POLICY PAPER

ONLINE PLATFORM ACCOUNTABILITY AND INFORMATION INTEGRITY IN THE WESTERN BALKANS

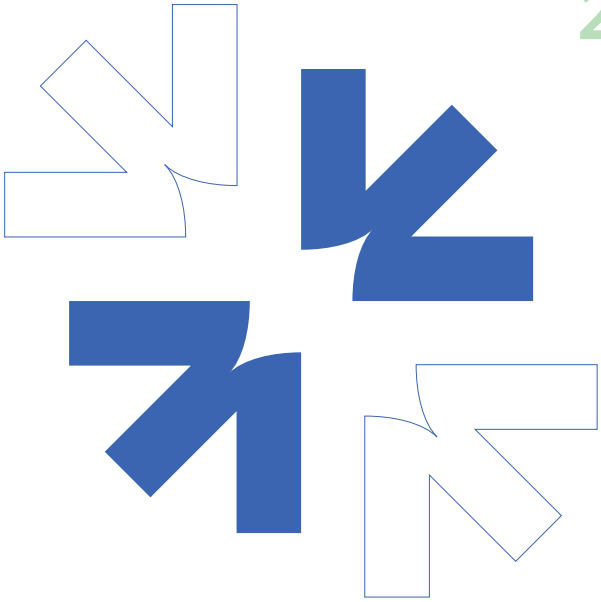
Bridging the gap before accession

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EXECUTIVE SUMMARY

The Western Balkans face a gap between preparation for EU digital regulation and the tools available to address platform-related risks today. The same major online platforms serve audiences across the region and the EU, while disinformation and other harmful narratives freely circulate across borders.

The European Commission's preferred approach to the Digital Services Act (DSA) alignment in candidate countries emphasizes operational readiness for application upon accession rather than its pre-accession replication. However, clear benchmarks for assessing readiness and practical pathways into the European cooperation structures remain insufficiently developed.

National approaches within the region are already diverging. Merit-based gradual integration could add further differences in access to European mechanisms and safeguards. These developments risk widening disparities in the protection of users' rights and the accountability of online platforms across the Western Balkans, even though the countries of the region share a closely interconnected digital market and information environment.

These disparities also have implications for democracy and the integrity of public debate. Election observations reveal persistent disinformation campaigns, coordinated attacks on political opponents and the artificial amplification of political messages to create an impression of widespread support. Narratives portraying the EU as hostile or authoritarian, and European integration as harmful or futile, also circulate across the information environment, making public understanding of the accession process itself a target of manipulation.

The European Democracy Shield offers a complementary basis for EU engagement with the Western Balkans. Its explicit recognition of candidate countries supports closer connections with European structures for digital governance, information integrity and democratic resilience. The Shield cannot replace binding platform supervision, but it can help the region address present risks while developing relationships relevant to future regulatory responsibilities.

Cooperation on shared democratic risks should extend across the Western Balkans, even as countries advance towards EU membership at different speeds.

The paper recommends that EU institutions:

1. **Make DSA readiness measurable within accession monitoring**, with written guidance and country-specific benchmarks connected to democratic institutions, fundamental rights, institutional independence, resources and implementation capacity.

2. **Enable progressive participation in European digital governance structures**, including observer arrangements and structured cooperation with Commission services and EU Digital Services Coordinators.

3. **Establish clear arrangements for participation in the European Democracy Shield**, enabling Western Balkan institutions and independent actors to engage in its structures, cooperation mechanisms and expert networks.

4. **Develop continuing election-related cooperation with Very Large Online Platforms**, including participation in the Code of Conduct on Disinformation's Rapid Response System or equivalent arrangements.

5. **Strengthen independent research and oversight,** through sustained support for civil society, researchers, fact-checkers and media.

DIGITAL PLATFORM GOVERNANCE IN THE WESTERN BALKANS

As part of their accession process, Western Balkan countries are expected to progressively align with the EU acquis. Digital policy forms part of the alignment requirements, primarily through Chapter 10 on digital transformation and media, with links to other negotiating chapters. The EU's expanding digital rulebook, including the DSA, Digital Markets Act (DMA) and AI Act, adds new legislative, institutional and capacity-related requirements to this process.

