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Zukunft D - Response to the Call for Evidence: European Democracy Shield

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Introduction

Zukunft D ("Future D") is a newly launched initiative by five civil society organizations in Germany—AlgorithmWatch, aula, Liquid Democracy, the Schwarzkopf Foundation Young Europe, and Wikimedia Germany—with the aim of strengthening democratic structures and competences in the digital sphere. As part of the German federal program "Demokratie leben!" ("Live Democracy!"), Zukunft D promotes democracy in a digitalized society by fostering knowledge sharing, developing policy proposals, nationwide networking, and the empowerment of underrepresented groups. The project focuses on increasing civic participation, enhancing digital literacy, and creating inclusive, secure, and accessible democratic infrastructures across the country.

We welcome the European Commission's initiative to launch the European Democracy Shield as an important step in reinforcing democratic resilience across the European Union. In particular, we support the emphasis on ensuring citizen's access to quality information, securing the integrity of elections, and strengthening public trust and participation in democratic processes.

Zukunft D supports a strong and proactive approach to defending democracy against evolving threats. Research within our organizations has repeatedly shown that automated systems used by online platforms can systematically distort public discourse, promote polarization and lead to a diffusion of responsibility for decisions that deeply affect users. These dynamics cannot be adequately addressed without robust transparency, independent oversight, and meaningful public engagement.

Feedback on the Key Issues of the Initiative

1. Countering Disinformation and Foreign Information Manipulation

Access to reliable and quality information from a variety of sources is a prerequisite of democracy. While we acknowledge the growing threat of foreign information manipulation and support initiatives to reduce the spread of false or misleading content, we believe that safeguarding democratic discourse requires addressing broader systemic dynamics beyond foreign interference alone.

ALGORITHM WATCH aula Liquid Democracy Schwarzkopf Stiftung JUNGES EUROPA WIKIMEDIA DEUTSCHLAND

In addition to hostile actors spreading disinformation deliberately, threats to a safe and productive public debate arise from the design of algorithmic systems that shape online platforms as well as the underlying business models of tech companies.

Algorithms of major social media platforms prioritize content that maximizes user engagement, often amplifying sensationalist or misleading information. This dynamic undermines informed public discourse and facilitates the spread of polarizing and extremist content. The same dynamic allows content creators to monetize and therefore profit from such content alongside the platforms themselves.

In addition, the current digital landscape is characterized by a concentration of market power in a few multinational technology companies. The CEOs of these tech companies have immense power to shape platform design and content moderation without much oversight or accountability, thus deciding which content ends up on our feeds. This leads to a concentration of power not only over the market but also gives platforms undue influence in shaping public opinion across the globe. In addition, we increasingly see tech companies' resisting regulation efforts and rolling back efforts to safeguard democratic principles and protect marginalised groups. These developments pose a challenge for public debate in the Union and beyond, for access to reliable information, and therefore for a productive and positive democratic discourse online.

By establishing free access to data, publications and other formats, produced with public money, the EU can significantly broaden access to reliable and diverse information. This would lay the ground for a more balanced opinion-forming within the public sphere and facilitate fact-checking as well as other counter mechanisms to disinformation. Given that broad community participation has proven effective in preventing disinformation, policies and infrastructures supporting this approach should be promoted.

We recommend:

- **Enforce DSA provisions on platform accountability**, especially data access for independent researchers.

- **Curb tech monopolies.** EU regulation should promote a more diverse and open landscape in AI. This includes breaking up monopolies, fostering a level-playing field, and ensuring contractual fairness along the AI value chain.

- **Increase independence from big tech companies** by funding public-interest digital infrastructure, including social platforms, public journalism, and civic engagement technologies to increase independence from big tech companies.

- **Expand free access to publicly funded knowledge and data** and foster community-driven knowledge creation and management.

2. Ensuring Electoral Integrity and Strengthening Democratic Frameworks

Election campaigns, public discussions and access to information are increasingly shaped by digital platforms, algorithmically curated feeds and LLMs, which gives the companies behind these technologies undue influence in shaping public opinion – as mentioned above. Threats to democracy arise from negligence (e.g. companies not applying safeguards thoroughly) as well as deliberate interventions (e.g. promoting or demoting certain forms of speech).

It is therefore vital that European platform regulation focuses on strengthening citizens' freedom of expression and information instead of exposing them to automated filtering mechanisms, which are once more controlled by platform operators. Transparency obligations in content moderation, effective redress mechanisms, the protection of users' privacy and the strengthening of their freedom of choice are needed – especially with regard to automated decision-making systems and personalisation.

An additional threat may arise from the increasing integration of LLMs into social media platforms and search engines. LLM features such as AI summaries in search engines change the way users navigate the web: Instead of providing links to external sources that users can click on and compare, the LLM gives one, seemingly definite answer. At the same time, LLMs are unreliable and are known to produce factual errors.[1] Wrong information is especially prevalent in low information cases, e.g. when data on the issue is scarce in the LLM training material. This is a problem, especially for sensitive areas such as elections. Voters cannot rely on chatbots or AI driven search features to provide accurate information about parties, candidates, or election logistics. At the same time, they are disincentivized to consult a variety of sources.

