

THE MAPPING OF THE MEDIA IN ARMENIA IN THE CONTEXT OF THE FIGHT AGAINST DIS/MISINFORMATION

FREEDOM OF INFORMATION CENTER

2021

This research was undertaken with support from the Center for International Private Enterprise (CIPE). The views and opinions expressed in this document do not necessarily reflect the views of CIPE.

Contents

Introduction	3
The research purpose, objectives and methodology	4
Executive Summary	7
A. Armenian Media Influencers	10
B. The Main Characteristics and Problems of Dis/Misinformation in the Armenian Media	15
C. Experience of the Armenian Media in the Fight Against Dis/Misinformation: How the Media Outlets Reduce or Eliminate Fake News	20
D. Legal Regulations and Mechanisms for Combating Dis/Misinformation	24
E. Conclusions	28
F. Suggestions and Recommendations	30

Introduction

Due to the novel coronavirus and a state of emergency declared to prevent the spread of the virus¹ (accompanied by unprecedented restrictions on some publications of local media outlets), the war in Artsakh and the martial law declared in Armenia (again, accompanied by strict restrictions on the media's activities), as well as the post-war unstable political and social situation in Armenia and Artsakh, a number of significant changes have taken place in the traditional and online media sector of Armenia in the past one and a half years (March 2020 to October 2021). The spread of dis/misinformation, in particular, has reached tangible levels during this period; information flows have multiplied, and verbal manipulations make up a significant part of politicians' speeches and public communication. Today, more than ever, there is a need in the Armenian media for qualified journalists, editors and individual media outlets to fight against dis/misinformation and fake news and develop fact-checking skills.

Especially in our days, along with the increasing role of social networks (particularly Facebook, TikTok, YouTube, Twitter, Instagram), some of the many new media outlets that have appeared in the field are becoming favorable (sometimes even deliberate) sources for the rapid dissemination of dis/misinformation. In order to eliminate the spread of fake news and in case of the spread to counteract the dis/misinformation, there are a few media outlets in Armenia, which over time have developed and improved relevant skills and tools. The influence and role of the latter have significantly increased in the Armenian media sector, but the Armenian public still receives information mostly from media outlets that do not take much responsibility in creating content, sometimes do not even check the facts and the accuracy of the news.

Considering the changes in the media sector in Armenia, it is necessary to think about creating new, regulatory and leverage-based legal measures to fight against dis/misinformation and fake news, as the current regulations do not contribute to the recovery of the sector. In this context, the recent legal solutions and mechanisms proposed by the authorities are mainly based on the practice of enforcing restrictions, imposing direct sanctions and fines, which is more than problematic, as it creates non-cooperative conditions and environment for media activities.

¹ March 16, 2020. RA Government Decision 298-N on *Declaring a State of Emergency in the Republic of Armenia*. Accessed 15/11/2021 [<https://www.e-gov.am/gov-decrees/item/33564/>].

The research purpose, objectives and methodology

The research entitled “The mapping of the media in Armenia in the context of the fight against dis/misinformation” was conducted in October-November, 2021. The purpose of the research was to map the media environment in Armenia in the context of the fight against dis/misinformation, to highlight those who have the main influence in the field, to explore the existing patterns of dis/misinformation, the peculiarities of creating and spreading fake news. The research also reveals the modern methods and toolkits of debunking dis/misinformation and the fight against fake news that are available in the Armenian media sphere.

This document has a primary purpose:

a) to support the public sector, state and government agencies, non-profit initiatives and organizations developing media policy in the current situation, so that the latter can correctly assess the reality of the Armenian media environment in terms of developing legal regulations or self-regulatory mechanisms;

b) to introduce the general public to the Armenian media environment, to mention who are influential in the context of the dissemination and circulation of dis/misinformation, helping to avoid misunderstanding of social reality;

c) to collect anti-dis/misinformation programs implemented in the Republic of Armenia;

d) to identify patterns of dissemination of dis/misinformation and their features, characteristics, threats and problems.

At the same time, there is a need to understand what the Armenian media environment is like in the context of creating and spreading dis/misinformation:

- who are the main influencers in the media sphere?

- what are the patterns and peculiarities in terms of dissemination of dis/misinformation?

- what are the main characteristics, threats, problems of the circulated dis/misinformation in the media,

- what legal frameworks are in place to combat dis/misinformation or how effective are they in this regard?

- how the existing legal norms/regulations work,

- do the media try to reduce or eliminate fake news, what tools and methods do they use?

- what are the current anti-dis/misinformation programs in Armenia?

The object of the research is the Armenian media environment, and the subject is the fight against dis/misinformation circulating in it, the existing patterns, threats, the scope of debunking it, the methods and tools used by media outlets, the legal regulations, the anti-dis/misinformation programs in Armenia.

The research was carried out by the strategy of mixed methods, combining expert interviews with the study of influential information platforms (having audiences), and previously available research documents on the topic.

The methodology stipulates a purposeful combination of quantitative and qualitative methods. The mixed method research allows using the toolkits of both quantitative and qualitative methodologies in the phase of data collection, as well as combining the analytical resources of both methodologies in the phase of data analysis and interpretation.

Exploratory sequential mixed methods design has been chosen to implement in the framework of the methodology. It allows using the qualitative and quantitative methods in phases, and integrating the obtained data with each other. Qualitative data is collected in the first phase of the research (October 2021), the analysis of which leads to the second – quantitative – phase. Finally, the data collected in both phases are analyzed in a combined way. Qualitative analysis has become the basis for formulating and identifying research problems that are subject to quantitative study.

Within the framework of the research, two sociological methods of information collection were used: expert interviews and publicly available other research documents. To understand the dissemination of dis/misinformation in the Armenian media environment and the tools/methods of debunking it, to analyze the actions taken by the media outlets in this regard, expert interviews were conducted with representatives of active media outlets in Armenia, editors and people appointed to the position of managing newsrooms (media manager). In order to ensure the balance and complete impartiality of this research, interviews were conducted with persons, well-informed about the topic, including media analysts, fact-checking journalists, opinion-makers and media influencers. A total of 15 expert interviews were conducted.

The method implementation allows finding out with the help of experts the general logic of dis/misinformation dissemination, existing patterns, exploring the threats and problems, disclosing the primary sources of dis/misinformation dissemination in the Armenian media, identifying the main influencers and the media outlets fighting against dis/misinformation, methods and tools used to reduce dis/misinformation by other media outlets not oriented on fact-checking, to collect current programs implemented in the context of the fight against misinformation in the Republic of Armenia.

The review of the documents took place by combining content analysis with traditional approaches. A content analysis of documents stipulates measurements of the quantitative aspects of information, whereas the content and context-related aspects are studied in the framework of the traditional approach. The research team considered as a document the legal regulations that have the status of law, the field research and studies carried out by different organizations, and publicly available, a number of media publications, which were identified as a result of the first stage of the research - expert interviews.

The media outlets fighting against dis/misinformation were examined in detail, the media content created by them, the tools and methods used by fact-checking journalists were examined too.

The media platforms with an active audience (for one month, October 1 - 31, 2021), the problematic websites in the field of dissemination of dis/misinformation were studied as well, based on the latest research on media consumption, dis/misinformation and fake news in Armenia².

The use of the method made it possible to quantify retrospectively, to compare the data obtained as a result of expert assessments on the characteristics of dis/misinformation, threats, problems, sources, patterns and peculiarities.

As a result of the study, practical suggestions and recommendations were presented, due to the implementation of which it is possible to improve the media environment in Armenia, contributing to the reduction of dis/misinformation, the creation of new tools for debunking, the regulation of the process of it.

In presenting the practical suggestions and recommendations special attention was paid to the need to introduce common, modern tools in the fight against the spread of dis/misinformation in Armenia, the international practice of solving problems through legal self-regulation bodies of the media.

² "Media Consumption in Armenia - 2019", conducted by the Media Initiatives Center (MIC) and Caucasus Research Resources Center-Armenia (CRRC). The results were made public in October 2019, available at: [https://www.crrc.am/wp-content/uploads/2019/03/MICE-Report-2019_.pdf]

"Study of the level of media consumption and misinformation in RA".

The survey was conducted by the Union of Informed Citizens consulting NGO and the Leading Public Research Group (ARP Group). The results were made public in October 2019, available at: [https://uic.am/wp-content/uploads/2019/11/Report_Media_Final_10.10.19_Q.pdf]

"The Patterns of Disseminating Disinformation in the Armenian Online Media". The research was conducted by the Media Initiatives Center, it summarizes results of the research conducted in June-August 2020, published in March 2021, is available at: [<https://media.am/en/lab/2021/03/12/26664/>]

"Disinformation and Misinformation in Armenia: Confronting the Power of False Narratives". The research was conducted by Freedom House and the results were made public in June 2021, available at: [https://freedomhouse.org/sites/default/files/2021-07/Disinformation-in-Armenia_Am-final.pdf].