Digital governance also intersects with the fundamentals of accession. Effective regulation of digital platforms requires a legal framework consistent with international human rights standards and independent institutions with adequate resources and administrative capacity. The way these institutions use their regulatory powers has direct implications for freedom of expression, media pluralism, privacy and democratic participation. Preparations for the EU digital rulebook are therefore closely connected to broader reforms concerning the protection of fundamental rights and the functioning of democratic institutions.

In the case of the DSA, the European Commission has clarified that candidate countries will be neither asked nor expected to reproduce the regulation in national legislation before accession[1]. The Commission's preferred direction is achieving operational readiness first: preparing the institutions, building capacities and arrangements needed for effective DSA enforcement upon membership. This does not prevent candidate countries from choosing to regulate online platforms at national level or adopting legislation aligned with the DSA before accession: the Commission does not require such legislation before accession, but countries remain free to adopt it.

Whether countries adopt national legislation or focus on operational readiness, effective preparation largely depends on relationships and circumstances that are beyond national institutions. In the EU, the DSA implementation relies on a complex supervisory architecture, with responsibilities distributed among national Digital Services Coordinators, other competent authorities and the Commission, supported by the European Board for Digital Services and cross-border cooperation mechanisms. Although the operational readiness approach provides an important common direction for the region, it means that the candidate countries will be preparing for application while remaining outside the DSA's supervisory and cooperation system central to its implementation. This limits opportunities for future competent authorities to gain practical experience within the system they are preparing to join. Participation also matters for civil society and researchers, whose evidence-gathering and contextual expertise are important for identifying platform-related risks and scrutinising regulatory responses. Their ability to contribute heavily depends on connections with European networks and counterparts, access to data and tools, and working relationships with platforms.

Without clear benchmarks defining what operational readiness entails at different stages of accession, countries lack concrete guidance on how to prepare for DSA implementation, while the absence of measurable criteria makes it more difficult to monitor and assess progress consistently across the region.

[1] As presented by DG CONNECT at the TAIEX Multi-Country Workshop on the Digital Services Act (March 12-13, 2026), https://shorturl.at/84osu

The information environment, interconnected both across the Western Balkans and between the region and the EU, is one of the areas where these limitations will be felt most acutely. Shared languages, overlapping audiences and cross-border media and content distribution connect countries across the region, while the same platforms and wider information flows also link them to EU Member States. The pre-accession period therefore concerns both future implementation capacity and the ability to address risks already affecting users and democratic processes.

The possibility of gradual integration into the Single Market, as recently announced by the European Commission[2], adds another dimension to this issue. Opportunities for participation in DSA enforcement architecture before membership may develop at different speeds across Western Balkan countries, depending on their progress on accession reforms and the conditions attached to particular arrangements. Alongside different national regulatory approaches, this could create further differences in access to European mechanisms and safeguards.

[2] "EU to offer single-market access to candidate countries", https://www.politico.eu/article/ursula-von-der-leyen-eu-offer-single-market-access-to-candidate-countries/

THE END OF THE REGIONAL APPROACH?

The Western Balkan countries are preparing for DSA implementation at different speeds and through different approaches. These differences reflect both their progress towards EU membership and national policy choices about how to regulate digital services. Recent legislative developments in Montenegro and Albania, the only two countries from the region which have made significant progress in accession negotiations, demonstrate the different approaches emerging in the region.

Different national pathways: cases of Montenegro and Albania

Montenegro began preparations in June 2025 by establishing a multisectoral working group to develop the legislative framework for DSA implementation. The process involved examining different approaches to alignment and consultations with the European Commission. Rather than transposing the DSA into a standalone domestic regulatory regime, Montenegro opted for an implementation act aiming to establish national conditions for DSA's full application upon EU accession. The legislation[3], adopted in October 2026, designates the Digital Services Coordinator (DSC) and establishes national supervisory responsibilities, procedures, remedies and sanctions. Its preparatory framework covers institutional and technical assessments, coordination, recruitment, training and raising public awareness, with dedicated resources to support this preparatory period. Montenegro's approach therefore uses legislation adopted before accession to establish the institutional framework and prepare authorities for their responsibilities upon membership.

Draft Law on Digital Services in the Republic of Albania[4] takes an entirely different approach, seeking to establish a national framework for regulating digital services which draws extensively on the DSA wording and structure. Unlike Montenegro's accession-triggered implementation model, the Albanian approach envisages applying substantive obligations through domestic legislation during the pre-accession period. This includes national supervision of very large online platforms and search engines designated as such by the European Commission. The model therefore assigns national authorities responsibilities that, under the EU's DSA framework, fall under the European Commission's supervision and are supported by EU-level regulatory and enforcement mechanisms.

