



Nordic Council  
of Ministers

# **A Nordic approach to democratic debate in the age of Big Tech**

Recommendations from the Nordic  
Think Tank for Tech and Democracy

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A close-up photograph of a person's hands holding a black smartphone. The person's left hand is in the foreground, wearing a silver ring with three small diamonds on the ring finger. The right hand is behind the phone, holding it from the back. The background is blurred, showing a person wearing a light blue shirt.

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*The big question is no longer if we need more democratic control with Big Tech. The question is how and how fast*

TOBIAS BORNAKKE, CHAIR



# Preface

The Nordic countries are exceptional.

We have incredible levels of trust in each other. We have a strong tradition of open public debate, where everyone can make themselves heard. We fiercely believe in the freedom of speech. And we have citizens who are generally well-informed and well-equipped to participate in public debate.

We have so much to celebrate and so much to preserve.

While social media hold great democratic potential, we have also, in recent years, seen how platforms not only enable democratic debate but also impact it negatively. The spread of false information online, whether intentional or not, threatens factual common ground. The use of offensive language prevents some groups in society from joining democratic debates. And opaque algorithms have spurred political polarisation.

We have all come to realize that increased democratic control with Big Tech is a necessity for democratic societies to thrive in the increasingly digital 21st century. The big question is no longer *if* we need more democratic control with Big Tech. The question is *how* and *how fast*. In this regard, the Nordic countries should take the lead in showing the way.

The Nordic countries, although remarkable in terms of trust, democracy and welfare, are also small countries with small languages and economies. Measured against the powers of Big Tech, each of us may not be considered worthy opponents. But when we join forces, our political voice echoes louder.

This past year the Nordic Think Tank for Tech and Democracy have done just that. Great minds from all over the Nordic region have joined forces and put their combined efforts into coming up with possible initiatives to address the most pressing challenges to the Nordic democracies. Although we come from varying backgrounds within communities of research, media and art, we have been remarkably united when it comes to the urgency of this task. Because all of us have much to preserve.

Our recommendations are ambitious on behalf of the Nordic region. As we need them to be. Together we can move towards a future, where digital technology fulfills its democratic potential.

**Tobias Bornakke**

*Chair of the Nordic Think Tank  
for Tech and Democracy*





# Summary and recommendations

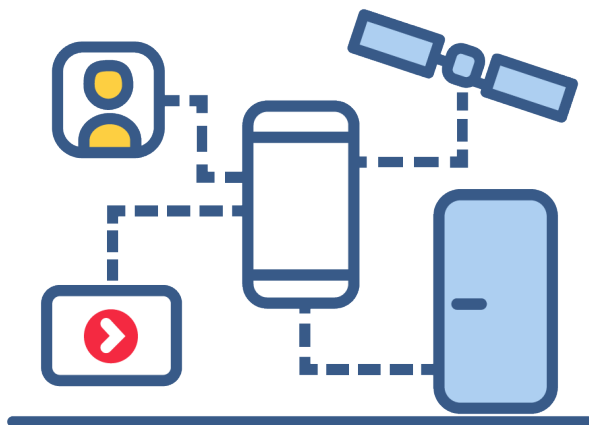
Online platforms of Big Tech companies such as Facebook, YouTube, Instagram, TikTok and Twitter have become integral democratic infrastructure. They allow people to connect across the world, new communities to arise and are a popular source of information. In addition to all their positive potential, however, online platforms and their algorithmic functions may cause serious harm to our democracies and public debate.


Hate speech online may lead certain groups in society to withdraw from public debate, and the spread of mis- and disinformation threatens open, transparent and factual democratic debate and can fuel polarisation. Content moderation is known to be minimal in smaller languages such as the Nordics<sup>1</sup> and thus emphasises a greater need to focus on these problems, especially for vulnerable groups such as children and youth. However, since public scrutiny is often actively counteracted by the platforms, most of the insight we have into the workings of these platforms is from leaks from former employees of the companies.

Our vision for the Nordics is to be a united tech-democratic region, with thriving citizens and open and informed public debate taking place across different spaces. We want the Nordics to have vigilant public oversight over democratic infrastructure, building resilience to already strong Nordic public spheres.<sup>2</sup>

The Nordic countries share similar cultures and long-standing democratic values that provide an opportunity for strengthening our democracies even when they take increasingly place online.

With this background, the Nordic Think Tank for Tech and Democracy proposes the following Nordic recommendations to protect and strengthen the democratic debate in the age of Big Tech.



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- 1A.** Establish a Nordic Centre for Tech and Democracy to support the enforcement of European tech regulation, share experiences and develop new policies.
  - 2A.** Protect the well-being and safety of children and youth online and push for more general control for citizens.
  - 2B.** Establish an online hub for knowledge exchange on digital literacy.
  - 3A.** Support the volunteers who facilitate online communities where democratic debate unfolds.
  - 3B.** Promote the innovation and implementation of technology that supports open digital public debate to create alternatives to large online platforms.
  - 4A.** Give public service media a strong digital mandate for online presence, content creation and development of platforms for democratic debate online.
  - 4B.** Step up support for independent fact-checkers.
  - 4C.** Push for better content moderation in the Nordics.
  - 4D.** Initiate a Nordic task force to oppose the risks to democracy from disinformation generated by artificial intelligence.
  - 5A.** Support access to platform data and algorithms for independent researchers.
  - 5B.** Commission a biennial report on the state of Nordic digital democracies.