Executive Summary

Considering the changes in the media environment and reality in Armenia, there is a need to develop new legal regulations and methods to debunk misinformation and fake-news, counter-managing newly appeared risks, as the current regulations do not contribute to the improvement of the media environment. In this context, the recent legal solutions and mechanisms suggested by the authorities are mainly pursued by the practice of imposing restrictions, which enforces direct sanctions, fines, which is more than problematic, as it creates non-cooperative conditions and environment for media and production activities.

The research of "Mapping the Armenian media environment in the context of combating misinformation" was conducted during October-November, 2021. The aim of the research is to map the media sector of Armenia in the context of the fight against misinformation, to highlight the main influencers in the field, to explore the existing patterns of misinformation, the peculiarities of creating and spreading fake news. The research also reveals the modern methods of debunking misinformation and the fight against fake news, the fact-checking tools that are used by the Armenian media outlets.

The primary objectives of this research document is:

a) to support the public sector, state bodies and agencies, non-profit initiatives and organizations in developing media policies in the current conditions, so that the latter can correctly assess the reality of the Armenian media in terms of developing legal regulations or self-regulatory mechanisms.

b) introducing the Armenian media environment, highlight the main influencers in the context of the dissemination and circulation of misinformation, helping to avoid misperceptions of social reality.

c) collect current misinformation debunking programs implementing in Armenia,

d) identify the patterns of creation and dissemination of misinformation and their characteristics, dangers and problems they bring to the society.

The research was conducted by mixed methods, combining expert interviews, and monitoring of the influencers' activities of Armenian media environment. The research includes also previously available survey and study documents on the topic.

We have summarized the main findings of the research with the following conclusions:

1. Based on the assessments of experts, it was possible to state that due to a number of phenomena and processes conditioned by the coronavirus, war, aftermath and internal political tensions, the flow of misinformation and fake news has significantly increased in Armenia.
2. Public trust in the media is quite low. Among the reliable media houses, there are mainly TV companies that have nationwide broadcasting. There is almost no public trust in the information of online media.
3. TV companies in Armenia continue to be the most influential media.

4. When identifying creators and disseminators of misinformation, experts generally highlighted several concrete groups of sources.
5. The main platforms for disseminating misinformation are the high-visibility media, in particular, on television, social media which active are used in spreading fake narratives.
6. To simplify the main characteristics, patterns and peculiarities of the circulating misinformation, a scheme based on expert assessments is presented, which includes three bases: creator of information, message and communication context. Everything can be conditionally grouped on three grounds: "who says", "what's and how its was said", "why or in what context it was said".
7. Illegal refusal of journalists' access to information requests or incomplete responses or illegal delays cause problems in terms of dissemination. In particular, when state bodies do not provide timely, complete information, as well as when they do not proactively publish information, this creates fertile ground for misinformation, false news, distorting government-public communication.
8. Public administration bodies do not act proactively. On their own initiative, they do not fully disclose information related to their activities based on the principles of accessibility, timeliness, completeness and accessibility. The official websites of state bodies do not fully meet the necessary standards of transparency and effective communication. The documents published on the official websites do not correspond to the open data format. And it becomes difficult or impossible for journalists to compare, analyze different documents, re-use the public information.
9. The continuous growth of misinformation and fake narratives is a great danger in the context of Armenia's success in democratic processes. Misinformation also poses a serious threat to society, not contributing to the development of the information sector, where fact-based debate does not go beyond contextual information manipulation, political manipulation and falsification.
10. Government officials and state agencies miscommunicate on sensitive topics such as war and its aftermath, which increases information risks and insecurity. Of particular importance is the issue of prisoners of war and demarcation and delimitation discussions and processes taking place along the line of contact between Armenia and Azerbaijan, which often brings the Armenian information environment misinformation, fake news through the Azerbaijani information flows. Not having a comprehensive strategy of measures on how to combat such cases, the Armenian media environment responds to the situation by circulating these false narratives until the moment when the state agencies find time to respond.
11. Some factors bring dangerous rumors and misinformation about the pandemic including the circulation of conspiracy theories. The media field is full of fake narratives, which diverts the public's attention from public health guidelines and recommendations.
12. Despite concerns about the dissemination of misinformation, experts claim that, unlike more professional fact-checking journalism platforms and editorial boards, there is no constant, organized fight against misinformation in the Armenian media environment, and it is not countered by other media houses. The latter is more concerned with creating its own content than fighting against misinformation. There are several newsrooms and initiatives of fact-checking journalists in Armenia, the aim of which is exclusively to fight and debunk misinformation.
13. Political actors continue to use fake news, rumors about the activities of NGOs, international donors, and their alleged political goals. This allows targeted campaigns against these NGOs to be used to divide society, lose civil society trust, and undermine democracy.

14. As a result of the assertions of the experts, it has been highlighted that there is no document, policy, strategy or action plan that has been developed or adopted by the state. The fight against misinformation is defined as a set of partial, short-term, or restrictive measures.
15. Information of public interest is not clarified by the state bodies in a timely and accessible manner, creating a gap, which is either filled with fake-narrative information, or remains empty, undermining public confidence in the information of officials.
16. In the last two years, the Government and the National Assembly have from time to time come up with various legislative initiatives in an attempt to create certain restrictive arrangements to combat misinformation, hate speech and reduce illegal content. However, these legislative initiatives were mainly partial and episodic in their nature. According to experts, they were mainly assessed by the professional journalistic community as pressures on freedom of speech and media activity.

A. Armenian Media Influencers

The state of emergency declared in March 2020 (to prevent the spread of the novel coronavirus, which imposed unprecedented restrictions on some media outlets), the military actions in Tavush (at the northeast of Armenia) in July (for the “Anvakh” (Fearless) military outpost) and the active military actions in Nagorno Karabakh since September 27 (as a result, severe restrictions were imposed, especially on the media, not allowing full coverage) have significantly transformed the media sector. This is evidenced by the participants of specialized interviews for research purposes. Almost all experts emphasize that dis/misinformation, fake news and information flows have risen sharply, increasing the other problems faced by the media consumer, including where to get accurate, verified information and news. During this period, the number of fake accounts active in various social networks has increased significantly, which, according to experts, is the result of the fact that currently public perceptions of the potential and role of social media have changed.

It seems the public has realized the great potential of social platforms; they give an opportunity to be heard and to spread their own ideas. As a result, being active in social networks has become an integral part of both individual accounts, as well as the media and the representatives of state agencies.

From an interview with the head of a news agency

Some experts explain the phenomenon as a result of the diversity in the Armenian media, since modern technologies today make it possible to “be heard” in a short time. In addition, after 2018, the political control over the media sector was somewhat noticeable, which was tangible and visible before the “Velvet Revolution” that took place in 2018.

The society, people, also including state officials and politicians have started to use the opportunity that there is freedom of speech, and that freedom can be a very convenient tool for them to become audible. And now it is possible to spread dis/misinformation, not to check the facts of one’s own publications, to spread fake news, but as a result, there will be no legal prosecution, as there is no regulation for that. Even the existing norms are not applied the way they should be applied.

From an interview with a representative of a body of media advocacy

It is obvious that the diversity in the media sector has led to information polarization of the public, as a result of which dis/misinformation, fake news, manipulations and political propaganda are more easily spread than the denials about the inaccuracy of all that. The motives of dis/misinformation groups, individuals and those with political interests have also noticeably changed, mainly moving from the field of self-interests to the field of values and morality.

There are quite mobile groups, individuals who are engaged in creating and disseminating fake news. Their actions are also performed in a very coordinated way. The so-called “Army of Fake Accounts”

still continues to circulate various theses for public perceptions, which is a great threat in the context of success in democratic processes.

From an interview with a fact-checking specialist

In Armenia, research has been conducted to reveal how the peculiarities and commonalities of dis/misinformation in the local media sector are intentionally emphasized and made obvious in the texts. Despite the fact that both in Armenia and around the world the peculiarities of dis/misinformation are conditioned by a number of factors or standards, they can be grouped according to three bases: “Who is saying?”, “How is he/she saying?” and “Why and in what context is he/she saying?”