Enforcing these responsibilities on national level might be difficult. Although the draft provides for the obligation of foreign service providers to designate contact points and legal representatives, establishing effective communication with global platforms and a direct regulatory relationship with Albanian authorities may prove challenging. Even when communication is established, a national authority operating outside the EU system cannot rely on cross-border cooperation and enforcement procedures to obtain information, secure compliance with orders or collect supervisory fees from platforms.

The draft also raises questions about how the proposed supervisory system would be financed. Under the proposed framework, annual supervisory fees would be charged to very large online platforms and search engines, with the proceeds allocated to the Digital Services Coordinator, but does not establish a dedicated funding arrangement for building the capacities needed before such revenues become available (a Regulatory Impact

[3] Law on the Implementation of Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act), https://www.sluzbenilist.me/propisi/399147 (available in Montenegrin only)

[4] https://konsultimipublik.gov.al/Konsultime/Detaje/1022

Assessment, which would provide clarity on these questions, was not made publicly available during the consultation process). This creates a potential dependency on payments whose collection may itself be difficult to enforce.

Establishing an effective supervisory system requires adequate financing, specialised personnel, technical infrastructure and information systems, as well as clear procedures for coordination and information exchange among relevant authorities. The draft designates several competent authorities and provides for cooperation between them, but does not establish how responsibilities will be coordinated in practice, particularly where mandates intersect across platform supervision, electoral oversight and data protection. It also envisages that the DSC can request cooperation from EU member states' DSCs, but without clarifying the legal basis and procedural mechanisms through which such requests may be made and acted upon during the pre-accession period[5].

Albania's approach therefore illustrates the gap between introducing DSA-based obligations before accession and establishing the conditions for their effective application.

Despite different national approaches, Western Balkan countries face many common implementation challenges. These concern democratic safeguards and institutional capacities, as well as the expertise and sustainability of civil society, academic researchers and organisations that may undertake roles as trusted flaggers or out-of-court dispute settlement bodies. Even countries further advanced in preparation face difficulties in securing the specialized knowledge and long-term resources these functions require.

These shared needs call for a consistent EU approach across the Western Balkans, with common principles and clear milestones adapted to national circumstances. The pace of preparation can differ while maintaining a common direction and providing all the countries - including those further from accession - with a credible pathway into European cooperation.

DSA preparedness in the context of gradual integration

National developments are unfolding alongside the EU discussions on gradual integration before membership. The Growth Plan for the Western Balkans identifies the Digital Single Market as one of priority actions for integration into the EU's single market , bringing the relationship between economic integration and digital governance into the pre-accession discussion. While the Commission's approach to DSA alignment centres on the countries' readiness to apply it upon accession, gradual integration envisages participation in selected areas of the single market beforehand. How these approaches connect in the digital field is not sufficiently defined.

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[5] Public consultations for the draft law were open between July-September 2026 and during this period, UG "Zašto ne", with the help of local expert Megi Reçi, submitted detailed comments on the draft law, highlighting specific concerns that illustrate these broader institutional and enforcement challenges. The submission pointed to several crucial shortcomings of the proposed draft's approach and put forward recommendations to address them, including the need to guarantee adequate conditions for functional independence and operational capacity of DSCs and other competent authorities; the need to clarify institutional roles and cooperation arrangement between competent authorities; as well as to provide crucial safeguards to protect freedom of expression and personal data. It was also recommended to reconsider national replication of Commission-level functions and focus, instead, on operational matters and procedures. The submission also proposed establishing a multistakeholder cooperation mechanism (e.g. a Digital Services Advisory Board) composed of competent authorities, civil society organizations, fact-checkers, independent experts, researchers, and out-of-court dispute resolution bodies, to provide expertise and advice to the DSC on systemic risks and emerging digital-rights issues.

[6] https://enlargement.ec.europa.eu/enlargement-policy/growth-plan-western-balkans_en

A merit-based approach links opportunities for gradual integration into the EU Single Market to progress on fundamental reforms, including the rule of law, alignment with relevant EU standards and demonstrated readiness to meet the requirements of integration. This preserves incentives for progress, but may also create an additional layer of differentiation between Western Balkan countries. These differences matter in a region whose markets and information environments remain closely interconnected. Different national approaches are not inherently incompatible, and countries retain the sovereign choice to regulate digital services according to their domestic circumstances. However, divergent obligations and supervisory arrangements could produce uneven protection for citizens using the same platforms and accessing much of the same online content. If some countries also gain earlier access to European supervisory and cooperation mechanisms while others remain outside, this would add to the differences in protection already created by different national regulatory approaches.