# The Nordic democratic debate in the age of Big Tech

Today, online platforms<sup>3</sup> such as Facebook, YouTube, Instagram, TikTok and Twitter provide channels for citizen participation in democracy and public debate. These platforms did not exist 20 years ago, but today they allow people to connect across the world and new communities to arise. At their finest, they reduce distances between people and give everybody the chance to make their voices heard. Aside from creating forums for interacting and exchanging opinions, online platforms and social media have become popular sources of news in the Nordic countries.<sup>4</sup> Consequently, online platforms are both important infrastructure for following and participating in public debate.

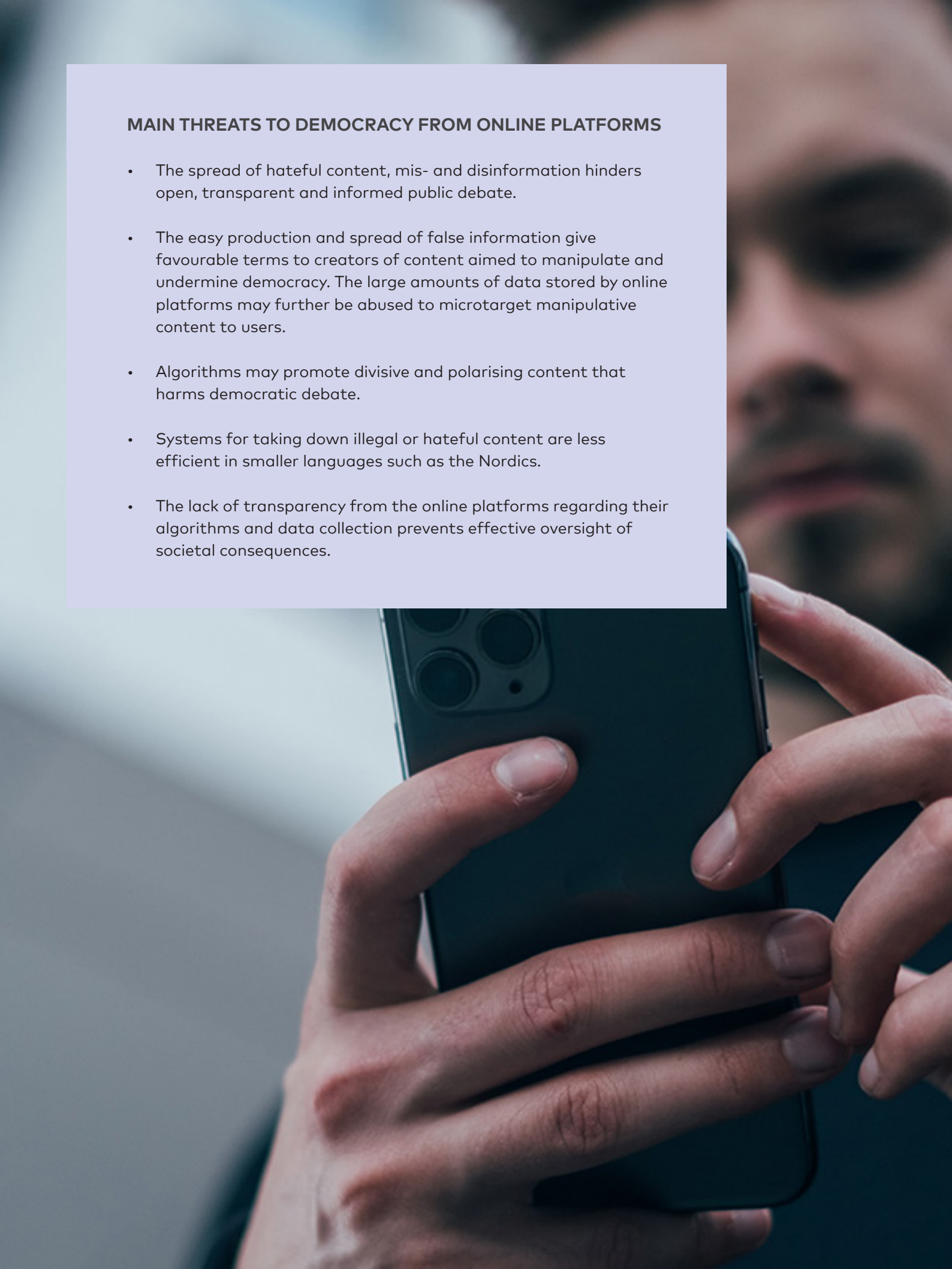
## **Big Tech threatens to undermine open democratic debate**