As a result of specialized interviews, it was concluded that one of the most frequently mentioned criteria is the sender of information, i.e. the source. It is especially emphasized whether the source is known to the consumer and is reliable, and what its public reputation is. According to experts, dis/misinformation and fake news are mainly found in publications where the author is not mentioned and there is no professional signature, source or link to the source; and usually the references are made to unknown or uncertain sources, often containing words like “according to our reliable sources” or “we have the news that”.

When identifying the senders and disseminators of dis/misinformation, experts generally single out several groups of sources:

1. Ideological groups (ultraconservative, VETO, Adekvad)
2. Facebook groups, real or fake accounts and pages
3. Opinion leaders and decision makers on social networks
4. Media owned by the former government
5. Clickbait websites³
6. “Mushroom” media⁴
7. Russian websites or translations from those websites

The main platforms for disseminating dis/misinformation and fake news are popular media outlets, particularly TV and social networks.

³ At first glance, these are news websites whose main activity is to increase the number of visitors to the website through various methods, including the dissemination of dis/misinformation, and the main goal is to make profit.

⁴ Fact-checking specialist, journalist Karine Ghazaryan defines “mushroom” media as follows: “...quasi-news, quasi-entertainment websites that do not create their own content, are full of contextual advertising and reproduce like mushrooms” (see <https://media.am/hy/verified/2019/02/15/11062/>, accessed 28.11.2021).

Social networks, especially Facebook, gained more importance and recognition for the social and political life of the country after 2018, when Prime Minister Nikol Pashinyan chose to create public awareness through Facebook posts and live broadcasts as his main means of communication with the public. According to a survey⁵ conducted in 2019, citizens considered the Facebook pages of government officials to be mostly reliable, while at the same time considering social media as a less reliable source of information and expressing greater confidence in television. Most of the online public speech is focused on the Facebook platform; however, during the war in Artsakh in 2020, Armenians also began to actively use Twitter and Telegram⁶.

Since the creation of online media in Armenia, one can often notice the “matryoshka” effect. Online media outlets regularly copy news (especially international news) from Russian websites. Then, other supporting local media outlets republish the information, each citing the former as the primary source like a chain reaction, which increases the spread of the original message. The same goes with various Telegram channels, which are rapidly gaining popularity in influential media, especially as a result of television coverage.

Terrestrial television media (TV companies) are quite influential in Armenia. According to a media consumption study of 2019 on “Caucasus Research Resource Center (Armenia)”, 72% of Armenians watch national TV channels every day and they rely on TV more often for information⁷. 57% of the respondents use online sources and social media as the most frequently used source of information on a daily basis, followed by local TV channels (40%), Russian TV channels (26%), cable and/or satellite (paid) TV channels (25 percent)⁸. 83 percent of online news followers said they could access online media through social media, while only 17 percent said they received information directly from a news website⁹.

The results of the research on “Media Consumption in Armenia” clearly show that television remains the most consumed source of information in Yerevan and the regions¹⁰. It should be noted that the level of receiving information from television has continuously decreased compared to previous years. Although there is no similar research dating back to 2021, previous researches conducted in 2015 and 2017, clearly show that the Internet, which seems to be the primary source of information in Armenia today, is rapidly gaining ground.

Three frequencies of the Armenian public multiplex have been allocated to three Russian channels: “All-Russia State Television and Radio Broadcasting,” “Russia-K” and “Channel One Russia”¹¹. These decisions were made without a tender, based on the new Armenian-Russian interstate agreement

⁵ “Study of the Level of Media Consumption and Dis/information in the Republic of Armenia.”

⁶ Samvel Martirosyan, “Telegram News: Why and How,” media.am, Dec 1, 2020, [https://media.am/hy/critique/2020/12/01/25240/].

⁷ “Media Consumption in Armenia – 2019” research, page 7.

⁸ Ibid.

⁹ Ibid., page 8

¹⁰ “Media Consumption in Armenia – 2019” research.

¹¹ Hakhverdyan N., “Foreign State Channels Will Again Appear in the Public Multiplex”, media.am, published on December 9, 2020, available [https://media.am/en/newsroom/2020/12/09/25404/].

signed in December 2020. Such international agreements are regarded in the RA Law on “Audiovisual Media” as an exception. If such agreements are concluded between states, the broadcast slot is awarded without a tender¹².

Russian channels broadcast in Armenia do not spread less fake news and dis/misinformation about the processes taking place in the country. The content of the latter, I can say, is never impartial and is always conditioned by political expediency. For example, this was obvious especially in the publications about the second president of the Republic of Armenia Robert Kocharyan, which are always full of manipulations and false statements. Maybe Russia does not consider this a problem, but we do.

From an interview with a fact-checking specialist

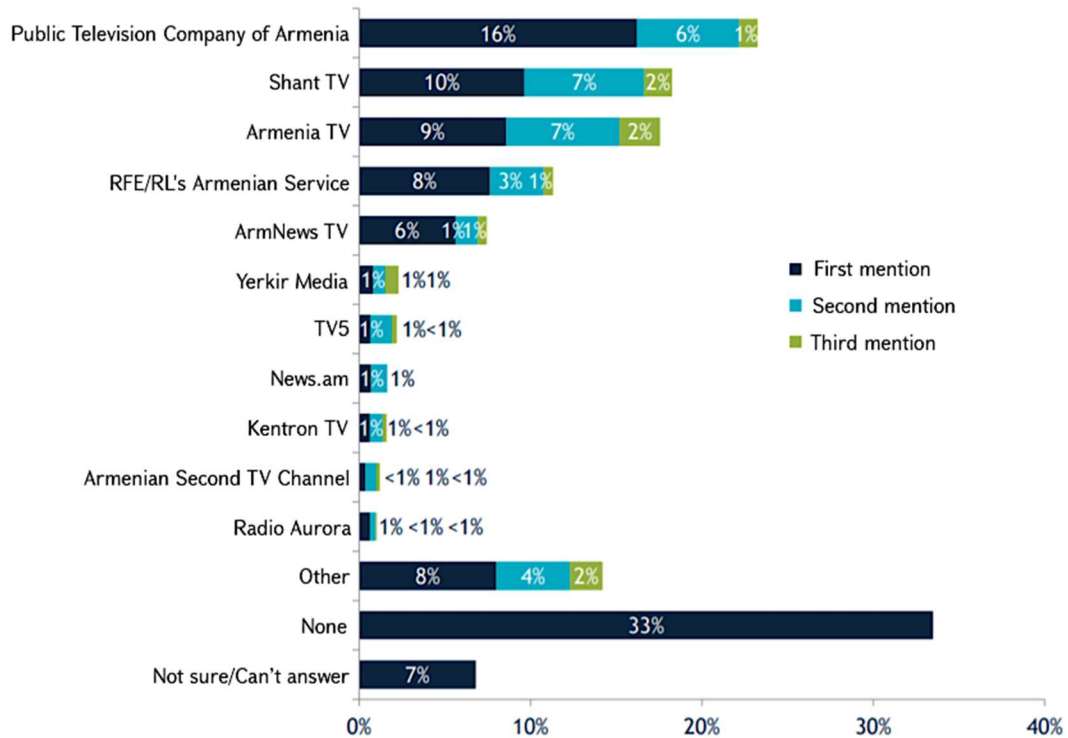
In February 2021, the International Republican Institute conducted a public opinion poll among the population of Armenia¹³. Taking into account the internal political situation in the country at that time, the focus was primarily on public awareness of political processes and on the main sources that allow to be informed. Trust in the media is quite low. 34% do not trust any media outlet, while 46% named at least one TV channel among the 3 trusted media outlets. “Public TV” is the most reliable media outlet for receiving political information, although the majority of respondents mentioned in the first place that they do not trust anyone. “Shant” and “Armenia” national TV channels were also considered reliable media outlets among the citizens. Since September 2020, “RFE/RL’s Armenian Service” (produced by the editorial office of the radio station of the same name) has been available not only online, but also in the TV programs of all major cable broadcasting companies in Armenia. There is public trust in the latter’s political media. “ArmNews TV” is in the top five in terms of trust. It is available only in Yerevan (as well as in a number of communities near the capital). And although it has limited coverage of its TV program, it far outperforms other local broadcasters.

Public confidence in other media outlets is insignificant. This is partly due to the fact that the majority of Armenians do not have or have not mentioned their primary and preferred source of information.

The full list is available below.

