actions to ensure equal treatment of users. These reports must also include measures taken to prevent illegal content, disclose parameters used for content recommendations and provide options for users to manage their data preferences. Additionally, providers must create and publish an advertising library with information about ads, such as content, duration, target audience and reach.

Both Article 13 of the EU's Digital Services Act (DSA) and Article 34 of Türkiye's Law No. 7418 impose obligations on online service providers regarding the appointment of legal representatives. The legal representative serves as a liaison for regulatory authorities,

ensuring effective communication and the enforcement of the law. Both frameworks aim to enhance oversight and ensure platforms comply with national regulations on disinformation, user rights and content moderation. While DSA Article 13 applies to all digital services, including intermediary services, hosting providers and very large online platforms (VLOPs), Turkish Law No. 7418 Article 34 specifically targets social network providers with more than 10 million daily users in Türkiye. Under the TSA, the legal representative must be authorized to receive legal and regulatory notices, including binding decisions and ensure compliance with the DSA's provisions. In Türkiye's law, the legal representative not only acts as a point of contact but must also have full technical, administrative and financial authority. The DSA primarily relies on fines and corrective measures for non-compliance, ensuring proportionality and due process. Law No. 7418 provides stricter enforcement tools, including fines, advertising ban and the potential reduction of the platform's bandwidth by up to 90% for failing to comply with regulatory requirements (Law No. 7418, 2022: Article 34, EU Digital Services Act: Article 13).

Article 26 of EU's Digital Services Act (DSA) and Article 34 of Turkish Law No. 7418 addresses responsibilities of advertisers and the role of legal representatives, particularly in ensuring transparency and accountability in online advertising. While both frameworks aim to regulate advertising practices to prevent disinformation and protect public trust, they differ in scope, implementation and enforcement mechanisms. Both frameworks emphasize transparency in online advertisements by requiring advertisers to provide clear and accessible information about their identity and the content of their advertisements. DSA Article 26 enforces compliance through fines and corrective measures, relying on a risk-based approach and periodic audits of large platforms. Article 34 of Turkish Law imposes stricter enforcement mechanisms, such as advertising bans,

bandwidth reductions, or fines, for non-compliance. These differences reflect varying regulatory priorities: the DSA focuses on systemic transparency, while Türkiye's law prioritizes stronger local enforcement.

In response to the government's handling of the February 6, Kahramanmaraş earthquakes in 2023, numerous lawsuits have been filed against social media users. Kemal Kılıçdaroğlu, the leader of the opposition Republican People's Party (CHP), was the first public figure sued for "disinformation" after criticizing the government's actions, as well as for "insulting Turkish Nation, the State of the Republic of Türkiye, and its institutions." (European Commission, 2023). On the second day after the earthquakes, excessive information pollution led to reduced bandwidth on X, hindering search and rescue efforts; access was restored the next day. Moreover, legal actions were initiated against 609 individuals, leading to 150 detentions and 29 arrests for "inciting public hatred and hostility" on social media in connection with the earthquakes (European Commission, 2023).

According to parliamentary records, between October 18, 2022, and October 10, 2024, a period during which the law was in effect, 4,590 individuals were investigated for "publicly disseminating misleading information." A total of 33 people were arrested under this law, 3 in 2022, 24 in 2023 and 6 in 2024 (MLSA Turkey, 2024).

3.2.1. Oppositions to the Law

Law No. 7418 introduced regulations on various issues, including the recognition of online news employees as press members, press card issuance, the protection of personal rights and children and social network obligations, as well as official announcements. However, it has garnered significant attention, particularly regarding aforementioned

Article 29, which incorporated Article 217/A into the Turkish Penal Code to address disinformation.

The regulation has faced significant criticism from opposition parties, legal professionals and social media users, primarily for its potential to undermine freedom of expression and introduce censorship. Critics argue that it could trigger a surge in investigations, fostering a climate of fear that stifles open discussion and critical evaluation of issues. Concerns have also been raised about its incompatibility with Article 13 of the Constitution, which safeguards fundamental rights and freedoms. Additionally, the regulation is seen as potentially creating an uneven playing field in elections by limiting free discourse. Specific criticism is directed at Article 29, which is perceived as overly ambiguous and prone to misuse, leaving room for subjective judicial interpretation that could result in arbitrary enforcement (Oymak, 2022: 510). In response to criticisms regarding the law, AK Party Hatay Deputy and the Chairman of the Turkish Grand National Assembly's Digital Media Commission Hüseyin Yayman, stated, "When addressing this issue, we consistently referred to the European Union's *acquis*, particularly examining what exists in Germany, France, United Kingdom and the United States, and carefully considered these regulations" (TBMM, 2023: 6). The then Minister of the Interior, Süleyman Soylu, also commented, "A stricter disinformation law exists in Germany and France." (Kınık Öz & Kara, 2023).

This concern is echoed by international organizations, including Amnesty International, which has voiced similar apprehensions about the potential for misuse and overreach. Amnesty International published a statement on October 24, 2022, titled "Türkiye's 'Disinformation Law' Tightens Government Control and Curtails Freedom of

Expression," expresses concern over these legislative amendments. The organization cautioned that these amendments could result in individuals being sentenced to up to three years in prison for sharing content considered "untrue and intended to create panic" on subjects such as national security, public order, or public health. The statement emphasizes the law's ambiguous language, especially in Article 29, which introduces a new offense into the Turkish Penal Code without clearly defining critical terms like "untrue information." Amnesty International argues that such ambiguity may result in arbitrary enforcement, thereby infringing upon freedom of expression. The statement emphasizes that, under international human rights standards, broad restrictions on disseminating information are impermissible and may lead to self-censorship among the public media professionals. As a result, Amnesty International calls on the Turkish government to repeal the legislation and bring its laws governing freedom of expression into compliance with international legal obligations (Amnesty International, 2022).

This concern is further reinforced by legal challenges to the regulation itself. The Constitutional Court reviewed the Republican People's Party's (CHP) application seeking the annulment and suspension of Article 217/A, introduced into the Turkish Penal Code (TCK) through Article 29 of Law No. 7418. After deliberation, the General Assembly of the Constitutional Court rejected the request to annul the provision that imposes a prison sentence of one to three years for individuals convicted of "publicly disseminating misleading information" (Gazete Oksijen, 2022).

This legislation has raised significant concerns among journalists and experts as well. Questions have emerged about whether the laws genuinely aim to address misinformation or serve as tools for a networked authoritarian government to regulate

citizens' online behavior. Critics highlight the lack of clarity regarding which content may be deemed criminal, warning that such ambiguity could endanger press freedom and individuals' right to online anonymity (Coşkun, 2022; Aydıntaşbaş, 2022).

Some scholars argue that several provisions in Turkish law, such as those mandating social media platforms with a certain user base to comply with legal requirements, designate a local representative, and remove clearly illegal content within 24 hours of notification, were directly modeled after Germany's NetzDG. Türkiye, which had already encountered significant challenges concerning freedom of speech and fundamental rights under the previous version of the law, has seen these issues further intensified by the adoption of provisions from the NetzDG. When the NetzDG was introduced in Germany, many internet activists and sociologists expressed concerns that it could serve as a model for autocratic regimes. Indeed, the law initially influenced countries such as Russia, India, Brazil, Malaysia, the Philippines, India, Singapore and ultimately Türkiye. Supporters of the Turkish Law argue that the law is necessary for public safety, aligns with global norms and is based on the most current and modern version of the law (Sarı, 2020).

3.2.2. Public Institutions in the Fight Against Disinformation

The Presidential Directorate of Communications, established under Presidential Decree No. 14 on the Organization of the Directorate of Communications and published in Official Gazette No. 30488, which came into effect on July 24, 2018, following the closure of the Directorate General of Press and Information serves as the primary state institution tasked with combating disinformation.

On August 5, 2022, Prof. Dr. Fahrettin Altun, Presidency's Head of Communications, announced via social media the establishment of an independent "Centre

for Combating Disinformation" (Dezenformasyonla Mücadele Merkezi) within the Directorate of Communications to counter systematic disinformation campaigns targeting Türkiye. This unit functions under Article 3 of the previously mentioned Presidential Decree No. 14. The article designates the Directorate with the responsibility of ensuring the prompt and accurate distribution of information to the public and relevant authorities, as well as evaluating the impact of this information on public opinion.

Republic of Türkiye Directorate of Communications Center for Combating Disinformation focuses on monitoring and countering psychological operations, propaganda, perception management efforts, and both domestic and international disinformation targeting Türkiye. It actively addresses manipulative activities by publishing Disinformation Bulletins, which are made publicly accessible on the Presidency's Directorate of Communications' website. These bulletins are issued weekly or daily, depending on the situation, to inform the public and mitigate the spread of false information (Presidency's Directorate of Communications, 2022). The center's activities can be accessed through the Directorate of Communications' official website (iletisim.gov.tr) as well as its dedicated website (dmm.gov.tr).

However, the Centre for Combating Disinformation has been criticized for the majority of its posts focusing primarily on refuting disinformation, without including explanatory and persuasive information, official explanations or links to reliable sources. It has also been noted that the low engagement levels, such as replies, likes and shares should be addressed to improve the visibility and interaction of the Centre's posts (Özgür, 2024: 22-23).

