



The Censorship Network: Regulation and Repression in Germany Today



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Foreword



Over the past several years, investigative reporting has revealed a range of coordinated efforts to suppress online speech in Western countries. Often referred to as the Censorship-Industrial Complex, these networks of information suppression (mostly operating under the guise of “countering-disinformation” or “hate speech”) have been particularly widespread in the United States, United Kingdom and the European Union. Within the EU, Germany plays an outsized role in this complex, with a plethora of government and private nodes engaged in monitoring online speech and advocating increasing levels of content suppression.

While in the US the influence of these networks has diminished with the advent of the second Trump administration (leaving aside the new administration’s other free speech aggressions), in Europe and in Germany these networks continue unabated despite popular backlash.

Germany’s reputation as a hive of censors has devolved to the level of caricature. In early 2025, a [US 60 Minutes investigation](#) became a viral sensation for clips of dawn apartment raids by armed police on people who had posted offensive memes. In other clips, state prosecutors giggled at the seizure of citizens’ devices and emphasized the seriousness of the offense of “insulting” a politician.

While significant studies and journalism have been undertaken to investigate the German government agencies, non-governmental organizations (NGOs), academic centers, foundations and more that push for and implement the country’s censorship regime, our conversations with a range of German free speech advocates suggested that a full mapping was yet to be done.

With liber-net’s background working with journalist Matt Taibbi on the Twitter Files and in mapping [Censorship-Industrial Complex](#) (a US-focused map in hindsight), we set out to apply a similar methodology to Germany. Working with a host of German specialists, researchers and advisors, we documented more than 300 organizations contributing to online content suppression activities in Germany, far beyond the scale we had anticipated.

You can find a searchable, filterable and AI-promptable database of these organizations, including information on their activities, topic areas, funders and more [on the liber-net website](#). This reflects more than half a year of mapping the government agencies, NGOs, academic centers, think tanks and networks involved in suppressing Germans’ digital expression, as well as the sources of funding backing these efforts.

Throughout this report you'll find infographics that shed light on the activities and composition of these organizations as well as the topics they are concerned with. The graphic below provides a summary of who we believe are at the core of Germany's information suppression network.

It would be tempting to label each of these organizations as “censorship advocates” or even “censors,” but it is much more complex than that. Some clearly are overtly censorious, such as the government-appointed “trusted flagger” organization HateAid. Similarly, the unironic [Machine Against the Rage](#) initiative provokes a “you can't be serious?” response, but serious they are indeed. At the same time, our database includes more moderate initiatives, such as local governments offering small grants for counter-hate speech education as a way to combat increasing social fragmentation. We've included them all and ranked them from five to one flags – with five flags indicating the worst offenders – to provide a full picture of this massive, tangled sector.

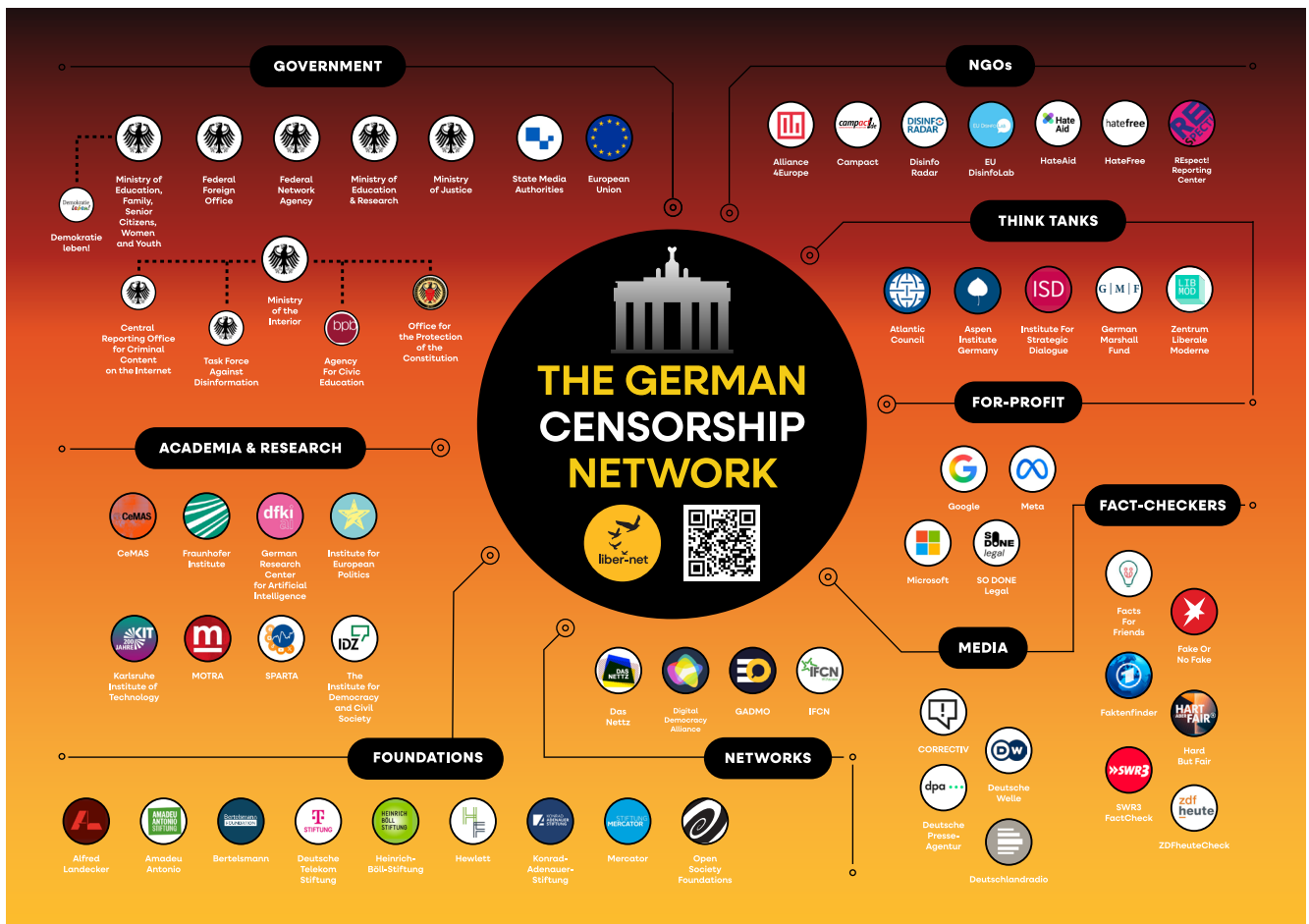
Commensurate with that, this report features a visual map of the leading censorship organizations in Germany, inspired by the [Censorship-Industrial Complex map](#) we produced with Matt Taibbi as part of the Twitter Files.

At the same time we conducted a rigorous search for grants for German content suppression activities, unearthing more than 425 at the time of this publication. Most originate from the German government, though this likely reflects the relative visibility of public funding in this field. Uncovering private funding is more challenging due to weaker reporting mandates and a dependency on voluntary disclosures. For that reason, the funding graphs we are publishing stick to analysing the government grants. We hope to return to an investigation of the private money in the months ahead.

Our research indicates that the German government maintains an unusually close relationship with organizations that present themselves as independent – far more so than in the United States, where we have conducted [similar research](#).

Finally, the report analyzes the origins of the current German censorship obsession, identifies the hybrid of geopolitical and structural accelerators, and offers some immediate solutions to arrest and hopefully reverse this trend. Ultimately, this can only be achieved by popular movements large enough to make the censorship regime impossible.

Andrew Lowenthal, CEO, liber-net





Introduction: Political and Legal Context of Stepped-up Repression

Since its founding in 1949, the Federal Republic's self-image as a free society has relied on certain guarantees of free expression, including media independence, together with clearly defined limits on the government's authority to regulate speech. A liberal ethos shaped in part by the catastrophes of the first half of the twentieth century and by West Germany's position on the front line of the Cold War has historically informed the country's constitutional order and the civil society built around it.¹ The arrangement has long been regarded as a bulwark against authoritarian censorship.

Over the past decade, however, this liberal-democratic framework has shown signs of erosion. A recent poll of Germans published by the *European*, for instance, revealed that 84 percent of respondents reported having refrained from expressing their views out of fear of repercussions – a clear signal that the polity sees itself as politically constrained. Moreover, when asked directly, 54 percent reported having personally experienced episodes in which they were unable to articulate an opinion freely.² These data suggest an intensifying contradiction between Germany's self-understanding as a free society and the reality of an increasingly restrictive situation. The outlook of the German polity is not surprising: it is no longer exceptional to read about police raiding someone's home or turning up at a school to question a teenage student over social media posts.

The German state of affairs is part of a broader global pattern of stepped-up digital censorship introduced in response to the populist wave of 2016, a period marked by the Brexit referendum and the election of Donald Trump to the White House. Subsequently, Germany has gained worldwide notoriety for its heavy-handed efforts to combat what it broadly designates as misinformation and hate speech – terms frequently weaponized to punish disfavored views.

1 The Federal Republic, or West Germany, absorbed the German Democratic Republic, or East Germany, on Unification Day, October 3, 1990.

2 "The INSA-Umfrage: Deutsche sehen Meinungsfreiheit zunehmend eingeschränkt," *The European*, August 2, 2025: <https://www.theeuropean.de/wissenschaft/insa-umfrage-deutsche-sehen-meinungsfreiheit-eingeschraenkt>.

A coarsened political culture may explain some of the current developments, but restrictions on political speech derive chiefly from institutional sources within a new state-backed regulatory framework. This apparatus has been further tightened amid the Ukraine and Gaza crises and is shaped primarily by the convergence of geopolitical and economic pressures now weighing on the country's prospects and, in turn, on the legitimacy of its political establishment.

Germany's political leadership has opted for containment over reform, deploying ever-increasing regulatory instruments and exercising repression to sideline popular dissent across the political spectrum, touching every sphere of policy debate. From the Christian Democratic Union (CDU) and its Bavarian sister party, the Christian Social Union (CSU) through to the Greens, Berlin's ostensibly rival factions have moved in virtual lockstep on unprecedented measures from public health to foreign policy, and have disregarded pressing matters of popular concern: deteriorating infrastructure (inclusive of a dire shortfall in healthcare capacity), mounting fears of escalating war in Europe and increasing friction over immigration.³ The strategy appears to be a Faustian bargain made by progressives with the extreme center to empower an increasingly repressive state in delimiting Internet discussion, while failing to consider that their political foes could some day be at the helm of the same repressive apparatus. This strategy has had the presumably unintended effect of inflaming a real lack of representation among the discontented, fuelling a populist movement which, to the chagrin of the establishment, appears by several measures to have gained the projected support of a quarter of the electorate.⁴

The architecture of the speech regulatory regime is byzantine, combining a patchwork of federated government offices and non-governmental organizations (NGOs) on which they rely to produce a dense web of sometimes redundant operations restricting speech. Taken individually, some of these elements may appear inconsequential, but as a composite, they are substantial.

The landmark legislation of Germany's intensifying management and repression of online speech is the 2017 Network Enforcement Act, or NetzDG. In fact,

3 Helen Whittle, "Young Germans Fear War and Poverty Yet Remain Optimistic," *Deutsche Welle*, October 15, 2024: <https://www.dw.com/en/young-germans-fear-war-and-poverty-yet-remain-optimistic/a-70472485>;

Bernhard Straub, "Germans Are Losing Faith in Their Healthcare Policy," Robert Bosch Stiftung report, March 17, 2023: <https://www.bosch-stiftung.de/en/stories/germans-are-losing-faith-their-healthcare-policy>.

4 Ferdinand Knapp, "Far-right AfD tops German popularity ranking in bombshell new survey," *Politico EU*, August 12, 2025: <https://www.politico.eu/article/germany-far-right-afd-lead-survey>.

NetzDG was the first major attempt by an OECD-type country to oblige platforms to police the entirety of online expression.⁵ It was presented at the time as a response to a real change in internet dynamics, including increases in “fake news” and “hate speech,” which, though often referring to real phenomena, soon became catch-all phrases encompassing a swathe of online speech that is neither fake nor hateful, but could pose a threat to the establishment’s grip on power and the status quo. This is of particular concern to the political class in the face of mounting popular discontent in the aftermath of the unresolved European economic crisis after 2010, and the founding of the populist right-wing party Alternative für Deutschland (AfD) in 2013.

Mobilizing Germany’s already restrictive criminal code regarding speech, NetzDG required large online media platforms, including social media firms with millions of users, to remove or block content presumed to be in violation of German law. Certain customary and well-defined offenses were grouped together with more ambiguous and therefore expansive designations such as “insult” and a broadened understanding of “defamation,” especially of politicians.⁶ The law penalized firms for failure to remove content deemed “manifestly unlawful” within 24 hours, and other reported speech within seven days; fines amounting to tens of millions of euros could be levied in cases of persistent non-compliance, resulting in millions of takedowns per year.⁷ Although such measures did remove genuinely illegal content, they also prompted warnings from a United Nations (UN) observer who was alarmed by the law’s “undue interference with the right to freedom of expression and privacy.” Its “lack of judicial oversight” for severe penalties imposed according to mandatory, expedited deadlines, he argued, risked establishing a “precautionary censorship” of “legitimate expression.”⁸ At the time, campaigns against NetzDG were led predominantly by progressives.

The reach of NetzDG into hazy areas encompassing otherwise legally protected speech along with its automated, time-sensitive implementation gave rise to bureaucratic absurdities, exemplified by takedowns and suspension of satirical content and accounts – one infamous example being the suspension in 2019 of the satirical magazine *Titanic*’s social media accounts over a post sending up racist attitudes. Subsequent legislation in the vein of the NetzDG frame-

5 NetzDG has been largely superseded by the EU-wide Digital Services Act.

6 The relevant statute is §188 of the German criminal code.

7 See FSM, “Self-regulation according to NetzDG”: <https://www.fsm.de/en/fsm/netzdg/>.

8 David Kaye, “Mandate of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression,” UN Office of the High Commissioner for Human Rights, June 1, 2017, pp. 3–5.

work, both in Germany and in the wider EU, has produced equally nonsensical outcomes.⁹

These German developments run parallel to trends in the US, where “Russian disinformation” emerged as a favored explanation for Donald Trump’s 2016 victory in the presidential election on the basis of a fabricated dossier backed by intelligence officials and funded by Hillary Clinton’s presidential campaign. Soon after, a series of initiatives was launched under the pretext of combating foreign interference, such as the Hamilton 68 dashboard to track Russian disinformation (Hamilton 68) and the network of “fact-checking” consortia expanded in concert with state agencies. This campaign inaugurated a sustained program of official disinformation designed to institutionalize joint state-NGO control over digital speech.

By 2017, skepticism of this official account of alleged Russian interference had become taboo across much of American civil society. What had emerged was, in effect, a security-state-led opposition to the elected president on national security grounds. Throughout the Covid period, the 2020 presidential election, and then with the 2022 Russian invasion of Ukraine and, public-private partnerships between the US state and social media firms resulted in escalated censorship, and the well-documented mass repression of online speech.¹⁰ In one instance, during the lead-up to November 2020 elections, pressure from members of the US national security apparatus led to the formal suppression of the *New York Post* in response to its verified reporting of factual information damaging to the Joe Biden campaign. Both Meta, the parent company of Facebook, and Alphabet, the parent company of Google, have publicly admitted their complicity in removing content from their platforms relating to Covid and the 2020 election at the behest of Biden administration officials during this same timeframe.¹¹ *liber-net* has elsewhere published an overview of these develop-

9 See “German hate speech law tested as Twitter blocks satire account” *Reuters*, January 3, 2018: <https://www.reuters.com/article/technology/german-hate-speech-law-tested-as-twitter-blocks-satire-account-idUSKBNIESIAS/>. For a report of the scale of NetzDG within the first years of its implementation – likely in the order of hundreds of thousands of blocked statements on platforms, never evaluated in terms of their illegality, see: “NetzDG führt offenbar zu Overblocking,” in *Reporter ohne Grenzen*, July 7, 2018: <https://www.reporter-ohne-grenzen.de/pressemitteilungen/meldung/netzdg-fuehrt-offenbar-zu-overblocking>.

10 Susan Schmidt et al., “Report on the Censorship-Industrial Complex: The Top 50 Organizations to Know,” *Racket News*, May 10, 2023: <https://www.racket.news/p/report-on-the-censorship-industrial-74b/>.

11 In September 2025, counsel for Alphabet formally apologized for its censorship collusion with the White House: <https://www.nytimes.com/2025/09/23/technology/youtube-reinstating-banned-accounts-pandemic-election.html/>.

ments along with recommendations for reining in such threats to freedom of expression.¹²

The repression of speech in Germany is of course distinctive politically and legally. Still, German developments approximate those of the US in content as well as chronology. For today's Berlin establishment – effectively the traditional *Volksparteien* of the CDU, SPD plus the Greens, the Free Democratic Party (FDP) and even elements of Die Linke – the overwhelming view is that digitally mediated speech and ideas are to be put on a short leash.

Why has Germany taken such an aggressive approach? First, Germany, as with most OECD countries, is governed by an increasingly insular and globally oriented political leadership seeking to stem the populist tide, whether of the left or right. The second major factor is Berlin's subservience to the Washington establishment. Since late 2017, the US has formally pursued a national security strategy of containment directed at both Russia and China, geopolitical rivals it has designated as "revisionist powers" engaged in "strategic competition" with the US.¹³ These causes, combined with Germany's unique federalist regulatory architecture and federal funding mechanisms account for the specificity of Germany's censorship network.

This situation is exacerbated by Germany's geopolitical dependence on the US. In demonstrating its Atlanticist alignment against Moscow and Beijing, Germany only compounds its economic difficulties and feeds division between elite and popular politics.¹⁴ Treating Russia and China as geopolitical antagonists runs counter to Germany's immediate economic interests, since, as Europe's leading economic and industrial power, it has relied on affordable energy from the former

12 See liber-net, *Federal Awards for 'Mis-, Dis-, or Malinformation' and other content moderation initiatives, 2010–2025* (April 15, 2025): <https://liber-net.org/federal-awards/> and liber-net, *Federal Policy Proposals to Protect Digital Free Speech in the United States* (March 3, 2025). Internal political divisions within the US are beyond the scope of the present report.

13 See the White House-issued *National Security Strategy of the United States of America*, December 2017, *passim*, and the *Summary of the 2018 National Defense Strategy: Sharpening the American Military's Competitive Edge*, May 2018, p. 2: "The central challenge to U.S. prosperity and security is the reemergence of long-term, strategic competition by revisionist powers. It is increasingly clear that China and Russia want to shape a world consistent with their authoritarian model – gaining veto authority over other nations' economic, diplomatic, and security decisions." Emphasis in the original.