The implications are particularly important for Bosnia and Herzegovina, Serbia, North Macedonia and Kosovo, whose accession prospects remain more uncertain or distant. If access to European digital governance arrangements depends on membership or progress towards earlier integration into the single market, these countries could remain outside for a prolonged period. Working on institutional readiness alone cannot overcome national authorities' limited ability to secure effective online safeguards for citizens.

These gaps have democratic consequences that accession-driven regulatory alignment alone cannot address. Risks to information integrity, fundamental rights and democratic participation persist regardless of progress towards membership. An approach that secures access to European mechanisms and safeguards only for the most advanced candidates risks leaving the rest of the region exposed to these challenges for years to come - while also leaving the more advanced countries vulnerable to cross-border risks originating in neighbouring countries with weaker regulatory safeguards.

Progress in reforms should continue to determine opportunities for deeper EU integration, but cooperation on platform accountability, information integrity and democratic resilience should not depend exclusively on accession timelines. The EU therefore needs an approach that recognises different levels of preparedness while extending relevant cooperation, expertise and practical support across the Western Balkans.

ONLINE PLATFORMS AND RISKS TO DEMOCRATIC PROCESSES

Online platforms play a central role in election campaigns. They have become a primary channel for the distribution of information, news and viewpoints, enabling candidates to reach voters and disseminate political advertising, while their design and functioning strongly influence which information reaches audiences and gains visibility. Risks to elections can therefore arise from both the content circulating on platforms and the methods used to distribute it.

The DSA recognises these effects through its requirements for very large online platforms and search engines to assess and mitigate systemic risks, including negative effects on civic discourse and electoral processes. The Commission's election guidelines[7] explain how these responsibilities relate to electoral periods, including cooperation with relevant authorities and independent experts, transparency of political advertising, recommender systems and responses to manipulation.

The Code of Conduct on Disinformation[8] complements these obligations. Its commitments address advertising revenues associated with disinformation, transparency of political advertising, fake accounts, bot-driven amplification and other manipulative practices. It also provides for cooperation with researchers and fact-checkers and a Rapid Response System[9] during elections. Participation remains voluntary, but its integration into the DSA framework in 2025 made the commitments auditable and established the Code as a relevant benchmark for assessing disinformation-related risk mitigation by participating platforms.

The difference between EU and Western Balkan elections therefore concerns both the responsibilities platforms face and the means available to scrutinise their conduct. Platforms serve closely connected audiences on both sides of the EU border, but their handling of risks in candidate country elections is not subject to equivalent DSA supervision. Domestic authorities cannot rely on the same procedures to obtain information or secure follow-up, while independent organisations lack equivalent opportunities to connect their findings with regulatory scrutiny.

Nevertheless, the Code offers opportunities to strengthen election-related cooperation beyond the EU, particularly through more structured engagement between platforms, fact-checkers and civil society organisations. Extending mechanisms such as the Rapid Response System to candidate country elections would require specific arrangements[10], but could help address some of the existing gaps in cooperation and platform accountability.

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[7] Commission Guidelines for providers of Very Large Online Platforms and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes pursuant to Article 35(3) of Regulation (EU) 2022/2065, https://digital-strategy.ec.europa.eu/en/library/guidelines-providers-vlops-and-vloses-mitigation-systemic-risks-electoral-processes

[8] https://digital-strategy.ec.europa.eu/en/policies/code-conduct-disinformation

[9] The Rapid Response System (RRS) for elections is a time-bound dedicated framework of cooperation and communication among relevant signatories of the Code of Conduct on Disinformation. It allows non-platform signatories to swiftly report time-sensitive content, accounts, or trends that they deem to present threats to the integrity of the electoral process in the European Union and discuss them with relevant platforms in light of their respective policies, https://disinfocode.eu/elections

[10] https://shorturl.at/QiSHu

Election integrity in Western Balkans is also an EU issue

Election campaigns in the Western Balkans take place in an online environment where disinformation, coordinated attacks and artificial amplification can shape the information available to voters. Political promotion is not always clearly identified, and the ownership or affiliations of accounts distributing campaign messages may be concealed. Alongside misleading content, organised activity can distort perceptions of which political views attract genuine public support.