However, online platforms and, especially, their algorithmic functions for recommending content may also cause serious harm to our democracies and public debate if not regulated properly. Online debates are often hateful or offensive and can threaten the freedom of speech by causing some groups in society to withdraw entirely from public debate.<sup>5, 6</sup> Particularly young people and women seem to avoid online debates today due to the hateful language in online debates.<sup>7, 8</sup>



## MAIN THREATS TO DEMOCRACY FROM ONLINE PLATFORMS

- The spread of hateful content, mis- and disinformation hinders open, transparent and informed public debate.
- The easy production and spread of false information give favourable terms to creators of content aimed to manipulate and undermine democracy. The large amounts of data stored by online platforms may further be abused to microtarget manipulative content to users.
- Algorithms may promote divisive and polarising content that harms democratic debate.
- Systems for taking down illegal or hateful content are less efficient in smaller languages such as the Nordics.
- The lack of transparency from the online platforms regarding their algorithms and data collection prevents effective oversight of societal consequences.





Another challenge is the spread of mis- and disinformation online that threatens transparent and factual democratic debate and may fuel polarisation.<sup>9, 10, 11</sup> Factual debates and credible sources are being further eroded due to the accelerated prevalence and easy production of false and biased information online.<sup>12</sup> Ultimately, the scale has tipped in favour of creators of content aimed to manipulate and undermine democracy.

Social media are typically available to their users free of charge. Platforms profit from selling advertisements and, therefore, seek to maximise the amount of time users spend on their platforms. Rather than focusing on supporting and promoting open democratic debates, they seek to keep the attention of the users by offering engaging and curated content to each user, moderated and recommended based on parameters that are unclear to both the users and the public. As a result, misinformation and disinformation, as well as other polarizing or harmful content, thrive on online platforms since they encourage user engagement by evoking strong feelings such as anger.<sup>13, 14, 15, 16</sup> Consequently, such content may spread faster than more moderate and factual content.

This challenge is a global one, but more pressing in small language areas such as the Nordic region. Online platforms rely heavily on automated moderation to take down content that is illegal or in violation of their terms and conditions. Since such moderation tools are developed primarily for content in English, this leads to less effective moderation in small languages, and may

increase the proportion of harmful content.<sup>17, 18</sup>

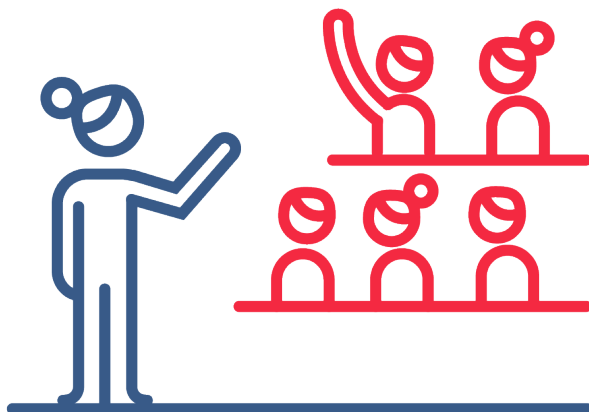
Added to this challenge, the principles of content moderation are global, which means that they are formulated in different cultural contexts than the Nordic. Accordingly, Nordic historical references, values and satire might get lost in the moderation process, and the wrong content may be taken down.

While these challenges endanger the democracies of today, they are even more pressing for the democracies of tomorrow. They also affect the future citizens of the Nordic countries – today's children and youth – whose journey towards democratic citizenship takes place in an environment of misinformation and hateful speech. For malignant actors who wish to manipulate public opinion, the youth and children are especially vulnerable since they are the most digitally active across the population.<sup>19, 20</sup> Furthermore, there is increasing evidence that the heavy use of social media and other digital platforms by children and youth has consequences on their general well-being. This needs to be followed closely.

The platforms collect enormous amounts of information about their users – from self-reported data to behavioural data, from information on your age to information on your health. Such information allows online platforms to micro-target content to individuals based on their interests but may also be abused for manipulative purposes, e.g., by targeting content and advertisements specifically to certain individuals in order to retain attention and maximise engagement.

The lack of transparency and accountability from online platforms regarding what citizens are exposed to in the algorithmic user feeds, their moderation practices and information on what they do with our data hampers effective public oversight.<sup>21</sup> This is highly problematic since online platforms today constitute a democratic infrastructure that plays a central role in our social life and society at large. Consequently, we do not know nearly enough about how Big Tech and their platforms influence our society and our democratic debates, particularly how they impact our children and young people.<sup>22</sup>

Finally, the rapid development of the tech industry and its corresponding influence on our lives for a long time has left these companies with almost no regulatory boundaries. Increasingly, regulation is catching up, and societies are deciding to set the rules for the platforms and not the other way around. Regulation, however, have a hard time keeping up with the intense and constant development of technological opportunities, and there are plenty of areas where democracies need to do more and demand more from online platforms.