14 See, *inter alia*, the following reports in the *Financial Times*: Olaf Storbek, "German economy shrinks for second consecutive year," January 15, 2025; Richard Milne, "German companies are risking a 'lose-lose' decoupling with China," January 30, 2025; and Patricia Nilsson, Patrick Mathurin, Laura Pitel, "German manufacturing job losses deepen fears over industrial decline," February 18, 2025.

and, more recently, exports to the high growth economy of the latter as it itself industrialized. Germany's position as an energy-poor but world-beating manufacturer for exports in the heart of Europe therefore comprised the decades-long model of Rhenish capitalism underwriting the Federal Republic's social contract.

A self-undermining fidelity to the US-led Atlantic order is now evident in Berlin's committed reversal of a long-standing policy of *détente* with Moscow. That policy, dating to chancellor Willy Brandt's *Ostpolitik* of the late 1960s, had a powerful social and pacifist component: a substantial portion of the citizenry recognized peaceful relations with Moscow as in the national interest, since Europe (and West Germany specifically) would be Ground Zero in any world war precipitated by Washington-led rearmament of the 1970s and 1980s.

Post-Cold War economic integration eastward after unification was extended and endured practically up to the middle part of the last decade, despite perfunctory denunciations of Moscow's human rights violations. From the activist left through the SPD leadership and big business, it was simply taken for granted that economic ties requiring basic good diplomatic relations with Russia were beneficial to Germany and a condition of general peace in Europe, especially when the rest of the Eurozone lay in tatters after the 2008 world economic crisis.

Today, neither Brandt's *Ostpolitik* nor the narrower mercantilist outlook represented by former Chancellor Angela Merkel in the first decades of this century are to be found among the governing parties. That German politics should have inverted so quickly, with those historically skeptical of Washington essentially falling in line without question, and at such great cost to German society – one need only think of the Nord Stream sabotage – is indicative of a sense of urgency among the country's elite to bring Germany into line with US policy toward Russia and China. Politics is now diverted away from rational self-reflection in the service of Washington's escalation against its Eurasian adversaries, and consequently such politics must be accompanied by stepped-up repression.¹⁵

15 The alarm around NetzDG was at the time sounded internationally and within the ranks of the German center-left. See, *inter alia*, Human Rights Watch's intervention, that of the Media Freedom and Information Access Clinic at Yale Law School, and the more cautious statements of Die Linke and Green parliamentary representatives, who, while agreeing with the spirit of the law, expressed reservations about its fast-track requirements. Respectively: Human Rights Watch, "Germany: Flawed Social Media Law: NetzDG is Wrong Response to Online Abuse," February 14, 2018: <https://www.hrw.org/news/2018/02/14/germany-flawed-social-media-law/>; Diana Lee, "Germany's NetzDG and the Threat to Online Free Speech," October 10, 2017: <https://law.yale.edu/mfia/case-disclosed/germanys-netzdg-and-threat-online-free-speech/>; and Stefan Krempel, "Netzwerkdurchsetzungsgesetz: Kritik und Korrekturbereitschaft im Bundestag," *Heise Online*, May 19, 2017: <https://www.heise.de/news/Netzwerkdurchsetzungsgesetz-Kritik-und-Korrekturbereitschaft-im-Bundestag-3718401.html/>.

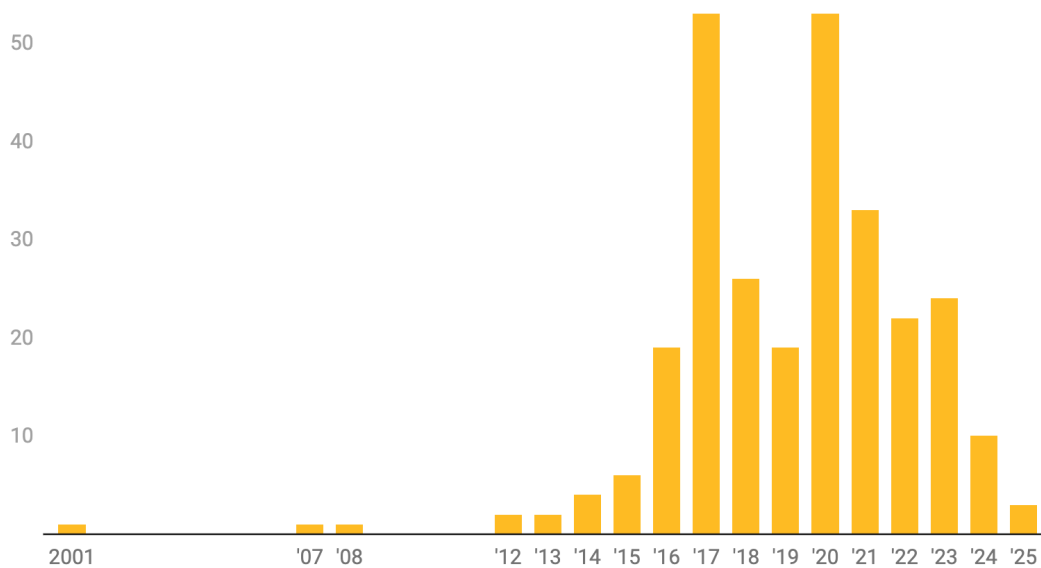
This repression is imposed *a fortiori* in the service of Berlin's backing of Tel Aviv's siege and destruction of the Gaza Strip. Justified in moral terms by appeal to the Federal Republic's *Staatsräson* – unconditional loyalty to Israel as penance for the Nazi Judeocide – protest and dissent are censured under a bloated definition of “anti-Semitism” that includes most criticism of Israel's Prime Minister Benjamin Netanyahu, his cabinet and their ideology.¹⁶ Such powerful, all-encompassing taboos around the Nazi dictatorship and the Second World War have been used to justify the extraordinary measures taken against populism of both the right and left.

Of course, organized campaigns of information warfare, including disinformation and propaganda, have long existed. All states engage in such practices, with special units devoted to such efforts in Europe and around the world, although foreign aid cuts by the new Trump administration suggest the digital aspects of the programs have been toned down in part.¹⁷ These campaigns will naturally take on digital forms given the centrality of online platforms for inter-state relations and the long-standing integration of all information media into the Internet. Racist, xenophobic and other bigoted content is likewise a component of online discourse, ranging from spontaneous outbursts to organized campaigns that, in the German context, may violate federal law. The present report is principally concerned, however, with the politicized branding of speech as disinformation or as illegitimate and therefore in need of suppression – including those political viewpoints challenging officialdom that either are not themselves illegal, or were not prior to 2016.

16 See Helen Whittle, “Germany passes controversial antisemitism resolution,” *Deutsche Welle*, November 6, 2024: <https://www.dw.com/en/germany-passes-controversial-antisemitism-resolution/a-70715643/>. The DW reported that the Bundestag's resolution on anti-Semitism was opposed by “legal experts, civil society groups and prominent Jewish intellectuals.” Only the left-wing opposition party Bündnis Sahra Wagenknecht (BSW) voted against it. For specific instances of online censorship regarding alleged anti-Semitism, see the entry for ZDFheuteCheck in Ch. 4.

17 The matter is discussed below in the analysis of NATO's Centres of Excellence, especially its StratCom COE; see Ch. 2, *EU Agencies*.

New and existing organizations beginning content controls programming in Germany



Present disputes over online speech in Germany arise from the breakdown of an official consensus that has ceased to benefit the majority. A November 2022 report by the [German Council on Foreign Relations \(DGAP\)](#), *A German Digital Grand Strategy: Integrating Digital Technology, Economic Competitiveness, and National Security in Times of Geopolitical Change* is exemplary.¹⁸ Although it promises the safeguarding of a “rules-based” approach to promote openness, the DGAP recommendations are geared toward consolidation at *Land*, federal, EU and “ultimately, global” levels of digital guidelines “that align with national, EU and NATO security concerns” in domains as varied as education, health and policework.¹⁹

Along with institutional anchors such as NATO and the EU, whose mechanisms of influence guarantee straightforward economic and security dependence, trans-atlantic think tanks like the Atlantic Council are key to the German censorship complex. The DGAP’s boosting of the new “democratic technology governance order” exemplifies a transformed definition of democracy from an essentially “*plebeian institution*” into a “*moral attitude*,” as the sociologist and director emeritus of the Max Planck Institute in Cologne Wolfgang Streeck has observed.²⁰ But in the digital regime envisioned by the DGAP and like-minded experts, morality

¹⁸ For further discussion of the DGAP itself, see the section on German Atlanticism in Ch. 2 of this report.

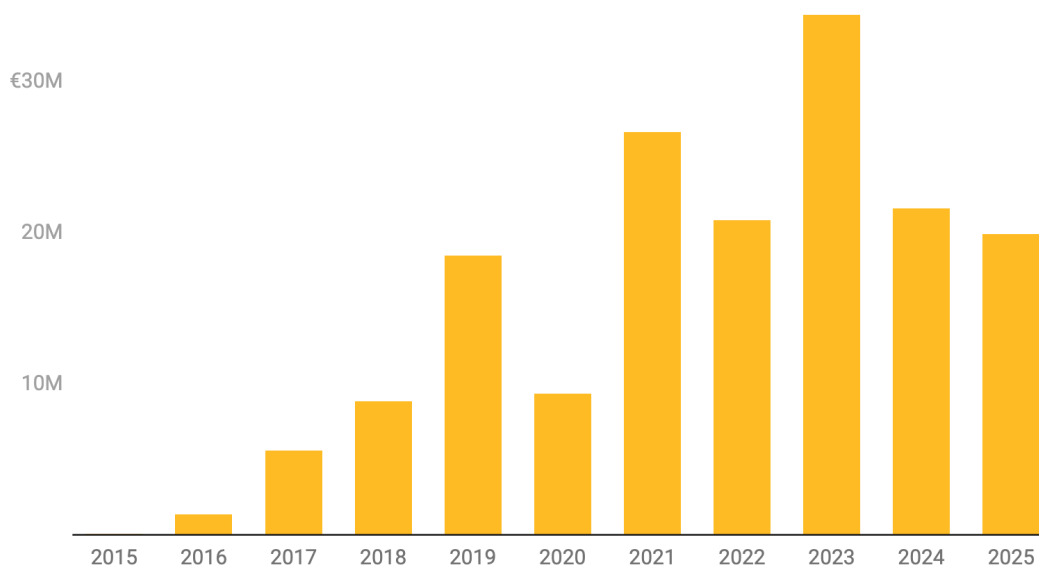
¹⁹ DGAP, *A German Digital Grand Strategy*, November 2022, p. 18.

²⁰ Wolfgang Streeck, *Taking Back Control? States and State Systems after Globalism* (London and New York: Verso, 2024), p. 47. Emphasis in the original.

is the security guaranteed by advanced preparations for a hybrid warfare regime that collapses the distinction between military and civilian spheres, and combines efforts to influence and manipulate information with the familiar repressive operations undertaken by the state. The Atlantacist foreign policy agenda is now a moral imperative.

Funding for content controls in Germany

Through November, 2025

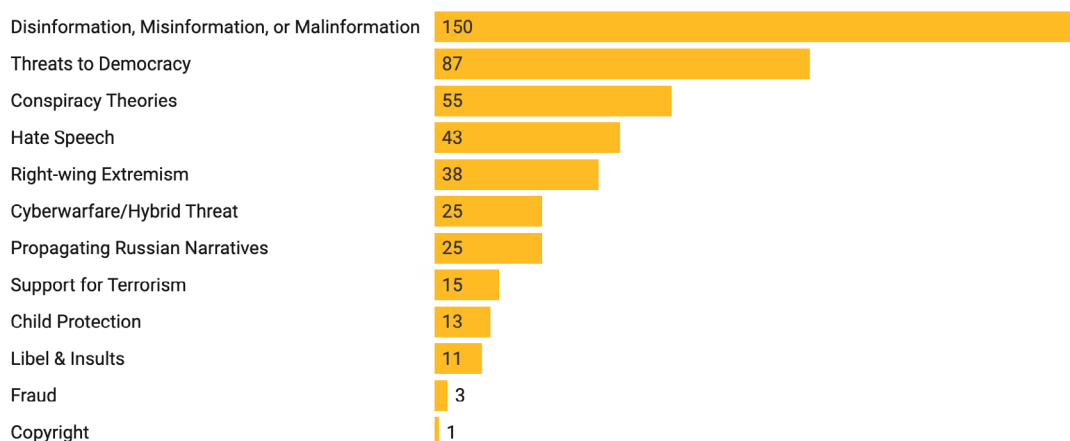


The same framework extends to other topics troubling to those leading major German institutions and parties. During the Covid-era crackdown on “misinformation,” for instance, a declared health emergency authorized the dramatic expansion of state-sanctioned speech control. In March 2020, the federal government, together with the *Länder*, invoked the Infection Protection Act (*Infektionsschutzgesetz*); while the Act itself did not prescribe technical “filtering” or “takedown” duties for private platforms, ministries and health agencies encouraged social media services to flag or label content that contradicted official recommendations.²¹ This guidance, combined with panicked communications from government channels and in the media, fed into the existing NetzDG framework, creating a de facto environment in which a broad range of pandemic-related commentary – from clinicians raising safety concerns to journalists questioning the proportionality of restrictions on movement and travel – could be subject to removal requests if authorities deemed it “misinformation” under the law’s

21 In 2020, a Federal Ministry of Justice (BMJV) minister publicly called on social networks to remove Covid-19 falsehoods and block users who spread them: <https://www.zeit.de/news/2020-03/17/lambrecht-soziale-netzwerke-sollen-falschmeldungen-loeschen/>.

wording. liber-net's database reveals an increase shortly after the start of Covid in the number of German organizations regulating speech on the Internet.

Justifications (rationale provided) by German organizations for content controls programming



Debates on immigration have likewise been constrained through Germany's regulatory framework. NetzDG's hate-speech provisions cover expressions that incite hatred or discrimination against protected groups, which includes ostensibly xenophobic or anti-immigrant rhetoric. This can, and often is, interpreted broadly: posts that question the adequacy of asylum procedures may be classified as illegal hate speech and ordered removed, even where arguments are factual. One frequently deployed slogan, "*Hass ist keine Meinung*" ("Hate is not an Opinion") illuminates the rhetorical strategy: suppress and criminalize dissent by equating it to an overly broad definition of "hate."²² Likewise, gender-related discourse has been captured by the new censorship architecture; in 2020, the Criminal Code (StGB) expanded the definition of "incitement to hatred" to include "discriminatory statements against persons based on gender identity," resulting in a cascade of platform-level policies to prevent and remove ideas critical of contemporary transgender politics and activism. Such measures have constrained academic research, including in medicine, and repressed a range of political views on the complex relations of sex, gender and law.

22 The slogan appears to have been popularized by the 2017 book of the same name, written by German Green Party politician Renate Künast. The phrase, frequently used since, made the cover of a 2023 educational pamphlet produced by HateAid: <https://hateaid.org/wp-content/uploads/2023/09/hateaid-hass-ist-keine-meinung-aufklaerungsbooklet-digital.pdf/>.

The State



The state is central to current efforts at restricting online expression in German society. At federal, *Land* and even municipal levels – and in concert with the EU bureaucracy – the state’s full legal and coercive capacity is now deployed to regulate speech and to fund and manage non-governmental organizations (NGOs) committed to a range of regulatory and punitive measures: flagging, reporting and managing online discourse directly. These measures, combined with programs of cultural-political influence, impose further informal restrictions on speech through construction of taboos and by redirecting dissent.

State intervention in online speech is more openly institutionalized in Germany than in the US. In the US, large information-control operations, especially under the Biden administration, have been largely concealed and delegated to NGOs, universities and think tanks. This indirect form of coordination is likely due to the limitations imposed on government by the First Amendment. Still, the second Trump administration has assumed a more overtly coercive and erratic approach to speech control. In Germany, widespread sympathy for whistleblowers Julian Assange and Edward Snowden once reflected a civic wariness of surveillance, but public sentiment has since polarized amid expanding regulation of the public sphere. Such measures are justified with reference to the Basic Law, but have broadened into a more comprehensive regime of digital control.

The Federal Bureaucracy

Germany’s constitutional order, in letter at least, formally prohibits censorship and guarantees free expression. Article 5 of the *Grundgesetz* (Basic Law) affirms the freedoms of opinion, information, press, broadcasting and visual media. It states plainly that outright censorship is not to take place; limits may arise only from “general laws,” protection of the youth or insults to “personal honor,” each interpreted under a principle of proportionality.²³ This juridical starting point frames the subsequent growth of a dense administrative and regulatory apparatus governing online speech, much of it routed through intermediary liability, platform compliance and executive coordination designed to respond to what

23 “There is to be no censorship” (“Eine Zensur findet nicht statt.”). Article 5 of the German Basic Law: https://www.gesetze-im-internet.de/gg/art_5.html. The phrase “right to personal honor” (“Recht der persönlichen Ehre”) invokes the formal concept of an insult to it (“Ehrverletzung”). It therefore permits restrictions to freedom of speech due to defamation, insult, libel and so forth.

ministries now call “hybrid threats” since Germany’s Network Enforcement Act (NetzDG) of 2017.²⁴ The bureaucracy is composed of a layered system coupling federal criminal law, intelligence infrastructure and *Länder* media supervision with the European Union’s Digital Services Act (DSA), which effectively superseded NetzDG in Germany with its adoption in 2022. The Federal Office of Justice, the Federal Criminal Police Office, the Federal Data Protection Commissioner and the *Bundesnetzagentur* occupy distinct but complementary nodes of what has become a de facto censorship network. The design claims to preserve constitutional guarantees through ex post enforcement and platform due diligence, yet in practice it shifts decisive action to administrative and corporate actors.

Criminal law is also mobilized. As discussed in Chapter 1, NetzDG provided the template for content removal on large social networks. The law targets categories of illegal speech defined elsewhere in the criminal code (for instance §130 StGB on incitement of hatred), and enforces compliance by obliging providers to remove “manifestly unlawful” content within 24 hours of notice, or within seven days for other cases, backed by fines of up to €50 million. NetzDG’s defining feature was to privatize initial determinations of illegality by shifting responsibility for this to the platforms, with the [Federal Ministry of Justice \(BfJ\)](#) empowered to supervise the platforms and impose fines, but taking no part in the first stage of determining the legality of content.²⁵

Central to this new paradigm is the [Federal Interior Ministry \(BMI\)](#)’s designation of disinformation as a hybrid threat, prompting the development of interministerial offices.²⁶ The BMI’s public material identifies a task force against disinformation that convenes authorities across ministries, operating as an arm of the Interior-led **Working Group on Hybrid Threats (AG Hybrid)**. Government communications around the 2024 European election, for instance, present this as a forum for information sharing and action and emphasize coordination across

24 Deutscher Bundestag, “Neues Lagebild zu hybriden Bedrohungen,” (August 4, 2025): <https://www.bundestag.de/presse/hib/kurzmeldungen-1103890/>.