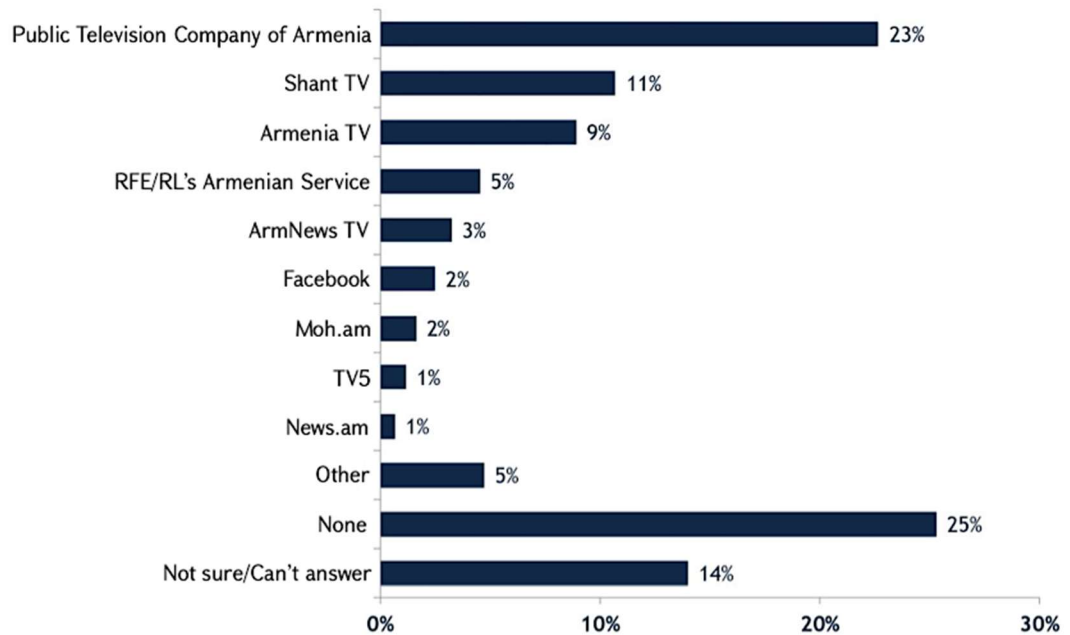
¹² RA law on “Audiovisual Media”, Armenian Legal Information System, accepted on June 2020, available [<https://www.arlis.am/DocumentView.aspx?DocID=145079>].

¹³ Public opinion poll: Current population of Armenia, February 2021, available [https://www.iri.org/sites/default/files/final_for_publication_armenia_electoral_reform_march_8_2021.pdf].



Already in July 2021, the International Republican Institute published another public opinion poll [research](#) to determine the population's attitude towards coronavirus and to map post-election expectations. The list of the most reliable news sources about coronavirus includes mainly TV companies: Public TV Company of Armenia (23%), Shant TV (11%), Armenia TV (9%), RFE/RL's Armenian Service (5%), ArmNews TV (3%). 2% of the respondents mentioned Facebook as a media outlet. Not trusting anyone again has the highest result (25%). In the media and on social networks, 25% of the respondents encounter dis/misinformation or fake news about the coronavirus every day, 14%- several times a week. 21% said they had never encountered fake news. In the capital Yerevan, this figure is higher than in the regions: 26% vs. 24%.

The chart shows the list of the most reliable sources of information about coronavirus.



The chart shows how often respondents encounter dis/misinformation or fake news about coronavirus.

B. The Main Characteristics and Problems of Dis/Misinformation in the Armenian Media

Media and social media have a great potential to socialize, shape public opinion and generate public debates in modern societies, including Armenia. They clarify and comment on the social reality as much as possible, raise many crucial issues of the society and various phenomena. Taking into account the above, the consumption of information in a diverse information environment has become easily accessible to the general public. In this context, the information disseminated in the media and on social media is often either inaccurate or contains incomplete information, and sometimes intentionally or unintentionally is misleading. Monitoring information flows in such a media environment is quite difficult, as they involve intentional or sometimes unintentional provision of incomplete or inaccurate information. The problem is especially acute when it concerns the Armenian media sector, which has become quite polarized in recent years.

Today, many media outlets have merged with their social media platforms, which has further expanded the scope of information flow and media audience. The censorship of the Armenian media in the context of the novel coronavirus infection and the war in Artsakh, as well as the media rhetoric between the ruling power since 2018 and the former authorities have multiplied the volumes of dis/misinformation. At present, a number of media outlets are politically, ideologically and/or financially influential. In the current media sector, the ruling power from 2018, led by Prime Minister Nikol Pashinyan, is often framed as a “Western-led” government that deliberately damages the Armenian statehood, hinders the pro-Armenian settlement of the Karabakh conflict and lacks the

appropriate competences to lead. One can often find stories about the weakening of Armenia's statehood and the destruction of traditional values by George Soros, the novel coronavirus infection, the establishment of global control through vaccinations, topics of complete human control and a number of manipulations that are related to regional and geopolitical issues, yielding to the popular conspiracy theories. Such information flows are intentionally or unintentionally accompanied by hate speech, dark PR, fake news and huge amounts of dis/misinformation.

To describe the main characteristics of dis/misinformation circulating in the Armenian media, experts have greatly stressed the factor what the textual style, quality and content of the message conveyed by the information look like, and how they are presented. This could be examined on several levels: in the title of the article, in the text, in the section with or without professional signature (news, section, most read, editor's selection, etc.).

According to experts, in the titles of publications containing dis/misinformation, one can often find elements that direct the audience to certain actions, which arouses interest among readers, making them read the news. As examples of guidance, there are four types of titles: titles containing question marks and other punctuation marks that express emotions, titles using italics, titles of a sensational nature and titles that do not communicate the context of the original content.

“Sensation”, “urgent”, “did you know”, “exceptional”, “lest it gets deleted” and other similar headlines can be found on every platform in today’s media, but if you decide to click, open and read, it is clear that the content of the publication is either incomplete or completely untrue.

From an interview with a fact-checking specialist

In the Armenian media, the experts single out a group of mass media, where they have noticed deliberate flows of dis/misinformation and fake news. They can be divided into the following groups: online media, Telegram channels, terrestrial TV channels.

The texts of publications containing dis/misinformation are characterized by experts as having at least one of the following features, although they are more complex in nature:

- Violations of journalistic professionalism and literacy ethics
- Inconsistent text style (use of several styles and fonts)
- Irrational, emotional and intuitive exaggeration
- Subjective definitions, adjectives, interjections and exaggeration
- Exclamation marks
- Striking images
- Intentionally or unintentionally created infographics

Experts also state that the impact and impression the content intentionally or unintentionally leaves on the audience is essential to identify the characteristics of dis/misinformation. By using the above-mentioned characteristics, in fact, the emotions and impressions of the audience are directed and

controlled, which increases the potential impact of dis/misinformation on the recipient of the information.

Another important characteristic that could be deduced from the experts' observations was the contextualization of the information sent. This factor is especially important to emphasize the context and the goals in the light of which certain information is conveyed with specific content emphases and formulations. Accordingly, experts distinguish several groups of goals or contexts to address dis/misinformation: political interests (including geopolitical), media interests and personal interests (the financial side has a large component here).

Dis/misinformation in the Armenian media is often accompanied by political propaganda, and recently the most topical issues include the coronavirus infection, the war in Artsakh, the settlement of the Karabakh conflict, gender issues (the adoption and ratification of the Lanzarote or Istanbul Convention, the LGBT issues). In this context, a number of other topics are mentioned, including the relations between Armenia and Russia, Armenia and CSTO, Armenia and EU, the clashes between the armed forces of Armenia and Azerbaijan, the current authorities considered to be "Western agents" or "Sorosians," corruption, migration and the Church.

Of particular importance is also the issue of Armenian prisoners of war and the processes happening along the line of contact between Armenia and Azerbaijan, which often penetrates the Armenian information environment as dis/misinformation through Azerbaijani information flows. Lacking a comprehensive strategy to combat such incidents, the Armenian media responds to the situation by circulating fake news until government agencies find time to respond. Government agencies often spread contradictory messages, which exacerbates the media sector by creating public alarm.

Although the afore-mentioned characteristics prove that dis/misinformation and fake news do not originate from only one side of the media sector, they pose a serious threat to society, not contributing to the development of the information field, where today fact-based debate unfortunately does not go beyond the manipulations of contextual information and falsifications. Moreover, government officials and government agencies often misinform on sensitive topics such as war and its aftermath, which increases information risks and insecurity.