## NEW LEGISLATION ON THE WAY IN THE EU

Recently, the EU adopted the Digital Services Act, which sets up new rules for online platforms, including very large online platforms and search engines such as Facebook, YouTube and Google. This new regulation will, among others, require such platforms to make annual assessments of systemic risks of their platforms, including the negative impact of their platforms on society at large, democracy and the well-being of users. Importantly, they will be required to take action to mitigate such harm. This new legislation will, together with other new EU legislation – i.e., the AI Act, the European Media Freedom Act and the Digital Markets Act – provide a framework for any initiatives to come, whether European, national or Nordic.



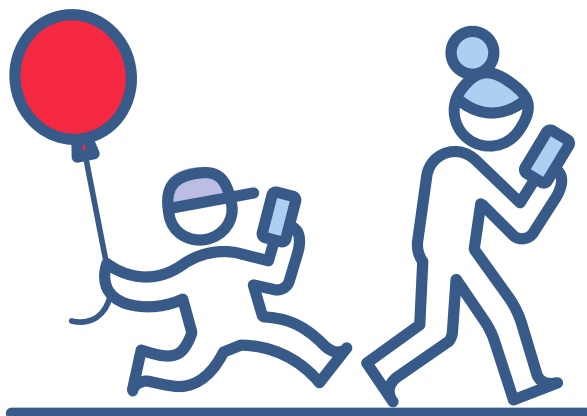
## A shared Nordic perspective

The Nordic countries have strong cultural and structural similarities. We share universal welfare states, strong democratic traditions, a high degree of digitalisation and social media usage, high trust levels, strong public service broadcasters and national newspapers, and high educational levels.<sup>23, 24, 25</sup> These are characteristics of the Nordic countries that we cherish and wish to actively work to protect – even when the world is changing, and our democracies are increasingly digitalised.

In a global context, the individual Nordic countries are both rather small in terms of population and language making the Nordics more vulnerable

despite their generally high media literacy and resilience against manipulation.<sup>26</sup> To a large degree, we share the same challenges and concerns when it comes to standing up to Big Tech and protecting our democracies.

This shared background and the tradition of Nordic cooperation provide a strong starting point for a joint approach to strengthening our digital democracy in light of the rapid technological development and the rise of Big Tech. Together, the Nordic countries should be a driver for a more forceful and transparent approach when it comes to how we allow Big Tech to influence our societies and democracies in the Nordics, in Europe and globally.



# **Vision and recommendations for Nordic democratic debate in the age of Big Tech**



## VISIONS

**1. We want the Nordic countries to be a united tech-democratic region**

**2. We want the Nordic countries to have thriving and digitally literate citizens**

**3. We want the Nordic countries to have access to diverse and credible digital platforms and communities**

**4. We want the Nordic countries to have open and informed public debates**

**5. We want the Nordic countries to have vigilant and well-informed oversight of Big Tech platforms**

## RECOMMENDATIONS

**A.** Establish a Nordic Centre for Tech and Democracy to support the enforcement of European tech regulation, share experiences and develop new policies

**A.** Protect the well-being and safety of children and youth online and push for more general control for citizens

**B.** Establish an online hub for knowledge exchange on digital literacy

**A.** Support the volunteers who facilitate online communities where democratic debate unfolds

**B.** Promote the innovation and implementation of technology that supports open digital public debate to create alternatives to large online platforms

**A.** Give public service media a strong digital mandate for online presence, content creation and development of platforms for democratic debate online

**B.** Step up support for independent fact checkers

**C.** Push for better content moderation in the Nordics

**D.** Initiate a Nordic task force to oppose the risks to democracy from disinformation generated by artificial intelligence

**A.** Support access to platform data and algorithms for independent researchers

**B.** Commission a biennial report on the state of Nordic digital democracies



# 1. A united tech-democratic region

Unifying as a tech-democratic region can help the Nordic countries pursue their common interests and pool their resources to strengthen digital democracy in light of the technological development and the rising influence of Big Tech. This unity will ensure that the Nordic countries remain at the forefront of responsible digital development and remain a democratic role model internationally.

## **Recommendation 1A – Establish a Nordic Centre for Tech and Democracy to support the enforcement of European tech regulation, share experiences and develop new policies**

To effectively address some of the biggest concerns relating to the democratic influence of Big Tech, we need strong institutions to facilitate a coordinated Nordic effort. When the Nordics work together, we can have a stronger starting point for dialogue within the European Union.

Accordingly, an organisational entity for Nordic collaboration on tech and democracy can play an important foundational role as a driver and host for Nordic initiatives within tech and democracy, covering both future initiatives yet to emerge as well as some of the other recommendations presented in this report.

**We recommend** that the Nordic governments establish a Nordic Centre for Tech and Democracy within the framework of the Nordic Council of Ministers to act as a collective Nordic instrument for further initiatives to tackle challenges arising from the increasing influence of Big Tech. The Centre should address two main areas:

Firstly, the Nordic Centre for Tech and Democracy should organise and coordinate a stronger Nordic voice on ambitious tech regulation and support national enforcement. This need has grown in recent years as the tech sector has increased lobbying resources dramatically. To secure a more level playing field and counterbalance the discussions around digital democracy, the Centre should pool resources and expertise from the Nordic countries. Accordingly, the Centre should collect the most pressing challenges related to the functions of Big Tech identified by civil society and research communities and distribute these to relevant national and European authorities.