25 Federal Ministry of Justice (BfJ), *Network Enforcement Act: Regulatory Fining Guidelines (Netzwerkdurchsetzungsgesetz – NetzDG)*, March 22, 2018. Full text in English: https://www.bundesjustizamt.de/SharedDocs/Downloads/DE/NetzDG/Leitlinien_Geldbussen_en.pdf/.

26 Federal Ministry of the Interior (BMI), “Disinformation as hybrid threat”: <https://www.bmi.bund.de/SharedDocs/schwerpunkte/EN/disinformation/article-disinformation-hybrid-threat.html>.

the government under BMI leadership.²⁷ A Bundestag brief and related government commentary since 2024 confirm this structure: the BMI coordinates such hybrid-threat policy federally through the Working Group; the Task Force against Disinformation functions as its coordination and response mechanism. By design, the system depends on executive discretion, its findings restricted to internal distribution among ministries and trusted partners, out of public view.

In 2024, the Interior Ministry also established the **Central Office for Detection of Foreign Information Influence (ZEAM)** to safeguard elections and the overall integrity of German politics. ZEAM defines itself as a defensive capability against foreign information operations and protector of constitutional order, extending the same executive logic of identifying allegedly hostile threats early, passing on the relevant information to platforms or law enforcement. The guiding premise is to empower administrative bodies to detect and triage potentially offending content, rather than subjecting content (of which there is a vast amount) to judicial review.²⁸ Likewise, the BMI, by way of the [Federal Agency for Civic Education](#), or [Bundeszentrale für Politische Bildung \(bpb\)](#) administers educational and civic initiatives that may often merge with anti-disinformation campaigns.²⁹

Under SPD control from 2021–2024, the Interior Ministry expanded its oversight of online expression, treating digital speech as an object of police and intelligence concern. In November 2024, BMI Minister of the Interior Nancy Faeser coordinated a nationwide “action day against hate posts” (*Aktionstag gegen Hasspostings*), involving more than 50 home searches and over a hundred police actions across multiple *Länder*.³⁰ The operation included pre-dawn house raids and the seizure of phones and laptops from those accused of online insults or

27 Federal Ministry of the Interior (BMI), “Task Force against Disinformation – forum for information sharing and action (2024 European election)”: <https://www.bmi.bund.de/SharedDocs/schwerpunkte/DE/europawahl-2024/artikel-europawahl-2024-faq-artikel.html/>.

28 ZEAM’s English-language homepage describes it as a “joint initiative of the Federal Ministry of the Interior and Community, the Federal Foreign Office, the Federal Ministry of Justice, and the Press and Information Office of the Federal Government.” (emphasis in original): <https://www.bmi.bund.de/SharedDocs/schwerpunkte/EN/disinformation-election/zeam-artikel-en.html>.

29 The bpb has recently called attention to the inadequacy of mere fact-checking, and appears to suggest that a broader approach to disinformation is required. See bpb, “Mittel gegen Desinformation: die Schwachpunkte von Faktenchecks,” August 4, 2025: <https://www.bpb.de/lernen/digitale-bildung/werkstatt/569313/mittel-gegen-desinformation-die-schwachpunkte-von-faktenchecks/>.

30 “Bundesweite Durchsuchungen wegen Hasspostings,” *Die Zeit*, November 12, 2024: <https://www.zeit.de/news/2024-11/12/bundesweite-durchsuchungen-wegen-hassposting/>.

incitement. Prosecutors interviewed on camera defended these measures as proportionate, arguing that digital “hate” causes enduring harm because online activity “sticks around forever.”³¹

The case of Stefan Niehoff, a retired Bundeswehr officer living with his wife and adult daughter with Down’s syndrome, exemplifies the overreach of digital speech enforcement under Faeser’s interior ministry. Niehoff’s home was searched during the *Aktionstag* after he shared a meme on social media in which the *Schwarzkopf* shampoo logo was altered to read *Schwachkopf* – “idiot” – beneath the profile of Vice-Chancellor Robert Habeck. The so-called *Schwachkopf* affair featured in national news media after prosecutors issued Niehoff a fine of €825, and further charges were later appended on the basis of earlier posts Niehoff had made that were critical of the Green Party, an escalation widely regarded as disproportionate. Habeck declined to withdraw his complaint over the offending *Schwachkopf* meme, allowing proceedings to continue against a pensioner of limited means. The episode is illustrative of the way in which § 188 of the German criminal code pertaining to defamation or slander of persons engaged in public life has been subverted to suppress ordinary political satire, a feature of public discourse which was once considered a civic safety valve.³²

A smaller but emblematic case occurred in the state of Mecklenburg-Vorpommern, where a 16-year-old student was removed from class and questioned by police after posting a TikTok smurf meme referencing the AfD’s blue campaign color. In an interview with the national-conservative *Junge Freiheit*, the student later described the episode as humiliating and politically motivated. Subsequent reporting by *Tagesspiegel* and *Die Zeit* suggested that other posts containing alleged right-wing codes had been the cause of the episode; yet in July of 2025,

31 Sharon Alfonsi et al., “Germany is prosecuting online trolls. Here’s how the country is fighting hate speech on the internet,” *CBS News*, February 16, 2025: <https://www.cbsnews.com/news/germany-online-hate-speech-prosecution-60-minutes/>.

32 Fatina Keilani, “Rentner wird zu einer Geldstrafe von 825 Euro verurteilt – in den Fokus der Ermittler geriet er wegen des «Schwachkopf»-Posts gegen Robert Habeck,” *Neue Zürcher Zeitung*, June 18, 2025: <https://www.nzz.ch/international/rentner-wird-zu-einer-geldstrafe-von-825-euro-verurteilt-in-den-fokus-der-ermittler-geriet-er-wegen-dem-schwachkopf-post-gegen-robert-habeck-ld.1889485/>.

the Administrative Court in Greifswald ruled that the police intervention was unlawful and had violated the student's civil rights.³³

Founded in 1950 and operating under the BMI, Germany's domestic intelligence agency, the **Federal Office for the Protection of the Constitution (BfV)**, is tasked with monitoring extremism and foreign influence operations. Its mandate extends to political surveillance and investigation of parties, associations, and individuals – including, in recent years, its own former chief – for alleged anti-constitutional activity.³⁴ During the Covid period, the BfV, which also maintains *Land*-level offices, expanded its capacities substantially. It now keeps and publishes a list of organizations it accuses of the “delegitimization of the state, as relevant to the protection of the constitution” (*verfassungsschutzrelevanten Delegitimierung des Staates*); the categorization also applies to individuals, who are privately monitored, whereas previously only organized groups were at risk of being surveilled on this basis. The BfV's annual *Verfassungsschutzbericht*, or Constitutional Protection Report, is essentially a public blacklist, naming groups who deviate from official policy or who publish dissenting viewpoints. As an example, the daily paper *Berliner Zeitung* had to contest its designation as a “pro-Russian outlet” by the BfV's Bavarian subsidiary, ultimately forcing a retraction.³⁵ The prominent journalist Aya Velázquez has also been targeted, with her articles monitored by the BfV.³⁶ In another case, *Compact Magazin* was outright banned and its offices searched in July 2024 due to the BfV's classification of

33 See, respectively, “16-Jährige postete wohl rechtsextreme Inhalte,” *Tagesspiegel*, March 19, 2024: <https://www.tagesspiegel.de/gesellschaft/panorama/16-jahrige-postete-wohl-rechtsextreme-inhalte-polizei-ruckte-offenbar-gar-nicht-wegen-afd-schlumpf-video-an-schule-an-11389201.html/>; “Polizei nennt Details über Internet-Posts einer Schülerin,” *Die Zeit*, March 19, 2024: <https://www.zeit.de/news/2024-03/19/polizei-nennt-details-ueber-internet-posts-einer-schuelerin/>; and Greifswald Administrative Court press release, “Verwaltungsgericht Greifswald stellt Rechtswidrigkeit einer polizeilichen Gefährderansprache gegenüber einer Schülerin fest,” January 2025: <https://www.mv-justiz.de/gerichte-und-staatsanwaltschaften/fachgerichte/verwaltungsgerichte/verwaltungsgericht-greifswald/Aktuelles/?id=212106&processor=processor.sa.pressemitteilung/>.

34 “Hans-Georg Maaßen: Verfassungsschutz fragt offenbar Daten über ehemaligen Präsidenten ab,” *Der Spiegel*, August 16, 2023: <https://www.spiegel.de/politik/deutschland/hans-georg-maassen-verfassungsschutz-fragt-offenbar-daten-ueber-frueheren-praesidenten-ab-a-15ee94d1-2c3c-4fce-9alc-f67eb79c95ec/>.

35 “Bayern muss Verfassungsschutz-Bericht nach Beschwerde der Berliner Zeitung korrigieren,” *Berliner Zeitung*, November 9, 2024: <https://www.berliner-zeitung.de/politik-gesellschaft/verfassungsschutz-zieht-bericht-nach-beschwerde-der-berliner-zeitung-zurueck-li.2253196/>.

36 Aya Velázquez, “In eigener Sache: Ich werde vom Bundesamt für Verfassungsschutz beobachtet,” June 4, 2024: <https://www.velazquez.press/p/in-eigener-sache-ich-werde-vom-bundesamt/>.

the magazine as right-wing extremist. The private residence of editor Jürgen Elsässer was also searched.³⁷ A year later, however, the ban was overturned by the Federal Administrative Court, which ruled that although *Compact* had disseminated anti-constitutional material, its activity did not meet the threshold for prohibition.³⁸

Parliamentary inquiries show that the BfV and the foreign intelligence service, the [Bundesnachrichtendienst \(BND\)](#), analyze what they classify as foreign-state disinformation or influence activity, including on social media.³⁹ The BND was founded in 1956 as a successor to the Gehlen Organization, an intelligence service created by former Wehrmacht officers under US supervision after 1945, then operating in the American zone of occupied Germany.

Another key federal office regulating and repressing speech is the **National Cybersecurity Council (Nationaler Cybersicherheitsrat)**. Chaired by the Federal Government Commissioner for Information Technology, the Council brings senior representatives from ministries, *Länder*, and critical-infrastructure operators together to coordinate strategy. Its remit is cybersecurity policy, not content control; deliberations are advisory and interagency.

Other notable federal agencies or offices for the regulation of online speech include:

The [Federal Criminal Police Office \(BKA\)](#) which criminal law enforcement. It is not a speech regulator but, under § 13 of the Digital Services Law (DDG) in conjunction with § 2 of the BKA Act and Article 18 of the 2024 DSA, it receives reports from platforms of suspected crimes, registering and investigating them accordingly.

The [Federal Office of Justice \(BfJ\)](#) is the former administrative enforcer of the Network Enforcement Act (NetzDG) and still closes legacy cases. It has imposed significant fines (e.g., a €5.125 million sanction on Telegram for non-compliance with reporting and local representation duties). With the DDG now implementing the DSA, day-to-day platform-oversight

37 Deborah Cole, "Germany bans 'right-wing extremist' magazine," *Guardian*, July 16, 2024: <https://www.theguardian.com/world/article/2024/jul/16/germany-bans-rightwing-extremist-compact-magazine/>.

38 Thomas Escritt, "German court overturns ban on far-right magazine," Reuters, June 24, 2025: <https://www.reuters.com/business/media-telecom/german-court-overturns-ban-far-right-magazine-2025-06-24/>.

39 Bundestag 20. Wahlperiode, Drucksache 20/12872, September 9, 2024: <https://dserver.bundestag.de/btd/20/128/2012872.pdf/>.

functions have shifted, but BfJ precedent remains relevant to transparency and reporting enforcement.⁴⁰

The **Federal Commissioner for Data Protection and Freedom of Information (BfDI)** is an independent federal authority supervising data protection at federal public bodies and, in the private sector, providers of telecoms and postal services (other private-sector data controllers fall under the *Länder* authorities). Its mandate concerns GDPR-compliant processing, not speech rules; however, enforcement can affect moderation systems that rely on personal-data profiling, access to datasets, and researcher-access provisions under the DSA.

The **Press and Information Office of the Federal Government (BPA)** monitors online discourse using social-listening tools, including watching accounts suspected of circulating disinformation. The government stresses this activity is for situational awareness and is part of a broader inter-agency information exchange effort; it does not amount to “systematic detection” of disinformation, and no enforcement authority is claimed.⁴¹

The [Federal Ministry of Education, Family Affairs, Senior Citizens, Women and Youth \(Bundesministeriums für Bildung, Familie, Senioren, Frauen und Jugend, BMBFSFJ\)](#) has expanded beyond its traditional focus on welfare, adding a digital media portfolio aimed at influencing and managing online discourse. It administers the extensive program [Demokratie leben!](#) (discussed at greater length in this report) which, while educational in name, in reality constitutes a political intervention by the Ministry into German society.

The EU’s DSA is enforced at the national level and designates the [Bundesnetzagentur \(Federal Network Agency\)](#) as Germany’s Digital Services Coordinator (DSC).⁴² Under the DSA, Germany divides enforcement responsibilities: while the EU Commission retains exclusive oversight of *very large online platforms* (VLOPs) – online platforms operating in the EU with more than 45 million monthly active users – and *very large online search engines* (VLOSEs), national authorities – including BNetzA and State Media Authorities – share supervision

40 Bundesamt für Justiz, “Bundesamt für Justiz erlässt Bußgeldbescheide gegen das soziale Netzwerk Telegram,” Press Release, October 17, 2022: <https://www.bundesjustizamt.de/DE/ServiceGSB/Presse/Pressemitteilungen/2022/20221017.html>.

41 Bundestag 20. Wahlperiode, Drucksache 20/12872, September 9, 2024: <https://dserver.bundestag.de/btd/20/128/2012872.pdf/>.

42 On DSC, see: <https://digital-strategy.ec.europa.eu/en/policies/dsa-dscs/>.

of other obligations and may delegate tasks such as youth protection and data protection. The DSA imposes graduated obligations on digital service providers, including notice-and-action procedures for dealing with illegal content, internal complaint procedures, transparency reporting, risk assessments and mitigation measures. Platforms that fail to comply face significant penalties, potentially including fines amounting to six percent of a firm's global annual revenue, or suspensions.⁴³ A particularly controversial mechanism is the "trusted flagger" regime under Article 22 of the DSA, in which DSC-certified organizations receive priority or expedited treatment when filing reports.⁴⁴ Transparency around DSA enforcement in Germany remains limited: public documentation of investigative or disciplinary cases is scarce, making it difficult to assess how and when German authorities act in practice.⁴⁵

At present, there are four German organizations certified as trusted flaggers; two are charged with monitoring disinformation and hate speech. The nonprofit organizations [REspect!](#) (certified in October 2024) and [HateAid](#) (certified in June 2025) focus on hate speech and "digital violence" as well as terrorist content on social media networks and video platforms. (Two additional organizations, Bundesverband Onlinehandel e.V. and Verbraucherzentrale Bundesverband, focus exclusively on consumer protection, online trade, product safety and commercial fraud on digital platforms and marketplaces.)

Among Germany's federal bodies involved in regulating digital expression, the Interior Ministry (BMI) and the domestic intelligence agency it oversees, the Federal Office for the Protection of the Constitution (BfV), have become the most aggressive instruments of surveillance and censorship, with the Justice Ministry (BMJ) providing their legal foundation. The BMI's designation of disinformation as a hybrid threat has expanded state monitoring through units such as ZEAM and nationwide police operations against online speech. The BfV now wields political power through the public stigmatization of journalists and parties it classifies as extremist. The BMJ's Network Enforcement Act and its successors institutionalize privatized censorship, forcing major platforms to enforce government-defined speech limits, in some instances beyond judicial scrutiny.

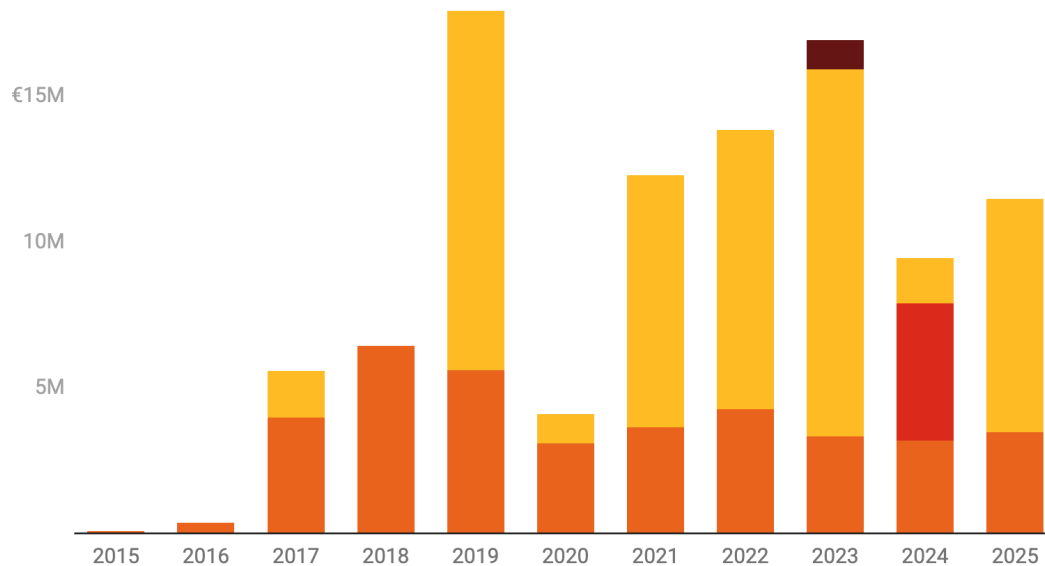
43 See Ben Wagner et al., "Mapping interpretations of the law in online content moderation in Germany," *Computer Law & Security Review*, Volume 55, November 2024: <https://www.sciencedirect.com/science/article/pii/S0267364924001201>. For a timeline of the DSA's development, see: <https://digitalpolicyalert.org/change/9716/>.

44 See Jacob van de Kerkhof, "Article 22 Digital Services Act: Building trust with trusted flaggers," in *Internet Policy Review*, Vol. 14, No. 1, March 2025: <https://policyreview.info/articles/analysis/article-22-digital-services-act/>.

45 Ramsha Jahangir, "What We Don't Know About DSA Enforcement," *Tech Policy Press*, April 8, 2025: <https://www.techpolicy.press/what-we-dont-know-about-dsa-enforcement/>.