Apart from following bulletins published by the Centre for Combating Disinformation (DMM), Turkish citizens can also submit individual reports and track their submission through the "Disinformation Reporting Service," accessible under the "Directorate of Communication" section in the e-Government (e-Devlet) portal (turkiye.gov.tr, n.d.).

Another and older state-led counter-disinformation initiative is "Fact Check Line" (Teyit Hattı) of the Anadolu Agency, the official news agency of Türkiye. Established in October 2019, the Fact Check Line aims to identify and rectify content that obstructs the public's access to accurate information. The unit works to combat disinformation by correcting out-of-context statements, sharing the original versions of manipulated images and addressing disinformation campaigns. Furthermore, it continuously develops new strategies to combat information pollution, with the goal of eliminating harmful sources, enhancing media literacy and raising awareness about malicious content creators (Fact Check Line, n.d.).

In conclusion, both the Republic of Türkiye Directorate of Communications Centre for Combating Disinformation and the Anadolu Agency's Fact Check Line play crucial roles in combating disinformation. Together, these initiatives reflect Türkiye's comprehensive approach to tackling the spread of false information, fostering media literacy and raising public awareness to create a more informed society.

3.3. Brazil's Fight Against Disinformation

Covering an area of roughly 8.5 million square kilometers, Brazil is the largest country in South America, both in terms of land area and population. Shaped by centuries

of migration, indigenous heritage and cultural exchange, Brazil has a diverse demographic structure with a population of over 215 million (World Bank, 2023). Due to its considerable economic, social, and geopolitical significance, Brazil attracts scholarly attention, not only for its demographic profile but also for its intricate political landscape.

Originally inhabited by indigenous tribes, Portugal colonized the land for centuries. After a brief period as a united kingdom with Portugal, Brazil gained independence in 1822. The country transitioned from a monarchy to a federal republic with a presidential system by 1889. According to the CIA World Factbook's 2023 estimates, the Brazilian economy ranks seventh in terms of purchasing power parity. (Central Intelligence Agency, n.d.). Brazil holds membership in several prominent international organizations, including the BRICS and the G20. Furthermore, Brazil is a founding member of several prominent institutions, including UN, G20, the CPLP (Community of Portuguese Language Countries), the Organization of Ibero-American States, OAS, and MERCOSUR.

A study conducted by the BBC World Service in September 2017, which included participants from eighteen countries, found that 79 percent of respondents expressed concern about the authenticity of information available on the internet. This issue was most pronounced in Brazil, where 122 percent of respondents expressed worry about distinguishing between authentic and fraudulent content online (Cellan-Jones, 2017).

In 2019, the Brazilian state of São Paulo introduced media literacy as an elective course for middle school students. The aim of this course was to help students recognize what qualifies as news and understand how to verify sources (Gomes, 2019).

In 2020, The Superior Electoral Court (TSE) of Brazil has collaborated with social media platforms by establishing an official court chatbox on WhatsApp. This enables

anyone to directly make concerns regarding suspicious posts to TSE authorities. Electoral officials and WhatsApp have access to a technology that enables them to receive and gather information about social media accounts that are suspected of disseminating messages in large quantities, a behavior that is in violation of Facebook's rules of use (Tribunal Superior Eleitoral, 2020).

Brazil's legislative branch, the National Congress (Congresso Nacional), operates as a bicameral system, consisting of the House of Representatives (Câmara dos Deputados) and the Senate (Senado Federal). The House of Representatives is made up of 513 deputies, elected through proportional representation. Each state and the Federal District are assigned a minimum of 8 and a maximum of 70 seats, determined by population size (Câmara dos Deputados, n.d.). Deputies serve four-year terms, representing the population's interests on a proportional basis. The Senate, in contrast, guarantees equal representation for Brazil's 26 states and the Federal District, with each state electing three senators through a majority vote for staggered eight-year terms (Câmara dos Deputados, n.d.). Both chambers collaborate to legislate, oversee the federal budget and hold the Executive Branch accountable. The Senate also holds exclusive powers, such as ratifying international treaties and conducting impeachment trials. Together, these bodies maintain checks and balances within Brazil's federal structure, ensuring democratic governance through shared legislative responsibilities.

Examining Brazil's challenge with disinformation during election periods is essential to understanding the need for an 'anti-disinformation law' and the subsequent regulations being implemented. In Brazil, the judiciary oversees the electoral process through a specialized but temporary structure, with electoral judges appointed from state or

federal courts. The electoral system comprises a state-level electoral court for regional elections and a higher court in Brasília for national elections. Strict regulations govern electoral advertising, prohibiting paid radio and television ads, restricting social media advertising and requiring transparency in printed materials. Appointed judges monitor compliance and adjudicate disputes during elections, while courts certify election results and handle any challenges to their validity (Santos, 2020). This politically charged environment underscored the critical role of Brazil's juridically managed electoral system in maintaining oversight and fairness during the election process.

Brazil has 187.9 million of a digital population (Datareportal, 2024), ranking as the fifth-largest country in terms of internet users globally. Nearly 80% of the population are active social media users. As reported by the Reuters Institute's Digital News Report (2024), 74% of Brazilians rely on online sources (including social media) to access news, underscoring the significant role digital platforms play in shaping public opinion and the potential for disinformation to influence voters. The leading social media platforms in Brazil are WhatsApp (147 million users), YouTube (144 million users), Instagram (134,6 million users), Facebook (113,3 million users) and TikTok (98,59 million users.) (Datareportal, 2024) The prevalence of social media in Brazilian daily life highlights its significant role in the spread of disinformation, particularly in the lead-up to elections, where it becomes a crucial battleground for political influence.

The 2018 Brazilian presidential elections occurred against the backdrop of a deeply polarized political landscape, characterized by a pronounced divide between right- and left-wing factions. This polarization deepened in the aftermath of the large-scale protests of 2013 and was further fueled by key political developments, such as the impeachment of

President Dilma Rousseff and the imprisonment of former President Luiz Inácio Lula da Silva. (Santos, 2020). Research on Facebook political activity during this period highlights the growing polarization, noting that between 2014 and 2016, six initially distinct communities of political interest coalesced into two largely insular groups: progressives and conservatives, with minimal overlap in perspectives or interactions (Ortellado and Ribeiro, 2018).

The 2018 Brazilian elections were profoundly shaped by disinformation campaigns, with WhatsApp emerging as a central platform for the dissemination of false political information. This reliance on WhatsApp stemmed from its cost-effectiveness and accessibility, particularly in a country where traditional SMS services were prohibitively expensive. The affordability on the app, combined with data packages offered by mobile operators allowing unlimited usage, contributed to its widespread adoption. The app was installed on over 90% of mobile devices in Brazil, cementing its role as a vital communication medium for both personal and political purposes (Saboia, 2016).

A delegation from the Organization of American States (OAS) conducted an observation of the 2018 elections and highlighted disinformation as a significant concern. While their report commended the electoral process and the reliability of the voting system, it underscored the complexity of combating disinformation in this context. The delegation noted that social media platforms, particularly WhatsApp, played a pivotal role in spreading misleading information, fueling polarization and public distrust in the democratic framework (OAS, 2018).

The Electoral Justice Permanent Program on Countering Disinformation, established through Ordinance TSE No. 510 of August 4, 2021, represented the

continuation and refinement of the Superior Electoral Court's (TSE) efforts to mitigate the harmful effects of disinformation. This program specifically targeted misinformation related to the Electoral Court and its members, the electronic voting system, the various phases of the electoral process and its participants. This strategic plan is structured around three primary axes: information, prevention and response. Each axis encompasses specific projects and initiatives to combat disinformation effectively. The information axis focuses on disseminating accurate and official election-related information. This includes establishing a network for mass information sharing, launching a WhatsApp chatbot for electoral queries, improving fact-checking access, enhancing electoral transparency and developing digital tools for reliable communication. The initiatives prioritize freedom of expression and employ prebunking strategies to reduce the public's susceptibility to disinformation. The prevention axis emphasizes education and awareness through initiatives like training internal and external stakeholders on disinformation and electoral integrity, addressing the mental health of those directly involved in combating disinformation and promoting media literacy. It also includes awareness campaigns, collaborations on media literacy projects, engagement with political parties to emphasize their responsibilities and support for public institutions in countering disinformation. The response axis addresses disinformation directly through a coalition for fact-checking, partnerships with digital platforms to combat disinformation networks and a reporting channel for content dissemination issues. It also includes monitoring disinformation targeting the electoral process, collaborating with law enforcement and prosecutorial bodies, establishing a Strategic Cyberintelligence Committee, and revising regulations to more effectively address disinformation.

In parallel, the European Union's Code of Practice on Disinformation, initially introduced in 2018 and reinforced in 2022, tackles disinformation during election periods, particularly during European Parliament elections. Similar to Brazil's TSE efforts, the EU's Code emphasizes cooperation among key stakeholders, such as digital platforms, fact-checkers, civil society, and governments, to combat the spread of disinformation. Both frameworks have a multi-stakeholder approach, wherein the EU's Code of Practice advocates for platforms to implement measures such as transparency reporting, content moderation and the suspension of accounts spreading disinformation. Similarly, Brazil's TSE has formed strategic partnerships with digital platforms to ensure rapid responses and content removal related to disinformation, particularly surrounding the electoral process (Folha da Serra, 2022). A key distinction between the two approaches lies in the level of formal regulation. The EU relies on a voluntary framework with an emphasis on cross-border collaboration, whereas Brazil has adopted a more centralized, state-driven approach focused on national elections and protecting electoral integrity through formal government programs.