Secondly, the Centre should track Big Tech's compliance with European regulation such as the Digital Services Act in the Nordic region, to support the relevant authorities' enforcement of legislation. As a key part of the Digital Services Act, the largest tech platforms will be obligated to publish an annual risk assessment and commission an independent audit of the systemic risks of their platforms. These new obligations should increase transparency related to the negative impacts of their platforms on society, democracy and well-being, especially regarding children and youth. The Nordic Centre for Tech and Democracy should work to hold relevant tech companies responsible by examining and challenging these assessments, potentially in the role of a 'trusted flagger'. To that end, the Centre should build a Nordic panel of experts who annually present their analysis and possible objections to these assessments. Further, they should engage with the European Commission, which enforces the transparency obligations of very large online platforms at the European level, as well as national authorities where relevant.

Importantly, the Centre should act independently from both the tech sector and Nordic political systems and be led by a board of relevant Nordic researchers, legal experts and NGOs within the field.





## 2. Thriving and digitally literate citizens

For citizens to effectively handle the threats and opportunities online, they need the skills and knowledge to critically evaluate and navigate digital media and information. This requires media literacy in general but also, more specifically, digital literacy. However, citizens also need the tools to control their own usage of online platforms and to help their children navigate online life.

### **Recommendation 2A – Protect the well-being and safety of children and youth online and push for more general control for their citizens**

The well-being of citizens, especially children and young people, is a particularly pressing concern. While social media and screen time have many positive effects, it is also associated with risks when it comes to mental well-being in terms of unhealthy comparison culture,<sup>27</sup> loss of face-to-face interaction,<sup>28</sup> loneliness,<sup>29</sup> lack of sleep<sup>30</sup> etc.<sup>31</sup> In general, we also see very low participation of youth in public debate online, with young people themselves blaming the harsh tone in political debate.<sup>32, 33</sup>

Children and youth are more experimental online and are, therefore, more exposed to online harm than adults<sup>34</sup> making it problematic when especially younger children have access to platforms and forums that lack robust age verification and parental control by design.

The Nordic countries should therefore strive towards minimising online risks to children and young people as they are the future of our societies and democracies.

***We recommend*** that the Nordic countries push for making platforms legally obligated to offer settings that enable citizens to take more control of their usage of platforms in their everyday lives at EU level. These settings should be guided by a need for the well-being of citizens in integrated online and offline lives, with a particular focus on protecting children and youth, and the well-functioning of our democracies.

***We recommend*** that the Nordic countries establish a specialised Nordic task force to 1) commission a meta-analysis on the potentially damaging effects of social media platforms on citizen well-being and the democratic space, and on this background 2) develop recommendations for Nordic policy initiatives onward.

***We recommend*** that the Nordic countries work ambitiously to protect minors from harmful environments and functions online. This should include applying a precautionary principle when introducing new functions on social media and other digital platforms. In this way, the online platforms will, to a greater extent, have to assess, document and counter possible harmful effects of their services.

***We recommend*** that the Nordic countries work to introduce a legal demand for effective age verification and parental control as default settings for relevant social media platforms. The policy should be designed by drawing upon the experiences from recent similar policy work in France, Germany and the European Union (i.e., the EU-consent project). The Nordic countries' policy approach should strive to grant the best protection for Nordic minors while respecting minors' right to freedom of expression and their right to privacy.<sup>35</sup> Subsequently, the Nordic countries should work to make such verification part of the common EU agenda and future amendments to the Digital Services Act. Eventually, such verification may be extended beyond verification of age to verification of identity.

## **Recommendation 2B – Establish an online hub for knowledge exchange on digital literacy**

Digital literacy and source criticism are essential for citizens to fully participate in the digital society and to understand the impact of technology on democracy. The high level of personal curation of our online feeds may make it harder to bridge cleavages between differing opinions since we cannot know what information has informed those opinions. This places high demands on individuals to understand the mechanisms curating the feeds.

Through effective digital literacy tools, the Nordic countries can empower their citizens to distinguish between different kinds of information and sources and their credibility and to think critically about why certain information is presented to them in a particular way. Since contextual and technological challenges are rapidly changing, this requires constant updating of digital literacy competencies. Strong and systematised collaborations across countries and actors on digital literacy could help strengthen the impact of digital source criticism and literacy activities.

***We recommend*** that the Nordic countries create and run an open-access online repository for developing and sharing best practices and methods for digital literacy. The hub should have a capacity-building role and create content resources including learning materials and curricula, and provide support and education for teachers, librarians, media professionals and other crucial actors promoting digital literacy.





### 3. Access to diverse and credible digital platforms and communities

For an open and vibrant democratic debate online, we benefit from being able to access a diverse set of fora that allow us to meet others with similar interests and exchange opinions. However, much of the public debate unfolds, although in different communities, on the same online platforms. Accordingly, these platforms have massive power over our democratic debate but do not always live up to the responsibility of protecting the public debate. Nordic countries should strengthen transparency, accountability and social trust by promoting diversity in platforms and communities.