Information manipulation and electoral integrity in Bosnia and Herzegovina's 2026 elections

Monitoring of Bosnia and Herzegovina's 2026 elections, conducted by Raskrinkavanje fact-checking platform[11] illustrates how information manipulation can affect not only political competition, but also public confidence in democratic institutions, electoral processes and the rule of law. The findings reveal the interplay between domestic political interests, cross-border information networks and external actors, as well as the growing role of online platforms in distributing and amplifying misleading and manipulative content.

While foreign malign influence in the Western Balkans is often associated with direct anti-EU rhetoric, recent election monitoring reveals a subtler yet damaging dynamic: the European Union was largely absent as a campaign theme, reflecting a concerning marginalisation of the EU in the political narratives of both local and external actors. Instead, foreign information manipulation and interference primarily targeted the electoral framework itself.

Regional and external state-aligned outlets, originating notably from Serbia and Russia, alongside sensationalist coverage in Croatian media, disseminated systematic disinformation campaigns aimed at eroding public confidence in new election technologies. Media analyses demonstrate that outlets such as RTRS, RT Balkan, and Sputnik Srbija actively seeded distrust toward novel voting equipment, framing election reforms as tools for Western interference. This included fabricated intelligence alerts, such as debunked claims of CIA warnings regarding possible manipulation of election technology, and sensationalist narratives depicting chaos and system failures on election morning. Notably, post-election monitoring captured a marked shift in editorial positions, with technology that had been criticized before the vote receiving more favourable political results materialized. This shift suggests that the narratives were driven less by consistent concerns about electoral technology than by political interests.

Parallel to attacks on voting infrastructure, external influence also involved sustained pressure on democratic norms and the rule of law, particularly visible during the early elections for the President of Republika Srpska. Extending from earlier snap elections through the general election cycle, Russian and Serbian media ecosystems actively delegitimized state-level judicial and electoral institutions to favor ruling political options in Republika Srpska. Fact-checking analyses confirmed that Russian state media displayed clear bias in favour of the ruling SNSD, framing local opposition and state judicial mandates as Western-backed destabilization. These narratives were heavily amplified by Serbian tabloid media, which routinely recycled disinformation to legitimize defiance of state institutions and court rulings. These sustained narratives, which originally gained traction during early presidential elections in Republika Srpska, demonstrate that external interference in Bosnia and Herzegovina is not episodic.

[11] https://raskrinkavanje.ba/

By attacking institutional integrity and legal accountability, such operations directly undermine the EU's foundational accession benchmarks on democracy and rule of law.

Monitoring of the October 2026 general elections also documented the growing role of social media platforms in political manipulation. Disinformation was particularly visible on social networks, where anonymous pages campaigned primarily to discredit particular political options. Networks of Facebook pages published identical content to maximise their reach, while accounts displaying bot-like behaviour repeatedly commented on political parties' posts to create an illusion of widespread support. While familiar patterns of politically biased reporting and manipulative campaign content persisted, much of the observed disinformation circulated on social media rather than through traditional media. Instances of AI-generated disinformation and manipulative content were also documented. These observations show how established campaign tactics are being combined with coordinated online distribution, artificial amplification and new tools for producing deceptive content.

Earlier monitoring of EU-related disinformation provides additional context. Ahead of Bosnia and Herzegovina's October 2026 elections, Raskrinkavanje mapped EU-related disinformation in media and social media content published between December 2022 and July 2026. The findings[12] identified narratives portraying the EU as an increasingly authoritarian project seeking greater control over citizens and everyday life. Conspiratorial claims about digital surveillance, health policies, migration, family and restrictions on traditional ways of life presented different European initiatives as elements of a coordinated agenda to limit freedoms and impose social change. EU digital and media regulation, including the DSA, was described as an instrument of censorship and restrictions on freedom of expression. Other narratives portrayed European institutions as undemocratic or illegitimate, integration as externally imposed demands and a loss of sovereignty, and EU accession as an endless or ultimately futile process. Claims about Western hypocrisy and hostility reinforced these portrayals.