Content controls grants from select German government ministries

■ Demokratie Leben! (a program of BMBFSFJ)
 ■ Federal Ministry of Education, Family Affairs, Senior Citizens, Women and Youth (BMBFSFJ)
 ■ Federal Ministry of Research, Technology and Space (BMFTR)
 ■ German Federal Ministry of the Interior (BMI)



The Länder

Germany's federal structure gives the *Länder*, the constitutive federal states of the republic, primary authority over the regulation of broadcasting and tele-media (including the Internet) through the [Landesmedienanstalten, or State Media Authorities](#). The significant role of the *Länder* in these activities distinguishes Germany from the United States, where state legislation and legal action play only a minor role compared to federal initiatives. Operating on the basis of a small percentage of the total revenue from the obligatory public broadcaster contribution levied on every German household, their combined budget amounts to approximately €162 million annually.⁴⁶ The legal grounds for *Land*-level oversight is the Media State Treaty (*Medienstaatsvertrag*, MStV), ratified by all 16 federal *Landtage* (state parliaments), which entered into force in November 2020, consolidating revisions to the older *Rundfunkstaatsvertrag* of 1991

⁴⁶ ARD ZDF Deutschlandradio Beitragsservice, Jahresbericht 2023 – Erträge aus dem Rundfunkbeitrag, June 25, 2024: <https://presse.rundfunkbeitrag.de/pressreleases/beitragsservice-stellt-jahresbericht-2023-vor-bundesweiter-meldedatenabgleich-sorgt-fuer-deutlichen-anstieg-des-wohnungsbestands-3331602/>.

by formally expanding the remit of State Media Authorities to Internet platform services.⁴⁷

Inside this framework, the **Commission for the Protection of Minors in the Media (KJM)** was charged with enforcing the **Youth Media Protection State Treaty (JMStV)**. These bodies monitor telemedia, apply youth-protection categories (age ratings and restrictions and so forth), and may initiate measures against providers. The KJM's portfolio is no longer limited to television and radio; it now also subjects online speech to the regulatory standards formerly applied only to telemedia.⁴⁸ In recent years, the State Media Authorities have expanded into monitoring and combatting disinformation, hosting an annual "Safeguarding Freedom" conference and producing a report on fake news. They have deployed AI programs for flagging suspected illegal and politically undesirable content, including politically "extreme" speech online, for referral to prosecutors for investigation or indictment.⁴⁹ Under authority granted by the 2020 MStV for journalistic and editorial supervision, the Media Authorities have also targeted subjective opinions, not just factual claims, imposing regulatory standards on what are in effect political opinions.⁵⁰

As funders, the State Media Authorities also back an array of pedagogical initiatives. These are designed to shape the reception of politics and history through digital media literacy and anti-disinformation campaigns directed at youth, often with the cooperation of educational institutions and in collaboration with the Federal Agency for Civic Education (bpb) and the Federal Ministry of Education, Family Affairs, Senior Citizens, Women and Youth (BMBFSFJ). While not actively managing speech, these government programs attempt to frame official views as acceptable and erect taboos around dissent. Their scope is enormous: State Media Authorities monitor those blogs, magazines, or YouTube channels

47 Benedikt Frank, "Alexa, richte dich nach diesen Regeln," *Süddeutsche Zeitung*, November 8, 2020: <https://www.sueddeutsche.de/medien/medienstaatsvertrag-rundfunkstaatsvertrag-neu-regeln-1.5108215/>.

48 Medienstaatsvertrag (MStV), *Fassung des Fünften Medienänderungsstaatsvertrags, in Kraft seit 1. Oktober 2024, Länder der Bundesrepublik Deutschland*. https://www.die-medienanstalten.de/fileadmin/user_upload/Rechtsgrundlagen/Gesetze_Staatsvertraege/Medienstaatsvertrag_MStV.pdf/; Kommission für Jugendmedienschutz, "Aufgaben und Auftrag": <https://www.kjm-online.de/ueber-uns/aufgaben-und-auftrag/>.

49 See Sebastian Meineck, "So Überwacht die Medienaufsicht das Netz," *Netzpolitik.org*, July 12, 2022: <https://netzpolitik.org/2022/interne-unterlagen-so-ueberwacht-die-medienaufsicht-das-netz/>.

50 See the letter by Marcus Klöckner, "Wenn Landesmedienanstalten Medien öffentlich an den Pranger stellen," *NachDenkSeiten* May 28, 2021: <https://www.nachdenkseiten.de/?p=72874&pdf=72874/>.

falling outside of the purview of the self-regulating but federally subsidized trade organization, the *Presserat*, or German Press Council.

Not all State Media Authorities employ identical instruments. For example, the [Medienanstalt Berlin-Brandenburg \(mabb\)](#) has been particularly active in pursuing anti-disinformation operations, funding and sometimes directly organizing public events alongside Google and other collaborators. The [Saxon State Media Authority \(SLM\)](#) has since 2023 employed an AI system to flag and report content to the criminal authorities, along with the DSA enforcer; it also funds media-literacy and journalism projects.⁵¹ Meanwhile, the *Landesmedienanstalt* of [North Rhine-Westphalia \(LfM NRW\)](#) has a policy of pursuing prosecution over simple takedown orders when it comes to online speech allegedly running afoul of criminal law.⁵² The equivalent authority in [Lower Saxony \(NLM\)](#) established a youth platform, JUUUPORT, that offered an online seminar on Fake News in the Age of Covid, in which discussion of public health policy was cast as problem to be scrutinized, and grouped together with disinformation and harassment.⁵³ NLM has also stated that criminally suspect speech “must not go unpunished” and it has set up reporting mechanisms so that media companies may refer online commentary directly to police offices. Invoking this reporting system, a local justice minister issued the following warning to the public: “They should realize that a quickly typed sentence online can cost a month’s salary or more in court.”⁵⁴

51 On SLM’s use of AI for flagging, see “Datenverarbeitung beim Einsatz des Aufsichtstools ‘KIVI,’” SLM homepage: <https://www.slm-online.de/datenschutz-aufsichtstool-kivi/>; for SLM budget details and programs, see the SLM Jahresbericht 2023/2024: https://www.slm-online.de/fileadmin/user_upload/Jahresbericht_der_SLM_2023_2024.pdf/.

52 “Wie die Landesanstalt für Medien NRW gegen Fake News vorgehen will,” WDR, September 25, 2024: “The state authority... wants to professionalize the enforcement of the law and intervene above all when fake news is obviously politically motivated.”: <https://www1.wdr.de/nachrichten/landespolitik/landesanstalt-medien-nrw-gegen-fake-news-100.html/>. For more on the political situation in NRW after the September 2025 local elections, see Wolfgang Streeck, “The AfD Storm Has Only Just Begun: Liberal Lawfare Will Fail,” *Unherd* 16, October, 2025: <https://unherd.com/2025/10/the-afd-storm-has-only-just-begun/>.

53 See the seminar page at NLM: *Safer Internet Day: Juuuport-Scouts Stellen Im Online-Pressegespräch Ihr Online-Seminar Zu „Fake News In Zeiten Von Corona“ Vor*. The seminar was held in Hannover on February 3, 2021: <https://www.nlm.de/aktuell/pressemitteilungen/pressemeldungen/safer-internet-day-juuuport-scouts-stellen-im-online-presseggesprach-ihr-online-seminar-zu-fake-news-in-zeiten-von-corona-vor/>.

54 See the NLM State Media Authority statement, “Hatespeech Darf nicht Folgenlos Bleiben”: <https://www.nlm.de/aktuell/pressemitteilungen/pressemeldungen/hatespeech-darf-nicht-folgenlos-bleiben/>; for an overview of the workshop framework, see: <https://www.juuuport.de/infos/online-seminare/>.

Germany's federated burden-sharing takes the form of dual supervision by *Land* and federal authority. As already discussed, the *Bundesnetzagentur* (Federal Net Agency), as the DSC, oversees German compliance with the Europe-wide DSA and coordinates with trusted flaggers HateAid and REspect! – organizations with “special expertise and experience in identifying and reporting illegal content” that are often active at the state level.⁵⁵

These organizations, typically NGOs or research institutes, apply to the DSC for trusted flagger status; before approval, the DSC verifies that the applicant possesses specialized expertise and is independent of the platforms it will monitor. The trusted flagger then drafts a notice that describes the suspect material, cites the applicable legal ground (such as hate speech or child-sexual-abuse material), provides a direct link or identifier so the platform can locate the content and attaches any supporting evidence. This notice is transmitted directly to the relevant online service provider (e.g., YouTube, Instagram, TikTok, X), and under Article 22 (2) of the DSA the platform must treat the report as a priority, processing it without delay. After the platform has taken (or declined to take) action, the trusted flagger informs the DSC of the outcome; the DSC logs the case, monitors compliance and can intervene if it deems that the response has been inadequate. Each year the trusted flagger must publish an annual report in German or English detailing the total number of notices submitted, the categories of illegal content reported, the actions taken by platforms and any disputes. Recently, the DSC unveiled an online portal to allow both trusted flaggers and the public to add reports directly into the system.⁵⁶

The *Länder* media authorities, meanwhile, enforce MStV and JMStV obligations on media services based on their own statutory authority.⁵⁷ The federal and state levels interact and overlap. For instance, a Hamburg or Hesse media authority investigates any telemedia offering intended for the general public for violating the JMStV under the state treaty, even as the Bundesnetzagentur handles DSA-related compliance for the same provider.⁵⁸ This amounts to a layered apparatus where federal authority sets priorities at the state level, even where education – according to the republic's constitutional framework, a prerogative of the *Länder* – is concerned. Accordingly, centralization in the Berlin minis-

55 The DSA Trusted Flagger program is described at the Bundesnetzagentur site: <https://www.dsc.bund.de/DSC/DE/4TrustedF/start.html/>.

56 DSC complaints portal: <https://www.dsc.bund.de/DSC/DE/3Verbraucher/3VB/start.html/>.

57 Overview of the Digital Services Coordinator role may be found at: https://www.dsc.bund.de/DSC/DE/_Home/start.html/.

58 Media supervisory authority as overseen by the Medienanstalt Hessen and that of Hamburg are described at the following sites: [ma-hsh.de](https://www.ma-hsh.de/); and [medienanstalt-hessen.de](https://www.medienanstalt-hessen.de/)

tries has in practice overridden the constitutional guarantee of decentralization intended to prevent official, centralized regulation of discourse.

EU Agencies

EU-level institutions assume a share of media regulation inside Germany, including for Internet-based expression. The European Commission has its own program of digital policy pertaining to the entire EU. The DSA is the basis for all member states' particular legislation, and the Commission sets its own foreign policy, including a sanctions regime affecting media access. From the February 2022 Russian invasion of Ukraine, for instance, EU sanctions banned access to Russian media channels RT and Sputnik, including their online and social media presence. By 2024, even individual journalists, including German nationals Alina Lipp, Thomas Röper and Hussein Dogru were sanctioned personally for allegedly pro-Russian – and in Dogru's case also pro-Palestinian – reporting. As a consequence, their digitally mediated expression has been censored. In the case of Dogru, who is a resident of Germany, these severe restrictions on banking and travel, imposed in response to an alleged and generic “hybrid threat,” have effectively excluded him from society entirely without due process.⁵⁹

The aforementioned DSA, in force since 2024, is a comprehensive framework for content moderation, and requires its own German-level enforcement in the form of the Digitale Dienste Gesetz, which has effectively replaced the NetzDG statute. It is also attached to the **European Board for Digital Services (EBDS)**, coordinating the DSA's implementation across the entirety of the Union. Other EU-level regulations influencing online speech include the **European Digital Media Observatory (EDMO)** and its dedicated hub in Germany and Austria, the German-Austrian Digital Media Observatory. This Commission-sponsored network coordinates “responses to disinformation campaigns” across member states, thereby exerting significant influence over what is classified and treated as disinformation. The **General Data Protection Regulation (GDPR)** of 2018 contains provisions governing automated content profiling.⁶⁰ The **Audiovisual Media Services Directive (AVMSD)**, amended in 2018, extends regulation to video-sharing platforms and requires measures against hate speech, disin-

59 For more on this particular case, see Hüseyin Dogru, “How the EU is using anti-Russia sanctions to Criminalize Journalism,” June 16, 2025: <https://diem25.org/how-the-eu-is-using-anti-russia-sanctions-to-criminalise-journalism>.

60 Electronic Frontier Foundation, “Unintended Consequences, European-Style: How the New EU Data Protection Regulation will be Misused to Censor Speech,” November 20, 2015: <https://www EFF.org/deeplinks/2015/11/unintended-consequences-european-style-how-new-eu-data-protection-regulation-will>.

formation and the like, while the 2021 **EU Terrorist Content Regulation (TCO)** imposes strict obligations on platforms and national authorities for the removal of flagged speech on security grounds; such orders, though subject to judicial review, are executive in nature and responsive to foreign policy aims. In effect, they amount to sanctions.⁶¹

German Atlanticism and the US

Finally, it must be mentioned that the United States has exerted substantial influence over Germany with regard to the regulation of online speech and opinion. Since the inauguration of the second Trump administration in January 2025, certain contradictory developments have emerged. Trump and the Republican majority have pressured Europe to reduce its censorship and regulatory regime, in principle on free speech grounds, but arguably more so in defense of the commercial interests of US platforms and technology firms. At the same time, the Trump administration has cut the budgets of US counter-disinformation efforts inside Europe. Still, a powerful Atlantic foreign policy establishment continues to pursue the aims of the 2018 US National Defense Strategy – approved under Trump in his first term – which identified information warfare as a key domain of strategic competition. In practice, the bipartisan consensus of escalation in Ukraine encourages greater repression by European leaders who are obliged to impose this unpopular policy if they are to retain US security guarantees. Directly or indirectly then – either through promoting regulation and censorship diplomatically through its bilateral relations with Berlin and Brussels, or by extracting concessions regarding higher military expenditure and lopsided trade arrangements – the US ultimately constrains Germany’s approach to the digital public sphere.

US Vice President J.D. Vance’s address to the 2025 Munich Security Conference illustrates the contradictions of German Atlanticism. Delivered on the eve of cuts to the United States Agency for International Development (USAID), and signaling a retreat from the Biden administration’s policy of promoting counter-disinformation abroad, Vance’s speech scandalized the US’s European allies gathered in Bavaria. Recounting basic precepts of liberal democracy, Vance reminded his audience that “you cannot win a democratic mandate by censoring your opponents” and suggested that demagoguery around “misinformation” should be seen

61 European Center for Not-for-Profit Law, ECNL Joins CSO Coalition in Court Case against EU’s Terrorist Content Regulation, November 8, 2023: <https://ecnl.org/news/ecnl-joins-cso-coalition-court-case-against-eus-terrorist-content-regulation/>.

as self-inflicted harm to the “shared values” of the West.⁶² The speech thus marked a rhetorical departure from a policy of suppressing political expression on national security grounds. Yet in practice, this promised reversal has been far more ambiguous. As previously discussed, US influence over Germany’s commitment to escalation in Ukraine, as well as containment of China and remilitarization – lifting defense spending to five percent of GDP – has engendered precisely those conditions in Germany that preclude liberalization of the public sphere, thereby reinforcing Berlin’s increasingly restrictive approach to online speech.

American influence over German Internet policy is not confined to the declared preferences of any administration. It derives from the enduring imbalance of power between the two states. Eight decades after the end of the Second World War, the US retains a large conventional military presence on the continent – some 85,000 troops within the EU, of whom over 38,000 are stationed in Germany.⁶³ Command of NATO effectively gives the US authority over Germany’s security infrastructure, and through its control of air, sea and nuclear forces, ultimate jurisdiction in the European theater.⁶⁴

Atlantic foreign policy think tanks such as the Atlantic Council, the German Marshall Fund and others advance the foreign policy agenda of a US-led Atlanticism inside Germany. Their funding and activities remain formally at arm’s length from the government, but they invariably support government policy. During the first Trump administration and the Biden term, this meant promotion of increasingly restrictive Internet controls. Additionally, foundations with executive and advisory boards populated by ex-officials, and funded by industries in strategic sectors of military significance – such as aerospace, chipmaking or extractive industries historically reliant upon the state – develop and support Atlanticist foreign policy aims.

62 Vance: “Everything from our Ukraine policy to digital censorship is billed as a defense of democracy, but when we see European courts canceling elections and senior officials threatening to cancel others, we ought to ask whether we’re holding ourselves to an appropriately high standard.” See J.D. Vance, “Remarks by the Vice President at the Munich Security Conference,” February 14, 2025, The American Presidency Project, University of California, Santa Barbara: <https://www.presidency.ucsb.edu/documents/remarks-the-vice-president-the-munich-security-conference-0/>.

63 Molly Carlough, Benjamin Harris, Abi McGowan, “Where Are U.S. Forces Deployed in Europe?” Council on Foreign Relations, February 27, 2025: <https://www.cfr.org/article/where-are-us-forces-deployed-europe>.

64 For a historical overview, see Diana Johnstone, *The Politics of Euromissiles: Europe’s Role in America’s World* (London and New York: Verso, 1984), *passim*.

Initially a product of the early Cold War, this Atlantic regime has historically been grounded in the billeting of troops and military equipment, including NATO-administered weapons installations, along with diplomatic, cultural and business-minded offices and foundations such as the Atlantic Council (a spinoff of NATO itself) and the Atlantik-Brücke.⁶⁵ Today, because of a transformation in warfare that has collapsed distinctions between public relations aimed at domestic audiences and propaganda against enemy populations, along with the dual-use capacities of many civilian communications technologies for military purposes, focus has shifted toward “hybrid warfare” as discussed at the outset of this report.⁶⁶ Think tanks of the Atlanticist foreign policy establishment are therefore more directly than ever participants in a much more broadly defined theater of war which includes mass and new media. In some cases, those think tanks or foundations tasked with sponsoring the fight against foreign influence and disinformation will also back simulations and military drills, which now incorporate aspects of cyber and information warfare.⁶⁷

The Atlantic Council was founded in 1961 as a de facto policy arm of NATO with the aim of bolstering public support for the alliance. It presents itself as a nonpartisan hub for NATO-centered policy. Its **Digital Forensic Research Lab (DFRLab)**, founded in 2017, is committed broadly to countering disinformation, and was central to the 2020 Election Integrity Partnership. Internal emails revealed that the DFRLab was created at the behest of the US Department of Homeland Security; working with Stanford University, social media analysis firm Graphika and the University of Washington, it aided social media platforms in removing constitutionally protected speech.⁶⁸ Its follow-on initiative, the Virality Project, labelled “stories of true vaccine side-effects” as “malinformation” to be

65 For a detailed history of the Atlantik-Brücke, see Anne Zetsche, *The Atlantik-Brücke and the American Council on Germany, 1952–1974* (London: Palgrave, 2021), *passim*.

66 Dating to the allied occupation of the immediate post-war period, municipal *Amerikahäuser* are still found in large and small German cities; they sponsor cultural and political programs that reinforce US foreign policy, which has, in an era of hybrid warfare, drawn little distinction if any between domestic and enemy publics.

67 See, for instance, the activities of the various NATO Centres of Excellence, including the Riga-based Stratcom COE’s simulation, training for information warfare: <https://stratcomcoe.org/projects/information-environment-simulation-platform-inforange/3/>.