#### **Recommendation 3A – Support the volunteers who facilitate online communities where democratic debate unfolds**

Public debate online takes place all over the internet – in the comments on media outlets and politicians' social media accounts and not least in open digital communities on everything from being a new parent to the town you live in.<sup>36</sup> In these digital community halls, millions of Nordic citizens participate in the public debate, and the volunteers who organise, facilitate and moderate the conversations carry a large responsibility. Regardless of the primary subject of the community, a growing number of digital volunteers spend their time caring for the health of the digital community halls while also working to support open and trustworthy online debate.

***We recommend*** that the Nordic countries develop and test strategies for supporting digital volunteers to complement the Nordic countries' long-standing tradition of supporting an active civil society around our democratic conversation. Such initiatives may consist of micro-funding schemes funded by Big Tech for administrators of public groups of a certain size to cover operation expenses, training and innovation of the public debate within their group. They may also include the development of free training modules to promote inclusive and vibrant digital debates in online groups. Finally, Nordic countries may fund innovation projects that enhance public debate by building on shared Nordic democratic values.

### **Recommendation 3B – Promote the innovation and implementation of technology that supports open digital public debate to create alternatives to large online platforms**

Online platforms have become almost unavoidable for ordinary people in their everyday lives. However, with the challenges for democracy and public debate, including the blurring of lines between authentic and manipulated content, the use of time retention strategies and the manipulation of public opinion, alternatives for accessing public debate are pressing.

Since the online platforms of Big Tech have so many users and their business models are based upon the acquisition of smaller platforms on the rise, few alternatives to these platforms exist. Consequently, the promotion of technological as well as civic innovation and implementation of technology that enables open and trustworthy digital public debate may offer citizens real alternatives to large online platforms. Such technologies already exist around the world but need support in order to constitute realistic and trustworthy alternatives to the platforms of Big Tech.

Nordic countries ought to promote innovation and implement technology that support open digital public debate.

***We recommend*** that Nordic countries support the use of open standards and protocols (such as ActivityPub) to encourage effective portability between competing platforms.

***We recommend*** that the Nordic countries support funding for public and civic actors and regulations that increase diversity in available platforms in accordance with established state aid rules.

***We recommend*** that the Nordic countries ensure that policies on business and industry promote the development of sustainable and open democratic technologies, both at a national and a European level.





## 4. Open and informed public debates

The spread of misinformation and hate speech on social media can have detrimental consequences for democracy and public debate since it may prevent citizens from knowing fact from falsehood or from engaging in public debate at all. Especially since some groups are proven to be more vulnerable and exposed to these phenomena. The Nordics should have transparent and informed public debates. Public debate in the Nordics has been characterised by freedom of speech, education and access to credible news as well as a strong culture of credible information use<sup>37, 38, 39</sup> This should continue to be the case.

### **Recommendation 4A – Give public service media a strong digital mandate for online presence, content creation and development of platforms for democratic debate online**

Disinformation, diminishing trust in democratic institutions, as well as digital divide in access to quality news content challenge democratic debate in many countries. The Nordic countries have robust and pluralistic national media systems where both commercial and public service media play an important role in informing public debate. However, the latter, by nature, hold special responsibility for fostering democratic debate and participation.

Public service media should be able to effectively navigate the digital landscape and lead the way when it comes to transparency and the promotion of spaces for open public dialogue.

***We recommend*** that Nordic public service media are given a strong mandate for online presence and content creation. Public service media should be given a strong mandate to freely utilise digital productions in any relevant formats and develop new competencies and practices in the transparent use of algorithms and technologies to strengthen public cohesion.

***We recommend*** that Nordic public service media are given a mandate to develop, together with other national and Nordic partners and in accordance with established state aid rules, public service alternatives to commercial online platforms for participating in democratic debate online.

## **Recommendation 4B – Step up support for independent fact-checkers**

The spread of disinformation online urges democracies across the world and in the Nordics to defend trustworthy public debate. In combination with literacy, one way to counter the spread of false information online is fact-checking statements and reporting online to detect and inform of new disinformation campaigns and coordinated activities.

***We recommend*** that the Nordic countries step up the support to independent fact-checking organisations that guarantee diversity, independence, and expertise in countering mis- and disinformation. On their part, fact-checkers should implement and continuously improve tools and practices in their processes to sufficiently battle false information online at a pace that matches the spread of such information.

## Recommendation 4C – Push for better content moderation in the Nordics

Content moderation is an important tool for weeding out harmful content on online platforms. Such moderation is to a large degree carried out by artificial intelligence developed for content in English and with limited human involvement in the process. The transparency of online platforms when it comes to their moderation practices is inadequate, and this hampers public oversight. Moderation in smaller languages may thus be of much lower quality than in larger languages, which has consequences for whom and what controls both freedom of speech as well as the limits hereof in the Nordic countries.<sup>40</sup>

The Digital Services Act establishes a right for insight into platforms' moderation practices and a demand for biannual reporting from very large online platforms. However, greater insight into how our democratic debate is moderated by Big Tech is needed in order to keep trust in the democratic system high.