The trust in democratic institutions must also be protected beyond elections. This means increasing trust in state services and institutions. Special conditions apply in the public sector: We have no choice between different providers, but are inevitably subject to decisions made by the administration responsible for us. In addition, public authorities access sensitive personal data, and their decisions might have severe consequences for the people concerned: e.g., cuts in welfare benefits threatening people's livelihoods.

To strengthen trust in democratic institutions, it must be ensured that automated administrative processes provide general benefit, cause no harm, and do not discriminate against vulnerable groups. They must also not restrict the freedom of action of those affected. Algorithmic systems should

[1] https://algorithmwatch.org/en/llms_state_elections/

therefore only be used in the public sector if they fulfil strict requirements and are effectively monitored.

We caution against overreliance on surveillance tools to counter online and offline threats, as this can erode public trust in democratic institutions. While the AI Act introduces important steps towards more transparency on the use of high-risk AI, it allows for concerning exemptions to the ban on the use of remote biometric identification systems that should be closed.

We recommend:

- **Promote transparency and access to information,** including the legal right to open data.
- **Provide full transparency on all AI systems used in the public sector** by ensuring strong accountability mechanism in the AI Act (e.g. via guidelines) and clear guidance for an effective fundamental rights impact assessment.
- **Ban the use of remote biometric identification systems**, by addressing exemptions for state actors.

3. Strengthening Societal Resilience

A resilient democratic society requires more than technical fixes. Citizens must be empowered to understand and question the algorithmic forces that shape their digital experiences. We therefore support initiatives to strengthen media and tech literacy. Yet, ultimately, the responsibility for providing a safe and productive public sphere should lie with the providers of online services.

Nevertheless, free and open software remains crucial in creating open digital infrastructures and ensuring digital sovereignty. To strengthen a resilient, independent society, it should therefore be prioritized consistently by the EU when procuring software – especially with public funds.

Fostering a sense of agency and providing opportunities for participation in decisions that directly impact daily life are crucial for strengthening democratic engagement and thus increasing societal resilience. When individuals experience their input as meaningful and see tangible outcomes from their involvement, their support for democratic processes tends to grow. Therefore, the cultivation of democratic skills – such as critical thinking, communication, collaboration, and decision-making – should be an integral part of any strategy aimed at protecting and nurturing democracy in the Union.

Young people should have the opportunity to actively practice and experience these skills in relevant and manageable contexts in order to develop a deeper understanding of democratic responsibility, their own competencies and limitations, and the value of diverse perspectives, laying the foundation for active and informed citizenship.

We recommend:

- **Prioritize open and free software in EU procurement** to strengthen digital sovereignty and European independence.
- **Support programs that strengthen democratic** skills from a young age and ensure that public institutions such as schools incorporate meaningful participation.
- **Empower non-profit civil society organizations** that are vital for grassroots engagement and reduce legal burdens for civic engagement and volunteer work.

4. Fostering Citizens' Participation and Engagement

The current status quo often reveals a disconnect between citizens and decision-making processes. Many feel their voices are not adequately heard or that their input has limited impact. Existing avenues for participation are often complex, lack visibility, or suffer from low levels of public awareness and institutional credibility. This can lead to disengagement, a sense of democratic deficit, and a potential erosion of trust in political systems. Addressing this requires a shift towards more accessible, transparent, and impactful forms of engagement that empower citizens to actively shape the decisions that affect their lives.

To restore trust in democratic institutions, citizens must feel heard, respected, and able to participate meaningfully in public life in a productive and binding way. Respectively, civic engagement, whether digital or not, should be as free as possible from legal pitfalls, in particular liability risks and other unnecessary burdens. By prioritizing non-profit initiatives and favouring open-source frameworks for publicly supported participation platforms, the EU can ensure that efforts are driven by public benefit, are transparent, and accessible to all, fostering a more inclusive and engaged citizenry.

We recommend:

- **Develop and test novel social and technical tools**, emphasizing public, open-source and interoperable platforms technologies and interoperable technologies for transparency, reusability, and collaboration.

- **Establish low-threshold, multilingual participation processes**, that come to productive and binding agreements ready for implementation.
- **Promote digital literacy** and skills for effective online participation.
- **Expand the use of deliberative approaches** like citizens' assemblies.

Conclusion

Zukunft D welcomes the European Democracy Shield as a timely and necessary initiative to strengthen democracy in the EU. We urge the Commission to center transparency, accountability, and civic empowerment as guiding principles in all related actions.

We remain committed to contributing evidence, analysis, and collaboration to this and related initiatives, and are available to participate in further consultations to support the Shield’s development and implementation.