68 Andrew Lowenthal, “The Virality Project was a government front to coordinate censorship,” *Network Affects*, November 12, 2023: <https://networkaffects.substack.com/p/the-virality-project-was-a-government/>.

suppressed by online platforms.⁶⁹ A 2023 US House staff report criticized the effort as a restriction of lawful speech.⁷⁰

Twitter Files emails revealed that in 2018, DFRLabs hosted its anti-disinformation 360/OS Summit in Berlin, attendees of which included high-level decision makers such as the former US Secretary of State Madeleine Albright, the former Prime Minister of Sweden, former Presidents of Estonia and Poland, a former US Director of National Intelligence, Nobel Laureate Maria Ressa, and billionaire Reid Hoffman among others. Also in attendance were German Axel Springer CEO Matthias Dopfner and Wolfgang Friedrich, then head of the Munich Security Conference. Attendees from the event also met with the then German Minister of Justice and Minister of the Interior. Chancellor Merkel, though invited, was not present. In 2021, Green Party Foreign Minister Annalena Baerbock spoke at the Atlantic Council's EU-US Future Forum.⁷¹

NATO also sponsors a network of foreign policy think tanks called "Centres of Excellence." The alliance's Strategic Communications Centre of Excellence (StratCom COE), for instance, is a NATO-accredited, multinational military body with a stated mission to improve allied strategic communications through research, training and doctrine development. StratCom has become a key node in Europe's online speech regime: its recurring reports claim to have identified bot-driven influence operations, and its social media manipulation studies repeatedly purchased inauthentic engagement to test platform enforcement, alleging that the vast majority of fake likes, views and comments remained online for weeks.⁷² A 2019 exercise to test soldier readiness purported to show how cheaply actors can harvest data and induce off-platform behavior.⁷³

69 Matt Taibbi, Twitter Files reporting on the Virality Project, X, March 9, 2023: <https://x.com/mtaibbi/status/1633830108321677315/>.

70 See *Interim Staff Report of the Committee on the Judiciary and the Select Subcommittee on the Weaponization of the Federal Government*, November 6, 2023: https://judiciary.house.gov/sites/evo-subsites/republicans-judiciary.house.gov/files/evo-media-document/EIP_Jira-Ticket-Staff-Report-11-7-23-Clean.pdf/.

71 Attendees from the event also met with the then German Minister of Justice and Minister of the Interior. Chancellor Merkel, though invited, was not present. See Andrew Lowenthal, "Twitter Files Extra: How the World's 'No-Kidding Decision Makers' Got Organized," *Racket News*, June 7, 2023: <https://www.racket.news/p/twitter-files-extra-how-the-worlds/>; <https://www.racket.news/p/twitter-files-extra-how-the-worlds/>.

72 NATO StratCom COE's coverage of the Russian invasion of Ukraine can be found here: <https://stratcomcoe.org/publications/robotrolling-2022/243/>.

73 "NATO Group Catfished Soldiers to Prove a Point About Privacy," *Wired* February 18, 2019: <https://www.wired.com/story/nato-stratcom-catfished-soldiers-social-media/>.

StratCom COE positions its work as supporting the EU's Code of Practice on Disinformation, encouraging pressure on platforms to harden regulation and censorship. It also employs a strategy of blending information warfare, propaganda and public relations, activities directed at domestic audiences within NATO's sphere as well as foreign audiences.⁷⁴ In 2023, StratCom collaborated with DFR-Labs on an event in Latvia for NATO-partner governments to share best-practice methods for detecting, reporting and mitigating state-backed disinformation. The event also linked directly to a progressive digital human rights event.⁷⁵ DFR-Lab has stated numerous times that it has been collaborating with the NATO StratCom COE on research, training and policy-development since 2016; the partnership is often referenced in DFRLab's own updates in the NATO StratCom Dialogue agenda.

Among the organizations raising alarms about Russian influence operations during the February 2025 German federal election was the Berlin-based **German Council on Foreign Relations (DGAP)**. Founded in 1955, DGAP describes itself as a membership institute for foreign policy and has been influential in its policy research output as well as network-building. It counts more than 2,800 members and hosts over 150 events each year at its Berlin premises. Revenue comes from dues, institutional support from the Federal Foreign Office, and donations from bodies such as the Defense Ministry, the European Commission, Stiftung Mercator, and Open Society Foundations (OSF). DGAP's Technology Program runs the three-year "German-American Initiative on Influencers, Disinformation, and Democracy in the Digital Age," financed by the Transatlantic Program of the federal government and the ERP fund of the Federal Ministry for Economic Affairs and Energy (BMWE). Publications include the policy brief *Mobilizing Social Media Influencers* (dating to spring 2023).

The [European Council on Foreign Relations \(ECFR\)](#), a pan-European think tank founded in 2007 and headquartered in Berlin (with offices in London, Madrid, Paris, Rome, Sofia, Warsaw, Washington DC and Brussels), publishes policy briefs and commentaries and sponsors various conventions on-message with Atlantic foreign policy. Recent output includes "Disinformation for Beginners: How access to TikTok is Threatening European Security" (June 2025), urging tighter controls on the platform. "Digital Deceptions: How a European Democracy Shield Can Help Tackle Russian Disinformation" (May 2024) and the policy brief "Democratic Defence: How Italy Can Lead the Fight against Russian Disinformation" speak for themselves. The ECFR's Rome office has hosted workshops such as

74 Brett Boudreau, *"We Have Met the Enemy and He Is Us": An Analysis of NATO Strategic Communications: The International Security Assistance Force (ISAF) in Afghanistan, 2003–2014* (Riga: NATO StratCom COE, 2016), pp. 31, 58–59; 237–38; 281–82.

75 <https://www.atlanticcouncil.org/programs/digital-forensic-research-lab/360os/>.

“Disinformation Storm: Managing the Unmanageable?” (June 2024) and “Countering Disinformation as a Global Challenge” (November 2024). The former featured three speakers, drawn from **Globsec**, [Alliance4europe](#), and **NewsGuard Technologies**, a leading organization in newsranking. The ECFR’s donor register lists the German Federal Foreign Office, multiple EU foreign ministries, the European Commission, OSF and Google among its funders, though grants given to the Council are quite generic, and do not mention misinformation and disinformation specifically.

The [Atlantik-Brücke](#) is a private German association founded in Hamburg in 1952 by banker Eric M. Warburg and like-minded politicians and journalists to anchor the young Federal Republic in the Western alliance. Now headquartered in Berlin, the group operates as a membership network and think tank convening seminars, study trips and closed-door dialogues with US and European figures from politics, business and the armed forces. Its stated aim is to strengthen transatlantic cooperation for democratic stability and economic growth. In recent years Atlantik-Brücke has added disinformation to its agenda, publishing analyses of Russian propaganda campaigns and the threat posed by deep-fake video technology.⁷⁶

Founded in 1972 with West German funds intended to symbolize gratitude for the Marshall Plan, the **German Marshall Fund (GMF)** began as an American foundation, but now runs offices across Europe. The GMF operates within NATO’s public diplomacy orbit: in 2019 it co-hosted the “NATO Engages” summit, collaborating with NATO’s Public Diplomacy Division, and in 2024 NATO itself appeared on the GMF’s donor roll. The GMF’s Alliance for Securing Democracy, which maintains an office in Berlin and receives direct German government support, built the Hamilton 68 and Hamilton 2.0 dashboards to track alleged online Russian disinformation in the US. These dashboards became notorious for repeated mislabeling of legitimate popular expression as “disinformation,” propping up false claims of Russian bots influencing the 2016 US presidential election, known as the Russiagate affair. The *Washington Post*, among other media outlets, was compelled to issue corrections after having relied on the Hamilton dashboards for its coverage.⁷⁷ Under foreign minister Annalena Baerbock, Germany’s Foreign Office funded GMF and Baerbock herself used GMF forums such as the India

76 Gavin Wilde, “Russian Propaganda in the Southern Hemisphere: A Simplistic Scapegoat,” Atlantik-Brücke blog, June 29, 2023: <https://www.atlantik-bruecke.org/en/russian-propaganda-in-the-southern-hemisphere-a-simplistic-scapegoat/>.

77 “The Post Issues Minor Corrections in Coverage of Hamilton 68,” *Washington Post*, May 18, 2023: <https://www.washingtonpost.com/pr/2023/05/18/post-issues-minor-corrections-coverage-hamilton-68/>.

Trilateral Forum to articulate Berlin's policy in the Indo-Pacific, indicating further close coordination with the GMF on foreign policy.⁷⁸

Top recipients of content controls funding in Germany



78 Annalena Baerbock, "Opening Statement at GMF's India Trilateral Forum," December 6, 2022: <https://www.gmfus.org/news/opening-statement-foreign-minister-annalena-baerbock-gmfs-india-trilateral-forum/>.

Funding



Funding for the regulation of online speech in Germany, from outright censorship by way of flagging and reporting, through education and training, is supplied by the state and by independent grant-making foundations. As discussed in the previous section, the state's backing of such efforts is handled at multiple levels, from federal down to subsidiary *Land* governments and agencies, in coordination with Brussels and Washington. State funds also flow to certain foundations that are nominally private, but which tend to back official policies. These “public-private partnerships” are becoming increasingly common. They comprise one facet of a new political-economic arrangement of outsourcing government activities. Politically, they also indicate a novel form of elite management of the public sphere, where corporate and other private interests may in effect bypass legislative or parliamentary barriers to policymaking. This is accomplished by moving directly to implement, by executive or bureaucratic means, a policy otherwise subject to democratic pressure or judicial review.⁷⁹ Private contractors, foundations taking over government services or funding government activities of public consequence, are all means to this end.

Those funders operating in Germany engaged in censorship or related activities may be categorized broadly as follows. *Federal ministries, the EU and other direct state funding* support regulation and censorship directly through state or EU offices. *State programs and quasi-official foundations* work as adjuncts to federal, *Land* and municipal governments and ministries. They fund or supplement the funding of established public policy, at whatever level. Meanwhile, *private foundations* and *corporate philanthropies*, the nonprofit philanthropic arms of major commercial technology firms, fund or directly implement policy of their own design, advancing particular policy aims in cooperation with the state's regulatory regime. In part because state funds are disclosed more consistently than private sources, public funding is featured more prominently in liber-net's [database](#).

79 For an overview of this development, see Peter Mair, *Ruling the Void: The Hollowing of Western Democracy* (London and New York: Verso, 2013).

Federal Ministries, the EU and Other Direct State Funding

State funding for the regulation and censorship of online speech in Germany accounts for the largest known share of support.⁸⁰ From 2016 through 2025, combined *Land* and federal funds amount to €105,559,330, with growth more than tripling between 2020 and 2021, and almost doubling again between 2022 and 2023.⁸¹

The [Federal Ministry of Research, Technology and Space \(BMFTR\), formerly the Federal Ministry for Education and Research \(BMBF\)](#) is the largest ministerial funder of online speech regulation and counter-disinformation activity, providing a total of €56 million in funding since 2017. Most of these funds are aimed at the technical side of speech regulation – surveillance, flagging and so forth. Among the largest recipients, collecting over €9 million since 2023, is [RUBIN – News-Polygraph: Multimodal Orchestration for Media-Content Verification \(MOVERA\)](#). This program brings together German broadcasters, research institutes and technology firms which claim to check the authenticity of online news and media.⁸² [VERITAS](#) (an “intelligent, comprehensive and self-learning system for detecting and combating disinformation”) and [HybridD](#), based at the Institute of Communication Science (IfK) in Münster and targeting hybrid propaganda, each have received around €2 million since 2021 for similar projects.

Between 2019 and a projected end date of 2028, the BMFTR (formerly BMBF) is projected to spend over €20 million on [Monitoring and Transfer Platform Radicalization \(MOTRA\)](#), run out of the University of Hamburg, the Technical University of Darmstadt, the German Institute for Global and Area Studies Hamburg, North Rhine–Westphalia’s Police University and Saxony–Anhalt’s Police Academy.

80 Selection bias due to publicly available information may account for the balance favoring documented state sources of funding.

81 For comparison, see Florian Warweg, “Im Zweifel war’s der Russe: Bundesregierung steigert Ausgaben für Maßnahmen gegen ‘Desinformation’ um 45%”, *NachDenkSeiten*, October 16, 2025. (<https://www.nachdenkseiten.de/?p=140674>). Warweg’s report draws on parliamentary inquiry, which reveals a staggering rise in funding to counter “disinformation” – broadly defined so that any accusation of disinformation is equated with foreign interference and espionage. Warweg’s report and its underlying sources indicate exponential spending growth in this field from 2020–2024.

82 Among the program’s partners are Crowdee, a Berlin Technical University spin-off drawing on crowdsourced data; the German Research Center for Artificial Intelligence (DFKI); and Fraunhofer IDMT, which analyzes sound and video. Deutsche Welle and the Berlin–Brandenburg regional broadcaster rbb contribute, and Delphai/Intapp supplies data analysis; universities in Potsdam, Erfurt, and Jena offer research support.

The project, which also takes funds from the Interior Ministry (BMI) and the Ministry of Education, Family Affairs, Senior Citizens, Women and Youth (BMBFSFJ), deploys various forms of monitoring (combining surveys, protest–event tracking, statistical data and open–source Internet analysis) to detect radicalizing currents in society.

The [Bundeszentrale für politische Bildung \(bpb\)](#), charged with running federal civic educational efforts, has since 2021 distributed at least €636,000 to several programs and agencies, including the [Institute for Strategic Dialogue \(ISD\)](#), [CORRECTIV](#) and the [Center for Liberal Modernity \(Zentrum für die liberale Moderne gemeinnützige GmbH\)](#) for its project on “building and strengthening Russian–German (Micro)Influencers for Democracy on the Internet.”

The [Central Reporting Office for Criminal Content on the Internet \(ZMI\)](#) began full operation in February 2022 inside the Wiesbaden–headquartered Federal Criminal Police Office (BKA), becoming Germany’s clearinghouse for NetzDG reports of suspected criminal speech. Social media firms forward user posts deemed potentially unlawful; ZMI’s officers perform an initial legal check, then route validated cases to state prosecutors. From June 2021 to February 2024, partners transmitted roughly 20,900 notices, 83 percent of which were classified as criminal, and 75 percent assigned to a *Land* authority for prosecution. In 2022, the BKA projected about 250,000 NetzDG submissions and 150,000 new criminal proceedings annually once large platforms complied.⁸³ ZMI relies on a federated intake network: HessenGegenHetze, REspect!, Bavaria’s Konsequent gegen Hass, the State Media Authorities and other portals channel citizen complaints to Wiesbaden. By concentrating triage in a federal police unit, the scheme embeds speech policing within Germany’s criminal–justice machinery rather than media regulation or civil litigation.

The [Foreign Office](#) has granted just under €3.7 million since 2023 for such efforts. Among the largest recipients of Foreign Office funds are the ISD, [Deutsche Welle](#) and the [Disinfo Radar](#) program, which together take just under a third of the total. It is notable too that the Foreign Office sends funds for “countering–misinformation” abroad, including to [German embassies](#) in Africa, the Middle East and South America.

The EU directly funds dozens of organizations inside Germany, dispensing at least €30 million since 2018 for disinformation–related efforts. Recipients of EU

⁸³ See Markus Decker, “Hass im Netz: BKA rechnet mit 150.000 Strafverfahren pro Jahr,” *RedaktionsNetzwerk Deutschland*, January 11, 2022: <https://www.rnd.de/politik/internet-strafbare-inhalte-bka-rechnet-mit-150-000-verfahren-pro-jahr-STYQR7G3BVBBPKK4VRTZOLNO5Y.html/>.

grants in the order of over a million euros range from Germany's official public broadcaster, *Deutsche Welle*, which took €4 million from 2021–2024 for its Media Fit program to regulate information pertaining to the Ukraine war, and another €1.5 for its Media in Libya: Immune Against Disinformation grant in 2023. The EU also backed SPARTA (Society, Politics and Risk with Twitter Analysis), an interdisciplinary project located at the Bundeswehr University in Munich, through a grant of over €3 million paid out between 2021 and 2024. Since 2023, it has sent another €1,640,000 to the ISD for its STRIVE project, focused on the digital dimension of “hate, polarisation, and extremism” in Africa and the Middle East.

In its capacity as a direct funder of German anti-disinformation efforts that are official and publicly known, the **US Government** leaves a surprisingly light footprint, having [distributed just over \\$400,000 across 14 organizations since 2018](#).

Top recipients of content controls grants from the German Federal Foreign Office

Grant recipient	▼ Total amount	Grants	First start year
Institute for Strategic Dialogue	€1,094,742	4	2023
Democracy Reporting International (DRI)	€540,000	2	2023
German Embassy in Estonia	€484,836	3	2023
Deutsche Welle	€450,000	2	2023
Aspen Institute Germany	€291,916	2	2023
Missions Publiques	€258,451	1	2023
DebunkEU.org	€112,000	1	2023
German Embassy in Nigeria	€100,000	1	2023
German Embassy in Mali	€90,332	1	2024
German Embassy in South Sudan	€75,575	1	2023

Official Programs and Quasi-official Foundations

The German state operates in coordination with quasi-official foundations and programs to fund the regulation of online discourse. These programs and foundations are devoted principally to the enforcement of existing statutes such as the DSA or even the observation and reporting of criminalized political speech, along with education. Programs like **Demokratie Leben! (DL)** operate as direct subsidiaries of federal ministries – in the case of DL, for example, the Federal Ministry of Education, Family Affairs, Senior Citizens, Women and Youth (Bundesministerium für Bildung, Familie, Senioren, Frauen und Jugend, BMBFSF) provides funding and sets its agenda. DL in turn funds nearly 50 organizations by

way of 170 individual grants, with recipients ranging from party foundations to religious and civic organizations. Other quasi-official foundations are charitable private organizations that also contribute to the enforcement or coordination of state policy, such as the [Amadeu Antonio Foundation](#). Party foundations like the [Konrad Adenauer](#) and [Heinrich Böll Stiftungen](#) receive federal money directly, commensurate with their representation in the Bundestag, and develop through grant-giving the political outlook of their parties; they are in this sense also quasi-parliamentary and therefore more responsive to pressure from the electorate.⁸⁴

Another notable quasi-official foundation is the academic-oriented [German Research Foundation \(DFG\)](#), which in its contemporary incarnation dates to 1951. Although it is a self-governing organization abiding by private law, and so formally independent, 70 percent of the funds it dispenses come from the German federal government, with the remaining 29 percent drawn from the *Länder* and one percent from the EU. In 2025, the DFG granted Humboldt University in Berlin €6.9 million for its Rethinking Disinformation (Re:DIS) project to explore various facets of disinformation, hybrid warfare and the like across the university's departments. Notably, its most recent call for proposals expands the term "disinformation" to include claims that may be factually true but which remain unhelpful from the standpoint of Re:DIS arbiters: "Re:DIS [...] uses 'disinformation' as an umbrella term for publicly disseminated content that worsens the epistemic position of recipients, regardless of the content's truth value or the intentions of its producers."⁸⁵

The aforementioned **Demokratie leben! (DL)** is the German government's central grant vehicle for countering state-designated extremism, and merits special attention. Its annual appropriations now approach €200 million, with a sustained

84 Given the nature of the funding process for such foundations, however, responsiveness lags significantly, often by many years. Parties must have achieved representation in the Bundestag for at least three consecutive legislative periods (typically around 12 years) before they are eligible for federal foundation funding – a setup which handicaps newer parties. Those parties already enjoying an established presence in the Bundestag (of two legislative periods), on the other hand, can withstand falling beneath the five percent qualifying threshold for parliamentary seats in one period; presence in the state parliaments also entitles parties to separate funding streams.