On October 2, 2022, Brazil held elections for the President, Vice-President, 27 State Governors, 27 Senators (one-third of the Senators), 513 Federal Deputies, and over 1,000 State Parliament representatives. In the second round of the general elections held on October 30, 2022, Luiz Inácio Lula da Silva emerged victorious with 50.9% of the votes against the then-incumbent President Jair Bolsonaro (G1, 2022). Lula, who previously served as President from 2003 to 2010, assumed office on January 1, 2023.

The 2022 Brazilian presidential election was characterized by heated discussions on the issue of disinformation, with both leading candidates, Lula and Bolsonaro, participating

in debates and making accusations regarding the dissemination of false information online. The proliferation of fake news has become a growing concern in Brazilian politics, with the passage of the so-called "Fake News Bill," officially known as the "Law on Freedom, Responsibility and Transparency on the Internet" aimed at addressing the problem. During the election period, both Lula and Bolsonaro have accused each other of using online platforms to disseminate misleading information, with the candidates trading barbs over issues such as Bolsonaro administration's handling of the COVID-19 pandemic and the integrity of the country's electoral system. False claims included accusations of Satanism against Lula, linked to a video shared by Bolsonaro's sons, and a distorted interview with Bolsonaro suggesting he would eat human flesh, leading to claims of cannibalism. TSE intervened to ban misleading content. Corruption was also central, with Bolsonaro accusing Lula of involvement in the Petrobras scandal, while Lula criticized Bolsonaro's "secret budget" scheme. Disinformation on COVID-19 also spread, with Bolsonaro accused of spreading vaccine misinformation (BBC, 2022). The use of targeted political advertisement on social media has also been a point of contention, with concerns raised about the potential for such ads to manipulate voters through the spread of disinformation. (Bader, 2018) In between two rounds, on October 20, 2022, TSE adopted a resolution aimed at combating disinformation that undermines the electoral process's integrity, building upon prior efforts by the TSE and Federal Police during the 2022 general elections. The resolution prohibited sharing false or decontextualized information affecting the voting process, with noncompliance leading to fines or temporary suspension of social media accounts. Persistent violations may result in platform shutdowns. Additionally, paid electoral advertisements online were banned during critical election periods to ensure electoral integrity (TSE, 2022).

Throughout the election processes, the decisions made by the TSE have established significant legal precedents. One notable decision involved directing the removal of a post by the Brazilian media company ‘Brasil Paralelo’ on Twitter, which disseminated false corruption allegations about Lula da Silva. The court ordered the post to be taken down within 24 hours, imposing a daily fine for non-compliance. Another ruling forced the withdrawal of a false advertisement accusing Bolsonaro of cannibalism, aforementioned distorted video. The court deemed it offensive and a misrepresentation of the original context. In another case, the TSE intervened in the ‘Lulafix’ YouTube channel, requiring the removal of videos containing disinformation about Lula and threatening suspension and fines if the content was not taken down. Additionally, a ruling in response to Bolsonaro’s complaint against a federal deputy’s posts, which incited hate speech, resulted in further scrutiny of content that harmed the reputations of candidates (Rubio and Monteiro, 2023).

As we can see, Brazil’s efforts to combat disinformation are particularly intensified during electoral periods. A notable initiative in this regard is the establishment of The Integrated Center for Confronting Disinformation and Defending Democracy (CIEDDE) platform in March 2024, by TSE in preparation for the 2024 local elections. The aim was to combat disinformation, deepfakes and anti-democratic speech during elections. It collaborates with public institutions, social media platforms and private entities to ensure compliance with electoral rules and promote voter protection. CIEDDE manages complaints through an automated system, involving authorities like the Public Prosecution Service and Federal Police when necessary. Platforms must address flagged content within two hours, with non-compliance leading to removal orders by the TSE Presidency (Superior Electoral Court, 2024).

Having examined the underlying causes and the growing necessity for a legislative response to disinformation, we are now positioned to analyze the ‘Fake News Bill’ itself. Before the enactment of the ‘Fake News Bill’, Brazil already had a legal framework addressing various aspects of digital and electoral governance. These included Law No. 9,504 of September 30, 1997 (*Electoral Statue*), which regulates electoral processes and campaigns; Law No. 8.078 of September 11, 1990 (*Consumer Defense Code*), which provides safeguards for consumer rights, including those in the digital realm; Law No. 12.965 of April 23, 2014 (*Brazilian Civil Framework of the Internet*), which establishes principles, guarantees and user rights for internet use; and Law No. 13.709 of August 14, 2018 (*General Personal Data Protection Act*), which governs the processing of personal data to ensure privacy and security (Draft Bill No. 2.630, 2020). Approved in 2018 and effective since 2020, Brazil’s Lei Geral de Proteção de Dados (Law No. 13.709 of 2018) closely aligned with the European Union’s General Data Protection Regulation, setting forth principles that regulate personal data collection and use, ensure rights for data subjects and impose accountability requirements on data controllers and processors (Law No. 13.709, 2018; GDPR, 2016).

Despite this robust legal framework, the escalating challenges posed by disinformation, particularly in the context of elections and online political discourse, called for a more focused legislative approach. The government’s advocacy for the ‘Fake News Bill’ was primarily motivated by the perceived threat of disinformation during the 2018 presidential election, when concerns emerged regarding the spread of false narratives and their potential influence on the election outcome. In this context, Brazilian Senator Alessandro Vieira proposed Bill PL 2630 in May 2020, seeking to establish a more robust legal framework for addressing the spread of disinformation on digital platforms. The bill is

called “Lei Brasileira de Liberdade, Responsabilidade e Transparência na Internet” (Brazilian Law on Freedom, Responsibility and Transparency on the Internet), commonly referred to as the “Fake News Bill.” The bill sought to create a legal framework to address these issues, including provisions to ensure social media platforms are accountable for their content moderation practices and the potential imposition of fines for non-compliance. The version of document approved by the Senate in July 2020 was transmitted to the Chamber of Deputies, where a working group was formed to refine the text received from the Senate. The revised version, prepared by the working group, was presented in March 2022 and introduced substantial modifications, particularly in response to concerns regarding the presidential elections scheduled for October 2022 and the role of digital platforms in the dissemination of disinformation. The Bill has undergone multiple amendments; this study will focus on the most recent version, presented on April 27, 2023 (Câmara dos Deputados, 2020).

The revised text shares several similarities with the European Union’s Digital Services Act, notably the transparency reporting requirements as outlined in Article 15. The following is a comparison between Article 15 of the Digital Services Act (DSA) and Article 23 of the most recent version of Brazil’s “Law on Freedom, Responsibility and Transparency on the Internet”, known as Law no. 2.630 (Câmara dos Deputados, 2020).

Table 1: Comparison of EU DSA Article 15 and Brazil’s Law No. 2630 Article 23
(European Union, 2022; Câmara dos Deputados, 2020)

Aspect	EU Digital Services Act (DSA) - Article 15	Brazil’s Law No. 2630/2020 (Fake News Law) - Article 23
Transparency Reporting Requirement	Providers are obligated to release annual reports on content moderation in a machine-readable format and ensure they are easily accessible.	Providers are required to publish semiannual transparency reports, which must be readily accessible on their websites in a machine-readable format, in Portuguese, and available to the public.
Frequency of Reports	Annually	Semiannually, with the possibility of increased frequency due to significant public interest (e.g., during elections or public emergencies).
Content of Reports	1. Quantitative Data: Number of orders received from authorities, types of illegal content, number of notices submitted, and actions taken based on automated tools. 2. Qualitative Information: Description of content moderation efforts, use of automated means, and action taken against illegal content.	1. Qualitative Information: Detailed moderation procedures, including actions to combat illegal activities, changes to terms of use and recommendation systems, and data about moderation teams. 2. Quantitative Data: Number of active users, profiles, and moderation procedures, including those related to legal measures and automated tools.
Categories of Information	- Number of orders received from Member States’ authorities. - Notices submitted, actions taken (law or terms of service), and use of automated means. - Complaints received and decisions taken. - Description of automated tools and safeguards.	- Detailed breakdown of content and account moderation procedures. - Actions against illegal activities, changes in terms of use, and recommendation systems. - Number of active users and user profiles for comparative analysis. - Data on accuracy and precision of moderation procedures and legal measures. - Information on automated content moderation tools.
Reporting Format	Reports must be clear, easily comprehensible, and machine-readable.	Reports must be accessible, machine-readable, and available in Portuguese. They should meet open technological standards that allow interoperability between applications and databases, with anonymization of personal data.
Deadline for Publication	No specific deadline stated, but the reports must be available at least once a year.	Reports must be made public within 60 days after the end of the relevant semester.
Additional Considerations	The reports must provide comprehensive data on the deployment of automated systems for content moderation, covering their accuracy and any possible errors.	Semiannual reports must include detailed, qualitative descriptions and quantitative data, with the possibility of more frequent reports for cases of significant public interest or non-compliance.
Regulation and Enforcement	The Commission may adopt implementing acts to define the templates, form, and content of reports.	The law anticipates future regulation to further define and refine reporting content, taking into account the diversity of business models, and outlining the information to be included in the reports.