Online platforms should consequently do more to support public oversight.

***We recommend*** that the Nordic countries jointly push for moderation of high quality in the Nordics – both in the EU and vis-à-vis Big Tech. This may include appeals to employ Nordic moderators who can perform high-quality moderation of content in the Nordics with respect to the distinct Nordic cultures, democratic values, freedom of speech and freedom of information.

***We recommend*** that Nordic countries push for more transparency in moderation practices with a view to securing transparent and high-quality moderation in the Nordics. This should include an obligation to disclose information on both algorithmic and manual moderation practices categorised by language and cultural background (e.g., what content and actors are downgraded and deleted and by whom).

## **Recommendation 4D – Initiate a Nordic task force to oppose the risks to democracy from disinformation generated by artificial intelligence**

The past year brought about several breakthroughs within the area of content generated by artificial intelligence (AI). Most publicly known was the release of ChatGPT (GPT 3.5) with its authentic AI-powered text generation, but also the release of other AI tools to generate image, voice, and video. These tools mark the acceleration of an era where artificial intelligence will not only filter our democratic conversation but also produce some of its content.

While fascinating, the misuse of this technology to manipulate and undermine democratic debates and elections poses a particularly serious threat to the trust-based democracies of the Nordics.

With the proposed AI Act currently being negotiated in the EU and expected to enter into force in 2025 or 2026, AI-generated deep fakes will likely be subject to transparency obligations where users should be informed if a piece of content is AI-generated or manipulated. This new proposed legislation constitutes an important step towards addressing challenges from disinformation generated by artificial intelligence. However, we worry that transparency will not be enough. Disinformation is created and spread with hostile intent, and we cannot rely exclusively on hostile actors to comply with European regulations.

***We recommend*** that the Nordic countries act promptly on this new risk and commission a provisional Nordic task force on AI-powered disinformation. Composed of experts from the interplay of tech, policy and disinformation, and in collaboration with relevant Big Tech companies, the task force should explore short-term mitigating actions along with structural and long-term counter-measures to the risks from AI-generated content to complement those proposed in the AI Act. The results should inform the governments of the Nordic countries along with relevant Big Tech companies and the Nordic countries should work to lift relevant solutions to a European level to ensure efficient responses to the rising challenge.





## 5. Vigilant and well-informed oversight of Big Tech platforms

Vigilant and well-informed public oversight in the Nordic countries effectively puts pressure on Big Tech platforms to ensure that their design and activities align with democratic values and comply with relevant regulation as these platforms have become an essential infrastructure for our public debate. Public oversight helps to build trust in technology and promotes a healthy and democratic digital ecosystem.

### **Recommendation 5A – Support access to platform data and algorithms for independent researchers**

Open, transparent public debate and digital well-being in the Nordic region require a deep understanding of the information landscape and the factors that drive the spread of information. Furthermore, it requires an understanding of how this influences the well-being of Nordic citizens and the well-functioning of Nordic societies.

During the last five years, researchers' access to platform data and algorithms has deteriorated. The amount of accessible data has decreased, and the labour needed to gain access to data has increased to a degree where neither the individual researchers, universities nor NGOs have the resources, competencies or personal network needed to achieve proper data access. Our democracies thus risk losing basic empirical insights into the user behaviour and working of the platforms upon which our digital democracies unfold.

While the Digital Services Act aims to address this problem by offering formal rights for researchers to request access to data from very large online platforms and search engines of systemic risks for society, we worry that some platforms might attempt to limit access to data-sharing solutions through bureaucratic processes and demands that few researchers will know how to navigate. Furthermore, researchers may need assistance to comply with the demands for data protection and confidentiality set out in the Digital Services Act to gain data access.

Consequently, we worry that formal rights of access will not provide the desired knowledge and insight without support.

***We recommend*** that the Nordic countries work to ensure that no independent researcher with the intent to produce research for the good of society can be excluded from doing so. Accordingly, platforms' terms of service should not prevent data access for researchers who comply with relevant regulation and scientific integrity, even if this involves the use of web scraping techniques.

***We recommend*** that the Nordic countries establish an office to support Nordic actors' access to platform data by guiding researchers in their application processes and helping researchers comply with rules on data protection and confidentiality when carrying out their research. Additionally, the office should gather and distribute knowledge of what research applications other European researchers have been granted data access to with the purpose of creating transparency on data access and supporting the production of future research.

***We recommend*** that the office should work on ensuring sustainable and sovereign data storage solutions where data access is administered and provided through an independent Nordic entity outside Big Tech (e.g., a collaboration between national Nordic statistical agencies).<sup>41</sup>

Research access to the platforms is crucial for the well-being of our democracies, and accordingly a permanent organisation with this specific aim and with permanent staff is needed to sufficiently ensure that the Nordic societies gain the full advantage of the novel rights within the Digital Services Act. A collaboration among the Nordic countries will make any effort even more powerful as it will allow for more effective knowledge sharing and gathering of expertise.