85 See "Priority Programme 'Rethinking Disinformation (Re:DIS)' (SPP 2573)," DFG Newsletter, June 5, 2025: <https://www.dfg.de/en/news/news-topics/announcements-proposals/2025/ifr-25-45/>.

focus on “conspiracy narratives” and online hate speech.⁸⁶ Over 300 municipal Partnerships for Democracy, 16 *Land*-level centers and some 400 nationwide model projects receive funding from DL. Among its awardees is [DAS NETTZ](#) (for the project Bundesarbeitsgemeinschaft “Gegen Hass im Netz”), which received nearly €2 million total from DL in the period between 2021–2024. The [Archiv der Jugendkulturen e.V.](#), for its project sUPpress – Medienkompetenz für Engagement und Selbstwirksamkeit – received €226,500 annually from 2020 through 2024 and more than €1.3 million since 2021. The organization **CORRECTIV**, meanwhile, received €140,876 for a Brandherd Desinformation project advertised as a training program for volunteer organizations against TikTok-based disinformation. [Neue Deutsche Medienmacher e.V.](#) received over €2,150,000 total between 2016–2025 for projects against hate-speech. HateAid and Neue Deutsche Medienmacher have received nearly €3 million and over €2 million from DL since 2020 and 2016, respectively. The largest recipient by far of DL funds is [Jugendschutz](#), which since 2017 has taken in a total of €8.8 million across eight separate grants, in part for work related to combating “extremist

Top recipients of content controls grants from Demokratie leben!

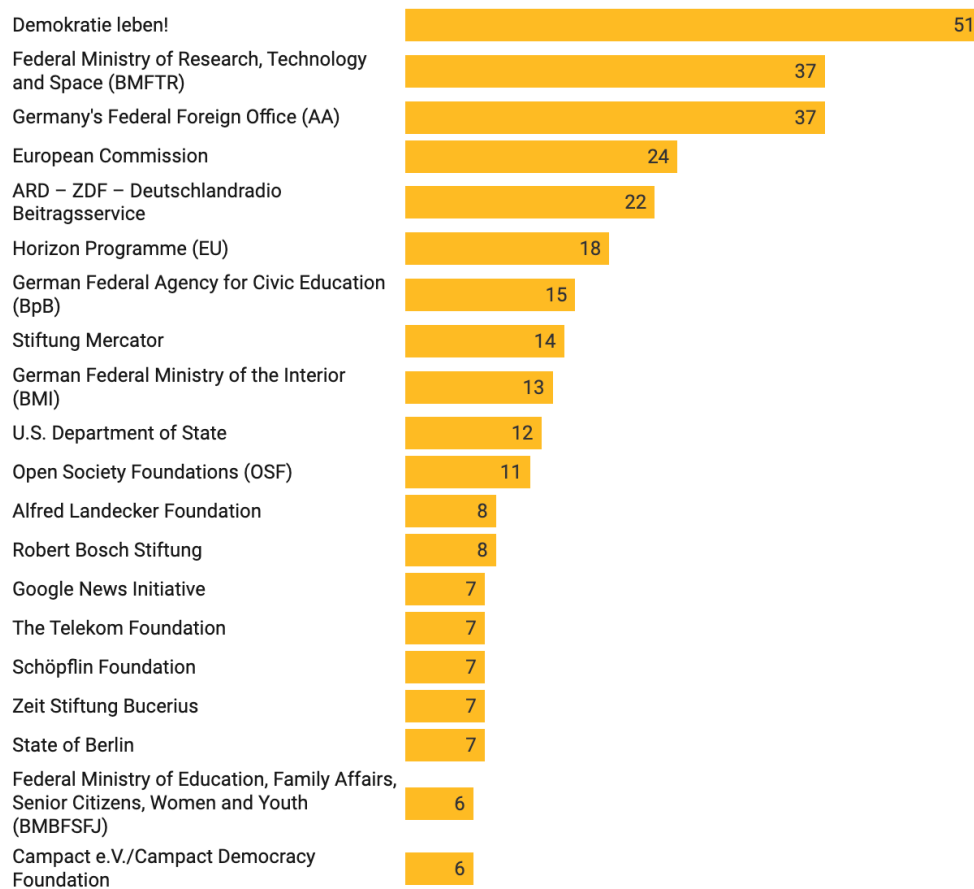
A program of the Federal Ministry of Education, Family Affairs, Senior Citizens, Women and Youth (BMBFSFJ)

Grant recipient	▼ Total amount	Grants	First start year
jugendschutz.net	€8,787,160	8	2017
HateAid	€2,924,210	7	2020
New German Media Makers	€2,151,861	10	2016
Anne Frank Education Center	€1,952,791	10	2020
Das NETTZ	€1,907,004	4	2022
Berghof Foundation	€1,630,283	10	2017
Open Knowledge Foundation Deutschland	€1,463,231	2	2017
Archiv der Jugendkulturen e.V.	€1,371,000	6	2020
Amadeu Antonio Stiftung	€1,287,195	8	2017
Die Rederei gUG	€875,000	5	2020
Drudel 11 e.V.	€753,982	6	2015
UFUQ e.V.	€750,000	3	2017
Zentrum Liberale Moderne (LibMod)	€726,087	4	2021
gut.org gAG	€673,044	6	2017
Betterplace Lab	€606,240	2	2021
The Institute for Democracy and Civil Society	€425,000	1	2025
Baden-Württemberg Youth Foundation	€424,562	1	2025
Kubus e.V.	€412,000	3	2017
The Association for Social Defense	€390,000	3	2017
Sapere Aude e.V.	€385,990	3	2017

⁸⁶ In the 2023 budget, the federal Demokratie leben! received approximately €182 million. According to the 2026 federal budget draft, its allocation will increase by €9 million compared to 2025. See, “Kabinett juverabschiedet Etatentwurf – Ausgaben von gut 520 Milliarden Euro geplant,” *Deutschlandfunk*, July 30, 2025: <https://www.deutschlandfunk.de/kabinett-verabschiedet-etatentwurf-ausgaben-von-gut-520-milliarden-euro-geplant-100.html/>.

Top funders driving content controls in Germany

By frequency of unique funding relationships with implementing organizations



** Demokratie Leben! here is shown separate from its parent ministry, the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth (BMBFSFJ), due to the sheer number and amount of funding provided by the program.*

content” and “pro-Russian propaganda” as well as the spread of “conspiracy beliefs” on encrypted messaging platforms such as Telegram.⁸⁷

Also working in close proximity to the state with funding from DL is the **Amadeu Antonio Foundation**. The foundation has taken a total of €1,287,000 from DL since 2017 as well as €930,000 directly from the BMFTR/BMBF since 2024, and over €743,000 from the BMJ from 2021–2023 for the project Countering Hate on the Internet (Firewall – Hass im Netz begegnen). Created in 1998, the foundation describes itself as Germany’s largest private NGO combating right-wing extremism, racism and anti-Semitism. As a funder of other efforts in the same vein, the foundation distributes donations, ministry grants and tech-sector money from its Berlin office into more than 150 local projects per year. Notably,

⁸⁷ See the Jugendschutz Annual Report 2022, p. 8: https://www.jugendschutz.net/fileadmin/daten/publikationen/en/annual_reports/annual_report_2022_protecting_minors_on_the_internet.pdf

its overbroad definition of anti-Semitism, encompassing political criticism of Israel, participation in Boycott, Divestment and Sanctions (BDS) and use of the Judeocide as historical analogy, reflects a narrow political viewpoint presented as civic responsibility.⁸⁸

The CDU/CSU-affiliated **Konrad Adenauer Stiftung** (KAS) promises support for democracy promotion, party training and information-integrity projects. It received €348,000 in government funds by way of DL for the project Smart-Camps for Combating Extremism and Strengthening Democracy. Further examples of KAS activity in this domain include recurrent support to West Africa's Dubawa fact-check network, India's First Check (DataLEADS) and the Prague-based, NATO-backed European Values Center. The latter facilitates the European Values (formerly Stratcom) Summit, billed as the "best European specialized summit focused on combating disinformation"; its Kremlin Watch program sounds the alarm about Russian public diplomacy and communications, feeding analysis to *Politico*, *France 24*, and the *New York Times*.⁸⁹ KAS also co-runs the Business Council for Democracy with the private Hertie School of Governance in Berlin. In 2024 it published a study on alleged AI-generated disinformation in Europe and Africa, which it described as a "new weapon of mass deception." The study called for immediate protective measures (detection, labeling, rapid takedown) coupled with a longer-term, cross-continental framework of regulation, education, fact-checking support and continuous monitoring to keep AI-generated disinformation from eroding democratic discourse across both continents.⁹⁰

Private Foundations⁹¹

Private foundations aligned with Atlantic foreign policy exert growing influence over Europe's information policy and public debate. The **Open Society Foun-**

88 See Amadeu Antonio Stiftung, "Was ist Anti-Semitismus?": <https://www.amadeu-antonio-stiftung.de/antisemitismus/was-ist-antisemitismus/> and "Antisemitismus Einfach Erklärt.": <https://www.amadeu-antonio-stiftung.de/publikationen/antisemitismus-einfach-erklart/>.

89 See European Values Summit 2024: <https://europeanvalues.cz/en/summit/summit-2024/> and Kremlin Watch Program: <https://europeanvalues.cz/en/our-programs/kremlin-watch/>.

90 Karen Allen and Christopher Nehring, "AI-Generated Disinformation in Europe and Africa," Konrad Adenauer Stiftung, January 31, 2025: <https://www.kas.de/en/web/medien-afrika/einzeltitel/detail/-/content/new-study-ai-generated-%20disinformation-in-europe-and-africa/>.

91 Given the nature of publicly available data, comprehensive mapping of the private side of grantmaking in Germany is a complex task, which Liber-net plans to undertake in the coming year.

dations (OSF) ranks among the world's largest private philanthropies, reporting \$1.7 billion in 2023 expenditures and more than 50,000 grants to date. The OSF's public grants database lists a cluster of German recipients focused on disinformation and online hate speech. In 2023, the **Institute for Strategic Dialogue** (ISD) received \$100,000 from the OSF "to support research on countering disinformation in Germany." By way of the [Campact Democracy Foundation](#), the OSF channelled \$150,000 to HateAid and \$150,000 to the #ichbinhier counter speech collective in 2021.

Likewise, the US-based **Hewlett Foundation**, with \$13.3 billion in assets, plays a significant role in Germany. Its Democracy, Rights and Governance portfolio finances NGOs on both sides of the Atlantic. German think-tank **Stiftung Neue Verantwortung (SNV)** has received funding from Hewlett to address the spread and impact of misinformation, as well as cybersecurity and transatlantic digital-policy. The Hewlett Foundation awarded over \$3 million to support the Alliance For Securing Democracy (ASD). Hewlett has also supported the German Marshall Fund's Digital Innovation and Democracy Initiative.⁹² Collectively, these grants position Hewlett as a leading source of US-based support for German and EU "digital governance."

The [Bertelsmann Stiftung](#) is a private foundation affiliated with the global publishing conglomerate that channels dividends from Bertelsmann SE & Co KGaA into public-interest projects. Four family-linked trusts headed by the Stiftung now hold around 80 percent of the media group's capital shares, guaranteeing a stable endowment. Bertelsmann Stiftung funds some of the most prominent overseers of discourse in Germany, including Finances Codetekt, Amadeu Antonio, Stiftung Neue Verantwortung and Zentrum Liberale Moderne.

The Essen-based [Stiftung Mercator](#) operates from an endowment of around €1.2 billion (in 2023, for example, it approved €55 million for 79 new projects). Recent grants include €257,000 to the ISD for AHEAD.TECH (2024) for research into alleged systemic risks to democratic elections arising from mis- and disinformation. A €500,000,00 grant to Reset Tech Action was intended to boost DSA compliance (2024), also concerning the 2025 federal election.⁹³ Its DSA Civil Society Coordination Group, with a €350,000 grant dispensed in 2024, brings together over 40 civil society organizations to coordinate implementation of the DSA. HateAid has also received Mercator funds for DSA enforcement.

92 A searchable database of the Hewlett Foundation's grants can be found here: <https://hewlett.org/grants/>.

93 The full roster of funding for Mercator's "digitalized society" department can be found here: <https://www.stiftung-mercator.de/en/what-we-work-on/projects/>.

Endowed with approximately €5.4 billion, Stuttgart's **Robert Bosch Stiftung** approved €182 million in grants in 2024, of which €11 million went to projects under its Strengthening Democracy theme.⁹⁴ The foundation has been an active initiator and funder of counter-disinformation and media-literacy initiatives since 2017. That year it launched the Das NETTZ network center against online hate speech, supported through 2022 and co-funded from 2020 by Stiftung Mercator. In 2020 it co-created the Business Council for Democracy (BC4D), with ISD Germany and the Hertie Stiftung, claiming to train employees in identifying disinformation, hate speech and conspiracy theories. More recent initiatives include support for the #UseTheNews "Year of News" campaign (2024) and co-funding with DL of the BetterPost project by Neue deutsche Medienmacher*innen.

Bosch's €11 million democracy portfolio is sizable, yet details about its exact operations are limited. Here, industry roots matter: digital-literacy projects targeting workplace resilience align neatly with Bosch's corporate human resources interests and Berlin's rhetoric of defending democracy. Collaboration skews toward like-minded networks, reinforcing an Atlanticist framing of platform regulation while sidelining dissenting viewpoints, as reflected in Bosch's vaguely worded pledges to combat conspiracy theories. Likewise, the foundation's Ukraine portfolio is extensive, yet its stated aims of "building back better" or building "resilience" in the country after a one-sided act of Russian aggression obscure a regional history in which NATO is a protagonist in the logic of escalation.⁹⁵

Corporate Philanthropic Foundations

Corporate foundations are among the most conspicuous in the public-private funding of online speech regulations, along with the general shaping of the outlook informing them. Concentrated in the telecom and information sectors, they are nearly all backed by multinational corporations, but in practice their orientation may be more global (as in Google News Initiative), or more closely tailored to the German national context (as in the cases of Vodafone and Bertelsmann).⁹⁶ Generally operating out of a small fraction of the net profits of their affiliated

94 "Robert Bosch Stiftung focuses on strengthening democracy," Press Release, February 27, 2025: <https://www.bosch-stiftung.de/en/press/2025/02/robert-bosch-stiftung-focuses-strengthening-democracy/>.

95 Bosch Stiftung, "Ukraine Engagement," <https://www.bosch-stiftung.de/en/foerdergebiet/ukraine-engagement/>.

96 See Ch. 5 on platforms for further discussion of this distinctive branch of corporate philanthropy.

firms, corporate philanthropic foundations align themselves with Berlin's regulatory regime often as much out of necessity and convenience as anything else.⁹⁷

[The Telekom Foundation \(or Deutsche Telekom Stiftung\)](#) operates mainly in-house, occasionally collaborating with universities or *Länder* ministries. From 2022–2023, the foundation spent €4.81 million on Telekom Group's "No Hate Speech" campaign, which included civil-society partners HateAid, Das NETTZ and [#IchBinHier](#) for specifically anti-disinformation work, including encouraging "action against hate speech wherever it appears."⁹⁸

[Vodafone Stiftung Deutschland](#) is the German branch of the global Vodafone Foundation network. It works almost exclusively by designing studies and pilot schemes that promise improvement of the public's digital capacities, online safety and civic participation. Flagship initiatives include Klickwinkel, a public-relations program that claims to help secondary-school pupils recognize disinformation and hate speech. Research outputs such as Jung | Digital | Sozial? (2019) and a 2018 youth survey on fake news literacy feed into policy briefings and occasional seminars run with partners such as the private Hertie School in Berlin. Vodafone also funded FactsforFriends, purportedly to combat Covid-related disinformation, but which deployed fact-checkers and journalists in a lopsided effort to compel "acceptance of the measures that have been put in place" by monitoring medical, scientific and more generally political discourse.⁹⁹ An October 2024 campaign promised to "combat fake news and hate speech," and to "prevent lies, manipulation and hate speech from taking root in the minds of children and young people."¹⁰⁰

97 US-based firms like Facebook and Google especially have been targets of Brussels and Berlin's regulatory regime and may be assumed to oblige European governments and the EU bureaucracy on matters of speech regulation out of necessity; the same was true of Silicon Valley firms with respect to the US federal government. See *Federal Policy Proposals to Protect Digital Free Speech in the United States*, liber-net, March 3, 2025, pg. 2: https://liber-net.org/wp-content/uploads/2025/03/liber-net_Federal-Policy-Proposals-Report_3.3.25.pdf/.

98 See Deutsche Telekom Stiftung's 2022–2023 Annual Report for more: <https://jahresbericht.telekom-stiftung.de/22-23/>; for its "Open Your Eyes Initiative," see: <https://www.telekom.com/en/company/details/no-hate-speech-open-your-eyes-1092966/>.

99 See: <https://www.prototypefund.de/projects/facts-for-friends/>. It is now known that what was presented as unimpeachable scientific consensus in 2020 was nothing of the sort, and that the public might have been better informed had open discussion been allowed among doctors and the public alike.

100 See "True Story statt Fake & Hate": <https://www.vodafone-stiftung.de/true-story-statt-fake-hate-schuelerwettbewerb/>.

[O2 Telefónica Deutschland](#) has a “digital responsibility” arm overseeing programs on cyberbullying, disinformation and hate speech. In 2020, it launched the WAKE UP! initiative with the industry self-regulatory body FSM and other partners, offering a web series, interactive learning modules and classroom materials to educate youth about cyberbullying, disinformation, and hate speech.¹⁰¹ In 2021, together with the [Stiftung Digitale Chancen](#) (Digital Opportunities Foundation), it developed **Faktisch betrachtet – fit gegen Fake News** (Factual perspective – ready to combat Fake News), an information kit for seniors under a joint Digital Mobility in Old Age (*Digital mobil im Alter*) program. While these civic education programs sound neutral, WAKE UP!’s brand of digital teaching materials, video clips, live streams and workshops has an explicitly political goal. On its website, WAKE UP! warns that “disinformation can influence political opinion and voting decisions... and, in the worst case, lead to radical, anti-democratic attitudes.”¹⁰² Indeed, it is the goal of WAKE UP! to educate youth not only to detect disinformation, but to form appropriate political preferences; disinformation, not genuine policy disagreement, is presented as the only source of changing and often “radical” political trends among young people.