These narratives circulated across media outlets, social platforms and national borders, with misleading claims reproduced and adapted by sources throughout the region. Media and social media sources both disseminated existing narratives and generated new misleading claims. Domestic sources operated alongside foreign ones, including Russian state media based in Serbia. This connected the country's information environment with wider regional distribution networks.

Large online platforms facilitate the circulation of political narratives across national borders. Shared languages and overlapping audiences further connect the information environments of the Western Balkans and EU Member States.

Election integrity in candidate countries is therefore also a European concern. Disinformation and manipulative narratives about the EU and the accession process can undermine public understanding of European integration, distort debates about reforms and influence public attitudes towards EU membership. Moreover, the cross-border circulation of content and manipulation tactics means that developments observed during elections in the Western Balkans can also provide important insights into risks affecting democratic processes elsewhere in Europe.

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[12] Mapping EU-related disinformation narratives in Bosnia and Herzegovina, https://zastone.ba/mapiranje-dezinformacijskih-narativa-vezanih-za-evropsku-uniju-u-bosni-i-hercegovini/

Exposure to these risks persists regardless of progress towards EU membership. Elections continue to take place, and information manipulation affects democratic processes while countries remain outside formal regulatory arrangements. Slower integration can prolong gaps in access to cooperation and safeguards, even as the information environment remains closely connected across borders.

The European Democracy Shield provides a broader policy framework for addressing these gaps. It recognises the importance of supporting candidate and potential candidate countries in strengthening democracy, protecting the information environment and addressing foreign information manipulation and interference.

THE EUROPEAN DEMOCRACY SHIELD AND WESTERN BALKANS

The EU has begun to include candidate countries in its efforts to address disinformation and strengthen democratic resilience. The European Democracy Shield[13], presented by the Commission in November 2025, envisages their involvement in several measures, including the monitoring activities of the European Digital Media Observatory (EDMO) and closer links between electoral authorities and the EU's election cooperation network.

The European Parliament's report on the findings and recommendations of its Special Committee on the Shield (EUDS)[14] gives this inclusion greater prominence. It calls for a shift from ad hoc support towards systematic, long-term cooperation, connecting candidate countries more closely with European structures for digital governance, information integrity and democratic resilience. The Western Balkans is specifically recognised as exposed to FIMI and hybrid threats, reinforcing the case for sustained engagement on information and election integrity.

The report also connects this engagement with digital regulation, calling for stronger support, tools and guidance for DSA implementation in candidate and potential candidate countries, alongside gradual integration into relevant EU enforcement and cooperation mechanisms where appropriate[15]. This points to a gap within the Shield's wider approach: DSA enforcement forms part of its response to platform-related risks, while candidate countries remain outside the regulatory system supporting that response.

Parliament's recommendations extend to practical cooperation on information integrity. They call for efforts to demonetise disinformation to include candidate countries and for trends observed there to receive particular attention in election-related work under the Code of Conduct on Disinformation. The report also calls for Commission engagement with civil society working on digital alignment, information integrity, election integrity and democratic resilience, and for support to fact-checking networks in candidate countries.

Taken together, these provisions place candidate countries within the implementation agenda of the Shield, as contributors to and participants in a wider European response. They provide political backing for sustained institutional and independent cooperation, while linking closer participation with candidate countries' own commitment to democratic reforms, the rule of law and cooperation with the EU.

Cooperation amid uneven regulatory integration

The Shield provides a basis for cooperation while integration into European regulatory arrangements proceeds at different speeds. Participation in those arrangements may depend on legal alignment and institutional preparedness, but risks to public debate and elections require attention throughout the accession process.

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[13] https://shorturl.at/lgsAm

[14] European Parliament resolution of 15 September 2026 on the findings and recommendations of the Special Committee on the European Democracy Shield, https://www.europarl.europa.eu/doceo/document/TA-10-2026-0286_EN.html

[15] See paragraph 24: "Calls on the Commission to increase efforts to promote and align the DSA and other key EU digital legislative acts in candidate and potential candidate countries and ensure that these countries have the support, tools and guidance needed for the implementation of such laws, enabling gradual integration into relevant EU enforcement and cooperation mechanisms, where appropriate; stresses that efforts to demonetise disinformation should explicitly include candidate and potential candidate countries, in order to prevent regulatory loopholes and cross-border spillover effects; stresses the need to take particular note of trends observed in candidate and potential candidate countries when conducting election-related work under the Code of Conduct on Disinformation;"

Cooperation on democratic resilience can therefore develop alongside regulatory integration without following identical conditions or timelines.