Brazil's efforts to combat disinformation demonstrate the critical need for comprehensive regulatory measures in an era of digital misinformation. Initiatives like the Superior

Electoral Court's (TSE) proactive interventions during elections and the introduction of the "Fake News Bill" underscore the country's commitment to safeguarding electoral integrity and democratic processes. By addressing challenges posed by its significant digital population and extensive social media engagement, Brazil has developed strategies that balance transparency, accountability, and collaboration, aligning with global regulatory frameworks such as the EU's Digital Services Act.

3.3.1. Oppositions to The Bill

The proposed law generated significant debate and scrutiny, with proponents arguing for the need to curb the harmful effects of fake news, while critics raised concerns about potential threats to free speech and individual rights.

President of Google Brazil, Fabio Coelho published a blog post on March 11, 2022 on Bill no. 2630, outlining the company's position and concerns about the proposed legislation. While acknowledging the importance of combating disinformation, Google raised concerns that the current version of the Bill could have unintended negative consequences. Google argued that the bill could inadvertently facilitate disinformation by reducing security of online platforms, increasing the risk of fraud and abuse and providing malicious actors with a 'guide' to circumvent platform protections. According to the blog post, this could ultimately undermine the quality and relevance of search results, allowing bad actors to manipulate ranking systems and prioritize misleading content (Google, 2020).

On April 27, 2023, Marcelo Lacerda, Director of Government Relations and Public Policy at Google Brazil, published a blog post expressing concerns about the potential adverse impacts of the Bill. While recognizing the need to combat disinformation, Google warned that several provisions within the Bill could threaten essential elements of the

internet, such as freedom of expression, access to information, and innovation. One primary concern was that the bill could inadvertently protect purveyors of disinformation by limiting the enforcement of platform policies on content moderation. This could lead to problematic content being kept online, especially from entities presenting themselves as journalistic organizations, but which promote misleading information. Furthermore, Lacerda expressed concerns about the Bill's negative impact on online advertising, potentially increasing costs for businesses and hindering competition (Google, 2023). According to a report by NetLab from Universidade Federal do Rio de Janeiro (UFRJ), Google also prioritized opposition content in its search results and ran paid ads on platforms like Spotify to criticize the Bill (NetLab, 2023: 4). Additionally, Google sent e-mails to YouTube content creators, warning that the Bill could adversely affect their financial earnings by disrupting the platform's revenue-sharing model. Other leading tech companies, including Meta (Facebook, Instagram, WhatsApp), X (formerly Twitter) and TikTok, have also voiced their opposed to the Bill (Correia, 2024: 63).

On May 9th, 2023, Telegram sent a message to its users in Brazil, claiming that a proposed law would effectively end freedom of speech. The message argued that the bill would grant the government censorship powers without judicial oversight, describing it as one of the most dangerous laws ever considered in Brazil, particularly in terms of its impact on fundamental human rights (Viapiana, 2023).

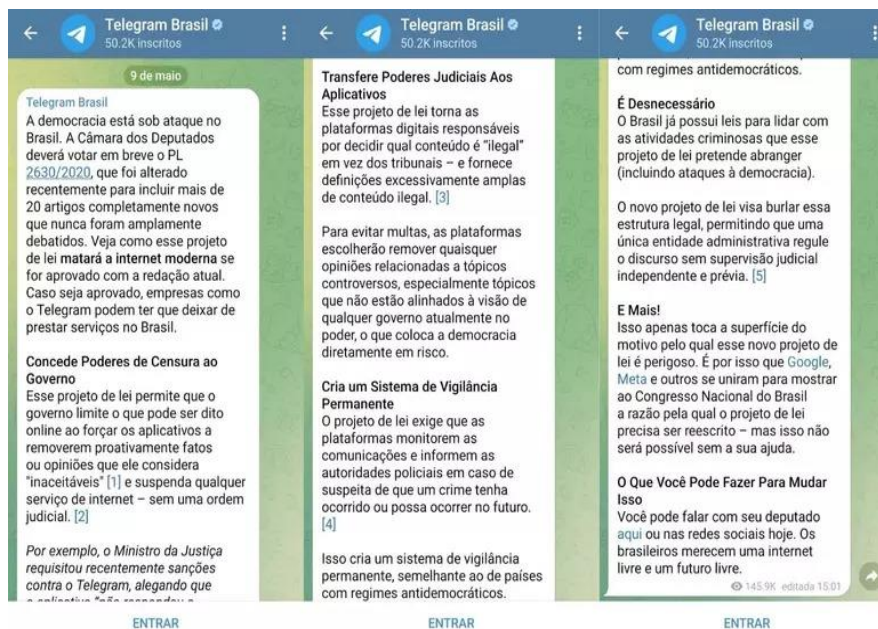


Figure 4: Screenshot of Telegram's message to Brazilian users against PL das Fake News (Intrieri, 2024)

The announcement elicited rapid responses from supporters of the bill, the federal government, the Public Prosecutor's Office, and the Supreme Court. The Minister of Justice has already issued a notice to Telegram, giving it a two-day deadline to provide clarification on the incident, with the risk of facing fines or suspension of its operations in the country. Brazil's Justice Minister, Flávio Dino, announced via Twitter on Tuesday afternoon that legal action will be taken against the social network Telegram following its mass dissemination of a statement opposing the "Fake News" Bill (PL 2630/2020), (Dino, 2023).

On 10 May 2023, Supreme Court Judge Alexandre de Moraes issued an order requiring the social media application Telegram to remove the message, warning that failure to do so would result in a 72-hour suspension of the application and a financial

penalty of R\$500,000 (US\$100,000) per hour. Telegram complied with the order and deleted the message approximately one hour after the order was issued (Poder360, n.d.).

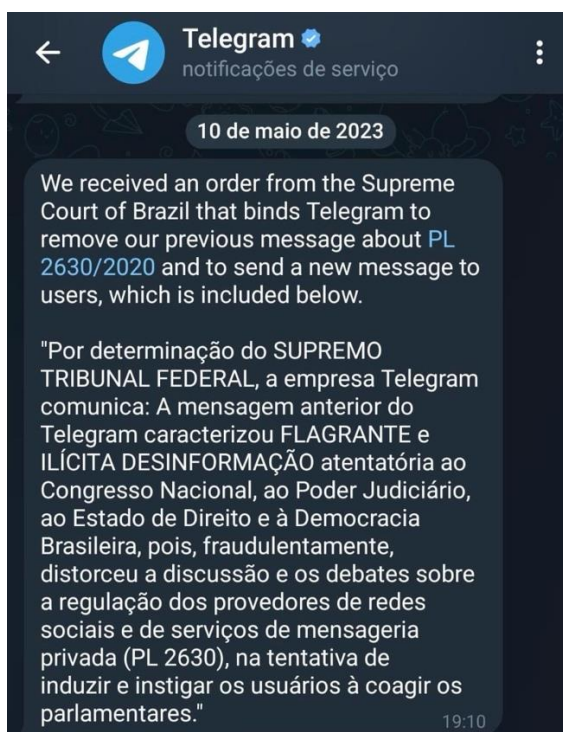


Figure 5: Telegram notification to users about Supreme Court directive regarding PL 2630/2020 (Monteiro, 2023)

The House of Representatives postponed the vote on the Fake News Bill, which had faced opposition from large technology companies. A new date for the vote has not been announced.

Another aspect of the bill that has faced criticism is its limited progress in addressing two key structural aspects of platform regulation: data management and market power. While the bill addresses certain aspects of platform operations, it allegedly falls short in areas where public intervention could challenge the economic dominance of US-based tech companies. This could result in a failure to enact meaningful change in the conditions under which both speech and data are regulated (Tomaz, 2023).

A study carried out by Fundação Getúlio Vargas (FGV), a prominent Brazilian think-tank, concluded that Brazil's ongoing public debate on digital platform regulation, particularly focusing on Bill No. 2630, reflects significant political and societal divisions over measures to combat disinformation. The study highlighted that the Bill was met with both strong support from key political figures in the 2023 government and criticism from the opposition, especially during its earlier stages. Public discourse often centered on the notion of censorship rather than addressing the Bill's intended framework for tackling online disinformation. Furthermore, the study found that narratives promoting the regulation were frequently tied to national security concerns, citing events such as January 8 attacks and school violence. Meanwhile, critics, including members of the far-right, accused the Bill of violating freedom of expression and falsely claimed it would censor religious texts, such as the Bible (Grassi & Ruediger, 2023). These findings underscore the contentious and polarized nature of Brazil's efforts to legislate against disinformation, highlighting challenges in achieving public consensus on the issue.

3.3.2. Public Institutions in the Fight Against Disinformation

The Secretariat of Social Communication - *Secretaria de Comunicação Social* (SECOM) is a high-level federal agency in Brazil, responsible for overseeing the release of funds and the management of advertising contracts signed by the Federal Government. Initially established as a sub-agency within the Secretariat-General of the Presidency, SECOM became a full ministry following a 2007 reform by President Luiz Inácio Lula da Silva. This reform also merged SECOM with the Secretariat of Press and Spokesperson, which handles government-media relations - a combination that drew criticism for overlapping responsibilities.

The Brazilian government's initiative to fight disinformation through the "Brasil Contra Fake" website, launched by the Communication Secretariat (SECOM) on March 25th, 2023, has sparked significant controversy, particularly among independent fact-checking organizations and journalists. While the government positioned the website as a tool to combat misinformation and clarify "fake news" related to its policies, critics have raised concerns about its lack of transparency, impartiality, and its blending of fact-checking with propaganda (SECOM, 2023).