101 Freiwillige Selbstkontrolle Multimedia-Diensteanbieter (Voluntary Self-Regulation of Multimedia Service Providers).

102 See: <https://www.wakeup.jetzt/was-ist-desinformation/>.

Civil Society



Despite significant funding and support from the government, much of the flagging and monitoring of online speech in Germany today is undertaken by organizations in civil society. These organizations may be categorized broadly as enforcers, focused on reporting and flagging speech under Digital Services Act (DSA) parameters; media operators, which handle public relations or information and influence campaigns directed at the general public; and educators, which run interactive programs for youth and adults as well as training for workplaces.

This complex of civil society organizations informs on the polity and plays a role in enforcing Germany's criminal code, in addition to delimiting permissible online speech. In performing these activities, civil society organizations collaborate with the state in an arrangement that signals a profound transformation of the public sphere, one resembling a hybrid warfighting model in which no distinction is made between speech and acts of war. Given that so much of public discourse now occurs online, and given social media's dual use for cyber warfare, the centrality of civil society in this development should not be underestimated.

Enforcers

Exemplary of the enforcement side of civil society is **HateAid**, a DSA trusted flagger which promises to preserve freedom of expression as a means of protecting democracy and "human rights in digital space." The organization plays a critical role in financing and supporting prosecutions against those in the orbit of the AfD for online speech. HateAid operates principally in three domains: counseling for victims of "digital violence"; political advocacy at the EU level; and legal action in the courts through cases filed in EU and German jurisdictions. A lawsuit against Twitter/X alleging "insufficient moderation of content that includes sedition (§ 130 German Criminal Code)" as related to anti-Semitic speech is indicative of a wider effort to ban users of the platform.¹⁰³ HateAid is backed by the Ministry of Justice (BMJ), which provided €1,033,786 in funding for the project "Hass als ganzheitlicher Bedrohung begegnen" (Addressing Hate as a Comprehensive Threat), running from January 2020 to the end of 2022.¹⁰⁴

103 See HateAid press release, "Lawsuit against Twitter," March 31, 2025: <https://hateaid.org/en/lawsuit-against-twitter-hateaid-and-the-european-union-of-jewish-students-submit-landmark-case/>.

104 "HateAid – Unterstützung für Betroffene von digitaler Gewalt": https://www.bmjv.de/DE/ministerium/forschung_foerderung/uebersicht/HateAid/hateaid.html.

Based on our research, HateAid has received a minimum of €4.5m in government funding since 2019. Legal and financial support to combat hate speech may be merited in certain cases, but it is notable that HateAid's track record indicates a preponderance of support for Green Party and SPD activist lawsuits against AfD politicians, suggesting that at least some of HateAid's state-funded activities are political in nature.¹⁰⁵

REspect!, a Baden-Württemberg reporting center, channels complaints regarding online hate speech to police and prosecutors. It reports €424,562 in funds received from Demokratie leben!, and is a member of the toneshift Network against online hate and disinformation. REspect also receives funds from the Bavarian State Ministry of Family, Labor and Social Affairs and is a designated trusted flagger – a deputized enforcer of DSA approved in its authority by the Bundesnetzagentur. It manages an online form letting anyone flag posts believed to be in violation of German criminal law on incitement or threats, and its team – law graduates and social-science specialists – screens submissions to file formal reports with police agencies.

Also on the legal side, the organization [So Done Legal](#), incorporated in 2022, bills itself as a specialized law firm for criminal prosecution of online hate speech and civil defamation. With high-profile clients including the notoriously litigious German politicians Robert Habeck, Marie-Agnes Strack-Zimmermann and Roderich Kiesewetter, So Done Legal's directors include the attorney Alexander Brockmeier, former FDP state legislator, and Franziska Brandmann, federal chair of the FDP's youth chapter, the Young Liberals (*Junge liberale*). So Done Legal invites victims to upload allegedly abusive social media posts to its website; an AI filter then flags supposedly criminally relevant content (a practice critics understand as legally questionable itself). Finally, lawyers demand deletion with a signed cease-and-desist letter, and seek monetary damages. Targets that ignore the letter face immediate suit. Published case notes include a €3,200 fine for "Hurensohn" ("son of a bitch") and €600 for "shut up you ugly woman."¹⁰⁶

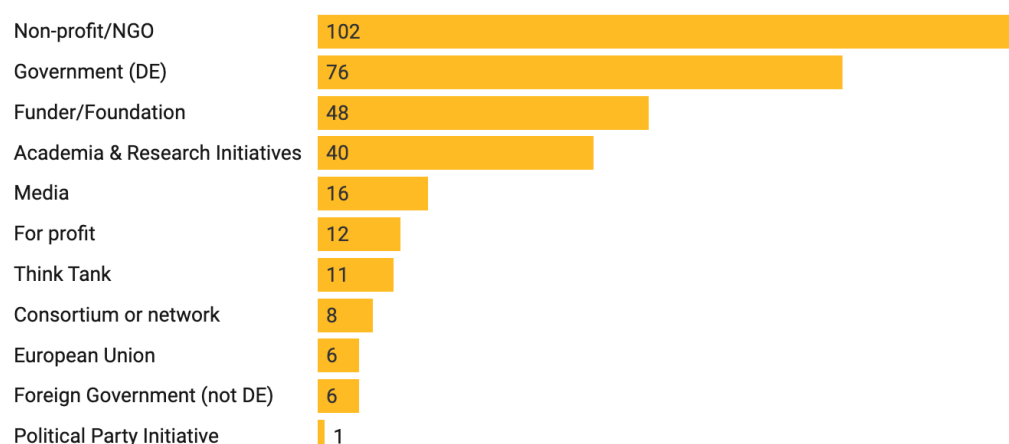
[HateFree gGmbH](#), registered in Regensburg and founded by human-rights advocate Sara Siakala and free-speech lawyer Markus Hampel, offers cost-free legal screening, advice and litigation for private victims of "digital hate" online. It advertises a three-stage review that can culminate in cease-and-desist orders

¹⁰⁵ Funders are listed at HateAid's website, and include the Ministry of Justice; the Ministry of Education, Family, Senior Citizens, Women and Youth; and DL, among other sponsors: <https://hateaid.org/en/this-is-hateaid/>.

¹⁰⁶ See "'Halt die Fresse, hässliches Weib!' kostet 600 €": <https://www.sodone.legal/urteile/jedes-urteil-staerkt-den-diskurs-duplicate-2/> and "3.200 € Strafe wegen 'Hurensohn'": <https://www.sodone.legal/urteile/3-200-e-strafe-wegen-hurensohn/>.

and damages. The nonprofit partners with REspect!, OFEK and Deutsche Telekom’s “No Hate Speech” program. Additional supporters range from Microsoft to the Bavarian government’s Wertebündnis (Alliance of values) network. Funding otherwise derives from donations, foundation grants and a success fee drawn from court-awarded damages. HateFree promotes itself as the only nonprofit in Germany officially cleared to provide both legal counseling and enforcement in digital-violence cases, framing online abuse as a direct menace to democracy.¹⁰⁷

Types of organizations funding and implementing content controls in Germany



Nonprofits and NGOs comprise a plurality of organizations working in the new field of counter-disinformation. They often report to government censors and the platforms, flagging content and rating news articles as well as published statements by public figures.

Media Operators

Disinfo Radar is an initiative run by [Democracy Reporting International](#) and financed in part by the German Federal Foreign Office (in 2023 it received €340,000 in funding). The Radar claims to study emerging technologies and the tactics that may weaponize them in political campaigns. It periodically releases “Radar Briefs,” rating each tool’s accessibility, cost and likely misuse, then folds the findings into quarterly threat digests and an annual DisinfoCon forum that gathers platform staff, diplomats and researchers. Analysts scrape fringe online

¹⁰⁷ Deutsche Telekom Press Release, “hatefree: Legal support in the face of digital violence,” February 28, 2023: <https://www.telekom.com/en/company/details/hatefree-legal-support-in-the-face-of-digital-violence-1027730/>.

message boards, influence-for-hire marketplaces and open-source code repositories to chart how synthetic media and micro-targeted ads migrate from prototype to mass use. A public dashboard tracks these shifts in near-realtime and flags early signals for election officials and civil-society monitors. Among notable examples of its operation is the Radar's "stories" project, which purports to identify "false narratives" that would "delegitimize" the Kiev leadership. On-message with the German Foreign Office, it avoids criticism of Kiev's use of far-right militias, suspension of elections, crackdowns on the Russian Orthodox church and the Russian language, or the scholarly critiques of NATO and Zelensky advanced by dissident Ukrainians.¹⁰⁸

Part of the [German-Austrian Digital Media Observatory \(GADMO\)](#), **CORRECTIV** promises to "strengthen democracy" through investigative journalism, media education and technology. It operates as a "nonprofit newsroom" focused on exposing disinformation. Among its projects are Faktencheck and Facts Forum. Headquartered in Essen, North Rhine-Westphalia with an editorial team in Berlin, it was founded in 2017 as an attempt to counter misinformation in that year's election. One of CORRECTIV's principal missions remains the regulation of a "fact-based discourse," by which it means debunking "targeted disinformation, false claims and half-truths" which cause "hatred and polarization" worldwide.

In January 2024, CORRECTIV published an investigation that drew international attention, in which it alleged that AfD politicians and right-wing activists had discussed mass deportations, including of German citizens, during a November 2023 meeting near Potsdam. The exposé catalyzed nationwide protests, but it was also met with skepticism, given CORRECTIV's conspiratorial assertion of having uncovered a "master plan" devised by an "AfD Complex." CORRECTIV's selective reporting, together with reliance on funding from a political system broadly hostile to the AfD, suggested a politically motivated investigation despite claims of neutrality.¹⁰⁹

108 From Disinfo Radar's self-described "Tactics": "Disinfo Radar is designed to detect specific tactics used by disinformation actors. By leveraging DRI's extensive experience monitoring social media, it tracks online discussions in near real-time among some 4,000 scholars and professionals, including well-established organisations like EUDisinfoLab, the Atlantic Council and Bellingcat." <http://disinforadar.com/tactics/>. For a scholarly Ukrainian perspective critical of Kiev, see Volodymyr Ishchenko, *Towards the Abyss: Ukraine from Maidan to War* (London and New York: Verso, 2024).

109 For a sympathetic yet detailed account of the investigation's method and politics, see Benjamin Bathke, "A scoop by nonprofit Correctiv sparked huge pro-democracy protests all over Germany. How did they pull it off?," *Reuters Institute for the Study of Journalism*, April 5, 2024: <https://reutersinstitute.politics.ox.ac.uk/news/scoop-nonprofit-correctiv-sparked-huge-pro-democracy-protests-all-over-germany-how-did-they/>.

The [Deutsche Presse-Agentur \(DPA\)](#), Germany's largest news agency, was founded in 1949 and expanded into fact-checking in 2013. It has been especially active since the Covid period and the 2022 escalation of war in Ukraine. Operating in Germany, Austria, Belgium, Luxembourg, the Netherlands and Switzerland, DPA's 30-person fact-checking team, certified by European Fact-Checking Standards Network (EFCSN) and Florida-based International Fact-Checking Network (IFCN), produces fact-check reports in German, French and Dutch for media outlets, governments and other organizations. It has worked with Meta, TikTok, and the Google News Initiative, and is active on the platforms WhatsApp and Faktencheck21, the latter of which is a journalist training outlet co-funded by Google. As part of the German-Austrian Digital Media Observatory (GADMO), the European Digital Media Observatory (EDMO) and its Belgian-Luxembourgish affiliate EDMO BELUX 2.0, DPA is a collaborator in the organized regulation of disinformation. Its UseTheNews initiative, funded with €1 million by the German government to promote news literacy,¹¹⁰ has given rise to questions about state influence, despite DPA's professed apolitical position.¹¹¹

[BR24 #Faktenfuchs](#) is a Munich-based fact-checking project operated by Bayerischer Rundfunk (BR), part of Germany's public broadcaster ARD. Launched in 2017, BR24 investigates political claims, social media rumors and viral information – particularly on topics like the Ukraine war and Israel-Palestine. Certified by the IFCN, it purports to be non-partisan and transparent in its operations. Topics are reportedly chosen based on current events, user inquiries and online trends, and determinations are published across BR24 platforms. #Faktenfuchs is funded through Germany's public broadcasting fee, and emphasizes its editorial independence from state and private influences. It promises to combat misinformation on platforms like Facebook, WhatsApp and Telegram.

[ZDFheuteCheck](#) is the fact-checking and investigative research initiative of ZDF, Germany's public-service broadcaster. Operating under the umbrella of ZDF's news division, it aims to verify claims, debunk misinformation and provide in-depth analyses on current events. ZDFheuteCheck covers a broad spectrum of topics, including politics, health and international affairs, often collaborating with ZDF's investigative program Frontal. Fact-checks are published on ZDF's official website, providing audiences with resources to assess the veracity of public statements and media reports. Yet the operation has admitted recently

110 DPA, "Independence is the cornerstone of our work" *Year of the News* entry: <https://www.dpa.com/en/about-dpa/independence/>.

111 See "Together against disinformation," *Fact Checking at dpa*: "The Russian war against Ukraine, the Corona pandemic and migration along with conspiracy myths and targeted disinformation campaigns pose [sic] the media with major new challenges." <https://www.dpa.com/en/fact-checking-at-dpa/>.

to censorship of comments on its platforms, especially regarding Tel Aviv's years-long onslaught against Gaza, with phrases including "genocide," "war of extermination," and even "Palestine" filtered automatically and "checked against criminal law."¹¹²

[Südwestrundfunk's \(SWR3\)](#) fact-checking initiative is one of several launched by German public broadcasters during the Covid period, when the legitimacy of official messaging came under strain. The format is brisk: a claim, a verdict and a source. The target is not the news itself but its afterlife – shaping how statements circulating on social media, often detached from context, are perceived. As with similar efforts, the aim is reputational hygiene.¹¹³

Meanwhile, the Berlin-based [Facts for Friends](#), created during the German government's #WirVsVirus hackathon in early 2020, presents itself as a tool to help users counter disinformation and conspiracy theories by offering concise, categorized rebuttals.¹¹⁴ Topics covered have included Covid, politics, the economy, business, the environment and Germany's 2021 federal election. The platform uses slogans such as #Factfluencer and #Don'tTellMeFairyTales to promote user participation. Funding has come from the Federal Ministry of Education and Research (via the Prototype Fund), the Vodafone Institute, the BMW Foundation Herbert Quandt and Google. Rising in prominence during the global surge in fact-checking interest, and then waning in the years following, no updates have been posted by Facts for Friends since August 2023.

These initiatives illustrate how Germany's fact-checking landscape has fused state ministries, public broadcasters and corporate sponsors into a single apparatus. Branded as neutral verification efforts, their common function is to promote official narratives and channel dissenting views into the category of disinformation. Notably, unlike their counterparts in the US, there is no observ-

112 See Tarek Baé, "Exklusiv: ZDF zensiert Kritik an Israel," *Itidal*, August 28, 2025: <https://itidal.de/exklusiv-zdf-zensiert-kritik-an-israel/>.

113 For a sympathetic overview, see Ulrike Zschache, "Disinformation and Counter-strategies in Challenging Times – The German Case," *EnTrust* Project, Sept. 2022. See p. 5 for mention of SWR3 Faktencheck specifically. https://entrust-project.eu/files/2022/10/Disinformation-and-Counterstrategies_Germany.pdf/.

114 Christoph Rybarczyk, "Diese Factfluencer prüfen Fakten für die Generation Z," *Hamburger Abendblatt*, December 27, 2021; and Press Release, *Kultur- und Kreativpilot*innen Deutschland*: <https://kultur-kreativpiloten.de/design/social-entrepreneurship/>.

able trend of German or European media fact-checking programs winding down in recent years.¹¹⁵

Educational Initiatives

A network of initiatives has emerged since the 2010s to teach digital literacy around disinformation, hate speech and youth protection. Programs range from peer-mentoring and workshops in schools, to federally backed alliances against online hate, to DPA's #UseTheNews news-literacy labs, and the Google- and FSM-supported portal Medien in die Schule — all financed through a mix of federal ministries, *Länder* culture budgets, major foundations and industry partners.

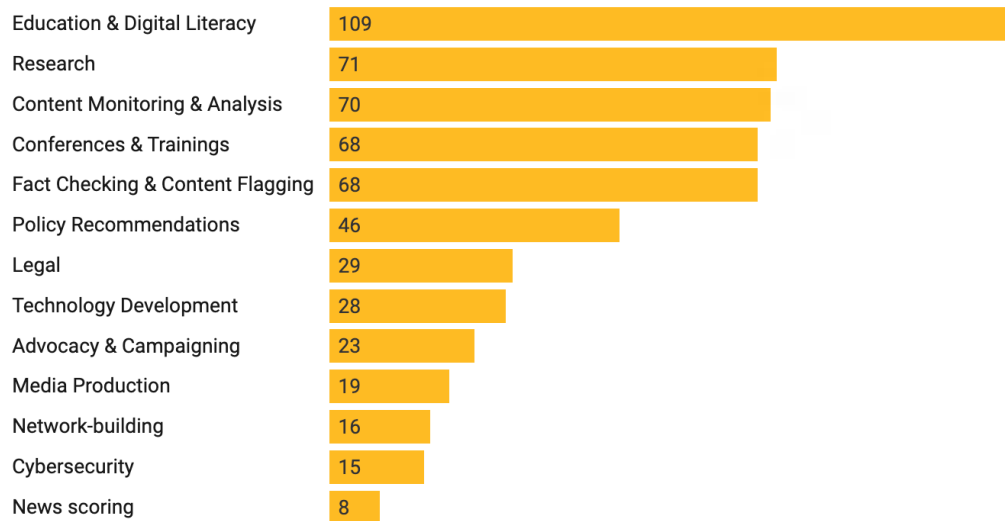
[Archiv der Jugendkulturen e.V.](#), founded in 1998 as an independent archival resource on youth scenes, has since 2020 directed a growing share of its pedagogy toward misinformation and online hate. Its five-year flagship project sUPpress – Media Literacy for Engagement and Self-Efficacy (2020–24) delivered workshops and digital modules on supposed conspiracy narratives and popular hostility to accredited professionals across the sciences and journalism; Demokratie Leben! supported the project to the tune of €1.12 million. The archive also runs Digitale Labore – Kompetent für Resilienz gegen Hass im Netz und Desinformation (Digital laboratories – Expertise for resilience against online hate and disinformation), a Berlin pilot that received a €250,000 federal grant in 2024 to train volunteers and Freiwilliges Soziales Jahr (Voluntary Social Year) cohorts on healthy social media use. Revenues remain modest: the 2022 annual report lists €504,125 in income, of which public subsidies formed the majority. Funding is rounded out by membership dues, ticketed events and private donations.¹¹⁶

The [Gesellschaft für Medienpädagogik und Kommunikationskultur \(GMK\)](#) was founded in 1984 in Bielefeld as an umbrella organization for German media-education professionals. With roughly a thousand members drawn from schools, youth work and academia, it publishes the journal Merz, runs annual conferences and drafts position papers on digital policy. In 2021–24, GMK formed part of the federally funded Kompetenznetzwerk gegen Hass im Netz; from 2025 it re-emerged inside “toneshift – Network Against Online Hate and Disinformation,” funded by the Federal Ministry for Family Affairs, Senior Citizens,

115 Google recently refused to integrate fact-checking organizations' work into Search/YouTube in Europe, saying it was “not appropriate or effective”: <https://www.theverge.com/2025/1/17/24345747/google-eu-dsa-fact-checks-disinformation-code-search-youtube/>.