This distinction is particularly important for countries further from membership. Connections with the Centre for Democratic Resilience, European election networks and platform counterparts can provide access to expertise, information exchange and practical cooperation before formal supervisory participation becomes possible. These relationships do not confer DSA enforcement powers, but can help domestic actors investigate risks, share evidence and engage with platforms on measures to address identified threats.

The Stakeholder Platform envisaged under the Shield provides a route for civil society, researchers, fact-checkers and media from the Western Balkans to contribute to the Centre's work. Their participation would bring independent evidence and local expertise into European discussions, including findings that may challenge domestic authorities. Transparent access, opportunities to shape priorities and feedback on contributions would make this involvement meaningful and sustained.

The 2026 Berlin Process Civil Society and Think Tank Forum recommendations[16] identify the European Democracy Shield as a means of strengthening the region's capacity to respond to digital risks affecting democratic processes. They call on the European Commission to *"use the European Democracy Shield and related EU digital governance mechanisms to strengthen the capacity of Western Balkan countries to respond to digital risks affecting democratic processes, by systematically including relevant stakeholders in cooperation mechanisms, expert networks and initiatives related to AI governance, platform accountability, election integrity and digital resilience. This should include providing practical guidance on the institutional arrangements, coordination protocols and operational requirements for candidate and potential candidate countries to participate effectively in these mechanisms; facilitating structured engagement with online platforms; and enabling researchers and other qualified public-interest actors from the region to access relevant platform data, datasets, computing infrastructure, analytical tools and other resources necessary for independent research and evidence-based oversight."*

As the EU develops new tools and structures to protect democracy, it is increasingly important that the enlargement countries can benefit from and participate in these efforts within the accession process. For the Western Balkans, the Shield offers a way to deepen cooperation with the EU even as countries advance towards membership at different speeds. The Shield cannot itself replace binding platform supervision, but it can support closer working relationships with European authorities and online platforms, helping countries address current risks while preparing for future regulatory responsibilities.

[16] Civil Society & Think Tank Forum (CSF) 2026, the official civil society platform of the Berlin Process. Policy Recommendations: Digital Transformation, AI and Digital Sovereignty, https://osfwb.org/csf2026/publications/

RECOMMENDATIONS TO EU INSTITUTIONS

1. Define and monitor measurable expectations for DSA readiness

The European Commission should place digital governance and information integrity more prominently within enlargement monitoring, connecting DSA preparations with the fundamentals of accession, including democratic institutions and fundamental rights. Country Reports should go beyond general calls for DSA alignment by setting out specific preparatory steps and measurable, country-specific benchmarks, supported by written guidance and reflected in other relevant enlargement instruments.

Benchmarks should cover time-bound action plans; safeguards for political, operational and financial independence; adequate resources and capacity development; and continuous, meaningful stakeholder involvement. Assessment should examine implementation and institutional practice alongside formal commitments, including whether national measures protect rights and avoid disproportionate restrictions.

2. Enable progressive participation in European digital governance structures and mechanisms

The Commission should establish pathways for Western Balkan authorities to participate in structures and cooperation mechanisms relevant to DSA implementation before accession. This should include exploring observer participation in the European Board for Digital Services and relevant working groups where legally possible, alongside structured cooperation with Commission services and EU Digital Services Coordinators.

The Commission should clarify participation conditions and available formats, including alternatives where formal access is unavailable. These pathways should connect national preparations with practical involvement in European exchanges, allowing authorities to contribute expertise, raise implementation concerns and develop working relationships with their EU counterparts.

3. Translate the European Democracy Shield's regional commitments into practical cooperation

The Commission and the European External Action Service (EEAS) should translate the Shield's recognition of candidate countries into clear arrangements for the participation of Western Balkan countries in the Centre for Democratic Resilience, the Stakeholder Platform, relevant European election networks and other Shield initiatives.

Cooperation should connect competent institutions with civil society, researchers, fact-checkers and media working on information integrity, platform accountability and digital and AI-enabled risks. Arrangements should provide transparent routes for independent participation and safeguards against the misuse of measures intended to protect democracy.