By serving as the government's spokesperson, being directly appointed to the presidency, publishing governmental news, and combating disinformation, SECOM can be regarded as the counterpart to the Directorate of Communications of Türkiye.

The Superior Electoral Court (TSE) is responsible for overseeing elections in Brazil and has been proactive in combating disinformation, particularly during election periods. It has collaborated with independent fact-checking organizations to identify and prevent the dissemination of false information, as seen during the 2018 and 2022 elections. In addition, the TSE launched its "Disinformation Combat" Program, which includes measures to provide voters with verified information and penalize those spreading fake news. To further promote transparency, the TSE also introduced the "Truth on the Net" program, aimed at tackling misinformation and safeguarding the integrity of the electoral process. (TSE, n.d.)

CONCLUSION AND EVALUATION

Access to information and communication has been a critical factor for individuals, nations, and states throughout history. States that have achieved more efficient and successful access to information and communication compared to others have strategically leveraged this advantage for economic and political gains, turning it into a significant asset in shaping their influence and competitiveness.

The diversification of information and advancements in the field of communication have greatly enhanced the impact of information and communication. The digitalization within this sector, which has profoundly impacted access to and dissemination of information, has led to the migration of the communication activities of individuals and nations to digital platforms. The difficulties experienced in verifying information and news on digital platforms and in terms of source reliability have become an important factor in the security of nations and internationally. Because the intense flow of information and concerns about source reliability experienced on these platforms have led to disinformation. With digitalization, disinformation has begun to occur more in every institution of society. For this reason, it has become necessary for organizations and states to combat and create policies to prevent disinformation (Ateş, 2022).

Fabricated narratives, while limited in certain regions, exhibit considerable variation in prevalence across the globe. The issue of disinformation in Brazilian politics is not a recent development; studies indicate that the country's media landscape has long been marked by significant political polarization, with prominent news outlets utilizing strategies that have shaped public opinion (Silveira et al., 2020).

Brazil, marked by high political polarization, experience a particularly notable incidence of complete fabrications. Latin American countries are especially impacted by various forms of falsehoods, including total inventions, manipulated and imposter content, and decontextualized information. European countries, on the other hand, are more affected by misleading information characterized by selective presentation, exaggeration and distortion. While certain topics, deceptive strategies, and types of misinformation appear globally consistent, falsehoods are deeply adapted to local contexts, influenced mainly by each region's distinct media systems and informational landscapes (Cazzamatta, 2024: 19).

Despite the significant consequences of disinformation at the individual, societal, and international levels, there remains a lack of consensus in both the literature and practice regarding disinformation activities and the measures to counter them. These issues are progressively being explored in academic research and discussed within policymaker discourse.

Both Brazil's Bill No. 2630 (2020) and Türkiye's Law No. 7418 (2022) incorporate provisions that establish jurisdictional reach and accountability mechanisms for large digital platforms, targeting those with significant user bases. Article 2 of Brazil's Law No. 2630 establishes that the legislation applies to social networks, instant messaging services, search engines and content-on-demand providers with more than 10 million monthly users in Brazil, highlighting its relevance to major digital platforms that serve Brazilian users. On a similar basis, Article 34 of Türkiye's Law No. 7418 requires social network providers with over 10 million daily accesses from Türkiye to designate a fully authorized representative within the country, along with corporate representation requirements for foreign platforms (Resmi Gazete, 2022). Similarly, the European Union's DSA imposes

strict obligations on very large online platforms (VLOPs) and very large online search engines (VLOSEs), which are defined as having more than 45 million monthly users. These platforms must comply with heightened transparency, content moderation and systematic risk mitigation measures to address issues like illegal content, disinformation and public safety. While all three frameworks impose obligations on large-scale platforms to mitigate systematic risks, the EU's DSA emphasizes broader systematic risk assessments and requires annual audits, while Brazil and Türkiye focus more on localized measures like advertising transparency and the appointment of local representatives. These distinctions highlight varying approaches to balancing platform accountability, user rights and national regulatory oversight across different jurisdictions.

Turkish Law No. 7418, under Article 6, imposes a requirement on internet news platforms to retain published content in its entirety and without alteration for a period of two days. This retention ensures that the content remains accessible for judicial review and potential legal inquiries. In contrast, Brazilian Draft Bill No. 2630, articulated in Article 46, stipulates a shorter retention period of six months for logs and removed content or disabled access. This period can be extended through judicial orders, emphasizing the regulatory need for compliance with legal processes. The European Union has analogous regulations, particularly under DSA and Code of Practice on Disinformation, albeit with distinct frameworks and mechanism for enforcement. While the EU regulations do not prescribe specific retention periods for removed content, they share a similar goal with the Turkish and Brazilian laws which is to ensure that content can be retrieved for legal scrutiny when necessary. Article 15 and Article 18 of The DSA requires platforms to provide access to content moderation data when requested by authorities, similar to how Turkish and Brazilian laws ensure that removed content can be tracked or retrieved for judicial

purposes. Both the EU's DSA and the Code of Practice on Disinformation emphasize transparency in the moderation of content, requiring platforms to report on their practices and provide detailed information about how content is removed, flagged or restricted. This mirrors Turkish (Article 34) and Brazilian regulations (Article 23), which require platforms to provide regular transparency reports outlining the removal of content and the retention of logs.

On the other hand, the similarity between Article 23 of Brazilian Bill and Article 34 of Turkish Law is striking. They share common objectives in promoting transparency and accountability among social media providers. Both laws require platforms to submit regular reports on content moderation, including details on content removal, algorithms, advertising policies and the management of user data. The Turkish law emphasizes transparency in how platforms highlight or restrict content and how they handle advertisements, including an ad library with detailed information. Similarly, the Brazilian Bill mandates semiannual transparency reports, which must include both qualitative and quantitative data on moderation practices, actions against illegal activities and changes to terms of use and recommendation systems. Both laws stress the importance of equal and impartial treatment of users, requiring platforms to report on measures taken to ensure fairness. They also empower users to manage content recommendations and restrict the usage of their personal data. Both frameworks highlight the need for accessible, machine-readable reports and set deadlines for timely publication with the Brazilian law specifying a 60-day timeline for semiannual reports.

Disinformation debates become particularly prominent during election periods. Government initiatives in this area facilitate swift responses to immediate information

threats, particularly those related to electoral disinformation. In recent Brazilian elections, the judiciary collaborated with digital platforms to ensure prompt action and compliance with court orders concerning unlawful content. These efforts aimed to establish transparent and effective communication channels between digital platforms and public authorities, ensuring that content moderation decisions were transparent, publicly accountable, and aligned with national legal frameworks. Similarly, The European Commission emphasized its commitment to safeguarding democratic processes during the June 2024 elections by combating disinformation and foreign information manipulation. Key measures included enforcing the Digital Services Act (DSA), which mandates risk assessments and content moderation for very large online platforms (VLOPs). The Commission also launched election guidelines and voluntary stress tests for platforms like X (formerly Twitter) and Meta to ensure compliance. Awareness campaigns, media literacy initiatives, and fact-checking collaborations further strengthened resilience against disinformation (European Commission, 2024).

In contrast, there is no record of Türkiye implementing specific measures or initiatives to address disinformation or enhance digital platform accountability before the 2023 General Elections or the 2024 Local Elections.

While the European Union, Türkiye and Brazil each have distinct frameworks and practices for combating disinformation, a common criticism across all three is that their legal regulations are often compared to the "Ministry of Truth" depicted in George Orwell's *1984*, with critics arguing that these laws allow the government to unilaterally determine what constitutes the truth and punish those who refuse to comply (Barnes, 2023) (Öztürk, 2023).

The central issue of this research resides in the differing approaches taken by these three entities to address the widespread problem of disinformation. While the European Union has established regulatory frameworks aimed at enhancing transparency and accountability in digital media, Türkiye's approach reflects a blend of legal measures and state-driven narratives. In contrast, Brazil's strategies emphasize community engagement and social media literacy, recognizing the importance of empowering citizens against misinformation.

The research and document analysis indicate that Brazil regularly cites EU policies in its comparative evaluations. In contrast, Türkiye's adoption of EU rules appears to be less extensive than Brazil's. Future research would benefit from investigating the underlying factors that influence the varying degrees of EU policy adoption between Brazil and Türkiye. Additionally, examining the specific areas where Brazil aligns more closely with EU regulations could provide insights into the motivations and strategies driving this alignment.

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TÜBİTAK Popüler Bilim Yayınları.