Particularly dangerous are the fake news, dis/misinformation and conspiracy theories about the COVID-19 pandemic, filling the media with fake stories, which divert public attention from public health guidelines. Although a certain level of public confusion and skepticism was to be expected, especially at the onset of the pandemic, as health professionals and government officials around the world were trying to understand the nature of the novel coronavirus infection and respond accordingly, the effects of fake and distorted news have exacerbated Armenia's public health in the long term. Some experts and well-known public figures create and reinforce generally negative allegations about the novel coronavirus, making Armenians particularly vulnerable to the effects of dis/misinformation. These public figures legitimize stories that are harmful to public health. The situation has worsened at the present stage, when vaccines have been developed by different

laboratories. A comprehensive needs assessment has been conducted on this topic by the Freedom of Information Center, but the results are not available to the public.

In Armenia, COVID-19 vaccinations are on a voluntary basis, and the process has been seriously jeopardized due to anti-vaccination stories. Such views are sometimes supported by health professionals, which aggravates the situation, as the credibility of these actors can confuse and keep the public from getting vaccinated.

The increase of dis/misinformation (“Western agents”, “Sorosians”, “statehood-breakers”) circulating in the public consciousness, especially in the public sector, media and CSOs, has already had hazardous consequences. Following the tripartite declaration of a ceasefire on November 10, 2020, the local offices of OSF-Armenia and RFE/RL Armenian Service were attacked¹⁴.

Political groups and parties seeking power and a change of government after the war continue to use false information about the activities of CSOs, foreign donors and their alleged political goals¹⁵.

Many problems arise in this situation. Today, the information environment in Armenia is neglected, honest public discourse is not formed, and professional journalistic work continues to yield to myths, fake stories and dis/misinformation. This gives rise to another problem: targeted fake information campaigns. Such campaigns divide the society, undermine the trust in the civil society and question the democracy, so the neglect of the problem endangers the foundations of the general democratic progress of Armenia.

When the media sector is confronted with the aftershocks of 2020, the difficulties of building a national vision at the present stage and the spread of dis/misinformation and fake news, the challenges, opportunities and fact-based debates and discourses about the future of the country decrease.

In this context, international experience can be useful for Armenia. For example, at the initiative of the Poynter Institute for Media Studies, International Fact-Checking Network was established in 2015, bringing together fact-checking organizations from around the world and providing them with opportunities, methods, and sometimes funding them to be more resilient to dis/misinformation, combat and counter dis/misinformation flows with their own toolkits¹⁶. No less important for the professional community are the annual media conferences organized by the International Fact-Checking Network under the auspices of the Poynter Institute, which discuss the experience of

¹⁴ Attack on the office of “RFE/RL Armenian Service”, published on November 10, 2020, available [<https://www.azatutyun.am/a/30939683.html>].

Mkrtchyan A., Attack on the office of “Open Society Foundations – Armenia”, published on November 11, 2020, available [<https://www.azatutyun.am/a/30942405.html>].

¹⁵ “The Soros fifth column” gets involved in conspiratorial process of anti-Russian propaganda. Eduard Sharmazanov, Iravunk, [<https://iravunk.com/?p=192637&l=am>].

¹⁶ None of the current representatives of the Armenian media sector is a member of the network, although they have been able to cooperate in a mediated way (through a Georgian partner). The network not only organizes training courses, but also provides methodological guides and consultations to its member organizations.

different countries of the world and the main characteristics of dis/misinformation, taking into account the situation of the region and the world (war, pandemic, drought, food and water problems, climate change, global warming, etc.)¹⁷.

¹⁷ It is about the “Global Fact-Checking Summit”, known as the “Global Fact” conference.

C. Experience of the Armenian Media in the Fight Against Dis/Misinformation: How the Media Outlets Reduce or Eliminate Fake News

In the fight against dis/misinformation, the main agenda of the Armenian civil society and influential media includes strengthening independent media outlets, achieving transparency in media ownership and funding, promoting self-regulation mechanisms of media, developing fact-checking initiatives and teaching media literacy. In the last two years, a number of non-governmental journalistic organizations have come up with various initiatives, aimed at raising media literacy of the society, which should contribute to reducing the amount of dis/misinformation. In this context, the development of new subjects within the RA general education standards is of key importance, which could allow to increase the public resistance to dis/misinformation flows from an early age.

Recently, there have been a significant increase in programs on media literacy and fact-checking in the media, turning the fight against dis/misinformation into unique self-organization.

1) The Freedom of Information Center of Armenia has implemented both long-term and short-term projects with the aim of improving the situation in the educational institutions; fact-checking academic [laboratories](#) have been set up in a number of Armenian universities and schools, [“Fakehunting”](#) program has been launched (Samvel Martirosyan, Arthur Papyan, Lucy Manvelyan), and thematic journalistic publications have been posted.

2) The Public Journalism Club has implemented a number of projects, including “Creation of a fact-checking network”, development and operation of [“Fact Radar”](#) platform, as well as launching “Infodemia” multi-episode program.

3) CivilNet has launched a new and unique format, called “Fake of the Week”, which is an attempt to combat the spread of dis/misinformation. Every week, media expert Arthur Papyan reveals the most circulated fake news and introduces dis/misinformation theses.

4) The “Media Literacy” program on the Armenian Public TV is aimed at expanding the general knowledge of the Internet and media literacy. It has a quite wide audience. Media expert Samvel Martirosyan presents the basic principles of using the Internet, as well as informs about media dangers.

From September 2019 to June 2020, the Public Television, Yerevan Press Club, Media Initiatives Center and the Media Ethics Observatory launched a joint TV program, called “the Media Observer”. It created an environment of dialogue for the audience and media to discuss professional and ethical topics, the written and unwritten rules of the relations between the journalists and society, complex editorial decisions, as well as complaints and questions related to the latter.

5) “Factor” online TV company has decided to start its own fight against dis/misinformation flows since June 2021. It is quite active on social media, especially on Facebook, and often social media users circulate fake news. In the past, under the various publications of the media outlet, one could see dozens of comments with direct reference, which used to target people at fake

information platforms. Now the SMM specialists of this media outlet carefully edit FB users' comments, first warn, then eliminate the fake news and dis/misinformation from their platform, but still do not block the accounts that spread it not to hinder the users' freedom of expression.

6) [HETQ](#) online media outlet has a fact-checking specialist. The news agency highly appreciates the fact of having such a team player. The latter is mainly responsible for eliminating factual errors in the publications by HETQ employees, though individual publications are often posted to combat dis/misinformation, spread by public authorities, including state officials. HETQ does not intend to establish a separate fact-checking editorial office, but a new draft of the code of professional conduct was developed in 2021, taking into account the fight against dis/misinformation. Still in 2002 the media outlet adopted a [code of ethics](#), and every journalist at HETQ is obliged to follow the principles thereof. The new fact-checking code aims to improve the media environment. HETQ applies the "Truly Media" platform with a quite interesting and new toolkit, that has been developed as a result of international cooperation.

7) In October 2021, [Civilnet](#) established a fact-checking department, with 3 specialists who implement fact-checking research on a daily basis and help the editorial office to avoid fake news. The establishment of the department was supported by the British Embassy in Yerevan.

Unlike most of the Armenian media outlets, which aim to raise public awareness, rather than fight against dis/misinformation, the individual editorial offices, that fight against dis/misinformation, check and verify facts, do a great job.

8) One of the pioneers of fact-checking journalism in Armenia is the "Verified" section¹⁸ of "Media.am" professional platform, launched by the Media Initiatives Center. The first publications in this section appeared in 2012, though they were not published on a regular basis.

Currently, the "Verified" section implements fact-checking and verification of various information, circulating on social networks on an almost daily basis. The topics of the publications are also diverse, starting with the information struggle against the anti-vaccination campaigns to the verification of statements by the Armenian politicians, discussed in the public, revelation of manipulations, struggle against dis/misinformation spread by the representatives of the government and opposition. The publications in the "Verified" section vary in terms of genre presentation, including texts, images, infographics, various quizzes, data visualization, etc.

In June-July 2021 (before and after the forthcoming early parliamentary elections in Armenia), "Media.am" fact-checking team in cooperation with the Georgian platform "FactCheck.ge" (member of the international IFCN network, which allows cooperation with Facebook) checked and verified dis/misinformation spread in the Armenian segment of Facebook social platform, and tagged the FB

¹⁸ The publications of the "Verified" section are available as of 15/11/2021
[<https://media.am/hy/category/verified/>]

pages sharing fake news. At present, a lawsuit has been filed against “MEDIA.am” by “Hraparak” daily for such activities¹⁹.