116 See sUPpress, “Über uns”: <https://stand-up-participate.de/ueber-uns/>.

Activities undertaken by organizations funding and implementing content controls in Germany



Women and Youth, a six-organization alliance that includes HateAid and Das NETTZ. GMK's workshops cover fake news, hate speech and conspiracy theories for audiences ranging from tutors to vocational students. Recent articles argue that emotion-driven disinformation erodes public trust and calls for a national media-literacy offensive rather than bans. The association finances its work through member dues, project grants and state contracts; it discloses key data on its transparency page. Its annual budget is €1,390,079.¹¹⁷

[#UseTheNews gGmbH](#) began in 2020 as a joint venture of Deutsche Presse-Agentur (DPA), the largest German press agency, [Hamburg University of Applied Sciences](#) and the Hans-Bredow Institute. In 2022, the project was converted into an independent nonprofit company in Hamburg while remaining a DPA subsidiary. The initiative studies youth news use and develops remedy formats across three tracks: News Literacy Lab, Open News Education and the NewZee community. Its database bundles studies, lesson plans and tools. The Interior Ministry pledged up to €1 million for the 2023–24 “Year of News,” and the Federal Agency for Civic Education added €30,000 in 2024 for nationwide Newscamps. Supplementary grants include €25,000 from Schöpflin and ZEIT foundations (2021), €195,000 from [Brost Stiftung](#) (2024) and a sum from Robert [Bosch Stiftung](#). Dozens of Newscamps, backed by more than 50 partner outlets, ran in all 16 federal states.

¹¹⁷ Über die GMK: <https://www.gmk-net.de/ueber-die-gmk/about-gmk/>; and tone Shift, Entry on GMK: <https://toneshift.org/traeger/gmk/>.

[Medien in die Schule \(MiS\)](#) is an educational resource portal launched in 2013 as a joint venture of the multimedia regulator *Freiwillige Selbstkontrolle Multimedia-Diensteanbieter* (Voluntary Self-regulation by Multimedia Service Providers, FSM e.V.) and Google Germany, in cooperation with the television regulator *Freiwilligen Selbstkontrolle Fernsehen* (Voluntary self-regulation of television, FSF e.V.). The portal supplies free lesson packs for secondary schools on digital practices, hate speech, antisemitism, conspiracy theories and fake news. Each module credits separate financiers. *Hass in der Demokratie begegnen* (Confronting Hate in Democracy) lists the Amadeu Antonio Foundation and the [Auerbach Foundation](#) among its supporters. *Meinung im Netz Gestalten* (Shaping Opinion Online) also cites backing from these foundations together with the Federal Agency for Civic Education (bpb). *Realität und Fiktion in den Medien* (Reality and Fiction in the Media) also shows Auerbach support.¹¹⁸

The scope of the educational programming funded by federal ministries, *Land* cultural offices, foundations and commercial sponsors cannot be overstated. A plurality of those organizations identified by *liber-net* takes education and digital literacy as a focus. Most of this programming is designed for school-aged youth and promises to sharpen students' media literacy, a term which in some contexts may be perfectly innocuous, while in others it is a euphemism for teaching audiences not so much how to think critically, but what to think.

Whether these youth-focused programs will succeed in instilling Berlin's official conceptions of mis- and disinformation in younger generations remains uncertain. It is entirely possible that the effort could backfire. By imposing on students a narrow framework of permissible discourse – and one, furthermore, with a diminishing capacity to explain reality as it is experienced – state regulation of truth and falsehood may only make the populist rejoinder more appealing.

¹¹⁸ See *FSM-Jahresbericht 2018*, pp. 32–33: https://www.fsm.de/files/2022/03/fsm_jb_2018.pdf/ and *Freiwillige Selbstkontrolle Fernsehen* (FSF), "Digitale Themen in der Schule," Press Release, December 13, 2018: <https://fsf.de/ueber-uns/presse/pressearchiv/digitale-themen-in-der-schule/>.

Platforms and Big Tech



Social media platforms, video-hosting services and messaging apps together comprise the primary medium of censorship in Germany. Though formally governed by regulation, they are the points at which Internet content is flagged and ultimately removed. As described above, this process is codified in the European Union's Digital Services Act (DSA), which obliges "very large online platforms" (VLOPs) to adopt swift risk-assessment and removal of allegedly illegal or harmful material.

The imposition of these DSA obligations has led to the recruitment and development of a large bureaucracy of NGOs, academic research centers and national and EU agencies devoted to monitoring and censoring online expression. In Germany, organizations often receive funding from the same platforms they are expected to audit; corporate philanthropy determines the standard by which online speech is to be regulated. The collusion is ubiquitous: the Amadeu Antonio Foundation receives funding from Meta through the Online Civil Courage Initiative (OCCI), and both the Institute for Strategic Dialogue (ISD) and the European Media and Information Fund (EMIF) have received million-dollar grants from Google. Those research centers and independent think tanks defining algorithmic bias and misinformation as criteria for censorship are often funded by the platforms themselves.¹¹⁹

Across Europe's burgeoning disinformation sector, the major platforms present themselves as guardians of democracy while Brussels and Berlin embed their products ever deeper in the regulatory apparatus. Microsoft joined the EU Code of Conduct in 2016 and tied its software to ratings given by the US-based NewsGuard, outsourcing judgment to this private firm.¹²⁰ Facebook launched the Online Civil Courage Initiative in Berlin with €1 million, routed through grants to ISD and the Amadeu Antonio Foundation. Google's News Initiative has bankrolled CORRECTIV, dpa-infocom and the EMIF, marketing industry support as philanthropy. TikTok, under EU scrutiny, pays AFP and dpa for fact-checking and sponsors Amadeu Antonio Foundation workshops, integrating its moderation with continental regulatory priorities.

119 See the liber-net database on Germany: <https://liber-net.org/de-censorshipnetwork>.

120 For a critical appraisal of NewsGuard, see Paul Schreyer, "Media Culling," *Multipolar*, April 7, 2022: <https://multipolar-magazin.de/artikel/media-culling/>. Schreyer documents NewsGuard's preference for established media outlets in Germany (from *Süddeutsche Zeitung* to the tabloid *Bild*), where NewsGuard's own conflicts of interest and political orientation are not adequately disclosed to those encountering its point-based evaluations of media credibility.

X/Twitter has registered a decline in observable moderation globally, including among its 22 million German users, since US billionaire Elon Musk's 2022 acquisition of the platform.¹²¹ Prior to this, Twitter had collaborated with German agencies, and was particularly active in its content moderation activities during the Covid period. In one instance, Twitter sought to shield Pfizer from critical scrutiny so as to increase uptake of its mRNA vaccine, in line with German government priorities.¹²² X's subsequent resistance to DSA and NetzDG guidelines has prompted repeated threats of multi-million-euro fines.¹²³ In 2023, X-Corp. pulled out of the EU's voluntary disinformation code.¹²⁴

X's anti-regulation push, whether an effect of genuine political conviction or commercial opportunism, has in one respect reignited debate in Germany over free speech and its suppression. Yet Musk's conspicuous sympathies for the AfD have also reinforced the association of free speech with the political right, heightening polarization around the matter.

In January 2016, **Facebook** (now **Meta**) launched the OCCI in Berlin, pledging €1 million to "counter-speech" campaigns against hate and extremism.¹²⁵ The platform partnered with the Amadeu Antonio Foundation, the ISD and King's College London's ICSR, framing OCCI as "the first strategic non-governmental effort to mount a Europe-wide proportional response to hate, violence and terrorism online."¹²⁶ A 2017 TechCrunch note confirmed expansion to France and the UK under the ISD's lead. According to an ISD briefing, the German pilot's first six months "supported and boosted 17 counter-speech campaigns, reach-

121 Simon Kemp, "Digital 2025: Germany," Data Reportal, February 25, 2025: <https://datareportal.com/reports/digital-2025-germany/>.

122 Lee Fang, "COVID-19 Drugmakers Pressured Twitter to Censor Activists Pushing for Generic Vaccine," *The Intercept*, January 16, 2023: <https://theintercept.com/2023/01/16/twitter-covid-vaccine-pharma/>.

123 Emma Woollacott, "Germany Threatens Twitter With €50 Million Fine For Failing To Tackle Illegal Content," *Forbes*, April 5, 2023: <https://www.forbes.com/sites/emmawoollacott/2023/04/05/germany-threatens-twitter-with-50m-fine-for-failing-to-tackle-illegal-content/>.

124 Francesca Gillett, "Twitter pulls out of voluntary EU disinformation code," *BBC*, May 27, 2023: <https://www.bbc.com/news/world-europe-65733969/>.

125 Federico Guerrini, "Facebook Launches New Initiative Against Online Extremism and Hate Speech," *Forbes*, January 19, 2016: <https://www.forbes.com/sites/federicoguerrini/2016/01/19/facebook-launches-new-initiative-against-online-hate-speech-in-europe-and-beyond/>.

126 "The OCCI upsills and upscales the civic response to online hate and extremism in Europe," Institute for Strategic Dialogue: <https://www.isdglobal.org/isd-programmes/online-civil-courage-initiative-occi/>.

ing an additional 2.5 million targeted users.”¹²⁷ Facebook’s 2019 hate-speech report reiterates continued support: “We will continue to support the work of the OCCI.” The value of remittances made to ISD Germany is undisclosed; the non-profit omits donor amounts in its public filings.

Founded in 2018 as Google’s in-house philanthropy for journalism, the **Google News Initiative (GNI)** claims to have supported over 7,000 partners globally, dispensing \$550 million. The program sits at the top of the €1.9-trillion Alphabet balance-sheet, yet frames its grantmaking as altruistic industry support. Flagship disinformation outlay includes a \$9.5 million tranche in 2020–21 for 11 Covid fact-checking projects. In Germany specifically, the GNI’s footprint is visible on four fronts: dpa-infocom’s FaktenCheck21; CORRECTIV; earlier Google fellowships appear from 2016 onward; and the EMIF – which received an inaugural €25 million over five years from Google. The GNI also co-finance fact-checking summits and coalitions (e.g., Trusted Media Summit series, Fighting Misinformation Online conference with EUI/Gulbenkian).¹²⁸

TikTok is a signatory to the EU Code of Practice on Disinformation and publishes semi-annual transparency reports covering community-guideline enforcement and government-removal demands. To satisfy EU regulators, the platform underwrites a paid network of IFCN-accredited fact-checkers: AFP has reviewed German-language videos since 2020, while dpa-infocom co-hosts an election-integrity hub for the 2025 Bundestag vote. TikTok also funds media-literacy NGOs; it bankrolls the Amadeu Antonio Foundation’s Demo:create workshops on short-video pedagogy, hate speech and disinformation. In April 2025, TikTok announced Footnotes, a US-only, crowd-sourced context layer, yet stressed it would retain a network of roughly 20 professional fact-checking organizations globally.¹²⁹

Microsoft’s entry into the 2016 EU Code of Conduct tied it to fast-track removal of flagged speech under Commission auspices. Its 2018 partnership with News–

127 Institute for Strategic Dialogue, “ISD partners with Facebook to combat online extremism and hate speech in France”: <https://www.isdglobal.org/isd-partners-facebook-combat-online-extremism-hate-speech-france/>.

128 Google News Initiative, “Advancing the long-term Sustainability of Journalism and Publishing,” *2021 Impact Report*: <https://newsinitiative.withgoogle.com/impact/>.

129 “How TikTok is Preparing for the 2025 Federal Election in Germany,” Press Release, January 29, 2025: <https://newsroom.tiktok.com/en-eu/how-tiktok-is-preparing-for-the-2025-german-federal-election/> and Anna Katzy-Reinshagen et al., “Towards transparent recommender systems: Lessons from TikTok research ahead of the 2025 German federal election,” Institute for Strategic Dialogue, July 14, 2025: <https://www.isdglobal.org/digital-dispatches/towards-transparent-recommender-systems-lessons-from-tiktok-research-ahead-of-the-2025-german-federal-election/>.

Guard, active until at least 2024, delegated judgments of reliability to a private ratings firm.¹³⁰ In Germany, its Berlin office convenes civil-society partners such as HateAid to present threats to democracy largely in terms of hostile state propaganda or new technologies like deepfakes.¹³¹ By promoting “Defending Democracy” programs, Microsoft casts itself as guarantor of electoral integrity, yet its activities advertise product credibility and entrench the firm in the apparatus of speech regulation.

Taken together, these interventions mark a convergence between platform self-interest and European regulatory design. Each company casts its funding and partnerships as democratic safeguards, yet the practical effect is to entrench private intermediaries in the policing of speech. What emerges is not the promised defence of democracy but in fact its erosion via outsourcing of censorship to subcontracted corporations.

130 Tom Burt, “Defending against disinformation in partnership with NewsGuard,” *Microsoft on the Issues*, August 23, 2018: <https://blogs.microsoft.com/on-the-issues/2018/08/23/defending-against-disinformation-in-partnership-with-newsguard/>.

131 “Demokratien in Gefahr: Können Technologien Politik und Gesellschaft schützen?” Microsoft Berlin event page: <https://www.microsoft.com/de-de/berlin/veranstaltungen/raum4/demokratien-in-gefahr/default.aspx>.

Conclusion: Prospects and Recommendations



Political Prospects and Questions

As this report goes to press, Germany's incongruous Union-SPD grand coalition finds itself in a precarious position. Internal divisions threaten its durability and capacity to govern. Both parties face historically low approval as the economy enters its third year of near-zero growth, and rearmament has so far failed to offset the deindustrialization brought about by the Ukraine war. Meanwhile, chatter about reinstating conscription to the military or national service and continued weapons exports to Israel have deepened public unease and discontent.

Politically, the so-called "firewall" (*Brandmauer*) around the AfD – the agreement among all other parties to reject any legislation it puts forward, along with its ongoing exclusion from government – has elevated the party to the position of de facto opposition. By several measures, the Alternative rivals or surpasses the Union in popularity, commanding the support of a quarter of the electorate. The response of the big parties and their minor adjuncts has been to talk of an outright ban. In other words: safeguard democracy by shutting out the opposition, now on the cusp of becoming the largest party, through the formation of a political cartel representing a shrinking share of the polity. Such an extra-electoral maneuver would likely detonate a major political crisis, yet there is little indication that the ruling parties would have by then lost their appetite for repression to deal with it.

These developments occur in a Germany that has, over the past decade, emerged as the epicenter of a bureaucratized apparatus of digital control. Successive laws have imposed overlapping layers of compliance obligations, deputizing private firms and NGOs as extensions of state authority. The result is a censorship system whose reach exceeds conventional limits on state action. Through coordinated flagging networks financed by federal ministries and *Länder* media authorities, online discourse is filtered, and political dissent – especially on foreign policy or other politically sensitive matters – is suppressed or penalized. This digital apparatus, cloaked in the language of safety and democracy, has consolidated a regime of pervasive monitoring and repression, undermining the pluralism once regarded as foundational to the postwar republic.

Recommendations

Policy recommendations will have little purchase if they are not accompanied by organized popular movements inside and outside the Bundestag. Nevertheless, some programmatic elements, including broad principles, may be kept in mind. They are as follows:

- The DSA and what remains of NetzDG must be repealed. As they are currently written and implemented, these regulations cause material harm to individuals and organizations who engage in political speech. Furthermore, due to the harsh penalties they impose, these regulations deter political speech and free debate, along with scientific and critical inquiry. They amount to censorship.
- So long as they carry state-enforced sanctions or criminal penalties, overbroad definitions of anti-Semitism that cannot be distinguished from criticism of Israel, Israel's government or the state's ideology must be abandoned. Examples of such excesses are found in the rhetoric and resolutions upheld by the Bundestag in late 2024 and the International Holocaust Remembrance Alliance (IHRA) working guidelines. Insofar as specifically anti-Semitic discrimination is to be treated as distinct from libel, slander, incitement or other criminal activity, criticism of Tel Aviv's conduct, and the ideologies informing it, must not be proscribed.
- All information (or counter-disinformation) efforts with military or dual use applications must be subject to full public disclosure. Given the reorganization of NATO communications doctrine, hybrid warfare programs involving the propagandizing of the domestic population should be identified as such, especially where official input and funding is influencing private or quasi-private activities in nonprofit or commercial sectors. Civic-minded rhetoric should not be permitted to camouflage what is in fact a coordinated, state-backed campaign to militarize civil society.
- Educational policy must be returned to the *Länder* and municipalities; centralized influence over education as dictated by Berlin in consultation with Brussels violates the spirit if not the letter of the Federal Republic's Basic Law.¹³²

¹³² Specifically, Articles 30 and 70.

- Media oversight must not be federally organized, coordinated or exercised. Such a concentration of power increases the risk of widescale silencing of dissent under the guise of combatting disinformation.
- Bans and repression must be replaced by open debate and inquiry.
- Public financing of NGOs must be curtailed sharply, and never deployed to favor any one political party or political point of view; state subsidies should be blind to partisan affiliation, ensuring that neither the governing coalition nor the opposition can leverage public funds to suppress dissent.

The public use of reason and argument based in evidence is fundamental to enlightened humanistic inquiry and should be encouraged, not made taboo. This means that critical thinking, including popular skepticism of official pronouncements and policies, must be understood as central to preserving democratic self-government. Ex cathedra argument, irrationalism and unthinking deference to authority – including credentialed experts – imposes a conformism that harms thought and creativity.

In the coming period, as the European economies slow further or enter recession, and as the continent's governments turn increasingly toward militarization, it may be expected that they will also escalate their attempts to repress, censor and scapegoat critics. It is therefore essential that popular movements seeking to preserve and expand freedom of expression online develop political responses equal to the scale of the restrictions now reshaping the public sphere.



About liber-net

liber-net combats the emerging trend of digital authoritarianism and works to reestablish free speech and civil liberties as the norm for our networked age. Through journalism, research, media production, network-building, and campaigning, liber-net provides a platform to create alliances, expose civil society corruption, and foster open conversations.

We are driven by the urgent need to reject digital authoritarianism, and are committed to promoting human autonomy, dignity, and pluralism. We oppose systems of online censorship, their growing social acquiescence, and the accelerating surveillance regimes operating in and through information technology. The liber-net team comes from the progressive digital rights and public policy field, with decades of combined experience. We have a deep understanding of these issues and are working to connect with the many disaffected advocates in this space.



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