4. Establish continuing election-related cooperation with Very Large Online Platforms

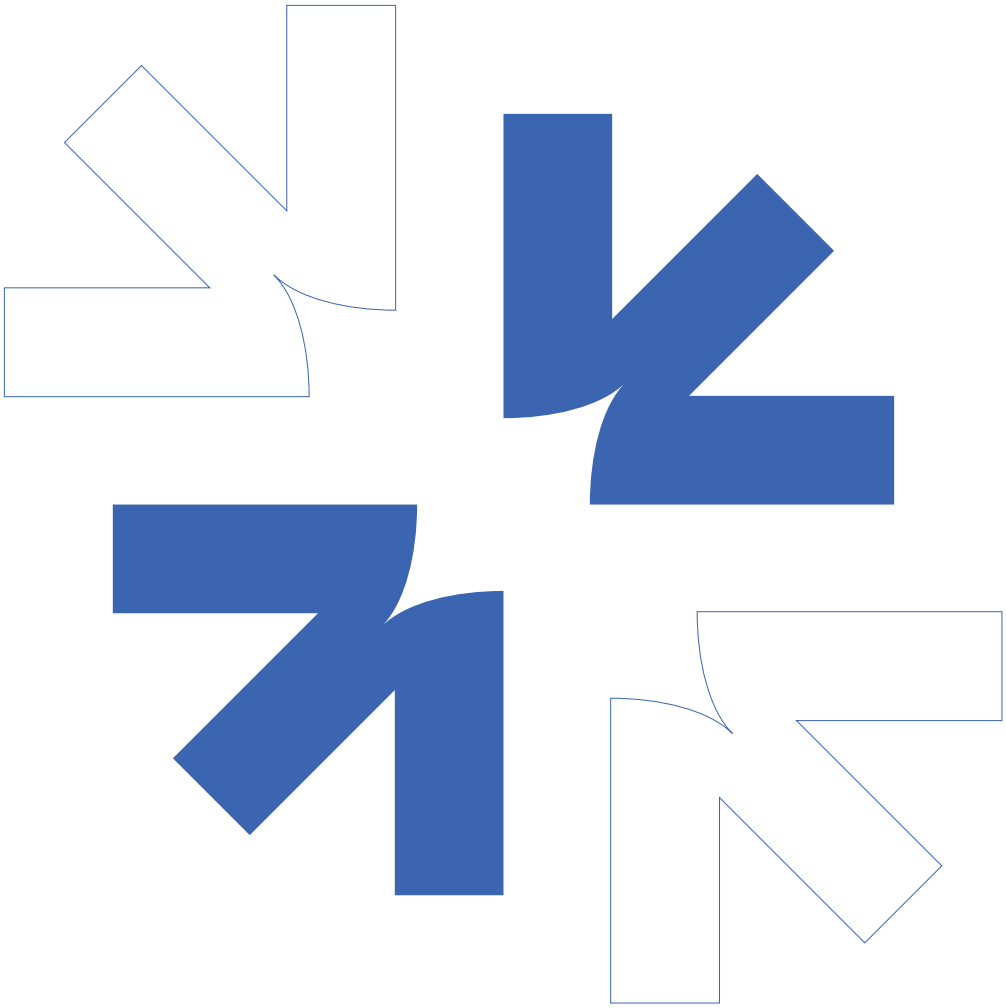
Relevant EU services should facilitate structured cooperation among platforms, competent institutions and independent experts before, during and after elections in candidate countries. This should include participation in the Code of Conduct on Disinformation's Rapid Response System, or equivalent arrangements where participation is unavailable, supported by reliable communication and escalation channels, local-language expertise, timely assessment and meaningful feedback.

Election-related work under the Code and associated European initiatives should systematically consider evidence from candidate countries, including coordinated manipulation, artificial amplification, deceptive AI-generated content and narratives targeting the EU and accession. Consistent with EUDS recommendations, cooperation should also address the monetisation of disinformation affecting candidate countries.

5. Support independent expertise and access to research resources

EU assistance should sustain the capacity of researchers, civil society, fact-checkers, academia and media to investigate platform-related risks and contribute to European cooperation. Support should cover specialist staff, analytical tools, secure infrastructure and cross-border research, including links with EDMO and relevant European networks.

The European Commission should clarify existing mechanisms through which researchers and civil society organisations from the Western Balkans can access platform data and support their participation where eligible, while facilitating alternative arrangements where these mechanisms do not adequately address regional needs. Such support should safeguard independent scrutiny of both online platforms and public authorities, and enable evidence from Western Balkan candidate countries to inform EU-level analysis and responses to information manipulation and other digital risks.



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