At the stage of conducting the research, three authors work for the “Verified” section, including Karine Ghazaryan, Arshaluys Barseghyan and Ofelia Simonyan. The latter study the most discussed topics on social networks and political statements on a daily basis, and try to clarify whether everything is right and complies with the reality. From August 2020 to June 2021 Karine Ghazaryan and Arshaluys Barseghyan launched a joint podcast, entitled “Topic to ponder over”. 7 episodes have been published so far. It aims to expand the audience of the platform as much as possible and to attract new media consumers.

9) The “Union of Informed Citizens” non-governmental organization has been engaged in fact-checking journalism since 2016. The organization owns the “Fact investigation platform” at the domain address <https://fip.am/> (previously it was available as sut.am). The platform is mainly engaged in revealing and covering dis/misinformation which is spread in both local and regional media. From time to time, investigative materials are also published on the platform, which mainly involve the use of open data and public registers, as well as data visualization.

Since 2020, the “Factometer” program has been published on <https://fip.am/>, which summarizes the main fake news and dis/misinformation in a short video format on a weekly basis, to which the team of Fact Investigation Platform has referred through publications. According to the information available on <https://fip.am/>, the Fact Investigation Platform team consists of 5 journalists, one editor and one editor-in-chief.

Since 2020, the platform also labels the publications through its own fact rating system, including “False”, “Mostly false”, “Without verdict”, “Mostly true”, “True”, “Fake” and “Manipulative”.

10) From 2019 to May 2021 “The Information Checking Center” was also engaged in fact-checking journalism at the domain address <https://infocheck.am/am> (currently there are no updates, the latest publications are dated May 2021). Unlike the previous two, this platform is not independent and neutral in its activities, i.e., it is the project of “Public Relations and Information Center” SNCO of the RA Prime Minister's Office, which mainly checked the media publications, trying to present the government's viewpoint to the public.

The “About Us” section of the platform states: “The goal of the center is to protect the citizens from fake news. Here you can find the refutations of dis/misinformation spread by the media, clarifications from state agencies, as well as objective and accurate information about the activities of the Government”.

The publications on the platform have always been unsigned and have no authors. Professional interviews have found out that fact-checking team at infocheck.am consisted of 3 journalists and one editor. The latter were also actively supported by other departments of “Public Relations and

¹⁹ Case N: ED/31882/02/21, available as of 15/11/2021
[http://datalex.am/?app=AppCaseSearch&case_id=45880421204182199]

Information Center” SNCO (e.g., the team that monitors the content of online, broadcast and print media).

11) The online media outlet at the domain address <https://infocom.am/hy/> is a relatively new platform in the context of fact-checking journalism and combating dis/misinformation. The latter started its activities in the spring of 2018 as a Telegram channel.

The first publications in the “Fact checking” section²⁰ appeared in September 2019, but they have become more regulated and regular only since March 2020. In recent months, the platform has been paying special attention to the anti-vaccination campaign, trying to provide accurate information. Earlier in 2020, the “Fact checking” section contained verified data and information on COVID-19. The texts predominate on the platform with occasional pictures and videos.

12) The imitation of the “AnitFake.am” independent fact-checking platform is most often engaged in spreading fake news. This is a unique tactic with an interesting application in Armenia. The “Antifake.am” website, founded by the “Civic Consciousness” NGO, claims to be impartial, independent and dedicated to exposing the “lies” of the current government. However, the website regularly publishes unverified allegations or dis/misinformation. The content of “Antifake.am” mainly focuses on the stories of “Soros agents” and “foreign actors” in Armenia.

According to investigations by local and international independent fact-checking platforms, the individuals behind this initiative are closely linked to extremist groups such as “Veto” public-political movement and “Adekvad” union²¹, which in turn are linked to the former political regime and exercise a whole network of media outlets and social media accounts for developing dis/misinformation²². This is particularly dangerous; under the guise of checking facts these platforms not only spread dis/misinformation and present fake news more reliably, but it also undermines trust in professional, independent fact-checking initiatives.

Thus, unlike more professional platforms and editorial offices engaged in fact-checking journalism, the Armenian media environment does not fight and counteract dis/misinformation on a constant and regular basis. Experts do not have a desire to carry out such a mission; the editorial policy is mainly aimed at raising awareness about this or that event, and only in case of urgent need, the majority of the media outlets are engaged in the fight against fake news and dis/misinformation, by counteracting with only verified information and fact-checking. This mission is carried out by both long-term and short-term programs of various CSOs, or, first of all, the editorial offices engaged in fact-checking.

²⁰ Publications of the “Fact-checking” section are available as of 15/11/2021
[<https://infocom.am/en/Infotags/infotag?p=1&i= Fact-checking>]

²¹ For more details, see “TOP 10 myths of the government propaganda machine”, Adekvad, June, 2019,
<https://www.youtube.com/watch?v=rwzkqmNSwsk>

²² “Armenia Assailed by Deceptive ‘Fact-Checking’ Groups, Part 1: The Players,” DFR Lab, May 2, 2019,
<https://medium.com/dfrlab/armenia-assailed-by-deceptive-fact-checkinggroups-part-i-the-players-2ce03daf2d28>

D. Legal Regulations and Mechanisms for Combating Dis/Misinformation

The widespread dissemination of dis/misinformation can, indeed, be considered as one of the most serious challenges facing the government, which requires balanced and long-term solutions. Dis/misinformation can threaten all governmental reforms and development programs, as well as jeopardize the implementation of all initiatives and development programs by the latter. It undermines the public trust in state bodies, distorts the political discourse, and disrupts the harmony of public life.

To date, no concept paper, strategy or action plan has been developed and approved to combat dis/misinformation. The fight against dis/misinformation can be described as a set of sectoral, momentary and restrictive measures with short-term impact. On the other hand, state bodies do not come up with timely and comprehensible comments on issues of public interest, resulting in an information gap that is either filled with fake and manipulative information or left away, undermining the public trust in official information.

In the last two years, the Government and the National Assembly have from time to time come up with various legislative initiatives in an attempt to develop some restrictive norms to combat dis/misinformation, hate speech and illegal content. However, these legislative initiatives were mainly described as sectoral and episodic. Moreover, they were mainly regarded as pressures on freedom of speech and the press by the professional journalism community.

Armenian civil society and the media have always been in favor of self-regulation, media education, and more strategic planning for long-term solutions regarding dis/misinformation, however, the state, represented by the authorities, makes only short-term or completely unregulated and unclear efforts to combat dis/misinformation. Still in April 2020, in order to align the country's information field with the efforts to counter dis/misinformation in the context of the new COVID-19 pandemic, the authorities imposed unprecedentedly severe restrictions on the media activity, allowing the coverage of the pandemic by reference to only official sources, however, the restrictions were soon lifted amid dissatisfaction with local CSOs as well as international organizations²³. As a result of the restrictions imposed by the authorities during the war in Artsakh, 2020, journalists and the editorial offices had to rely solely on official sources to obtain information about the war, to avoid violations, for which high fines were defined²⁴.

Experts claim that both the aforementioned restrictions and poor communication by the state bodies contributed to the multiplication of the flow of fake news and dis/misinformation in Armenia.

By restricting the media activities in the initial stage of the pandemic, followed by the whole period of Artsakh war due to the martial law, the government created a unique information vacuum, which could not remain one-sided for a long time. There was a need for alternative

²³ H. Tsatryan, "Media work and media restrictions during the state of emergency", PJC, 2020, available [https://covid.pjc.am/wp-content/uploads/2020/07/arm_Research_Media_Freedom_During_COVID19.pdf]

²⁴ N. Nalbandyan, "Restrictions during martial law", Azatutyun, September 28, 2020, <https://www.azatutyun.am/a/30862808.html>

information. This has resulted in a unique anarchy in the management of information flows after the trilateral announcement, made in November.

From an interview with the editor of an online periodical

In recent years, the National Assembly has made a number of attempts to respond to the issues of the Armenian media through laws, as well as introduced amendments to the Criminal Code. The draft law, which was introduced by “My Step” faction MP, NA Speaker Alen Simonyan, was adopted in March 2021, which would triple the maximum penalties for insult and defamation up to 3 million AMD and 6 million AMD, respectively²⁵. Earlier in February, the Parliament proposed in the first reading a fivefold increase in the maximum penalties for insult and defamation, i.e., the amendments to the Civil Code proposed up to 5 million AMD instead of 1 million AMD and up to 10 million AMD instead of 2 million AMD in compensation for insult and defamation, respectively²⁶.

Local and international human rights organizations have criticized the legislative initiative, which jeopardizes both the freedom of speech and financial viability of the media, and urged the authorities to refrain from attempts to create a healthy information environment through penalties against free speech²⁷. The RA President Armen Sargsyan did not sign the law draft on April 15, applying to the Constitutional Court for review²⁸. Later in October 2021, the Constitutional Court found that the draft complies with the Constitution and the law entered into force.