ÖZET

Gerçeklik ve hakikat kavramları, epistemoloji ve ontoloji alanlarında sıkça tartışılmakta, birbiriyle bağlantılı ancak farklı anlamlar taşıyan iki kavramdır. Gerçeklik, insan bilincinden bağımsız olarak var olan, somut ve nesnel dünyayı ifade etmektedir. Hakikat ise bu gerçekliğin insan zihninde algılanan ve anlamlandırılan biçimini taşımaktadır. Bu iki kavram arasındaki ayrım, bilginin kaynağı ve doğruluk kriterleri açısından önem taşımaktadır. Gerçeklik, deneyim ve gözlem yoluyla algılanırken, hakikat genellikle bu algının yorumlanması ve anlamlandırılması sürecinde şekillenmektedir. Dolayısıyla, hakikat bireysel ve toplumsal çerçeveler içinde farklılık göstermektedir. Post-truth dönemi, hakikat ve gerçeklik kavramlarının bulanıklaştığı, duyguların ve inançların nesnel gerçeklerden daha etkili olduğu bir çağ olarak tanımlanmaktadır. 2016'daki Brexit referandumu ve Donald Trump'ın ABD başkanlık zaferi, bu dönemin simgesel olayları olarak kabul edilmektedir. Oxford Sözlüğü'nün 2016'da "post-truth" terimini yılın kelimesi seçmesi, bu dönüşümün toplumsal ve politik söylemi nasıl şekillendirdiğini ortaya koymaktadır. Bu dönemde, gerçeklik algısı kişisel inançlara ve duygusal anlatılara göre şekillenirken, doğru ile yanlış arasındaki sınırlar giderek silinmiştir. Sosyal medya, bu süreci hızlandırarak yanlış bilgilerin yayılmasını kolaylaştırmış ve bireylerin kendi doğrularına göre oluşturdukları yankı odalarını güçlendirmiştir. Gerçek, artık sadece doğruluğu değil, duygusal tatmini de içeren bir kavram haline gelmektedir. Postmodernizmin evrensel hakikate olan eleştirileri de bu dönemi besleyen unsurlar arasında yer almaktadır. Jean Baudrillard'ın "simülasyon" kavramı, gerçeğin yerini onun temsillerinin aldığı savunulmakta, Theodor Adorno ve Francis Bacon gibi düşünürler, medyanın gerçeği yeniden şekillendirme gücüne dikkat çekmektedir. Post-truth siyaseti, duygusal manipülasyon ve dezenformasyon yoluyla kamuoyunun gerçeklerden

koparılmasına dayanmaktadır. Politikacılar, dini ve milli duygular, terör, ekonomik kriz ve mağduriyet temaları üzerinden algı yönetimi yaparak halkın eleştirel düşünme becerilerini zayıflatmaktadır. Hannah Arendt'e göre, gerçek ve iktidar arasındaki gerilim demokrasiyi tehdit etmektedir. Sosyal medya platformları ise bu durumu algoritmalar ve yankı odalarıyla pekiştirmektedir. Cambridge Analytica skandalı, Brexit ve Trump'ın seçim kampanyaları, post-truth siyasetinin etkisini ortaya koymaktadır. Bu dönemde, yalan haberlerin yayılımı ana akım medyayı geride bırakmakta ve kamuoyu, gerçeği ayırt etme yetisini kaybetmektedir. Etik ve demokratik değerlerin zayıflaması, toplumsal kutuplaşmayı artırarak post-truth siyasetinin etkisini güçlendirmektedir.

Bilgi Çağı, Dijital Çağ veya Bilgisayar Çağı olarak da adlandırılmakta olup, bilginin yaratılması, erişilmesi, depolanması ve paylaşılmasındaki önemli dönüşümleri ifade etmektedir. Bu dönem, 20. yüzyılın sonlarına doğru internetin yaygınlaşması ve dijital cihazların gelişmesiyle başlamıştır. Bilginin daha erişilebilir hale gelmesi, toplumlar arasında küresel bir iletişim ve bağlantı ağı kurmuş, ancak bu gelişmeler aynı zamanda aşırı bilgi yüklemesi ve yanlış bilgilendirme gibi zorluklara da yol açmıştır. Özellikle hakikat ötesi çağda, doğru ve güvenilir kaynaklarla yanıltıcı içerikler arasındaki farkları ayırt etmek giderek daha zor hale gelmektedir. Bilgi Çağı'nın belirgin özelliklerinden biri, toplumların her alanında (kültürel, ekonomik, ekolojik ve politik) artan bilgi yoğunluğudur. Küresel bir bilgi altyapısının gelişmesi, bilgilerin hızlı ve geniş bir şekilde yayılmasını sağlamış ve bilgisayar devrimi ile bilimsel ve teknolojik devrim gibi kavramların ortaya çıkmasına yol açmıştır. Dijital teknolojilerin yaygınlaşması, özellikle kişisel bilgisayarların 1980'lerde kullanılmaya başlanması, bilgi yaratma, paylaşma ve iletişim yöntemlerini köklü bir şekilde değiştirmiştir. Bu gelişmeler, dijital okuryazarlığın önemini artırmış ve insanların dijital kaynakları verimli bir şekilde kullanabilme yeteneğini gerekli kılmıştır. Dijital iletişim

araçları, bilgi akışını hızlandırmakta ve dünya genelinde daha fazla kişiye ulaşmak mümkün hale gelmektedir. Sosyal medya, bloglar ve dijital haber siteleri, bilgilerin daha geniş kitlelere ulaşmasını sağlamış olsa da, bu platformlar aynı zamanda yanlış bilgi ve dezenformasyonun yayılmasına zemin hazırlamaktadır. Dijital ortamda, her birey içerik üretebilir ve yayımlayabilir, bu da geleneksel medya denetimlerinin ortadan kalkmasına neden olmuştur. Bu durum, "yankı odaları" ve "filtre baloncukları" gibi olguları yaratmakta, kişilerin yalnızca kendi inançlarını pekiştiren içeriklerle karşılaşmalarına neden olmaktadır. Ayrıca, algoritmalar, bireylerin çevrim içi olarak gördükleri içeriği belirlemede önemli bir rol oynamaktadır. Bu kişiselleştirilmiş içerik sunumu, kullanıcıların ilgilerine göre içerikleri sunma avantajı sağlasa da, aynı zamanda selektif maruz kalma ve doğrulama önyargılarını güçlendirmektedir. Algoritmalar, yanlış veya yanıltıcı bilgilerin, bireylerin mevcut inançlarına uyum sağladığı takdirde yayılmasına neden olabilmektedir. Bilgi Çağı'nın özellikleri, özellikle Post-Gerçek Çağı'nda, duygusal çekiciliği ve doğruluk yerine inançlara dayalı içeriklerin hızla yayılmasını sağlayan dezenformasyon kampanyalarının etkisini artırmaktadır. Bu dönemde, dijital içeriğin viral hale gelmesi ve sosyal medya algoritmalarının yanlış bilgileri güçlendirmesi, toplumsal kutuplaşmayı ve bölünmeleri derinleştirmektedir.

Veri, bilgi ve enformasyon arasındaki ilişkiler de, bilgi toplumunun temel unsurlarını oluşturmakta olup, veri ham halde bulunan ve işlenmeye ihtiyaç duyan en küçük bilgi birimi, enformasyon ise verinin anlamlı hale getirilmesi olarak tanımlanmaktadır. Bilgi ise, bu anlamlı verinin insan deneyimi ve içgörüsü ile birleşerek karar alma süreçlerine ve eylemlere dönüştürülmesidir. Bu üç öge, yeni medya teknolojileri için de büyük önem taşımakta ve içerik üretimi ile dağıtımı konusunda belirleyici rol oynamaktadır. Verinin

doğru bir şekilde yönetilmesi, yanlış bilgilerin yayılmasını engellemeye yönelik kritik bir faktördür.

Bilgi bozukluğu, yanlış ve yanıltıcı bilgilerin yayılmasını ifade etmekte ve post-truth dönemi ile medya tarihinden daha eski bir olgu olarak karşımıza çıkmaktadır. Tarih boyunca her dönemde yanlış bilgilere rastlanabilmektedir. Bu kavram, yanıltıcı bilgi (misinformation), kasıtlı yanlış bilgi yayma (disinformation), zarara yol açmak amacıyla gerçek bilgilerin çarpıtılması (malinformation) gibi alt kategorileri içerir. 2017'de Claire Wardle ve Hossein Derakshan, bilgi bozukluğunu daha iyi anlamak için bir çerçeve önererek, bu türleri birbirinden ayırmışlardır. Yalan haber, dezenformasyonun bir türü olup, genellikle internet ve sosyal medya aracılığıyla hızla yayılmakta ve toplumsal güveni zedelemektedir. Ayrıca, yalan haber, yanlış bilgiyle toplumu manipüle etme ve bireylerin doğruyu yanlışlardan ayırt etme yetilerini zayıflatma riskine yol açar. Bu tür bilgilerin yayılmasının önüne geçebilmek için bilgi doğrulama yöntemlerinin güçlendirilmesi önemlidir. Dezenformasyon, halkı yanlış bilgilendirmek amacıyla kasıtlı olarak yayılan yanlış veya yanıltıcı içeriklerdir. Bu içerikler, hükümetler, haber ajansları, istihbarat servisleri ya da bireyler tarafından üretilmektedir. Dijital ortamda algoritmalar, kullanıcıları duygu odaklı ve sansasyonel içeriklere yönlendirecek şekilde düzenlenmiş olup, bu da yanıltıcı bilgilerin hızla yayılmasına olanak tanımaktadır. Sosyal medya, algoritmalar aracılığıyla kişiye özel içerik önerileri sunarak yanıltıcı bilgilerin daha geniş kitlelere ulaşmasını sağlamaktadır. Ayrıca, "botlar" ve "troll fabrikaları" gibi otomatik yöntemler de yanıltıcı bilgilerin hızla yayılmasında önemli bir rol oynamaktadır. Dezenformasyon, özellikle politik manipülasyonlarda kullanılarak kamuoyunu etkilemeye yönelik stratejilerde yer almaktadır. Bu tür içerikler, demokratik süreçleri, halk sağlığını, çevreyi ve güvenliğini tehdit edebilmektedir. Aynı zamanda, doğru bilgiye dayalı gazetecilik

ve güvenilir kaynakların itibarı da zedelenmektedir. Bu stratejiler, halkın doğru bilgilere ulaşma yeteneğini bozmakta ve bireylerin kendi doğrularını yaratmalarına yol açmaktadır.