## **Recommendation 5B – Commission a biennial report on the state of Nordic digital democracies**

When the democratic debate unfolds online, the fate of democracy is put in the hands of privately owned online platforms. Any change in their algorithms, platform designs or moderation practices means an adjustment in the dynamics of democratic debates, often without any prior democratic discussion or even knowledge of the altered algorithms.

***We recommend*** that the Nordic Council of Ministers for Culture commission a biennial report on the state of Nordic digital democracies that can inform public debates on strengthening our societies and democratic debates in the age of Big Tech. The report should provide a comprehensive picture of the current state of the Nordic digital democracies while also identifying potential risks and challenges for the future, including assessing the Nordic ecosystem and content moderation practices of very large online platforms.

***We recommend,*** with inspiration from Reuters Digital News Report and as part of the commissioned report, creating a Nordic Tech-Democracy Index to systematically track developments in our digital democracy over time. Parameters may include digital civic and political participation, trust level and the level and spread of hate speech, misinformation and disinformation distributed across platforms and countries.

# About the Nordic Think Tank for Tech and Democracy

In 2021, the Nordic Council of Ministers for Culture decided to establish a temporary think tank for addressing the influence of Big Tech on democratic debate in the Nordic countries.

The purpose of the Nordic Think Tank for Tech and Democracy has been to discuss the increasing influence of social media and Big Tech on democratic debate in the Nordic countries and recommend possible political actions to protect and strengthen Nordic digital democracy.

The Think Tank was appointed in May 2022 and consists of 13 members from all over the Nordic Region: Denmark, Norway, Sweden, Finland, Iceland, Greenland, Faroe Islands and Åland.

The work of the Think Tank has been organised around three physical meetings in Copenhagen between September 2022 and February 2023. The Ministry of Culture, Denmark, has served as Secretariat to the Think Tank.







# Members

**Tobias Bornakke** (chair), Denmark, is a researcher and co-founder of Analyse & Tal. Tobias holds a PhD in digital methods and has led several studies on the democratic debate on social media across the Nordic countries.

**Anja Bechmann**, Denmark, is a professor at Media Studies and director of DATALAB at Aarhus University. Anja is also the Principal Investigator of the Nordic Observatory for Digital Media and Information Disorder (NORDIS).

**Bente Kalsnes**, Norway, is a professor at the School of Communication, Leadership and Marketing at Kristiania University College. Bente has served as a member of the Freedom of Speech Commission appointed by the Norwegian government.

**Carl Heath**, Sweden, is a senior researcher at the Research Institute of Sweden (RISE). Carl has previously been commissioned by the Swedish Government as Special Counsel for the protection of democratic dialogue.

**Elfa Ýr Gylfadóttir**, Iceland, is the director of the Icelandic Media Commission. Elfa has been Head of Division of Media at the Ministry of Education, Science and Culture and has been lecturing at the University of Iceland for 25 years.

**Fredrik Granlund**, Åland, is a journalist and program manager at Ålands Radio and TV (public service). Fredrik has worked as a journalist for 25 years and is interested in the relations between humans and new technology.

**Hanna Haaslahti**, Finland, is a media artist and director working with image and interaction. Hanna is interested in computer vision and its social implication on human relations and has participated in many international exhibitions.

**Jákup Brúsá**, Faroe Islands, is a digital marketing consultant and has worked with 100+ companies. Jákup's research on political communication was published in the International Journal of Information Technology and Politics.

**Martin Holmberg**, Sweden, is a programme manager at Medier & Demokrati, Lindholmen Science Park. Martin has previously worked in media organisations as a journalist, editorial leader and in leadership roles on digitalisation.

**Minna Aslama Horowitz**, Finland, is a docent and senior researcher at the University of Helsinki. Minna is a member of the Nordic Observatory for Digital Media and Information Disorder (NORDIS) and a fellow at St. John's University.

**Signe Ravn-Højgaard**, Greenland, is an assistant professor pursuing a PhD at the University of Greenland. Signe's research is on how digitalisation and the use of social media affect small democracies.

**Sumaya Jirde Ali**, Norway, is a poet and former editor of the feminist culture magazine Fett. Sumaya has written three poetry collections and received the Zola award for civil courage for her work and participation in the public debate.

**Thorgeir Ólafsson**, Iceland, is a senior advisor at the Icelandic National Broadcasting Service (RÚV). Thorgeir has worked as a press officer and has been responsible for mass media in the Ministry of Education, Science and Culture.

From the Ministry of Culture, Denmark, Marie Funch Adamsen and Janus Emil Mariager have served as Secretariat to the Think Tank.

# Disclosure of financial ties

Ahead of the work, all 13 members of the Think Tank handed in their individual disclosures of potential financial ties to Big Tech companies in order to secure transparency within the group on any relations to the industry in question.

# Notes

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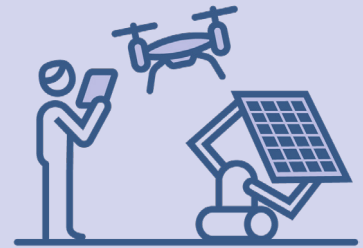
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# About this publication

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