By another law draft discussed in February 2021, the Parliament recommended to ban the media from referring to “anonymous sources of social networks”, arguing that the draft would help counter fake channels on social networks, especially on Telegram, and prevent the dissemination of dis/misinformation by the media²⁹. On October 28, the National Assembly discussed in the first reading the legislative package, authored by the deputies of the NA Civil Contract Faction “On Making Amendments to the Law on Mass Media”, as well as on Administrative Infringements and envisaging amendments and addenda to the Civil Code. The authors suggested adding a new concept to the law, i.e., “unidentified sources”, which means that it is impossible to identify the owner and creator of these sources. It was suggested that the media be held accountable for referring to unidentified sources. Amendments were envisaged to the article on transparency of funding sources. In case of failure to submit the report on time or reference to sources prohibited by law it

²⁵ M. Khachatryan, "The penalties for defamation and insult will be increased", published on March 24, 2021, Azatutyun.am, available at [<https://www.azatutyun.am/a/31167354.html>]

²⁶ N. Sahakyan, the National Assembly adopted in the first reading the draft on increasing the amount of compensation for insult and defamation, February 11, 2021, Azatutyun.am, available at [<https://www.azatutyun.am/a/31098133.html>]

²⁷ “Armenia: New Amendments Threaten to Stifle Media Freedom and Freedom of Expression,” Freedom House, March 26, 2021, <https://freedomhouse.org/article/armenia-newamendments-threaten-stifle-media-freedom-and-freedomexpression>

²⁸ The President did not sign the law increasing the fines for insult and defamation, and applied to the Constitutional Court, April 15, 2021, Azatutyun.am, available at [<https://www.azatutyun.am/a/31204903.html>]

²⁹ On Making Amendments to the RA Law "On Mass Media", February 2021, <http://www.parliament.am/drafts.php?sel=showdraft&DraftID=60991>

was proposed to fine the person engaged in journalistic activities three to five hundred times the minimum wage. The media outlets operating on the Internet that fail to submit financial report and identification data within the stipulated period, may not be accredited by the state bodies³⁰.

At July 30 extraordinary session, the NA adopted in the second reading a draft law, which criminalizes swearing and severe insult³¹. According to the law that entered into force in September 2020, 9 criminal cases have already been initiated for insult and swearing as of October 21³².

Media rights organizations are highly critical of these measures adopted by the RA authorities, calling the sanctions a “baton against independent media.”³³

CSO representatives fear that such legislation could serve as a tool in the hands of the authorities and be easily used under the guise of combating dis/misinformation, against legitimate free speech and journalistic activities. Such measures are momentary, often ineffective in the rapidly changing media environment, and fail to distinguish between problematic behaviors, by applying a uniform approach to issues such as defamation and dis/misinformation³⁴.

The attempts by the National Security Service (NSS) to identify people, spreading dis/misinformation have been reported as problematic by the international human rights organizations. Although Prime Minister Nikol Pashinyan and his teammates rightly or wrongly state that freedom of speech is more important than “protecting the government from fake news”³⁵, on April 4, 2019, he ordered the NSS to crack down on media outlets or social media users who manipulate public opinion, presenting it as a matter of national security³⁶. In the last three years, several cases have been reported where the NSS arrested Facebook account users on the grounds of inciting violence, spreading hate speech or threatening national security³⁷. It remains unclear how the NSS assesses the threat or crime in these cases, as such widespread calls to expose and punish “fake news” may violate the right to freedom of expression.

³⁰ The Parliament discussed the proposed amendments to the Law "On Mass Media" in the first reading, official website of the National Assembly, available at

[http://www.parliament.am/news.php?cat_id=2&NewsID=15378&year=2021&month=10&day=28&lang=eng]

³¹ The draft law on making an addition to the RA Criminal Code, available on the official website of the National Assembly [http://www.parliament.am/draft_history.php?id=12656&lang=eng]

³² G. Asryan, 9 criminal cases have been initiated for insult and swearing,

<https://media.am/en/newsroom/2021/10/21/30123/>

³³ "Annual report on the state of freedom of speech in Armenia, violations of the rights of journalists and mass media, 2020", Committee to Protect Freedom of Expression, January 26, 2021,

<https://khosq.am/reports/hայաստանում-խոսքի-ազատության-վիճակի-24>

³⁴ "Will the media be banned from referring to anonymous sources?" 1Lurer, February 7, 2021,

https://www.youtube.com/watch?app=desktop&v=fn_IVsygNP4

³⁵ "Pashinyan considers freedom of speech more important than protecting the government from fake news", Armenpress, January 31, 2019, <https://armenpress.am/arm/news/962640.html>

³⁶ N. Nalbandyan, R. Stepanyan, "Prime Minister. Those who manipulate the Internet should be contered very hard ", Azatutyun, April 4, 2019, <https://www.azatutyun.am/a/29861696.html>

³⁷ L. Sargsyan, "Fighting Fake News or Censoring Speech Online," EVN Report, January 20, 2020,

<https://www.evnreport.com/raw-unfiltered/fighting-fake-news-or-censoring-speech-online>

It is noteworthy that following the end of active hostilities in 2021, the Armenian society has faced the consequences of the conflict, and public perceptions of the state and the media have changed. According to the results of a survey conducted by the International Republican Institute (IRI-Armenia) in 2021, there is a decline in public opinion on the work of state bodies after the war. Positive opinion on the work of the Prime Minister's Office and the NA has decreased to 54% and 32% in 2021, as compared to 72% and 62% in 2019, respectively. Although the attitude and expectations of the Armenian society after the early parliamentary elections require further research, it is undeniable that after the war Armenians are looking for the truth and reliable information about the outbreak of hostilities, declaration of a ceasefire, and its aftermath.

The contradictory statements by the state agencies sometimes deepen the existing communication crisis. This search takes place against the background of uncertainty about the future of the country, vulnerability of national security and sovereignty, war and emotional shock of losses. Due to the failure of the authorities to deliver consistent and clear messages, as well as the lack of a strong strategy to combat dis/misinformation, the Armenian society remains unaware of and vulnerable towards fake news that fill the information vacuum.

E. Conclusions

We have summarized the main findings of the research with the following conclusions:

1. Based on the assessments of experts, it was possible to state that due to a number of phenomena and processes conditioned by the coronavirus, war, aftermath and internal political tensions, the flow of misinformation and fake news has significantly increased in Armenia.
2. Public trust in the media is quite low. Among the reliable media houses, there are mainly TV companies that have nationwide broadcasting. There is almost no public trust in the information of online media.
3. TV companies in Armenia continue to be the most influential media.
4. When identifying creators and disseminators of misinformation, experts generally highlighted several concrete groups of sources.
5. The main platforms for disseminating misinformation are the high-visibility media, in particular, on television, social media which active are used in spreading fake narratives.
6. To simplify the main characteristics, patterns and peculiarities of the circulating misinformation, a scheme based on expert assessments is presented, which includes three bases: creator of information, message and communication context. Everything can be conditionally grouped on three grounds: "who says", "what's and how it was said", "why or in what context it was said".
7. Illegal refusal of journalists' access to information requests or incomplete responses or illegal delays cause problems in terms of dissemination. In particular, when state bodies do not provide timely, complete information, as well as when they do not proactively publish information, this creates fertile ground for misinformation, false news, distorting government-public communication.
8. Public administration bodies do not act proactively. On their own initiative, they do not fully disclose information related to their activities based on the principles of accessibility, timeliness, completeness and accessibility. The official websites of state bodies do not fully meet the necessary standards of transparency and effective communication. The documents published on the official websites do not correspond to the open data format. And it becomes difficult or impossible for journalists to compare, analyze different documents, re-use the public information.
9. The continuous growth of misinformation and fake narratives is a great danger in the context of Armenia's success in democratic processes. Misinformation also poses a serious threat to society, not contributing to the development of the information sector, where fact-based debate does not go beyond contextual information manipulation, political manipulation and falsification.
10. Government officials and state agencies miscommunicate on sensitive topics such as war and its aftermath, which increases information risks and insecurity. Of particular importance is the issue of prisoners of war and demarcation and delimitation discussions and processes taking place along the line of contact between Armenia and Azerbaijan, which often brings the Armenian information environment misinformation, fake news through the Azerbaijani information flows. Not having a comprehensive strategy of measures on how to combat such cases, the Armenian media environment responds to the situation by circulating these false narratives until the moment when the state agencies find time to respond.
11. Some factors bring dangerous rumors and misinformation about the pandemic including the circulation of conspiracy theories. The media field is full of fake narratives, which diverts the public's attention from public health guidelines and recommendations.