Günümüzde, dijital medya ve sosyal medya platformlarının rolü giderek daha kritik hale gelmektedir. Bu platformlar, yanıltıcı bilgilerin hızla yayıldığı ortamlar haline gelmiştir. Medya okuryazarlığı, dijital doğrulama araçları ve şeffaflık ilkeleri gibi çözümler, dezenformasyona karşı etkili bir şekilde mücadele edebilmek için önem kazanmaktadır. Ayrıca, kullanıcıların medya tüketim alışkanlıklarını sorgulamaları ve dijital okuryazarlıklarını artırmaları gerekmektedir.

Avrupa Birliği (AB), dezenformasyonla mücadelede en etkili ve kurumsallaşmış uluslararası organizasyon olarak öne çıkmaktadır. AB'nin dezenformasyonla mücadele ihtiyacı, özellikle Rusya'nın Avrupa'nın demokratik süreçlerine etki etmeyi ve kamuoyunu manipüle etmeyi hedefleyen dış müdahale operasyonlarının arttığını fark etmesiyle ortaya çıkmıştır. 2015 yılı itibarıyla çevrim içi dezenformasyon kampanyalarının, demokratik kurumları zayıflatmak, toplumsal bölünmelere yol açmak ve medya ile hükümete olan güveni erozyona uğratmak için kullanıldığı belirgin hale gelmiştir. Avrupa Komisyonu'na göre, herhangi bir AB üye ülkesindeki demokrasiye yönelik tehditlerin, tüm Birlik'i zarara uğratma potansiyeli bulunmaktadır. AB, dijital dezenformasyonla mücadelede çok katmanlı bir strateji geliştirmiştir. Stratejinin merkezinde, uzmanlar, ulusal hükümetler, sosyal medya platformları, geleneksel medya organları ve araştırmacılardan oluşan bir iş birliği ağı yer almaktadır. Her bir grup, dezenformasyonla mücadeleye kendi benzersiz katkılarını sunmaktadır: Araştırmacılar dezenformasyon taktiklerini analiz etmekte, medya organları doğrulama yaparak gerçeği ortaya koymakta, platformlar ise dezenformasyonu tespit etmeye yönelik araçlar geliştirmektedir. Ayrıca, vatandaşların dezenformasyona karşı daha dirençli hale gelmesi için medya okuryazarlığı girişimlerine de büyük bir önem

verilmektedir. AB, bireylerin çevrim içi dezenformasyonu tanıyıp ondan kaçınabilmesi için eleştirel düşünme becerileri kazandırmayı hedeflemektedir. AB, dezenformasyonla mücadelede dengeyi sağlamak zorundadır: Demokrasi korunurken, ifade özgürlüğü ve medya çeşitliliği gibi temel haklar da gözetilmelidir. Bu bağlamda, AB'nin dezenformasyonla mücadele çabaları, yalnızca yasal ve kurumsal önlemlerle değil, aynı zamanda bireyleri bilinçlendirme ve toplumsal farkındalık yaratma çabalarıyla da pekiştirilmiştir. Bu strateji, bireylerin daha bilinçli bir şekilde çevrim içi dünyada etkileşimde bulunmalarını ve dezenformasyonla karşılaştıklarında doğru bilgiyi ayırt edebilmelerini sağlamayı amaçlamaktadır. AB içinde dezenformasyonla mücadele, Avrupa Dış Eylem Servisi (EEAS) tarafından yönetilmektedir. 2011'de kurulan bu servis, AB'nin dış ilişkilerinin yönetilmesinin yanı sıra, dezenformasyonla mücadele gibi konularda da merkezi bir rol üstlenmiştir. 2015'te kurulan Doğu Stratcom Görev Gücü, özellikle Rusya'dan gelen dezenformasyon kampanyalarına karşı AB'nin mücadelesini güçlendirmiştir. Görev gücü, AB'nin dış sınırlarındaki ülkelerdeki dezenformasyonla mücadeleye yönelik kamuoyu bilincini artırmaya yönelik çalışmalar yapmıştır. AB, 2015 yılında "EUvsDisinfo" girişimini başlatmış, başlangıçta pro-Kremlin dezenformasyonuna odaklanmış ancak zamanla daha geniş bir yelpazeye yayılmıştır. Bugün EUvsDisinfo, COVID-19, seçimler, iklim değişikliği gibi küresel sorunlarla ilgili dezenformasyonu da hedef almaktadır. Bu platform, vatandaşlara dezenformasyonla mücadele etme, yanlış bilgiyi tespit etme ve etkili bilgi kaynaklarını bulma konusunda yardımcı olmaktadır. 2017 itibarıyla, Avrupa Komisyonu, dezenformasyonla mücadelede daha kapsamlı bir yaklaşım benimsemiş ve çeşitli paydaşlarla işbirliği yaparak "Çok Boyutlu Dezenformasyon Raporu"nu yayınlamıştır. Bununla birlikte, 2018'de dijital platformlar için gönüllü bir Uygulama Kuralları (Code of Practice) hazırlanmış, Facebook, Google, Twitter gibi

platformlar bu kodu kabul ederek dezenformasyonla mücadelede ortaklık kurmuştur. Aynı yıl AB, dijital platformlardaki reklamcılık şeffaflığını artırmaya yönelik düzenlemeler getirmiştir.

2019’da Avrupa Komisyonu, dijital dezenformasyona karşı daha etkin bir müdahale için “WeVerify.eu” adında bağımsız bir doğrulama ağını kurmuş, ayrıca medya okuryazarlığı girişimlerini teşvik etmiştir. 2019 Avrupa Parlamentosu seçimlerinde dezenformasyonun önlenmesine yönelik çalışmalar da yoğunlaştırılmıştır. AB, platformların siyasi reklamları şeffaf hale getirmesini, sahte hesapların yayılmasını engellemesini ve dezenformasyonu yaymak için yapılan maddi çıkarları ortadan kaldırmayı hedeflemiştir. 2019’da kurulan “Hızlı Uyarı Sistemi” (Rapid Alert System), AB üye ülkeleri arasında dezenformasyonla mücadele koordinasyonunu güçlendirmeyi ve aktif dezenformasyon kampanyalarını teknik ve siyasi açıdan analiz etmeyi amaçlamaktadır. Bu sistem, bilgi paylaşımını artırmak ve zaman kaybını önlemek için daha verimli bir yapı sunmaktadır. Diğer bir önemli gelişme ise “Sosyal Medya ve Dezenformasyon Gözlemevi” (SOMA) ve “Avrupa Dijital Medya Gözlemevi” (EDMO) gibi platformların kurulmasıdır. SOMA, dezenformasyonla mücadelede Avrupa topluluğunda farkındalık yaratmayı hedeflerken, EDMO, çevrim içi dezenformasyonun daha etkin bir şekilde analiz edilmesi ve yanıtlanabilmesi için farklı paydaşlar arasında işbirliği yapmayı amaçlamaktadır. 2022’de, dezenformasyonla mücadelede daha kapsamlı bir yaklaşım benimsenmiş ve güçlendirilmiş Uygulama Kuralları (Code of Practice) yayımlanmıştır. Bu yeni kod, daha fazla platform ve şirketi kapsamış ve dezenformasyonla mücadelede daha güçlü bir birliktelik oluşturulmuştur. AB’nin dezenformasyonla mücadelesi, yalnızca kurumlar ve platformlar arasında değil, aynı zamanda bireylerin de bu süreçte aktif rol oynamalarını gerektiren bir yapıya dönüşmüştür. Bu nedenle medya okuryazarlığı, şeffaflık, reklam yerleşimleri, dijital

platformların sorumlulukları gibi birçok alanda yapılan düzenlemeler, dezenformasyonla daha etkin bir mücadele yürütmek için hayati önem taşımaktadır. AB, dijital ortamda güvenli ve şeffaf bir bilgi akışının sağlanabilmesi için yasal altyapıyı güçlendirmiş, aynı zamanda bireylerin daha bilinçli bir şekilde dezenformasyonla mücadele edebilmeleri için stratejik adımlar atmıştır.

