

Athens, 17/04/2025
Protocol Number 207/IS

To: Members of the bureau of the European Democracy Shield

Subject: Urgent Proposals for the Protection of Democracy in the Digital Age

Distinguished members of the European Democracy Shield Committee,

The Open Technologies Alliance (GFOSS), following our initial proposals, wishes to emphasize the urgent need for immediate and decisive measures to safeguard democracy in Europe. The situation is critical and requires specific legislative interventions that will effectively address the threats of misinformation, algorithmic manipulation, and attacks on democratic processes.

I. Proposed Legislative Interventions

1. Amendment to the General Data Protection Regulation (GDPR)

- Introduction of a legal basis for the use of European Digital Identity Wallet for identity verification with respect for privacy.
- Creation of specific provisions for data management in cases of systematic misinformation, while ensuring proportionality and judicial control.
- Establishment of a robust framework for verifiable participation in the digital space, simultaneously ensuring adequate accountability and protection of the right to anonymity.

2. Amendment to the Digital Services Act (DSA)

- Incorporation of provisions for:
 - Rapid procedures for removing misinformation during periods of crisis, with transparent and verifiable processes.
 - Establishment of open standards and certification for content management tools.
 - Mandatory transparency of content recommendation algorithms and the possibility of control by independent authorities.
 - Obligation for platforms to integrate certified, open-source fact-checking tools.

3. Amendment to the Artificial Intelligence Regulation (AI Act)

- Definition and certification of "Public Interest AI Systems" to be developed with open source code and public governance.
- Establishment of mandatory use of certified, open systems for detecting misinformation on large platforms.
- Creation of European "AI Factories" for the development of sovereign European models with

public governance.

4. New Directive: Platform Executive Responsibility

- Establishment of a pan-European framework of responsibility for platform executives in cases of systematic disregard for addressing mass misinformation.
- Incorporation of strong mechanisms for whistleblower protection and ensuring due process.

5. Amendment to the eIDAS2 Regulation

- Extension of the European Digital Identity Wallet to cover basic online services.
- Requirement for platforms to support alternative, European verification mechanisms, reducing dependence on private identification systems.

6. Amendment to the NIS2 Directive

- Enhancement of member states' capabilities to restrict access to platforms that systematically fail to comply with requirements for addressing misinformation.
- Creation of a European Platform Risk Register, with public access and regular updates.

7. New Regulation: Interoperability and Open Standards for Digital Platforms

- Establishment of mandatory interoperability between social networking platforms.
- Promotion of open standards and common application programming interfaces (APIs).
- Enforcement of competitive conditions that favor the development of decentralized, European alternatives.

8. Creation of a European Sovereign Technology Fund

- Establishment of a special fund with a budget of at least €10 billion for the development of sovereign European open-source solutions for the protection of democracy.
- Financing the development of critical digital infrastructures with public governance.

II. Table of Proposed Radical Measures and Relevant Legislation

Radical Measure	Relevant Legislation	Type of Change
European Digital Identity Wallet with optional use	GDPR, eIDAS2	Amendment to GDPR and extension of eIDAS2
Rapid removal of misinformation during crises	DSA	Addition of fast-track procedure provisions
Platform executive responsibility	New Directive	Creation of a pan-European directive
Mandatory open AI tools for misinformation detection	AI Act, DSA	Definition and mandatory use of Public Interest AI Systems
Algorithmic control by regulatory authorities	DSA	Addition of transparency/control provisions
Integration of certified fact-checking tools	DSA	Conversion of the Code of Practice into law
Access restriction for non-compliant platforms	NIS2 Directive	Extension with platform risk criteria
Mandatory interoperability	New Regulation	Creation of a new framework for open APIs
European Sovereign Technology Fund	New Regulation	Establishment of a new funding mechanism

The current situation requires immediate and decisive action. Our proposals aim at effectively protecting democracy while ensuring respect for the fundamental principles of openness, transparency,

and individual rights.

We are at your disposal to discuss our proposals in detail and request to participate in the hearing on April 22, 2025, to present our positions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ioannis Stamelos', with a long horizontal flourish extending to the right.

Ioannis Stamelos
President of the Board Open
Technologies Alliance (GFOSS)