12. Despite concerns about the dissemination of misinformation, experts claim that, unlike more professional fact-checking journalism platforms and editorial boards, there is no constant, organized fight against misinformation in the Armenian media environment, and it is not countered by other media houses. The latter is more concerned with creating its own content than fighting against misinformation. There are several newsrooms and initiatives of fact-checking journalists in Armenia, the aim of which is exclusively to fight and debunk misinformation.
13. Political actors continue to use fake news, rumors about the activities of NGOs, international donors, and their alleged political goals. This allows targeted campaigns against these NGOs to be used to divide society, lose civil society trust, and undermine democracy.
14. As a result of the assertions of the experts, it has been highlighted that there is no document, policy, strategy or action plan that has been developed or adopted by the state. The fight against misinformation is defined as a set of partial, short-term, or restrictive measures.
15. Information of public interest is not clarified by the state bodies in a timely and accessible manner, creating a gap, which is either filled with fake-narrative information, or remains empty, undermining public confidence in the information of officials.
16. In the last two years, the Government and the National Assembly have from time to time come up with various legislative initiatives in an attempt to create certain restrictive arrangements to combat misinformation, hate speech and reduce illegal content. However, these legislative initiatives were mainly partial and episodic in their nature. According to experts, they were mainly assessed by the professional journalistic community as pressures on freedom of speech and media activity.

F. Suggestions and Recommendations

Based on the studies and analysis of expert interviews, the following recommendations and consultations are introduced to solve the problems caused by the spread of dis/misinformation and fake news in Armenia. The recommendations are thematically targeted and include suggestions for the government, parliament, independent oversight bodies, media and civil society.

- **Support the development of independent media by encouraging the development of fact-checking journalism in all editorial offices**

Independent and fact-based journalism can counteract dis/misinformation and build a cooperative information environment. Confronting fake news via independent coverage is not a perfect solution itself, but developing the capacity of editorial offices can alleviate the situation. Building a truth-based discourse and creating a supportive environment which rejects information manipulation will be a good basis for counteracting dis/misinformation. The role of independent media is crucial to this end, as they can not only raise awareness, but also counter the spread of dis/misinformation.

One of the main obstacles to the smooth development of democratic institutions in Armenia is the poor state of the media environment. Current challenges include non-transparent information on ownership, lack of editorial independence, and limited financial resources (in particular, lack of financially sound models).

The RA Government and local and international donors should support the development of independent media through expanding financial viability, capacity building, technical assistance, and legislative reforms.

- **Implement reforms in the media environment**

Comprehensive media reforms should be included in the government's agenda, they should not have partial and momentary solutions, conditioned by political preferences. They should be implemented through consultations with media and/or civil society. The lawmakers need to cooperate with the media and civil society to develop a joint strategy for media reforms, addressing long-standing issues, such as transparency of ownership and availability of broadcasting licenses.

Media reforms should first and foremost ensure freedom of speech and the free flow of information. The lawmakers should be wary of means that link dis/misinformation to hate speech or impose severe penalties for violations.

- **Promote the development of media ethics and self-regulation mechanisms**

Many independent media outlets, NGOs, and journalism groups in Armenia are actively working to stop the spread of dis/misinformation and to create a culture of ethics among media employees.

Self-regulation mechanisms are an essential part of this process. Journalistic organizations, civil society, and relevant state bodies should support the capacity of such initiatives to incorporate their efforts towards countering dis/misinformation.

- **Develop the capacity of state/public media outlets**

From the perspectives of progress in fact-checking journalism, the activities of publicly funded media outlets are crucial in combating dis/misinformation and counteracting fake news. A number of countries have proposed solutions, the study of which could be useful for the publicly funded media in Armenia. In this context, it is necessary that the fact-checking research be conducted by the publicly funded Armenian media outlets impartially and in a timely manner, rather than by InfoCheck.am, operating under the auspices of the SNCO, under the Office of the RA Prime Minister. The state should delegate such functions to the Public Television Company, Public Radio, the print and online media outlets, “Armenpress” news agency, as the latter are largely financed from public funds. At the same time, clear mechanisms must be established so that the authorities, under the guise of that funding, cannot influence the impartial media coverage and editorial policy of public broadcasters and the media.

- **Increase public resistance through media literacy**

It is necessary to include media literacy a mandatory teaching component of the curricula of public schools and high educational institutions. The government, civil society, as well as local and international donors should prioritize media literacy especially for vulnerable groups, including the elderly. Libraries, cultural centers, and other public institutions can help expand the availability of media education.

Fact-checking editorial offices can also become part of the educational regulation by sharing their technical skills, modeling accountability, and challenging fraud.

- **Protection of civil society organizations, activists and human rights defenders**

One of the main targets of dis/misinformation campaigns in recent years has been civil society organizations, that work towards human rights or democracy. In particular, extremist conservative civic and political groups have initiated such campaigns to feed the public with exclusionary stories, that instill fear about civil society.

Authorities must ensure the safety of activists and organizations, as well as their ability to act without interference. The environment in which civil society can prosper and develop is vital to Armenia's

future. In addition, civil society organizations are a key ally in the fight against dis/misinformation, promoting dialogue and inclusion, as well as in bringing citizens closer to their state.

State officials should ensure the activities of oversight bodies by involving them in efforts to combat dis/misinformation.

- **Restore public trust in the information provided by the media outlets and state bodies**

Citizens are the most affected by dis/misinformation. The trust in media and the state has been undermined in recent years, as a group of misleading stories aim to undermine the legitimacy of state bodies, processes, and recommendations in the eyes of the society. Poor communication by the state bodies on important issues, especially the war and Covid-19 pandemic, accelerated the decline in public trust.

The RA Government should prioritize restoring and strengthening trust in state bodies should be as a long-term process that will contribute to the country's success in ensuring wider progress beyond the crossroads of dis/misinformation and democracy.

- **Adopt a strategic approach to information security**

The state should possibly strengthen communication strategy, as the weak communication by the state officials and institutions has exacerbated the vulnerability of the society to dis/misinformation, often resulting in information vacuums, which are first and foremost filled with dis/misinformation and fake news.

Authorities need to clearly define the strategies they use to communicate with the public, the media, independent oversight bodies, and civil society. This includes reassessing the values that guide the state communication, evaluating the processes that distinguish between the communications by the executive and legislative bodies, and the balance between them, as well as focusing on accuracy, timeliness, and transparency. In particular, proactive communication on sensitive, controversial or urgent issues can prevent the dissemination of fake news.

- **Develop a comprehensive strategy for developing a legislative package**

Dis/misinformation, fake news, the related information problems are incredibly complex, hence, they cannot be solved by ordinary means of targeting specific behavior. Moreover, the state officials should perceive dis/misinformation as a concrete phenomenon, without equating it with hate speech or defamation.

The process of creating a comprehensive legislative strategy in the information field should involve stakeholders (both executive and legislative, oversight bodies, media outlets and civil society), and strive to balance between the right to freedom of expression and the need to protect both citizens and democratic institutions from dis/misinformation. Armenia is not the only country in the world

to address this issue, and policy makers can study the best practices around the world to find a model that matches the unique vulnerabilities in Armenia. The government should refrain from harsh interference with the issue of dis/misinformation and fake news, as well as from the adoption of strictly restrictive legal acts, which may lead to a disproportionate restriction of the right to freedom of expression.

- **Ensure proper implementation of legal regulations to ensure transparency of beneficial owners of media outlets**

Although the package of BO regulation was adopted in 2021, however its implementation remains problematic. It is necessary to ensure the normal process of declaring beneficial owners, assist the media in fulfilling this obligation, entering data in the open public register and making it public. On the other hand, the media should be encouraged to play an active role in using the public register data and exercising public control over the accuracy of the published data.

- **Ensure freedom of information based on the information requests inquiries and proactive transparency**

Finally, in the context of the fight against dis/misinformation, it is a priority to properly process all information requests of media representatives, as well as to ensure proactive transparency of the state bodies. The latter are obliged to provide the media with complete, comprehensive and timely information of public interest. The public authorities should provide all the information at their disposal. They must give a full answer to journalists' requests, excluding any delays. No request should remain unanswered. Incomplete answers should be ruled out. On the other hand, proactive mechanisms of delivering information should be properly used to share complete information with the public in a timely manner.