Türkiye, son yıllarda internet kullanımında önemli bir artış yaşamış, özellikle genç ve dijital dünyaya hâkim nüfusun etkisiyle dijital platformlarda büyük bir etkileşim artmıştır. 2024 itibarıyla nüfusun %80'inden fazlası aktif internet kullanıcısı olmuş, sosyal medya platformları ise geniş bir kullanıcı kitlesine ulaşmıştır. Ancak bu dijital yaygınlık, beraberinde çevrim içi dezenformasyon gibi ciddi zorluklar getirmiştir. Özellikle yanlış bilgilendirmelerin hızlı bir şekilde yayılması, Türkiye'nin toplumsal yapısına etki etmekte ve demokratik süreçleri tehdit etmektedir. Dezenformasyonun artışının nedenleri arasında sosyal medyanın ana haber kaynağı haline gelmesi, siyasi kutuplaşmanın yoğunlaşması ve Türkiye'nin jeopolitik önemi yer almaktadır. Bu durum, dezenformasyonla mücadele için güçlü stratejiler geliştirilmesini zorunlu kılmaktadır. 2018 yılında Oxford Üniversitesi tarafından yapılan bir araştırmaya göre, Türkiye, dezenformasyona en fazla maruz kalan ülkelerden biri olarak öne çıkmıştır. Türkiye, bu sorunla başa çıkabilmek için 2007 yılında çıkarılan 5651 sayılı İnternet Kanunu'nu kabul etmiş ve bu kanunu birçok kez revize etmiştir. 2020 yılında ise, internet ortamında işlenen suçlarla mücadele etmek için 7253 sayılı Kanun çıkarılmıştır. Bu kanun, sosyal ağ sağlayıcılarını sorumlu tutmakta ve içerik silme ya da erişim engelleme gibi önlemleri kapsamaktadır. Son olarak, 2022'de dezenformasyonu engellemeyi amaçlayan 7418 sayılı Kanun kabul edilmiştir. Bu yasal düzenlemeler, zaman zaman ifade özgürlüğüne müdahale olarak eleştirilmiş, özellikle 7418 sayılı kanun, yanlış bilgi yaymak suçunu cezalandırmayı öngören maddesi ile tartışma

yaratmıştır. Yasa, kamu düzeni ve güvenliğine zarar verecek şekilde yanlış bilgi yayanlara hapis cezası getirmektedir. Türkiye, dezenformasyonla mücadelede devlet destekli kurumlar kurmuştur. Bunlardan biri, Cumhurbaşkanlığı İletişim Başkanlığı'na bağlı olarak 2022'de kurulan "Dezenformasyonla Mücadele Merkezi"dir. Bu merkez, dezenformasyonla mücadelede kamuoyunu bilgilendirmek ve yanlış bilgileri düzeltmek amacıyla haftalık bültenler yayınlamaktadır. Ayrıca Anadolu Ajansı'nın 2019 yılında kurduğu "Teyit Hattı" da, halkı doğru bilgiyle buluşturmayı amaçlamaktadır.

Brezilya, Güney Amerika'nın en büyük ülkesi olup, 8.5 milyon kilometrekarelik yüzölçümü ve 215 milyonluk nüfusu ile dikkat çekmektedir. Ülke, yerli halkların tarihsel etkileri, Portekiz kolonizasyonu ve ardından gelen kültürel etkileşimlerle şekillenen zengin bir demografiye sahiptir. Brezilya, yalnızca demografik yapısı değil, aynı zamanda önemli ekonomik, sosyal ve jeopolitik rolüyle de dünya çapında büyük bir öneme sahiptir. Ekonomik açıdan, Brezilya dünyanın en büyük yedinci ekonomisine sahiptir ve BRICS gibi önemli uluslararası organizasyonların bir üyesidir. Brezilya'da dezenformasyonla mücadele, özellikle seçim dönemlerinde önemli bir konu haline gelmiştir. 2018 seçimlerinde WhatsApp gibi sosyal medya platformları üzerinden yayılan yanlış bilgiler, seçim sonuçlarını etkileme potansiyeli taşımaktadır. Bu dönemde, hem dijital medya kullanımının yaygınlığı hem de siyasi kutuplaşmalar, dezenformasyonun etkisini artırmıştır. Özellikle WhatsApp, Brezilya'daki en popüler sosyal medya platformlarından biri olup, seçmenlere yönelik büyük çaplı dezenformasyon kampanyalarının merkezi haline gelmiştir. Brezilya, dezenformasyonla mücadelede çeşitli stratejiler geliştirmiştir. 2019 yılında São Paulo eyaletinde öğrencilere medya okuryazarlığı dersi verilmesi, toplumun doğru bilgiye nasıl ulaşacağına dair farkındalık oluşturma amacını taşımaktadır. Aynı şekilde, 2020'de Brezilya Yüksek Seçim Mahkemesi (TSE), WhatsApp gibi platformlarla işbirliği yaparak

şüpheli içerikleri raporlama ve hızlı bir şekilde müdahale etme imkanı sağlamıştır. Bu çabalar, seçmenleri yanlış bilgilendiren içeriklerin yayılmasını engellemeyi hedeflemiştir. Brezilya'nın dezenformasyonla mücadelesi, sadece seçim dönemleriyle sınırlı kalmamış, dijital ortamda yayılan yanlış bilgilerle daha genel bir mücadeleye dönüşmüştür. TSE, 2021'de "Dezenformasyonla Mücadele Programı"nı başlatmış ve bu program kapsamında doğru bilgi paylaşımı, medya okuryazarlığı projeleri ve içerik doğrulama yöntemleri ön plana çıkmıştır. Bu program, dezenformasyonun seçim sürecine zarar vermesini engellemek için dijital platformlarla yakın işbirliği gerektirmiştir. Brezilya, dijital platformların içerik moderasyonunu düzenlemeye yönelik yasal bir çerçeve de oluşturmuştur. 2020 yılında sunulan ve "Fake News Bill" olarak bilinen yasa tasarısı, dijital platformları dezenformasyonla mücadele etmek üzere sorumlu tutmayı amaçlamaktadır. Bu tasarı, platformların içerik denetimi konusunda daha şeffaf olmalarını, yanlış bilgi yaymayı engellemek için belirli önlemler almasını ve bu konuda sorumluluk taşımalarını amaçlamaktadır. 2022'deki seçimlerde, TSE, dezenformasyonun seçim sürecine olan etkisini minimize etmek amacıyla önemli adımlar atmıştır. Sosyal medya platformlarının seçimle ilgili yanıltıcı içerikleri yaymalarını engellemek için çeşitli kısıtlamalar getirilmiş, şüpheli içeriklerin yayılmasını engellemeye yönelik bir dizi düzenleme yapılmıştır. Ayrıca, TSE'nin bu süreçteki müdahalesi, dijital mecralarda yayılan yanlış bilgilerin seçim sonuçlarına olan etkisini sınırlamayı başarmıştır. TSE, dezenformasyonla mücadelede daha etkin bir yaklaşım geliştirmek için 2024 yerel seçimleri öncesinde "Dezenformasyonla Mücadele ve Demokrasi Savunma Entegre Merkezi"ni kurarak çalışmalarına devam etmektedir. Brezilya'nın dezenformasyonla mücadelesi, dünya çapında birçok ülkenin karşı karşıya olduğu benzer sorunları gözler önüne sermektedir. Bu çabalar, hem dijital medya

ortamında yanlış bilgi yayılmasının engellenmesi hem de seçmenlerin doğru ve güvenilir bilgiye ulaşmasının sağlanması adına büyük bir önem taşımaktadır.

Sonuç olarak, bilgiye ve iletişime erişim, tarihsel olarak bireyler, ülkeler ve devletler için kritik bir faktör olmuştur. Bilgi ve iletişimde daha verimli olan devletler, ekonomik ve politik kazançlar sağlamak için bu avantajı stratejik olarak kullanmış ve bunu etkilerini şekillendiren önemli bir varlık haline getirmiştir. Dijitalleşme, dezenformasyonun her toplumsal kurumda artmasına neden olmuş, bu da devletlerin dezenformasyonla mücadele politikaları geliştirmelerini zorunlu kılmıştır. Brezilya ve Türkiye’de dezenformasyonla mücadele için çıkarılan yasalar, dijital platformları denetlemeyi ve şeffaflık ile hesap verebilirlik sağlamak amacıyla çeşitli düzenlemeler getirmiştir. Her iki ülke, içerik moderasyonu ve şeffaflık raporları gibi düzenlemelerle büyük dijital platformları hedef alırken, Avrupa Birliği de benzer şekilde büyük platformlar için şeffaflık ve risk azaltma önlemleri getirmiştir. Ancak, her üç aktörün yaklaşımında da dezenformasyonla mücadeleye yönelik hükümetin "gerçek" tanımını belirleme eleştirisi öne çıkmaktadır.

Anahtar Kelimeler: Hakikat Sonrası, Dezenformasyon, Avrupa Birliği, Türkiye, Brezilya

ABSTRACT

With digital media tools, individuals have become content producers. The lack of control and monitoring mechanisms in social media, a key online platform, has enabled the unverified sharing of news and information. Such unchecked dissemination has severe negative consequences for societies and the era we live in. Thus, combating disinformation is crucial for the future of societies. The European Union (EU) stands out with its policies and measures against disinformation. The EU's framework includes transparency of political and issue-based advertising, scrutiny of ad placements, integrity of services, empowering consumers, cooperation during elections, and measuring the Code's effectiveness. This research uses document analysis, a qualitative method, to analyze the policies and strategies of Türkiye and Brazil in combating disinformation, referencing the EU's framework to identify similarities and differences. Findings reveal distinct approaches among the three entities. While the EU emphasizes regulatory frameworks to enhance transparency and accountability, Türkiye combines legal measures with state-driven narratives. Brazil focuses on community engagement and social media literacy, empowering citizens to combat misinformation. Brazil frequently references EU policies, demonstrating closer alignment, whereas Türkiye adopts fewer EU-inspired measures.

Key Words: Post-Truth, Disinformation, European Union, Türkiye, Brazil